

28 March 2025

Minister for Infrastructure
C/o Ministry for the Environment
PO Box 10362
Wellington 6143
Email: contact@fasttrack.govt.nz

Dear Ilana Miller

FAST TRACK PROPOSAL: GORDONTON COUNTRY ESTATE DEVELOPMENT

Thank you for the invitation to Waikato District Council to provide written comments on the referral application for the Gordonton Country Estate Development. Please find attached staff comments regarding the proposed project.

Should you have any queries regarding the content of this document please contact Josef Holland, Senior Consents Planner directly on Josef.Holland@waidc.govt.nz.

Kind Regards



Craig Hobbs
CHIEF EXECUTIVE
WAIKATO DISTRICT COUNCIL

To	Ilana Miller - General Manager, Delivery and Operations
From	James Fuller – Principal Spatial Planner, Josef Holland – Senior Consents Planner
Subject	Gordonton Country Estate
Date	25 March 2025

Invitation to provide written comments on application for referral of the Gordonton Country Estate Development project under the Fast-track Approvals Act 2024.

Waikato District Council Staff to provide written comments on the referral application - Gordonton Country Estate Development under the Fast-track Approvals Act 2024 including the matters requested in Ilana Miller's letter.

Exec Summary

Waikato District Council has reviewed the Gordonton Country Estate Development proposal under the Fast-track Approvals Act 2024. Based on this assessment, the Council finds the proposal **inconsistent** with regional and local planning documents and unlikely to deliver regionally significant housing.

Key issues include:

- **Zoning and Strategic Alignment:** The proposal is not aligned with the Waikato District Growth and Economic Development Strategy, Waikato Regional Policy Statement, or the Future Proof Strategy.
- **Infrastructure Limitations:** Gordonton does not have the necessary water, wastewater, stormwater, and transport infrastructure to support a development of this scale.
- **Environmental and Cultural Considerations:** The site includes remnant forest vegetation, significant waterways, and a Site of Significance to Maaori (Otaahua Paa), all of which require further impact assessments.
- **Limited Contribution to Regional Housing Supply:** The development serves a niche retirement market rather than addressing broad regional

housing demand. While we appreciate the need for elderly housing, its isolated location lacks critical services such as healthcare and public transport (for residents and workers), which may impact long-term viability.

Introduction

This response provides an assessment of the Gordonton Country Estate Development proposal from the perspective of a Principal Spatial Planner and Senior Consents Planner at Waikato District Council.

The proposal involves a 66.55-hectare retirement village development adjacent to Gordonton Village, featuring 659 units, communal facilities, and on-site infrastructure.

Gordonton, a rural settlement, currently lacks urban infrastructure and is not identified for significant growth under existing regional and district plans.

The population of Gordonton is estimated to be 1,762 with approximately 652 houses (2023 estimate for the wider rural catchment of Kainui-Gordonton). The growth for this area is projected to reach approximately 2100 by 2060 up to 778 houses or net increase of 126 homes. This proposal (659 units) would double the total number houses again.

Gordonton is located on State Highway 1B, an 8-minute drive from the Taupiri interchange on SH1. The settlement is a 15-minute drive to the northeast from the Hamilton City Centre and 20 minutes from the Hamilton train station.

The Gordonton community have a Gordonton Blueprint (a local community aspirational plan). The blueprint vision for Gordonton was a compact satellite village with its own unique identity where a close-knit community welcomes visitors. The top priority initiatives were to facilitate the re-establishment of the markets and the provision of infrastructure to accommodate traffic and parking. Identify where and how much additional residential and commercial land beyond the existing zoning and what this means for infrastructure and the form and function of Gordonton Road.

Consistency with local planning documents

1. Zoning and Plan Framework:
 - The development is fundamentally inconsistent with the current rural zone (Operative Waikato District Plan) and general rural zoning (Operative in Part Waikato District Plan).

- Careful consideration was given when drafting the Proposed Waikato District Plan and provisions to enable retirement villages were included in zones deemed appropriate for urban housing developments of this scale. These provisions were not included in the General Rural Zone.
- The current strategic direction of general rural land use is focused on serving rural activities within the district. Gordonton village at this point is not serviced with the appropriate infrastructure (wastewater, potable water).
- Approving this development could set a precedent for ad hoc growth and development in the rural area.
- If the proposal is progressed under the Fast-Track process it is recommended that community and Tangata Whenua engagement is undertaken.
- The proposal does not align with the Waikato District Growth and Economic Development Strategy, the Waikato Regional Policy Statement or the Future Proof - Future Development Strategy (sub-regional) developed under the National Policy Statement on Urban Development.

2. Transportation

- Waikato District Council needs to be involved in any consultation with NZTA, given the revocation of SH1B is underway, meaning that Waikato District Council will soon be the road controlling authority for Gordonton Road.
- It is expected that the detailed Integrated Transportation Assessment (ITA) will assess and include;
 1. Recommendations for both design and post-construction safety audits.
 2. Access treatment, including flag lights, signage, etc.
 3. Assess roading capacity, and the impact of increased traffic volumes on the local roading network. Gordonton Road was part of the previous State Highway network so this may be feasible subject to the above.
 4. Given the high number of units and the likely workforce to support the retirement village, support and transport for ancillary staff will be crucial. Public transport therefore becomes a specific need for the ongoing future of the retirement village. Gordonton is not an area where public transport is planned for in the future.
 5. The 17 October 2024 Commute traffic memo and application lack detail on the operation of the café:
 - Clarification is needed on whether the café will be exclusively for residents or open to the public; and

- Parking and traffic implications associated with the café need to be addressed.
- 6. Address construction traffic effects and any proposed mitigation.
- 7. Will need to assess district plan and Regional Infrastructure Technical Specifications (RITS).
- Pedestrian Connectivity between the site and Gordonton Village: Waikato District Council's roading team's expectation is that this will meet shared path standards, and the entire route should adhere to this standard. It is noted the current Gordonton Road footpath is substandard, especially considering the anticipated type and increase in pedestrian traffic expected from the activity, including the use of multi modal (mobility scooters).
- Proposed Pedestrian Bridge across Komakorau Stream:
 1. The design of the bridge must account for flood levels and stream flows; and
 2. Ownership of the bridge needs to be determined depending on its location (e.g. Roothing, Open Spaces, or Private ownership).

3. Three Waters Capacity:

Does the existing infrastructure (water, wastewater, stormwater) and roading in Gordonton village support a development of this scale?

- The proposal states on-site management of three waters, but this requires thorough investigation and long-term management plans.
- The water supply in Gordonton is serviced by Hamilton City Council and is restricted flow currently and is not adequate to service the development.
- The Applicant would need to consider the firefighting waters supply in more detail.
- There are no details or comments regarding connecting a 250mm water main off the existing 100mm water main as well as the northern supply issue/s controlled by Hamilton City Council. Again, there is no capacity for any additional water connections.
- A wider catchment study is needed on what the increased impervious surfaces will do to the site and the upstream and downstream effects on the surrounding area (which is not currently urbanised).

4. Environmental and Cultural sensitivity:

- The site includes streams, remnant forests, and a Site of Significance to Maaori (Otaahua Paa), requiring robust environmental and cultural impact assessments.

- Stormwater management and potential flooding risks, given parts of the site are low lying.

5. Community Impacts:

- Impact on the character of Gordonton village and existing residents.
- Potential for social and economic benefits, but also potential for strain on local services.
- Community consultation and engagement will be crucial as to the appropriateness of this development.

6. Subdivision

- Appendix 11, Section 3 of the application indicates subdivision is proposed, however detail cannot be located within the application as to what this relates to. If subdivision is proposed, Council will be a directly impacted party if the Applicant seeks to vest land and/or infrastructure to Council.
- Waikato District Council will be interested to know what the subdivision component of the proposal includes and will need to know what infrastructure will be vested to Council – such as roads, pedestrian links and stormwater infrastructure such as centralised stormwater and wastewater management systems. Council will need to know if this infrastructure will be designed and constructed to be consistent with the Regional Infrastructure Technical Specifications (RITS). RITS is our document which sets out how to design and construct transportation, water supply, wastewater, stormwater and landscaping infrastructure in 12 Waikato local authorities. If subdivision results in free hold residential dwellings, consideration needs to be given to the management and treatment of water and wastewater where land is under fragmented ownership.
- Waikato District Council is unable to indicate how the proposal may align with our district plans in this regard, given our district plans are explicitly linked to the Regional Infrastructure Technical Specifications (RITS). Information on the RITS is contained here <https://www.waikatodistrict.govt.nz/your-council/plans-policies-and-bylaws/plans/engineering-standards>

Delivery of Regionally Significant housing supply

1. Delivery of Regional Significant Housing:

- The regional council will need to be consulted to understand if this development aligns with the regional planning documents.

- While the proposal aims to address aged care needs, it is questionable whether it constitutes "regionally significant housing" in the broader sense.
- It's a niche housing market focusing on retirement living rather than contributing to general housing supply.
- The location of the development, and the ability of the residents to access other services within the district is a key factor to consider. Unlike other retirement developments integrated within urban centres, this site lacks proximity to essential services, including primary and tertiary healthcare, and retail.
- Precedent for future urban expansion with concerns about long-term sustainability and potential conversion into a general subdivision should the retirement model prove unviable.

2. Long-Term Management:

- The single corporation model raises questions about long-term management and financial viability. Especially when the demographics change.
- What happens if the corporation fails, where are the residents left, given they will only have a right to occupy?

Overall conclusion

The development proposal is inconsistent with local planning documents and does not deliver Regionally Significant Housing.

Specifically:

- The proposal is inconsistent with local planning documents, the area is zoned general rural under the district plan and the area is not identified in the Waikato District Growth and Economic Development Strategy for future development.
- A portion of the site is classified as Highly Productive Land (LUC1 or LUC2) under the National Policy Statement.
- From a district perspective, it addresses a specific demographic need (aged care), which has some merit, but other similar developments have closer proximity to social infrastructure including medical services.
- A lack of public transport will make staffing the site at Gordonton challenging, this should be factored into the assessment.
- The general housing solution may not significantly contribute to overall housing supply, given there is an appropriate supply for the next 30 years already identified in the district, around existing urban settlements, with the appropriate staged infrastructure.
- Similar retirement areas are either close to existing urban centres (Waikato district towns or Hamilton City) with the infrastructure (waters, transport, micromobility and social) to support these types of developments.

The proposal raises numerous planning issues that require careful consideration. A thorough assessment of its environmental, infrastructure, and community impacts, as well as its alignment with district and regional planning objectives, will be essential for the Fast-Track process.

Competing Applications

The invitation letter requests:

Any applications that have been lodged with the Council that would be a competing application or applications if a substantive application for the project were lodged. If no such applications exist, please also confirm this in writing.

Waikato District Council Response:

Below is the only application lodged with the Waikato District Council, and not granted, that would be considered competing with the referral application (FTAA-2502-1005):

- 180 Horsham Downs Road, Horsham Downs (LUC0294/19) received 13 February 2019 to establish a retirement village in the rural zone, consisting of 90 new residential units and community centre. This application has been on hold under s92 (2) since 28 March 2019. This development is approximately 8.8 km away.

Appendix A of this letter contains a list of granted land use consents for retirement villages that would be considered competing with the proposal for a retirement village.

Projects seeking approval section 42(4)(a) of the Act

The invitation letter requests:

In relation to projects seeking approval of a resource consent under section 42(4)(a) of the Act, whether there any existing resource consents issued where sections 124C(1)(c) or 165ZI of the Resource Management Act 1991 (RMA) could apply, if the project were to be applied for as a resource consent under the RMA. If no such consents exist, please also confirm this in writing.

Waikato District Council Response:

Waikato District Council has not issued any resource consents in relation to the site where sections 124C(1)(c) or 165ZI of the Resource Management Act 1991 (RMA) could apply.

Appendix A:

List of granted land use consents for retirement villages that would be considered competing with the proposal for a retirement village.

These were lodged between 2016 and 2025.

LUC0103/16	61 Bollard Road, TAMAHERE	Construct and use 20 new residential units (10 duplexes) as an extension to the existing Tamahere Eventide Rest Home and Retirement Village and to enable the existing café within the Rest Home and Retirement Village to be used by the general public.
LUC0103/16	61 Bollard Road, TAMAHERE	Construct and use 20 new residential units (10 duplexes) as an extension to the existing Tamahere Eventide Rest Home and Retirement Village and to enable the existing café within the Rest Home and Retirement Village to be used by the general public.
LUC0103/16	61 Bollard Road, TAMAHERE	Construct and use 20 new residential units (10 duplexes) as an extension to the existing Tamahere Eventide Rest Home and Retirement Village and to enable the existing café within the Rest Home and Retirement Village to be used by the general public.
LUC0156/20	70 Tamahere Drive, TAMAHERE	Extension of the retirement village development
LUC0195/21	158 Matangi Road, MATANGI	Construct and operate a Retirement Village (expansion of an established Aged Care rest home) in the Rural Zone
LUC0597/21	70 Tamahere Drive, TAMAHERE	Expand and operate a retirement village in the Rural Zone
LUC0188/24	56 Tamahere Drive, TAMAHERE	Construct and operate an extension to the retirement village across 56 and 70 Tamahere Drive to provide for a further 25 villas and a small arts and crafts facility. (Eastern Extension)
LUC0189/24	92 Tamahere Drive, TAMAHERE	Construct and operate an extension to the retirement village, across 82 and 92 Tamahere Drive to provide for a further 42 villas and a new health spa. (Southern Extension 2024)

LUC0016/25	14 Waerenga Road, TE KAUWHATA	To consent the entire Aparangi Retirement Village including the construction of 10 new residential retirement units within the village, associated stormwater discharge, infrastructure and earthworks.
LUC0212/25	37 Bollard Road, TAMAHERE	To construct an additional 3 duplexes (6 Villas) within a consented retirement village (LUC0103/16.01) at 37 Bollard Road, Tamahere located within the Country Living Zone of the Operative Waikato District Plan and Rural Lifestyle Zone of the Waikato District Plan – Operative in Part.

Invitation to provide written comments on a project under the Fast Track Approvals Act 2024

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Before the due date, for assistance on how to respond or about this template or with using the portal, please email contact@fasttrack.govt.nz or phone 0800 FASTRK (0800 327 875).

Written comments must be received by MfE, on behalf of the Minister for Infrastructure, no later than the due date.

Important information

Your personal information will be held by MfE and be used in relation to the project application and process. You have the right to access and correct personal information held by MfE.

A copy of your comments, including all personal information, will be provided to the Minister and the applicant.

If you are a corporate entity making comments on this application, your full contact details will be publicly available.

For individuals, your name will be publicly available, but your contact details (phone number, address, and email) will not be publicly available.

A copy of your comments will also be published on the Fast-track website. If you believe any of the information you have provided is confidential or sensitive and should be withheld from publication, please highlight the information concerned and provide an explanation to support your request for withholding it. Your comment and explanation will be decided by the Ministry on whether to withhold the information from publication.

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More information on the fast-track approvals process and providing comments can be found at [Process overview](#) | [Fast-track website](#)

Your written comments on a project under the Fast Track Approvals Act 2024

Project name	Gordonton Country Estate
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Before the due date, for assistance on how to respond or about this template or with using the portal, please email contact@fasttrack.govt.nz or phone 0800 FASTRK (0800 327 875).

All sections of this form with an asterisk (*) must be completed.

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)	Waikato Regional Council		
*First name	Miffy		
*Last name	Foley		
Postal address			
*Contact phone number	s 9(2)(a)	Alternative	
*Email	s 9(2)(a)		

2. Please provide your comments on this application
<p>If you need more space, please attach additional pages. Please include your name, page numbers and the project name on the additional pages.</p> <p>Thank you for the opportunity to provide comments on this application.</p> <p>Is this project of regional significance?</p> <p>Waikato Regional Council staff (WRC) do not consider this application to be regionally significant based on the criteria listed in s22(2)(a) of the Fast Track Approvals Act 2024 (the Act). 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 Assessment¹ shows a large net sufficiency for the Waikato District in the medium to long term (2026 - 2052) with a smaller insufficiency in years 1-3 (2022 - 2025) due to market conditions and infrastructure constraints.</p>

¹ [waikatorc.sharepoint.com/: b/s/FutureProofAdministration/EUvXT5gPQ0hCh_srmG-55wYBQgUj33egXcpHFFkfm3_Oeg](https://waikatorc.sharepoint.com/:b/s/FutureProofAdministration/EUvXT5gPQ0hCh_srmG-55wYBQgUj33egXcpHFFkfm3_Oeg)

Insert Fast-track logo

The Housing Capacity Assessment does show an insufficiency of housing in the affordable housing bracket, however, it is unclear whether this “bespoke” retirement village can deliver housing in the lower price bracket. We understand that villas in the Tamahere Country Club (a recently developed semi-rural, luxury retirement village also in the Waikato District) start from \$1.2 million.²

WRC has issued consents, or is currently assessing applications, for a number of retirement villages over the past five years. WRC is also aware of a number of other retirement living proposals, or extensions to existing retirement villages, in the Future Proof sub-region (including a proposal for a retirement village directly south of this project). Future Proof is currently undertaking work to better understand if there is a need for this type of retirement village to be located on rural land, based on a number of factors such as housing and locational preference, affordability, and infrastructure requirements etc.

Gordonton is a small village of 1,960 residents.³ It is classed as “other rural” by StatsNZ and has very limited services. The addition of a minimum of 659 residents in this location is unlikely to contribute to this being a “well-functioning urban area” as required by the National Policy Statement on Urban Development (NPS-UD).

Given this context and the inconsistencies with local and regional planning documents as discussed below, this application would be best addressed through a plan change to the Waikato District Plan. This would have the additional benefit of allowing the local community to have a say on the project.

Is this project consistent with local or regional planning documents, including spatial strategies:

Waikato Regional Policy Statement

The proposal is **inconsistent** with the Waikato Regional Policy Statement (WRPS), including the decisions version of *Change 1 National Policy Statement on Urban Development 2020 and Future Proof Strategy Update*⁴. The WRPS incorporates the key components of the Future Proof Strategy, including the settlement pattern. The relevant policy is:

UFD-P11 – Adopting Future Proof land use pattern

Within the Future Proof area:

1. *new urban development shall occur within the Urban and Village Enablement Areas indicated on Map 43 (5.2.10 Future Proof map (indicative only));...*

This is discussed further in relation to the Future Proof Strategy section below.

² From open source information.

³ 2023 census.

⁴ This change to the WRPS is not yet operative as it is subject to three limited appeals but they do not affect this specific provision or the village enablement area mapped for Gordonton.

The proposal does not meet the general development principles in APP11 of the WRPS.

While the location of this proposal is connected to the existing village of Gordonton, and the proposed movement and connectivity within the development site is good, its location in the wider regional context is less than ideal. It will create an elderly community in a rural area that will likely be reliant on travelling into Hamilton for many services.

The land in question is identified as having high class soils under the WRPS. The relevant Policy is:

LF-P11 – High class soils

Avoid a decline in the availability of high class soils for primary production due to inappropriate subdivision, use or development.

Future Proof Strategy

The proposal is **inconsistent** with the Future Proof Strategy. The Strategy is the future development strategy (as required by the NPS Urban Development) for the Future Proof sub-region. The Strategy was updated last year and identifies sufficient residential capacity for the sub-region for 30+ years. It has a compact and concentrated approach to growth with future development focused in and around key growth areas which are identified on the settlement pattern map. It **does not** identify Gordonton as an area for growth. The Strategy also supports protecting highly productive land for primary production.

Regional Land Transport Plan

The proposal is **inconsistent** with the Regional Land Transport Plan as it does not meet many of its objectives. For example:

- Climate change objective: *An environmentally sustainable, energy efficient and low-carbon transport system that delivers emissions reductions and enhances communities' long-term resilience to the effects of climate change.*

The objective is accompanied by policies that encourage compact urban form and growth in areas that already have good travel options and shorter average trip lengths.

- Growth and economic development objective: *An integrated transport system that supports compact urban form and planned future growth.*

The objective has policies that seek to implement transport solutions that support agreed national and regional spatial planning outcomes for compact urban form, housing and growth.

Policy P2 seeks to manage growth to protect the function, capacity and efficiency of the strategic transport network in the region, in particular the Waikato Expressway, other strategic and lifeline corridors.

Regional Public Transport Plan

The application information states the “*project will assist in supporting higher levels of intensification and growth along existing public transport corridors*”.

This is incorrect. There is no public transport at all in the vicinity and there are no short- or medium-term plans identified in the Regional Public Transport Plan to provide public transport services.

It is likely to take many more years before the Gordonton area population reaches a point at which WRC could justify public transport services. Until then, private vehicle use becomes the embedded mode of transport in the area, with the resulting impacts on emissions and accessibility.

Waikato 2070

This strategy was prepared by Waikato District Council in 2020 and was consulted on with the community through a special consultative process under the Local Government Act. It sets the development pattern for the district, including identifying specific growth areas and timings. Gordonton is **not** identified as a growth area. The document notes “other areas of the district have significant constraints to growth and are therefore not suitable for further growth and development (these have not been identified in this strategy)”.

Waikato District Plan

Under the Waikato District Plan, retirement villages in the rural zone are generally considered a **non-complying activity**.

Waikato Climate Action Road Map⁵

The proposal is **inconsistent** with the Waikato Climate Action Road Map. This is WRC’s strategy on how we will work with others to support the transition to a climate-resilient, low emissions society that’s less vulnerable to disruption, more affordable and better for health and wellbeing. One of the goals in relation to urban form and transport is:

Lead and encourage land-use decisions that shape sustainable, resilient transport networks to ensure communities have affordable access to services, amenities and social life.

While the proposed development provides walking and cycling opportunities within the site and to Gordonton village, it proposes to establish a large retirement community in a location that has limited access to services and no public transport to essential services such as doctors, pharmacies, supermarkets etc, or for social outings to see family and friends. All such, trips will need to be made by private vehicles. Even if emissions can be avoided through the use of electric vehicles, the use of private cars will be embedded as the only viable transport option available to residents due to the village’s location.

⁵ Climate-Roadmap.pdf

The elderly have particular transport needs and the inability to drive as they age can lead to isolation for residents, especially if family members and other potential visitors do not have access to a car and cannot visit easily. While retirement villages are marketed at 65+ year olds, the average age of entry is mid to late 70s⁶.

The application also omits emissions, from travel to and from the site by residents, visitors, and the employees and support services required to service the ongoing operation of a retirement village, from the discussion on carbon emissions which focuses solely on the ability to walk and cycle around the site and to Gordonton village.

Site considerations

- The site stormwater will discharge into the WRC Administered Drainage network, which could potentially negatively impact on the operation of the network in this location.
- The vast majority of the site has a high probability of Acid Sulfate Soils being present.
- The Ecological Report discusses the possible infilling of modified watercourses within the site. The NPS-Freshwater Management clause 3.24 requires that there be no loss of extent or values of streams unless there is a “functional need” which there wouldn’t be in this case. The applicants will need to consider avoiding any loss as part of their development proposal.

Water allocation

The proposal involves drilling of new bores for dewatering purposes and potable supply, taking of groundwater for dewatering purposes during construction, taking of surface water for dust suppression during earthworks, diversion of groundwater into the new stormwater pond, and taking of groundwater for alternative potable supply.

- There is limited information in the documentation relating to volumes of water required or location, and thus no Assessment of Effects.
- The application has identified relevant rules under the Waikato Regional Plan, however there are errors and omissions. This would need to be worked out once further information is known.
- The application proposes to harvest rainfall via roof supply from each building and each retirement unit. At 800 units, with roof coverage of approximately 42 Ha (7 clusters of 6 ha each), this is a significant volume of rainfall that is diverted and thus is no longer available to recharge groundwater or surface water. The effects of this diversion and use of water needs to be considered for this proposal.
- As per the NES Freshwater, the application needs to include assessment of the taking and use of water in proximity to wetlands. The NES Sources of Human Drinking Water needs to be assessed.

⁶ Your Questions Answered — Retirementlife.co.nz (run by the Retirement Villages Association)

s124C(1)(c) RMA considerations

A groundwater take consent granted for potable supply could potentially be fully utilised until the expiry of authorised takes in the catchment. Bores drilled in this location will be within the Hamilton Basin-North aquifer, identified in the Waikato Regional Plan. There is allocation available within the Management Level specified in Table 3-6 WRP for groundwater takes. The taking of surface water for dust suppression purposes should fit within available allocable flow of the Komakorau Catchment, although confirmation of take volume and location for this purpose would need to be provided. There is allocation available as a restricted discretionary activity within the Waikato River catchment at landward boundary of the coastal marine area.

s17(3) FFTA considerations

Online Sand Limited lodged an application with WRC on 16 December 2024 for consents associated with a large-scale sand extraction and cleanfilling facility at 1154 Gordonton Road (APP147116). This site is located immediately adjacent to Gordonton Country Estate Development Project. There may be competing interests for water resources, and definitely overlapping cumulative effects that need to be considered.

Corrections:

The application and associated document contains a number of factually incorrect statements which are addressed below:

- The application (at Question 4) states that the development will help intensify an existing public transport corridor. Gordonton is not serviced by public transport and the Waikato Regional Public Transport Plan⁷ does not identify any future services to Gordonton.
- In response to Question 12, the application talks about a review of the Future Proof Strategy as though that is currently occurring. The Strategy was updated in 2024 and adopted by partner councils in mid-2024. The application further states that the application is not inconsistent with the consultation draft. Please see comments on the strategy above.
- The application states that the site is “generally classified as moderate productive land”. This is incorrect. The land is LUC1, 2 and 3 on the existing regional New Zealand Land Resource Inventory (NZLRI) LUC layer, and meets the transitional definition of highly productive land under the National Policy Statement for Highly Production Land. The maps provided by the applicant in Appendix 19 differ from the NZLRI regional layer. The three maps in Appendix 19 are irrelevant with respect to provisions under the NPS-HPL

⁷ 2022-2032 Regional Public Transport Plan | Mahere Waka Tūmatanui Ā-Rohe o Waikato | Waikato Regional Council

transitional definition as only the regional NZLRI LUC is definitive of the occurrence of HPL.⁸

Conclusion

WRC staff do not consider this proposal to be regional significant. The relevant Housing Capacity Assessment signals that there is sufficient housing capacity in the district for the next 30+ years, and this proposal is unlikely to contribute to a well-functioning urban environment. It is inconsistent with key local and regional plans and strategies, including the Future Development Strategy.

Note: All comments will be made available to the public and the applicant when the Ministry for the Environment proactively releases advice provided to the Minister for the Environment.

⁸ *Environment Courts Blue Grass decision* dated 18th April 2024 ((ENV-2018-CHC-293) found that more detailed mapping undertaken since 17 October 2022 does not prevail over the identification of land as Land Use Capability Class 1, 2, or 3, as mapped by the New Zealand Land Resource Inventory and determines for the purposes of Clause 3.5(7) of the NPS-HPL whether land is highly productive land.

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If you are a corporate entity making comments on this application, your full contact details will be publicly available.

For individuals, your name will be publicly available, but your contact details (phone number, address, and email) will not be publicly available.

A copy of your comments will also be published on the Fast-track website. If you believe any of the information you have provided is confidential or sensitive and should be withheld from publication, please highlight the information concerned and provide an explanation to support your request for withholding it. Your comment and explanation will be decided by the Ministry on whether to withhold the information from publication.

Please do not use copyright material without the permission of the copyright holder.

All information held by MfE is subject to the Official Information Act 1982.

More information on the fast-track approvals process and providing comments can be found at [Process overview](#) | [Fast-track website](#)

Your written comments on a project under the Fast Track Approvals Act 2024

Project name	Gordonton Country Estate Limited
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Before the due date, for assistance on how to respond or about this template or with using the portal, please email contact@fasttrack.govt.nz or phone 0800 FASTRK (0800 327 875).

All sections of this form with an asterisk (*) must be completed.

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)	NZ Transport Agency Waka Kotahi		
*First name	Nicola		
*Last name	Foran		
Postal address			
*Contact phone number	s 9(2)(a)	Alternative	
*Email	environmentalplanning@nzta.govt.nz		

2. Please provide your comments on this application
<p>NZTA thanks the Minister for the opportunity to comment on the referral of this application into the fast track approvals process.</p> <p>NZTA has had pre-application engagement with the applicant regarding this project in September 2024. This consisted of a discussion with the applicant's consultant and a NZTA representative. The information provided at the time was also assessed by internal NZTA subject matter experts, who noted an Integrated Transport Assessment should be provided with the full application.</p> <p>As per the matters set out in the invitation to comment, NZTA provides the following commentary:</p> <p><i>1. Whether the project is likely to adversely affect the operation of the State Highway network</i></p> <p>NZTA would need to see the substantive application to be able to determine actual impacts on the state highway network, however developments of this nature usually impact the network through increased heavy vehicle movements during site development and construction, and a sustained increase in traffic volumes at the completion of the development.</p> <p>As part of the initial pre-application engagement the applicant undertook with NZTA, no significant concerns or adverse effects were identified by NZTA. As part of the substantive</p>

Insert Fast-track logo

application, NZTA would expect to see a comprehensive Integrated Transport Assessment prepared, along with a construction management plan, and mitigation measures to address any adverse effects on the state highway resulting from this development.

NZTA also note, that State Highway 1B, adjacent to this project, is not designated as a State Highway in the Waikato District Plan, and is due to have its state highway status revoked in the near future, now that the Waikato Expressway is complete.

2. Whether you consider there are any barriers to the applicant delivering the project

NZTA has no prior experience with this applicant, other than some pre-application engagement in September 2024. While this landuse development looks to be accessed from a local road, NZTA has no planned major upgrades planned for the adjacent section of SH1B that would be a barrier to the applicant for delivering this project. Whether any upgrades are required to accommodate the development (either for construction or operation) cannot be determined without further information – if upgrades are required, the developer would be required to work with NZTA and fund any works required.

Therefore, based on the information provided, NZTA has no concerns with this project, Gordonton Country Estate, being referred into the fast track approvals process.

NZTA would welcome the opportunity to provide comments on any substantive application in due course.

Note: All comments will be made available to the public and the applicant when the Ministry for the Environment proactively releases advice provided to the Minister for the Environment.

Invitation to provide written comments on a project under the Fast Track Approvals Act 2024

You have been invited to provide written comments to the Minister for Infrastructure (the Minister) on an application to refer a project under the Fast-track Approvals Act 2024 (the Act) to the fast-track process.

To comment on the project application, if you have obtained a link to register through the portal, you may provide comments directly through the portal.

Alternatively, you may wish to fill in the details on the attached form and reply by **Email** to info@fasttrack.govt.nz. Please mark in the subject line: "Comments on [Name] project Fast-track Application (Your name/organisation) by date."

Before the due date, for assistance on how to respond or about this template or with using the portal, please email contact@fasttrack.govt.nz or phone 0800 FASTRK (0800 327 875).

Written comments must be received by MfE, on behalf of the Minister for Infrastructure, no later than the due date.

Important information

Your personal information will be held by MfE and be used in relation to the project application and process. You have the right to access and correct personal information held by MfE.

A copy of your comments, including all personal information, will be provided to the Minister and the applicant.

If you are a corporate entity making comments on this application, your full contact details will be publicly available.

For individuals, your name will be publicly available, but your contact details (phone number, address, and email) will not be publicly available.

A copy of your comments will also be published on the Fast-track website. If you believe any of the information you have provided is confidential or sensitive and should be withheld from publication, please highlight the information concerned and provide an explanation to support your request for withholding it. Your comment and explanation will be decided by the Ministry on whether to withhold the information from publication.

Please do not use copyright material without the permission of the copyright holder.

All information held by MfE is subject to the Official Information Act 1982.

More information on the fast-track approvals process and providing comments can be found at [Process overview](#) | [Fast-track website](#)

Your written comments on a project under the Fast Track Approvals Act 2024

Project name	Gordonton Country Estate Development Project
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Before the due date, for assistance on how to respond or about this template or with using the portal, please email contact@fasttrack.govt.nz or phone 0800 FASTRK (0800 327 875).

All sections of this form with an asterisk (*) must be completed.

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)	Minister for Seniors		
*First name	Casey		
*Last name	Costello		
Postal address	Freepost Parliament, Private Bag 18 888, Parliament Buildings, Wellington 6160		
*Contact phone number	0800 7273 6282	Alternative	
*Email	Casey.costello@parliament.govt.nz		

2. Please provide your comments on this application
If you need more space, please attach additional pages. Please include your name, page numbers and the project name on the additional pages.

Note: All comments will be made available to the public and the applicant when the Ministry for the Environment proactively releases advice provided to the Minister for the Environment.

- The following comments are provided not only to inform the decision to refer the project to a panel, but also to indicate some opportunities for the Developer to consider in respect of detailed design should the project go ahead.
- I am supportive of projects to increase supply of housing, particularly housing options appropriate for older New Zealanders and which increase aged residential care facility capacity.
- The 659 unit development will provide a number of living options for older people including one-bedroom, two-bedroom and three-bedroom accommodation. The population of the Kainui- Gordonton area was 1,818 in

the 2023 census with 222 people aged over 65, so if this development proceeds it will significantly increase the population and change the demographics of the area.

- 4 There are a few local shops in Gordonton. Many facilities that older people are likely to want access to are not available in Gordonton but Hamilton is a 20 minute drive (18km) and Chartwell shopping centre 12 mins drive. There is no public transport available. Given the rural location, consideration should be given to the provision of transport options for those who cannot or prefer not to drive.
- 5 This development appears to be a retirement village for active, mobile older people, with housing organised in a series of clusters. Given the nature of the village, developers may want to consider provision of parking for campervans.
- 6 The land is currently zoned rural use. The design of the village incorporates ideas to fit into the rural landscape and includes lots of green spaces, trees, natural looking ponds for stormwater and includes provision for grazing throughout the village. The grazing would have to be managed as there can be conflicts between this and the residential land use.
- 7 The staging of the development shows that the communal amenities will be completed after stage one of the eight stage development which means residents should have access to these early on in the development. One aspect of the staging that could be considered is the housing immediately to the east of the communal facilities is currently being proposed to be left until stage eight.
- 8 The site adjoins Gordonton Road which is a busy 'arterial' road carrying in the region of 1,850 vehicles per day past the site. The posted speed limit outside the entrance to the site is 100km/hr, reducing to 70km/hr further to the west approaching Gordonton Village. There is difficulty with walking accessibility across a narrow rural bridge.
- 9 In addition to forming a stand-alone footpath and bridge structure option along Piako Road, the Developer has indicated gaining access from the site over the stream and across 3rd party land to Garfield Street would improve connectivity to the village shops and provide a safe walking and cycling route. Confirmation of an agreement to gain access over this route should be provided.
- 10 There is a formed concrete footpath along Woodlands Road to the Gordonton School which is adjacent to the site. The Developer could investigate footpath access along a concrete path within the site then via the school thereby gaining safe access to Woodlands Road and then to Gordonton Village.

IN-CONFIDENCE

- 11 Gordonton Country Estate Ltd has approved name reservation in the companies register. There is no information on the experience of the Developer in developing retirement villages.
- 12 If the project is referred to use the fast-track consenting process, I would welcome the opportunity to comment on the development in more detail.

From: [Infrastructure Portfolio](#)
To: [ETAreferals](#)
Subject: FW: Invitation to comment on fast-track referral application for Gordonton Country Estate Development Project under the Fast-track Approvals Act 2024 – FTI003
Date: Tuesday, 8 April 2025 2:54:17 pm

From: Environment Portfolio <Environment.Portfolio@parliament.govt.nz>
Sent: Thursday, 3 April 2025 5:21 PM
To: Infrastructure Portfolio <Infrastructure.Portfolio@parliament.govt.nz>
Subject: RE: Invitation to comment on fast-track referral application for Gordonton Country Estate Development Project under the Fast-track Approvals Act 2024 – FTI003

Good day,

On behalf of Hon. Minister Penny Simmonds, Minister for the Environment, please note that we do not have any comments on this application.

Kind Regards,

	<p>Office of Hon Penny Simmonds Environment Portfolio Minister for the Environment Minister Vocational Education Associate Minister for Social Development & Employment Website: www.beehive.govt.nz Private Bag 18041, Parliament Buildings, Wellington 6160, New Zealand</p>
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From: Infrastructure Portfolio <Infrastructure.Portfolio@parliament.govt.nz>
Sent: Wednesday, 5 March 2025 4:17 pm
To: Christopher Bishop (MIN) <C.Bishop@ministers.govt.nz>; Simon Watts (MIN) <S.Watts@ministers.govt.nz>; Penny Simmonds (MIN) <P.Simmonds@ministers.govt.nz>; Casey Costello (MIN) <C.Costello@ministers.govt.nz>
Subject: Invitation to comment on fast-track referral application for Gordonton Country Estate Development Project under the Fast-track Approvals Act 2024 – FTI003

To:
Minister for Housing
Minister for Climate Change
Minister for the Environment
Minister for Seniors

Dear Ministers,

Hon Chris Bishop, the Minister for Infrastructure (the Minister) has asked for me to write to you on his behalf.

The Minister has received an application from Gordonton Country Estate Limited for referral for the Gordonton Country Estate Development Project under the Fast-track Approvals Act 2024 (the Act) to the fast-track process (application reference FTAA-2502-1005).

The purpose of the Act is to facilitate the delivery of infrastructure and development projects with significant regional or national benefits.

Invitation to comment on referral application

I write in accordance with section 17 of the Act to invite you to provide written comments on the referral application. I have provided summary details of the project below.

If you wish to provide written comments, these must be received by **return email** within **20 working days** of receipt of this email. The Minister is not required to consider information received outside of this time frame. Any comments submitted will contribute to the Minister's decision on whether to accept the referral application and to refer the project.

If you do not wish to provide comments, please let us know as soon as possible so we can proceed with processing the application without delay.

If the Minister decides to accept the application and to refer the project, the Applicant will need to complete any preliminary steps required under the Act and then lodge their substantive application for the approvals needed for the project. An expert panel will be appointed to decide the substantive application.

Process

The application documents are accessible through the Fast-Track portal. If you haven't used the portal before, you can request access by emailing ftareferrals@mfe.govt.nz. Once you are registered and have accepted the terms and conditions, you will receive a link to view the documents. Existing users will be able to see application documents via the request when logging into the portal.

To submit your comments on the application, you can either provide a letter or complete the attached template for written comments and return it by replying to this email.

Before the due date, if you have any queries about this email or need assistance with using the portal, please email contact@fasttrack.govt.nz. Further information is available at <https://www.fasttrack.govt.nz/>.

Project summary

Project name	Gordonton Country Estate Development Project
Application ref	FTAA-2502-1005
Applicant	Gordonton Country Estate Limited
Project description	<p>The project is to construct a retirement village and associated ancillary activities on approximately 67 hectares near Gordonton, 5km northeast of Hamilton, comprising;</p> <ul style="list-style-type: none">a. approximately 659 residential unitsb. cafe, apartment style accommodation and health care provisionsc. roading, pedestrian, cycling infrastructure associated with the retirement villaged. water, wastewater and stormwater infrastructure associated with the retirement villagee. all earthworks required within the site and vegetation removal

Yours sincerely

Hon Chris Bishop

Minister for Infrastructure



Office of Hon Chris Bishop

Minister of Housing, Minister for Infrastructure, Minister Responsible for RMA Reform, Minister for Sport & Recreation, Leader of the House, Associate Minister of Finance

Email: christopher.bishop@parliament.govt.nz Website: www.beehive.govt.nz
Private Bag 18041, Parliament Buildings, Wellington 6160, New Zealand



**RESPONSE TO REQUEST FOR COMMENT – GORDONTON COUNTRY ESTATE
DEVELOPMENT**

This response is filed for Waikato-Tainui by:

Te Whakakitenga o Waikato Incorporated

PO Box 648
Hamilton 3240

INTRODUCTION

1. This response is made on behalf of Te Whakakitenga o Waikato Incorporated (Waikato-Tainui).
2. Te Whakakitenga o Waikato Incorporated (**Waikato-Tainui**) is the governing body for the 33 hapuu and 68 marae of Waikato (see **Appendix A**) and manages the tribal assets for the benefit of over 91,000 registered tribal members. It is also:
 - a) the trustee of the Waikato Raupatu Lands Trust, the post-settlement governance entity for Waikato-Tainui for the purposes of the Waikato Raupatu Lands Deed of Settlement 1995 and the Waikato Raupatu Claims Settlement Act 1995;
 - b) the trustee of the Waikato Raupatu River Trust, the post-settlement governance entity for Waikato-Tainui for the purposes of the Waikato-Tainui River Deed of Settlement 2009 and the Waikato Raupatu Claims (Waikato River) Settlement Act 2010;
 - c) the mandated iwi organisation for Waikato-Tainui for the purposes of the Maaori Fisheries Act 2004; and
 - d) the iwi aquaculture organisation for Waikato-Tainui for the purposes of the Maaori Commercial Aquaculture Claims Settlement Act 2004.
3. Waikato-Tainui welcomes the opportunity to respond to the “Ashbourne” fast-track referral application. This response is made on behalf of our 33 hapuu, 68 marae and more than 94,000 iwi members.
4. Waikato-Tainui recognizes that there may be overlapping interests with other iwi. Waikato-Tainui supports the views expressed in their separate comments regarding this referral application.
5. The comments provided here cover:
 - (a) overarching comments on key issues

(b) some specific topic-based submissions

BACKGROUND TO WAIKATO-TAINUI

7. Waikato-Tainui marae are kaitiaki of our environment and regard the holistic integrated management of all elements of the environment (such as flora, fauna, land, air and water) with utmost importance.
8. Waikato-Tainui are tangata whenua and exercise mana whakahaere within our rohe (tribal region). Our tribal rohe is bounded by Auckland in the north and Te Rohe Pootae (King Country) in the south and extends from the west coast to the mountain ranges of Hapuakohe and Kaimai in the east. Significant landmarks within the rohe of Waikato include the Waikato and Waipaa Rivers, the sacred mountains of Taupiri, Karioi, Pirongia and Maungatautari, and the west coast harbours of Whaaingaroa (Raglan), Manukau, Aotea and Kawhia moana, the eastern areas of Tikapa Moana (Firth of Thames), and principally, New Zealand's longest river, Te Awa o Waikato.
9. Both through its hapuu and collectively as an iwi, Waikato-Tainui has maintained ahi kaa, continues to exercise mana whakahaere, rangatiratanga and kaitiakitanga, and upholds and exercises Waikato-Tainui tikanga, kawa, maatauranga and reo within the Waikato-Tainui Rohe.
10. We acknowledge and affirm the intrinsic relationship of Waikato-Tainui with our natural environment, which carries with it both rights and responsibilities as a matter of tikanga and kawa.
11. Waikato-Tainui entered into a Deed of Settlement regarding our Waikato River claim under Te Tiriti o Waitangi in 2008 ("2008 Settlement"). This was followed by the signing of a revised Deed in 2009 and ultimately, enactment of the Waikato- Tainui Raupatu (Waikato River) Settlement Act 2010 ("Settlement Act"). The settlement marked the genesis of the Crown's statutory recognition of Te Mana o te Awa and the establishment of a "co-management" approach between Waikato-Tainui and the Crown regarding matters relating to the Waikato River.

WAIKATO-TAINUI OUTSTANDING AND REMAINING CLAIMS

12. Waikato-Tainui have several unresolved outstanding (Wai 30) and remaining te Tiriti o Waitangi grievances that are currently being negotiated with the Crown under the Treaty settlement negotiations process. These include (but are not limited to) claims in relation to the West Coast Harbours (Kaawhia, Aotea, Whaaingarua and Manukau) and Taamaki Makaurau. These claims are comprehensive in nature and extend to matters concerning whenua, the takutai moana, the moana itself, social, cultural and economic issues.
13. Wai 30 is held by Te Whakakitenga o Waikato to be negotiated on behalf of all 33 hapuu of Waikato-Tainui. The Wai 30 claim is inclusive of those parts and interests included in the original Wai 30 claim filed in 1987, that were intentionally set aside to be addressed, negotiated and settled separately to the Waikato Raupatu Claims Settlement 1995 and the Waikato-Tainui Raupatu Claims (Waikato River) Settlement 2010. This settlement represents a key part of the Wai 30 claim and is a continuation of these previous settlements.
14. Waikato-Tainui considers that our area of interest for settlement purposes to the moana includes the area of foreshore and seabed in and adjacent to each harbour bounded on the landward side by the line of mean high-water springs and on the seaward side by the outer limits of the Exclusive Economic Zone, including the beds of any rivers, lagoons, lakes and other water bodies that are part of the coastal marine area (within the meaning of the Resource Management Act 1991), as well as:
 - a) the airspace and the water space;
 - b) the subsoil, bedrock, minerals and other materials below the water bodies;
 - c) the marine and estuarine waters (including the waters of any rivers, lagoons, lakes or other water bodies);
 - d) the plants, animals and fish – flora and fauna;
 - e) the physical and metaphysical elements of the areas, waters, natural resources and geographic features;
 - f) the land, waters, water bodies (including rivers, lakes, wetlands, swamps, estuaries, streams, tributaries, springs, artesian waterways, and other natural watercourses), geographic features, natural resources, plants, animals, and activities within the catchment of each harbour which directly or indirectly interconnect with or affect the harbour; and
 - g) all physical and biological processes (including sediment movement, waves, tides, currents, and activities) within or affecting the areas, waters, natural resources and geographic features.

15. The claims themselves and the approach to negotiations is underpinned by the principles of mana motuhake, mana whakahaere and te mana o te moana. These principles are reflected in a Takarangi Framework (see **Appendix B**) and aspire to achieve autonomy, decision making rights, and co-governance/co-management rights to ensure the health and wellbeing of the moana.
16. Redress mechanisms in this regard are still being developed and negotiated with the Crown. In absence of settlement protections for these remaining claims, Waikato-Tainui seeks to provide and secure environmental protections for te taiao through other levers.

OVERARCHING COMMENTS ON THE PROJECT APPLICATION REFERRAL

17. Waikato-Tainui has reviewed the available information, and our findings and recommendations are included in this response. We note that a limitation of these findings, particularly regarding Iwi consultation, is that they are based on preliminary and high-level information, as the fast-track application is still at the referral stage.
18. Waikato-Tainui welcomes engagement with Waikato-Tainui iwi, hapuu, and marae on this project, noting that discussions with Ngaati Wairere and Ngaati Hauaa representatives have been ongoing since May 2024. Additionally, Waikato-Tainui notes that the consultation process included commissioning a Cultural Impact Assessment (CIA), which was carried out by Ngaati Wairere with support from Ngaati Hauaa and Waikato-Tainui.
19. Ngaati Wairere and Ngaati Hauaa are recognised hapuu of Waikato-Tainui and are mana whenua of the rohe for the proposed application. It should be noted that Ngaati Hauaa also has their own settlement directly with the crown.
20. Waikato-Tainui encourages ongoing continued engagement with Ngaati Wairere and Ngaati Hauaa to ensure cultural values pertaining to the project area fully considered.

Waikato-Tainui Position

21. While Waikato-Tainui acknowledges the potential benefits of this proposal, we have some concerns regarding the environmental, cultural, and social effects associated with the project. These include, but are not limited to:

Environmental Impacts

- (a) Landscape effects – The scale of the proposal will potentially alter the landscape and character of the area. It is unclear if the extent of the potential effects have been socialized with mana whenua and wider communities.
- (b) Land-use – Waikato-Tainui has consistently emphasized the importance of protecting highly productive land from inappropriate development. Waikato-Tainui see this as crucial to ensuring that land is preserved for food security, cultural practices, and future generations, etc.
- (c) Stormwater effects – In particular during construction, land disturbances may pose risks to waterways including the Komakorau Stream.

Cultural Impacts

- (d) Mana Whenua Consultation – should the fast-track referral application be successful, Waikato-Tainui requests that the applicant incorporate all information and recommendations from the CIA into the final development plans, ensuring that cultural concerns are addressed and cultural impacts are effectively mitigated.

Tai Tumu, Tai Pari, Tai Ao Plan – Waikato-Tainui Environmental Plan

- (e) Tai Tumu, Tai Pari, Tai Ao advocates for partnership and collaboration to uphold mana whakahaere. Without robust participation, the proposal fails to reflect the values of mana whenua.
 - (f) The CIA will help to ensure that the cultural and spiritual values associated with the proposed site are able to be considered in an appropriate way, thereby facilitating the protection, enhancement, and honouring of these Taonga for current and future generations.
22. Waikato-Tainui expects that the proposal will be assessed against all relevant parts of Tai Tumu, Tai Pari, Tai Ao. Key areas for ensuring full alignment include: i) ongoing consultation with iwi, hapuu, and marae regarding any cultural and heritage concerns;

and ii) ensuring the project integrates Maaori values and maatauranga in its implementation.

23. Waikato-Tainui's expects that appropriate weight and consideration will be given to the recommendations and concerns discussed here, particularly the following:

Strengthened Engagement and Cultural Input

- a) Waikato-Tainui encourages continued engagement with relevant Waikato-Tainui iwi, hapuu, and marae to ensure that the cultural values associated with the proposed site are considered in full and reflected in the development plans,
 - b) Require the Applicant to engage with Waikato-Tainui and relevant Waikato-Tainui iwi, hapuu and marae throughout the project to ensure that mana whenua perspectives shape the project's development where appropriate,
24. Waikato-Tainui expects that all negative effects identified as part of the proposal will be mitigated by using the highest targets or measures as outlined in section 8.3 of Tai Tumu, Tai Pari, Tai Ao and that the applicant will, together with Waikato-Tainui hapuu and marae, appropriately address and/or resolve these concerns prior to or immediately following any decision on the referral application.
25. Waikato-Tanui's expectation is that engagement is on-going with our iwi, hapuu and marae and that they are appropriately resourced by the applicant to completion of project so that the aspirations of Tai Tumu, Tai Pari, Tai Ao are achieved through collaboration and partnership.
26. Waikato-Tainui wish to remain directly engaged and informed throughout the entire process (i.e., from consenting to project execution and beyond, if necessary) and, in addition, we will continue to monitor progress in support of our iwi, hapuu, or marae for their separate engagements on this matter.

CONCLUSION

27. Waikato-Tainui supports a fair and comprehensive hearing processes that ensures all concerns raised in these comments are thoroughly addressed. It is essential that the final consenting process—whether streamlined or not—provides a platform for open dialogue, allowing for the consideration of Waikato-Tainui perspectives and the resolution of any issues identified. A transparent and balanced process will help

ensure that all relevant matters are properly examined and that any potential impacts on iwi values, culture, and interests are effectively mitigated.

Naaku noa, naa

A handwritten signature in black ink, appearing to be 'D. P. L.' or similar, written in a cursive style.

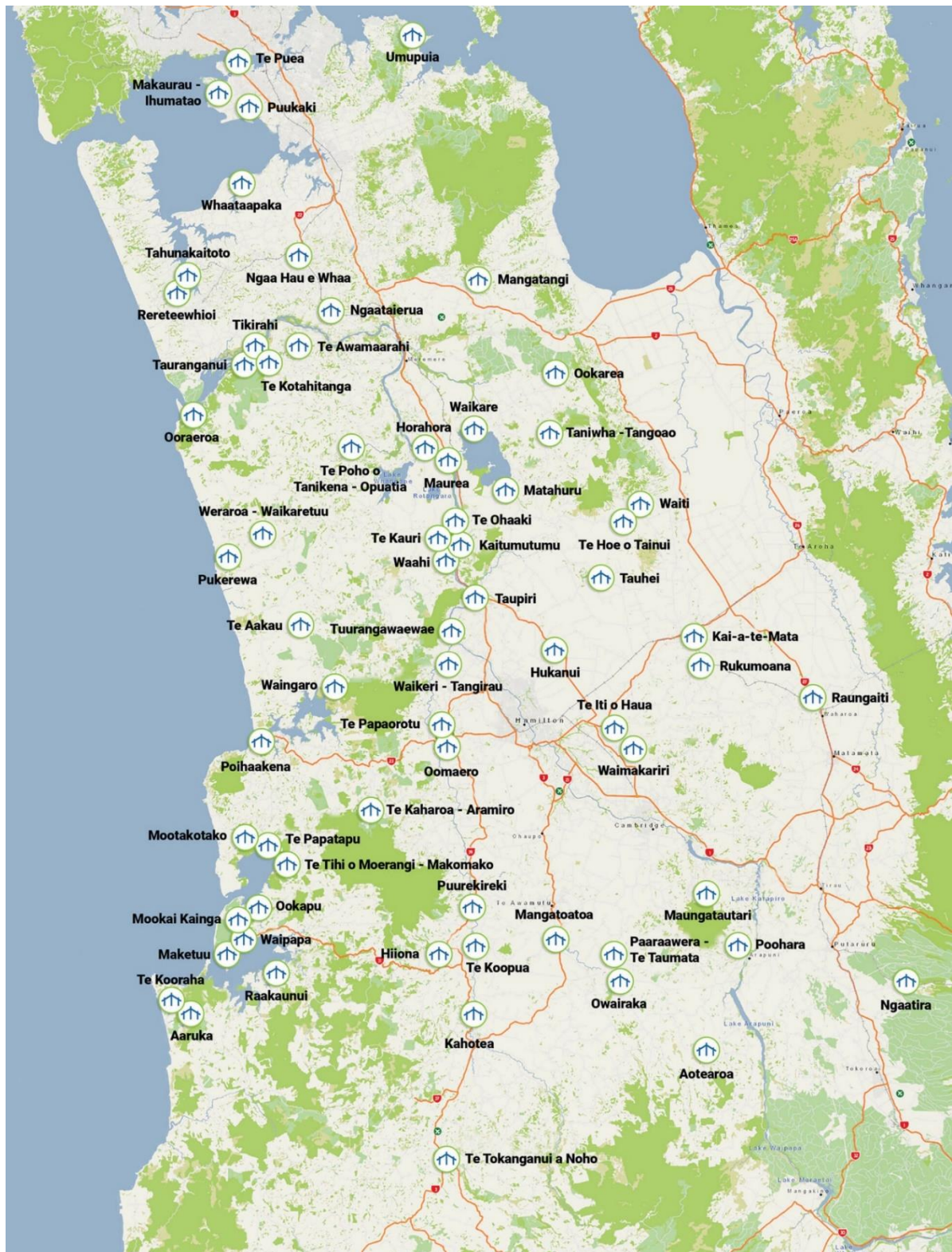
Te Maakariini Mapu

SENIOR PLANNER

WAIKATO-TAINUI

APPENDICES

APPENDIX A – Waikato-Tainui 68 Marae



APPENDIX B – Waikato-Tainui Remaining Claims Takarangi Framework

