

30 May 2025

New Zealand Government

Attn: Ben Bunting

Via: s 9(2)(a)

Tēnā koe Ben,

Response to request for further information for referral of the Gordonton Country Estate Development project under the Fast-track Approvals Act 2024

Thank you for your email, circulated on 21 May 2025, which set out a request for further information arising from your review of the referral application for the Gordonton Country Estate Development project. The request is as follows:

- 1. Demonstrate how the project will deliver significant regional economic and employment benefits.*
- 2. Demonstrate how the project will address housing needs at a scale providing regional benefits.*
- 3. Demonstrate the project's consistency with local and regional planning documents, including spatial strategies (including the Waikato Regional Policy Statement and Future Proof Strategy).*

Note: Please ensure your responses to these questions are supported with relevant metrics and references

Executive Summary

This response demonstrates how the benefits of the project would be regionally significant, as required by Section 22(1)(a) of the Fast-track Approvals Act 2024. Our comments in relation to the criteria set out in section 22 are as follows:

- **Attachment 1** – Technical Memo from Insight Economics

Regionally Significant

The Fast-track Approvals Act 2024 has established a framework that differs from the Resource Management Act 1991. We acknowledge that the matters outlined in Section 22(a) of the Fast Track Approvals Act direct the considerations available to the Minister when assessing a project's eligibility for referral. We respond to the relevant S22(a) considerations for Gordonton below.

S22(a)(i) - has been identified as a priority project in a central government, local government, or sector plan or strategy (for example, in a general policy statement or spatial strategy), or a central government infrastructure priority list:

- The Gordonton project aligns with Section 22(a)(i) of the Fast-track Approvals Act 2024 through its strong consistency with the Act's purpose of accelerating projects that deliver regionally significant housing benefits. While the project is not explicitly listed as a priority in a central government, local government, or sector plan or strategy, it fits well with the

strategic intent and lens of the urgent need to increase housing supply—particularly for the aging population.

- By delivering 659 residential living units tailored to older residents, the project directly addresses a critical and growing demographic need in the region. In doing so, it also contributes to the broader regional housing market by freeing up existing general housing stock, thereby improving housing availability across all age groups. This dual benefit—targeted housing provision and wider housing market relief—underscores the project’s alignment with government housing priorities and supports the delivery of housing that will offer a genuine regional benefit.

Section 22(a)(iii) - will increase the supply of housing, address housing needs, or contribute to a well-functioning urban environment (within the meaning of policy 1 of the National Policy Statement on Urban Development 2020):

- The Gordonton project will significantly increase the supply of housing by delivering 659 retirement living units, directly addressing a critical shortfall in aged care accommodation within the Waikato region.
- It meets a growing demographic need by providing a range of housing options for older residents, including independent living and assisted care, enabling ageing in place. In doing so, it also frees up existing housing stock for other population groups, supporting broader housing supply outcomes.
- The project contributes to a well-functioning urban environment, as defined by Policy 1 of the National Policy Statement on Urban Development 2020, by offering housing that meets diverse needs, is well-located adjacent to Gordonton village, and integrates walking and cycling links to local services and amenities.

Section 22(a)(iv) – will deliver economic benefits:

- The Gordonton project aligns strongly with Section 22(a)(iv) by delivering significant economic benefits to the Waikato region. It is projected to generate a \$235 million boost to regional GDP over a 10-year period and create 1,650 full-time equivalent (FTE) years of employment during construction.
- Beyond this initial phase, the project will provide ongoing economic contributions, including 58 permanent full-time jobs, an annual GDP increase of \$5.5 million, and \$4.1 million in wages.
- Additionally, the project has a broader regional benefit of attracting construction and professional services from across Waikato and adjacent regions, stimulating cross-sector growth and supporting regional economic integration.

Section 22(a)(x) – is consistent with local or regional planning documents, including spatial strategies:

- While not specifically identified as a key growth area in local or regional planning documents, the Gordonton project strongly aligns with their core outcomes and objectives—particularly in addressing housing supply and diversity and supporting elderly housing which is a key lens across local and regionally planning documents.

- Specifically, the project will advance the Waikato District Housing Strategy 2024, which recognises the urgent need to provide housing options for the elderly and directs increased supply and diversity of housing across the district through delivering 659 retirement living units, including serviced apartments and cluster housing. This will free up existing housing stock by enabling older residents to relocate from existing general housing.
- It also aligns with Waikato 2070, which encourages growth in and around existing rural settlements through compact, well-designed communities that respect rural character—principles that are central to the Gordonton proposal.
- Similarly, Future Proof Strategy 2024–2054 promotes a well-functioning urban form and targeted housing supply that responds to demographic trends, particularly the region’s rapidly ageing population. Furthermore, the project supports the Waikato Regional Policy Statement (RPS) by promoting regional benefit in terms of integrated and sustainable development near existing infrastructure and services, helping to consolidate growth around established communities and enabling ageing place

Gordonton Country Estate Development

Gordonton Country Estate has been developed for Waikato’s demographic by delivering retirement living, specifically for the ageing population within the Waikato. 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 and Region. It is this context that determines why Gordonton Country Estate is a regionally significant project that will deliver regionally significant benefits, specifically for the community of Gordonton Village (and surrounds) & Waikato Region.

Regionally Significant Benefits of Gordonton Country Estate

The benefits of the Gordonton Country Estate Development would be regionally, and in some cases nationally significant, as:

- The project will generate a wide range of economic benefits that will be regionally significant, including but not limited to:
 - Contributing significantly to housing supply for aged persons

Insight Economics outlines in Attachment 1 that their assessment suggests that there will be unmet demand of more than 570 RV units in the medium term, and about 4,480 over the longer term (when using Scenario 1 which assumes a constant penetration rate of 13.3%, the 2023 regional average)

With 659 RV units, the proposal is over eight times the regional average village size (approximately 75 units per JLL) and larger than any other village in the country—including Ryman’s Edmund Hillary Village in Auckland (432 units).

The proposal clearly constitutes a regionally significant boost to RV supply. A development of this scale targeted at the fastest-growing age group (75+) also represents a regionally significant

housing contribution. Finally, each RV unit typically frees up a conventional home, which will boost overall housing supply across the region.

- In the next ten years, the project will support employment levels in the region, specifically for the construction industry.

As outlined in Attachment 1 the proposal will create significant one-time boosts in GDP, jobs, and incomes, particularly during construction. In summary, over a ten-year period, including flow-on effects, we estimate that the development could have the following regional impacts:

- A one-time boost in regional GDP of around \$235 million;
- Employment for 1,650 FTE-years (or 165 people employed full-time for 10 years); and
- Additional household incomes of \$137 million.

For context, there were 20,600 construction jobs in the region in 2024. The proposal therefore represents nearly 1% of total regional construction employment over its development period—a significant share for a single project. This highlights the disproportionately large economic contribution of the development.

In addition, future onsite activities could sustain the following regional benefits at full build-out:

- Full-time employment for 58 people;
- Annual GDP of nearly \$5.5 million; and
- \$4.1 million paid annually in salaries / wages.

Through consenting and design, the project will generate a number of jobs, that require expertise beyond the immediate locality of Gordonton, including from the Bay of Plenty, Waikato, and Auckland. This is anticipated to be ongoing as the project moves to detailed design, particularly as this is a staged development proposal.

The number of jobs generated will then increase once construction of the project begins. Given the scale of the project, construction workers will be required from outside of the immediate locality of Gordonton, from the wider Waikato and Bay of Plenty area.

- The project will generate a wide range of numerous socioeconomic benefits. including but not limited to:
 - The project will enhance the 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.
 - Through consultation with Mana Whenua, the project will incorporate cultural values into the design to ensure the regional and national cultural narrative of Mana Whenua are reflected in the development. This may include Ngāti Wairere, art, and taonga, using Ngā Iwi-endorsed artists, indigenous planting schemes, and cultural naming.
 - Within the retirement village are a number of aged care facilities, including assisted care apartments, which will provide necessary medical care to the region. This is a significant

regional benefit as there are limited care facilities in Waikato District and the rural communities of Waikato.

- The project will generate a wide range of environmental benefits that will be regionally and nationally significant, including but not limited to:
 - The project directly responds to the national risk of climate change and natural hazards through the management of flooding hazards, via the stormwater management provided by the greenway, and the incorporation of measures to support the reduction of greenhouse gas emissions, such as renewable electricity generation and promotion of walking and cycling.
 - The project integrates effectively with adjacent ecologically sensitive areas while reintroducing biodiversity into a relatively barren landscape. The project avoids encroachment on natural wetland areas and incorporates stormwater detention devices across the development which includes native plantings, contributing to a positive ecological outcome. This will support the environmental outcomes within the immediate locality, but also on a regional scale due to the location of the site to the Komakorau Stream which stems into the Waikato River that is part of the Waikato Catchment.
 - By preserving the natural wetlands, the project maintains critical habitat, supports biodiversity, and safeguards natural water filtration processes to benefit the region. The inclusion of stormwater management features helps mitigate runoff, capture sediment, and facilitate bioremediation, improving water quality. Additionally, the ecological buffer/reserves with native plantings enhance regional ecosystems by creating wildlife corridors, improving air quality, and moderating urban temperatures.

Consistency with Local & Regional Planning Documents

Waikato District Housing Strategy (2024)

The Waikato District Housing Strategy (2024) is a comprehensive 10-year plan to address housing challenges across the Waikato District. The strategy acknowledges that the district is facing unprecedented growth, creating a housing challenge that needs to be addressed quickly. The project demonstrates a strong alignment with the Strategy. Specifically, the project's objectives and planned outcomes directly support the Strategy's vision that "everyone in our community has access to a home that is safe, healthy, and affordable, and is part of a prosperous, resilient, and connected community". The project aligns with the Strategy in the following ways:

- **Housing Supply and Diversity** – the Strategy focuses on increasing demand and supply of housing and directs the consideration of diverse housing models and options to support the community. The project directly contributes to this outcome, proposing to deliver 659 residential units for retirees which addresses the direction in the Strategy to provide housing that 'meets the needs of the elderly within their own neighbourhoods'. This will address the growing needs of the ageing population in the district and provides retirement housing choice to those within the District.
- **Access to safe, affordable and healthy homes** – the project will enable opportunities for people to remain within their community throughout their lifetime through providing access to retirement

living facilities. The proposed increase in housing supply tailored for the elderly can alleviate pressure on housing supply, contributing to improved housing affordability, a core objective of the Strategy. The project will also include new infrastructure such as stormwater, wastewater, and potable water treatment systems that contribute to healthy living environments which is a key outcome of the strategy.

- **Prosperous, resilient and connected** – the project increases housing supply to support the wider community with new spaces to live and thrive. It will integrate with the existing community, expanding on the rural character of the area. With provision for roading, pedestrian, and cycling infrastructure, and proximity to the Gordonton Village, the project supports community connectivity and access for residents to key social services (for example, health facilities, community services. This closely aligns with the Housing Strategy’s emphasis on homes, connected and prosperous communities. The project also incorporates features such as green space, sustainable water management, and low emission transport options, which aligns with the resilient sustainability goals of the Strategy.
- **Innovation** – the project offers a new opportunity and different concept for a retirement village that reflects the needs and character of the rural community. This is demonstrated through the large open spaces, integration of stock, grazing and expansive rural outlooks. The three waters infrastructure will also be managed onsite utilising innovative, sustainable technology.

The project is not only consistent with, but actively advances and delivers on the Waikato District Housing Strategy 2024’s vision and goals. The project helps to address core issues such as housing supply, infrastructure integration, and community connectivity while embodying the Strategy’s principles of equity, sustainability, and holistic planning. Overall, this project is well-positioned to contribute meaningfully to the district’s housing goals and is well aligned to the Strategy’s framework.

Gordonton Local Area Blue Print

The Waikato District Council commissioned the development of a Blueprint for the district. The Blueprint was developed and delivered through a series of intensive consultation and Inquiry-ByDesign workshops between July and November 2018. The aim of the Blueprint is to provide a high-level ‘spatial picture’ of how the district could progress over the next 30 years, address the community’s social, economic and environmental needs, and respond to its regional context. The Blueprint will provide the Waikato District Council with an effective and legible tool to move from vision to strategy, and from strategy to action by setting out specific, prioritised initiatives at the district and local level.

Gordonton is sought to be a compact satellite village with its own unique identity where a close-knit community welcomes visitors. The proposal aligns with the purposes and outcomes of the local area blueprint for the following reasons:

- The development will enable the establishment of additional permanent residents this will assist in the re-establishment of the markets and enable immediate economic growth of the village through retail and commercial support as sought by incentive GN6.1.

- The development proposes d connections for pedestrians and cyclists from the site to the village which can be used by all during day light hours as sought by incentive GN7.1.
- Additional planting along the Komakorau Stream will help establish a nature trail sought by initiative GN.2.1

Waikato 2070 - Growth & Economic Development Strategy

The Waikato 2070 Growth & Economic Development Strategy (Waikato 2070), outlines a 50-year vision for sustainable and strategic growth across the Waikato district. The strategy provides a framework for balancing economic development, community wellbeing, and environmental stewardship to create liveable, thriving, and connected communities. The project is strongly aligned with the goals, principles, and spatial direction set out in the Waikato 2070. It reflects the strategy's core vision of creating liveable, thriving, and connected communities and contributes to all four focus areas outlined in the strategy.

The Waikato District is experiencing higher growth than both Auckland and the national average growth rate. This project helps to support the rural community living within and around Gordonton and ensures there is sufficient housing supply and choice for the elderly population.

The project is consistent with the four key focus areas in Waikato 2070, as demonstrated below.

Growing Our Communities:

- **Housing Supply and Diversity:** The project proposes 659 retirement living units across a range of typologies, including one, two, and three-bedroom dwellings, as well as serviced apartments. This supports Waikato 2070's objective to provide diverse housing options for all life stages and to meet the growing demand associated with an ageing population.
- **Proximity to Existing Settlements:** The project site directly adjoins Gordonton village, aligning with the strategy's principle of compact and contained urban form by focusing growth around existing towns and minimising urban sprawl.
- **Masterplanned Community:** The project includes on-site amenities such as healthcare, recreational areas, and communal spaces, supporting the creation of a liveable, self-sustaining village, as envisioned in the strategy. It also supports walking and cycling connections from the village through to the school.

Build Our Business:

- **Economic Uplift:** The project will deliver one-off and ongoing economic benefits, including employment during construction and permanent jobs in healthcare, hospitality, and maintenance once operational which is consistent with the direction in Waikato 2070.
- **Supporting Regional Infrastructure:** The proposal includes upgrades to surrounding transport infrastructure and integration with walking/cycling connections, enabling efficient movement of goods and people, consistent with the Waikato 2070 focus on regional transport links.

Embrace Our Identity:

- **Rural identity:** The masterplan for the project has been carefully designed to reflect and protect the rural character of the surrounding area through an integrated rural environment with housing to create a unique retirement option for the elderly.
- **Cultural Integration:** Ngaati Wairere and other mana whenua have been engaged through the development and preparation of the masterplan and referral application. Cultural values and heritage are embedded into the design, including interpretation and protection of archaeological features (e.g., Otaahua Paa) and opportunity for indigenous planting.
- **Landscape and Environmental Design:** The retention and restoration of ecological features, including native vegetation and riparian buffers along Komakorau Stream, uphold the identity and natural character of the rural Waikato landscape. The project promotes opportunities for ecological and environmental protection and restoration.

Empower Our People:

- **Accessibility and Community Connection:** The development prioritises pedestrian and cycling connections to the village and local school, fostering intergenerational and community cohesion.
- **Health and Wellbeing:** By offering aged-care and retirement housing in a rural village setting, the project promotes wellbeing for elderly residents and enhances the social fabric of the wider district.
- **Education and Awareness:** Opportunities for interpretation of Māori archaeological sites and the surrounding natural environment will foster greater understanding and appreciation of local history and ecology.

The project offers limited and targeted growth to provide for the increasing ageing population that respects the local rural village character and landscape context. Furthermore, it:

- Builds on existing infrastructure and proximity to the urban fringe.
- Avoids fragmentation of highly productive land by clustering development and retaining grazing areas.
- Adopts a low-impact, staged development approach consistent with long-term strategic planning.

Overall, the project is a well-considered and strategically located development that supports the key pillars of Waikato 2070. It provides targeted housing, protects natural and cultural resources, supports economic development, and contributes to the long-term vision of connected and sustainable communities within the Waikato District. This alignment demonstrates the project's strategic merit and consistency with Waikato 2070.

Waikato Regional Policy Statement

The Waikato Regional Policy Statement: Te Tauākī Kaupapahere Te-Rohe O Waikato (Waikato RPS) became operative in May 2016. The Waikato RPS provides an overview of the resource management issues in the Waikato region, and the ways in which integrated management of the region's natural and physical resources will be achieved.

The project demonstrates broad and substantive alignment with the Waikato RPS by promoting integrated, sustainable development in a location that leverages existing infrastructure and community assets. The proposal contributes to a well-functioning urban environment by delivering a diverse range of retirement and aged-care housing options within walking and cycling distance of Gordonton village, thereby enhancing social connectivity and reducing reliance on private vehicle use. It reflects the Waikato RPS objectives around compact and efficient urban form, coordinated infrastructure provision, and the creation of liveable, resilient communities. The development incorporates cultural and ecological values through engagement with mana whenua, and integration of planned riparian and indigenous planting along Komakorau Stream. While the project intersects with rural land currently classified as moderately productive, it achieves an appropriate balance of social, environmental, and economic outcomes consistent with the overall purpose and intent of the Waikato RPS. Through a master-planned, low-impact approach, the project supports the strategic growth and wellbeing of the Waikato District in a manner that reflects the region's long-term vision.

More specifically, the project is considered to be consistent and well-aligned with the Waikato RPS in the following ways as an example:

Integrated and Sustainable Development

- Objective 3.1 of the Waikato RPS emphasises the need for resource use and development to be sustainable and integrated. The project supports this by:
 - Providing a masterplanned retirement community adjacent to the existing Gordonton village, promoting a compact urban form.
 - Incorporating on-site amenities and services, reducing the need for travel and supporting local infrastructure.
 - Enhancing connectivity through pedestrian and cycling links to the village and local school, fostering community integration.

Managing Built Environment Growth

- Objective 3.12 and Policy 6.1 focus on managing the built environment to achieve quality urban development. The project aligns by:
 - Delivering diverse housing options tailored to the ageing population, addressing demographic needs.
 - Ensuring the development is well-connected to existing infrastructure and services, promoting efficient land use.
 - Supporting the creation of a well-functioning urban environment, as required by the NPS-UD.

Infrastructure and Services

- Policy 6.3 and Method 6.3.1 advocate for coordinated infrastructure planning. The project:
 - Plans for necessary infrastructure upgrades avoids the need to exacerbate the need for additional stress on council and public three water infrastructure services.

- Ensures that any relevant infrastructure provision will align with the timing and sequencing of development, supporting sustainable growth.

Protecting Natural and Cultural Heritage

- Objective 3.19 and Policy 10.1 aim to protect significant natural and cultural resources. The project contributes by:
 - Engaging with mana whenua, including Ngaati Wairere, to incorporate cultural values into the development.
 - Preserving and enhancing ecological features, such as native vegetation and waterways, within the site.
 - Respecting and integrating archaeological sites, like Otaahua Paa, into the landscape design.

Consistency with Waikato RPS Change 1 (2022) and NPS-UD 2020

The Waikato RPS Change 1 incorporated the NPS-UD 2020, emphasising responsive planning and sufficient development capacity:

- Policy 6.3 (as amended) requires that urban development responds to the diverse and changing needs of people. The project:
 - Provides for the specific housing needs of the elderly population, contributing to housing diversity within the district.
 - Enhances the functionality of the urban environment through integrated design and service provision.
- Policy 6.6 encourages developments that add significantly to development capacity. The project:
 - Adds substantial housing capacity in a location identified for growth, supporting regional housing targets.
 - Demonstrates alignment with strategic planning documents, such as the Future Proof Strategy.

In summary as demonstrated above, the project is consistent with the objectives and policies of the Waikato RPS, including the recent amendments under Change 1. It exemplifies sustainable, integrated development that meets the region's social, economic, and environmental goals.

While the project is generally consistent with the key Waikato RPS objectives and policies, there are a few potential inconsistencies. These are outlined below:

- Loss of Highly Productive Land (Policy 14.1) – The Waikato RPS seeks to protect the availability and use of high-class soils (Land Use Class 1, 2 and 3) for primary production. The project site contains LUC Class 2 soils, which are considered highly productive. Despite this land being fragmented, it can/will lead to the loss of some of this land for primary production.
- Urban Expansion into Rural Zone (Objective 3.12 and Policy 6.1) – The site is currently zoned Rural in both the Operative and Proposed District Plans. The Waikato RPS generally directs urban development towards urban areas identified in growth strategies or spatial plans. While Gordonton is identified as a

rural village in Waikato 2070, it is not a formally designated growth node. As such, the scale of the proposal [659 dwellings and associated infrastructure] represents a significant urban expansion.

- Potential Reverse Sensitivity Effects (Policy 6.1 and 14.1) - Introducing residential and retirement living next to retained rural activities, such as grazing or farming, may result in reverse sensitivity conflicts (e.g., complaints about odour, noise, or chemical use). While the project aims to integrate rural character and retain some rural activities, the Waikato RPS seeks to avoid land use conflicts that could impact existing productive land users.

Despite the above, the project delivers significant benefits and potential mitigations that outweigh these potential inconsistencies including:

- The Waikato District is a high growth area, with insufficient amounts of large-scale areas of land that are zoned and able to support this type of development. While the project may be seen as inconsistent with intended rural character and strategy sequencing, it will help to ensure there is sufficient land available to cater for the high rates of growth, particularly catering to the ageing population needs on land where residential living can be efficiently and effectively realised.
- The economic, social, and housing benefits have been outlined in depth, particularly the need for aged care living, which is an emerging regional priority.
- The site's fragmented productive capacity, limited ecological value, and proximity to existing infrastructure are used to justify its 'highest and best use' for retirement living.
- The project includes retained grazing areas and will ensure that other areas better suited to supporting primary production within the district can be retained and protected for primary production purposes.
- Engagement with mana whenua, stormwater design, and ecological restoration help to balance the project's broader alignment with WRPS environmental and cultural values.

Based on the above, it is considered that the project aligns closely with most of the objective and policy direction within the Waikato RPS, especially in terms of integrated development and housing supply.

Future Proof Strategy

Future Proof Strategy 2024 – 2054 (Future Proof) is a 30-year growth management and implementation plan for the Hamilton, Waipā, Waikato, and Matamata-Piako sub-region. It provides a framework to manage growth in a staged and coordinated manner, addressing complex planning issues, especially cross-boundary matters. The project demonstrates strong alignment with the overarching principles and strategic direction in Future Proof by delivering a well-integrated, compact, and purpose-built retirement community on the fringe of the existing Gordonton village.

The development supports Future Proof's vision for managing growth in a coordinated and sustainable manner, with particular emphasis on providing housing choice for a rapidly ageing population, enhancing infrastructure self-sufficiency, and promoting active transport connectivity. It contributes to a well-functioning urban environment by offering a range of housing typologies, co-located amenities, and public spaces that foster community and reduce car dependency. The integration of cultural values through meaningful engagement with mana whenua and the retention and restoration of riparian and ecological corridors further reflects Future Proof's commitment to cultural recognition and environmental stewardship. While the site comprises moderately productive LUC Class 2 soils and sits outside formally

designated growth nodes, the project's tailored land use, its avoidance of rural land fragmentation, and its consistency with the Waikato 2070 strategy—which identifies Gordonton as a suitable location for managed growth—support a clear case for strategic alignment. Further detail on how the project aligns with several key objectives and principles of Future Proof is set out below.

Compact Urban Form and Managed Expansion:

- Future Proof Direction: Promote compact urban form and direct growth to existing urban areas and identified nodes. The project aligns with this direction in the following ways:
 - The project site is directly adjacent to the existing Gordonton Village, enabling efficient expansion of a rural service centre without disjointed or leapfrog development.
 - It is designed as an integrated and self-contained retirement estate, avoiding sporadic or low-density rural subdivision.
 - Walkability and cycling connections to the village support the principles of accessibility and active transport, key to the compact urban form vision.

Diverse and Inclusive Housing Supply

- Future Proof Direction: Provide a range of housing typologies to suit all ages and income levels. The project aligns with this direction in the following ways:
 - The project addresses a demographic gap in aged-care housing and retirement living, which is a growing sub-regional need.
 - It provides 659 retirement units across a range of 1, 2, and 3 bedroom typologies as well as serviced apartments, enabling ageing in place within the Waikato. Additionally, it allows people to remain within their community as their needs change. It offers the ageing population the opportunity to retire and continue living in Gordonton, close to family, friends, and familiar surroundings, without the need to relocate elsewhere in the district or region.
 - The project supports Future Proof's goals to free up existing housing stock (e.g. family homes vacated by downsizing retirees), indirectly improving housing supply for other age groups.

Infrastructure Efficiency and Self-sufficiency

- Future Proof Direction: Coordinate land use and infrastructure to maximize existing capacity and avoid premature infrastructure extension. The project aligns with this direction in the following ways:
 - The retirement village will provide on-site water, wastewater, stormwater, and roading infrastructure, ensuring that it does not place an undue burden on district services.
 - Traffic management plans and integration with surrounding roads will mitigate external infrastructure impacts.

Climate Change and Environmental Stewardship

- Future Proof Direction: Support climate-resilient development and reduce greenhouse gas emissions. The project aligns with this direction in the following ways:

- On-site amenities reduce car travel by allowing residents to live, receive care, and socialise within the development.
- Extensive native planting, riparian enhancement of the Komakorau Stream, and protection of ecological values will support ecosystem resilience aligning with environmental protection goals.
- The project includes solar infrastructure and water reuse initiatives to support emissions reductions and sustainable resource use.

Cultural Values and Engagement

- Future Proof Direction: Support iwi and hapū aspirations through meaningful engagement and cultural integration in urban development. The project aligns with this direction in the following ways:
 - Mana whenua, particularly Ngaati Wairere, have been actively engaged and consulted in the development of the masterplan and referral application.
 - The proposal incorporates archaeological values (Otaahua Paa), cultural narratives, and native flora significant to tangata whenua.
 - Cultural monitoring and accidental discovery protocols are proposed throughout construction.

While the project does align with many aspects of Future Proof, there are some inconsistencies with the overall strategy. This is outlined in more detail below.

Development of Highly Productive Land: The site contains LUC Class 2 land, which is considered highly productive. Future Proof seeks to retain highly productive land for primary production, particularly where alternative land exists.

- Despite the tension between this direction in Future Proof and project, the site's productivity is already moderately constrained and fragmented meaning it is not a prime location to support primary production. The proposal also seeks to retain some of the productive land as part of the design for grazing.
- The Expert assessments confirm the economic, environmental, and social benefits of the project outweigh the loss of rural land, especially due to the nature of the use (retirement living, not high-density residential sprawl). This is consistent with Clause 3.10 of the NPS-HPL, which Future Proof supports in exceptional cases.
- The development of this land for a retirement village of this nature will support and allow for land more suited to supporting primary production within the district be protected.

Urban Expansion into Rural Zone Not Identified as Priority Growth Node: Gordonton is not listed as a metro growth node in Future Proof or the Hamilton-Waikato Metro Spatial Plan. Future Proof favours growth in the identified urban nodes such as Te Kauwhata, Pokeno and Cambridge.

- The Waikato District is a high-growth area within the Future Proof sub-region, experiencing sustained population increases driven by its proximity to Hamilton and the Auckland-Hamilton growth corridor. Given the rate of growth, the Housing and Business Capacity Assessment figures used to inform Future Proof are likely outdated and not accurately reflective of the current demand pressures or demographic shifts, particularly the rapid growth in the ageing population. The project helps to proactively address

this gap by delivering a purpose-built, retirement-focused development in a strategically located area, supporting housing supply in line with the district's growth trajectory and community needs.

- While not a metro node, Waikato 2070 identifies Gordonton as a growth-enabled rural village. There is insufficient amounts of large scale areas of land that are zoned to enable retirement village type developments. While not identified, the project will ensure a greater supply of land is available to address the shortfall in aged care / retirement village living.
- The project does not set a precedent for general rural subdivision due to its self-contained, aged-care-specific use which is responding to a rapidly growing need in the market.
- The scale is proportionate to a long-term rural service centre expansion, not a new township.

Potential Reverse Sensitivity Effects: Introducing residential and retirement living next to existing rural activities may result in reverse sensitivity conflicts, such as complaints about odour or noise, which Future Proof aims to avoid.

- Despite this potential inconsistency with Future Proof direction, retirement villages typically generate lower levels of activity, traffic, and emissions than general residential developments. This makes them inherently more compatible with rural surroundings, as they are less likely to contribute to cumulative effects that exacerbate rural-urban interface tensions.
- The project includes strategically located grazing and open space areas around the site, particularly adjacent to the Komakorau Stream and other rural boundaries. These act as functional buffers, reducing direct interface with rural operations and providing a physical and visual transition between land uses.
- The entire estate will be held and operated under single corporate ownership (operating under the Retirement Villages Act 2003), allowing for consistent and proactive management of resident expectations. This significantly reduces the likelihood of fragmented complaints and allows for educational and contractual mechanisms (e.g. tenancy agreements or village rules) to inform residents of their rural context upon moving in.
- The project supports a long-term, policy-aligned growth outcome that acknowledges the surrounding rural land uses while introducing a much-needed housing typology.
- The development's limited and specific function as a retirement village, with no subdivision of land or general residential zoning, ensures that it does not create a precedent for broader rural intensification or subdivision pressure, further reducing future land use conflicts.
- While reverse sensitivity is a valid consideration, the economic, social, and demographic benefits of enabling elderly residents to remain within their community through holistic and well considered planning, clearly outweigh the limited risks of conflict with nearby rural activities.

Overall, the project demonstrates substantial alignment with Future Proof's strategy. It supports key outcomes around compact growth, housing diversity and supply, infrastructure efficiency, climate resilience, environmental sustainability and cultural integration. While not specifically identified as a growth area or node within Future Proof, the projects retirement village specific focus addresses a critical and growing housing need. Although there are some tensions regarding this development occurring on LUC Class 2 soils

the need for greater supply and availability of land are considered to outweigh this tension. On balance, the project contributes positively towards Future Proof's strategic direction.

Waikato -Tainui Environmental Plan

The Waikato-Tainui Environmental Plan (WTEP) provides a background to, and identifies key, resource-based issues for Waikato-Tainui. The plan sets out Waikato-Tainui's vision statement for environmental and heritage issues and key strategic objectives such as tribal identity and integrity, including "to grow our tribal estate and manage our natural resources." The plan is designed to enhance Waikato-Tainui participation in resource and environmental management. The WTEP

Section 25 of the WTEP refers to land use planning and development activities and includes objectives and policies which accept that development activities will occur on the basis of achieving positive environmental outcomes and overall environmental enhancement initiatives. In this respect, the WTEP is considered to enable this type of development provided that the potential environmental effects are appropriately managed and the overall environmental management objectives of these documents are achieved.

Section 19.4 of the WTEP outlines water quality objectives to ensure that fresh waters within the rohe of Waikato-Tainui are drinkable, swimmable and fishable in all places. Based upon the methods proposed to address the potential water quality effects of the proposed activities, I consider that these objectives of the WTEP will be achieved for the proposed development and water quality values of the Waikato River receiving environment will not be compromised.

Having assessed this proposal against the objectives and outcomes within the WTEP, I have determined that provided that the activities are carried out in accordance with the application and the recommended conditions are adhered to, the activities will be consistent with the WTEP.

Furthermore, tangata whenua consultation for this project has included direct engagement with Waikato Tainui and various local iwi/hapu groups to ensure that they are informed of the proposal in regards to the Regional Consent and are provided opportunity to comment on any aspects of the proposal which may be of specific interest or concern so that these matters are able to be addressed by the Applicant.

Overall, I consider that the subdivision and related infrastructure activities which are the subject of this application are consistent with the provisions of the WTEP.

Te Ture Whaimana o Te Awa o Waikato (Vision & Strategy)

The Waikato-Tainui Raupatu Claims (Waikato River) Settlement Act 2010 gives effect to the Deed of Settlement signed by the Crown and Waikato-Tainui on 17 December 2009. The Settlement Act has an overarching purpose to restore and protect the health and wellbeing of the Waikato River for future generations. Section 9(2) of the Settlement Act confirms that the vision and strategy for Waikato River (Te Ture Whaimana o Te Awa o Waikato) applies to the Waikato River and activities within its catchment affecting the Waikato River. As well as being deemed part of the RPS in its entirety pursuant to Section 11(1) of the Settlement Act, the vision and strategy prevails over any inconsistent provision in a national policy statement and Sections 11 to 15 of the Settlement Act prevail over Sections 59 to 77 of the RMA.

The proposed use of a proprietary stormwater treatment and the effective implementation of erosion and sediment control measures during construction/earthworks will specifically addresses the health and wellbeing of the Waikato River. This is further supported through the Regional Consent Conditions for Earthworks and Discharge of Stormwater to the Waikato River.

Conclusion

To conclude, as outlined above, Gordonton Country Estate Development delivers benefits of regional significance that demonstrate why this project should be referred under the Fast-track Approvals Act 2024. Given the locality of Gordonton Village to the Waikato Region, Gordonton Country Estate is a significant project for the region which will enable substantial job opportunities, deliver nationally needed housing supply, generate major economic revenue, and establish a well-functioning urban development for future residents and the community of Gordonton Village and its rural surrounds.

We trust that the above addresses your query, however please do not hesitate to contact us should you require any further information.

Yours sincerely | Nā māua noa, nā

Barker & Associates Limited



Rebecca Shaw

Senior Planner

s 9(2)(a)



Fraser McNutt

Partner

s 9(2)(a)

Attachment 1

Technical Memo Insight Economics



Urban & Environmental

Technical Memo

| | | | |
|----------|--|-------|--------------------------|
| To: | Barker and Associates | From: | Insight Economics |
| Date: | Wednesday, 28 May 2025 | Page: | 14 (including this page) |
| Subject: | Gordonton Country Estate Fast-track Referral – Request for Information | | |

CONTEXT

Insight Economics has been engaged to assist with a Fast-track application for the Gordonton Country Estate Development in the Waikato District (the **proposal**). We understand the Ministry for the Environment has requested additional information about the regional significance of the proposal. To assist, this memo assesses:

1. The need for additional retirement village capacity in the region;
2. The significance of the proposal's contribution to regional housing supply; and
3. The significance of the proposal's impacts on regional GDP, jobs, and wages.

NEED FOR ADDITIONAL RETIREMENT VILLAGE CAPACITY

Latest Official Supply and Demand Estimates

The Waikato region comprises 11 territorial authorities across multiple growth tiers under the NPS-UD, and there is no single Housing Capacity Assessment (HCA) that covers the entire region. The latest HCA for the Tier 1 Future Proof partners (Hamilton City, Waikato District, and Waipa District) offers useful insight into overall supply and demand but does not separately consider retirement village (RV) demand or housing needs by life stage.

To address this, our referral assessment included a dedicated supply-demand analysis for RV units, initially focused on a 60-minute drive-time catchment to reflect likely resident origins. In recognition of the Fast-track Approvals Act's (FTAA) regional focus, we have now replicated this analysis for the Waikato region.

Supply and Demand for Retirement Villages

We assessed two scenarios:

- **Scenario 1** assumes a constant penetration rate of 13.3%, the 2023 regional average;¹
- **Scenario 2** assumes the penetration rate increases gradually to 14%.²

Scenario 1 Results

Table 1 sets out our demand calculations for Scenario 1, which show estimated demand for 6,110 RV units in the medium term and just over 10,000 in the long term.

¹ JLL (2024). *Retirement Villages Market Review 2024*. Jones Lang LaSalle. Retrieved from <https://www.jll.com/en-au/insights/retirement-villages-market-review>, p. 27.

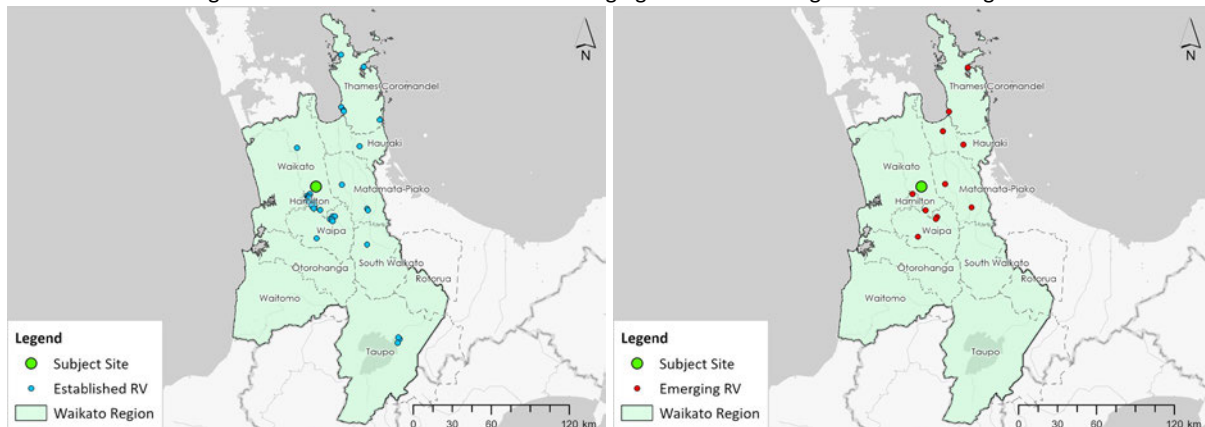
² That is, it will revert to its 2022 level as per the latest JLL review.

Table 1: Calculation of RV Unit Demand for Waikato Region – **Scenario 1**

| Measure | Base Year (2023) | Short-term (2026) | Med-term (2033) | Long-term (2053) |
|------------------------------|------------------|-------------------|-----------------|------------------|
| Population 75+ ³ | 37,960 | 45,467 | 59,720 | 97,919 |
| Penetration Rate | 13.3% | 13.3% | 13.3% | 13.3% |
| RV Residents | 5,049 | 6,047 | 7,943 | 13,023 |
| Occupation Rate ⁴ | 1.3 | 1.3 | 1.3 | 1.3 |
| RV Unit Demand | 3,884 | 4,652 | 6,110 | 10,018 |

By comparison, we identified existing capacity of just under 4,270 RV units in the region. This grows to around 5,540 units when anticipated supply within existing and emerging villages is included. Figure 1 shows the location of the retirement villages included in our assessment.

Figure 1: Location of Established and Emerging Retirement Villages in Waikato Region



In summary, our assessment suggests that there will be unmet demand of more than 570 RV units in the medium term, and about 4,480 over the longer term under Scenario 1.

Table 2: Sufficiency of Retirement Village Capacity in Waikato Region – **Scenario 1**

| Measure | Base Year (2023) | Short-term (2026) | Med-term (2033) | Long-term (2053) |
|---|------------------|-------------------|-----------------|------------------|
| RV Unit Demand | 3,884 | 4,652 | 6,110 | 10,018 |
| RV Unit Capacity ⁵ | 4,268 | 4,669 | 5,539 | 5,539 |
| Estimated Sufficiency (RV Units) | 384 | 17 | -571 | -4,479 |

Scenario 2 Results

The corresponding results for Scenario 2 are provided in Table 3 below.

Table 3: Sufficiency of Retirement Village Capacity in Waikato Region – **Scenario 2**

| Measure | Base Year (2023) | Short-term (2026) | Med-term (2033) | Long-term (2053) |
|---|------------------|-------------------|-----------------|------------------|
| Population 75+ | 37,960 | 45,467 | 59,720 | 97,919 |
| Penetration Rate | 13.3% | 13.3% | 13.5% | 14.0% |
| RV Residents | 5,049 | 6,047 | 8,062 | 13,709 |
| Occupation Rate | 1.3 | 1.3 | 1.3 | 1.3 |
| RV Unit Demand | 3,884 | 4,652 | 6,202 | 10,545 |
| RV Unit Capacity | 4,268 | 4,669 | 5,539 | 5,539 |
| Estimated Sufficiency (RV Units) | 384 | 17 | -663 | -5,006 |

³ The population projections reflect the average of the Stats NZ medium and high growth scenarios.

⁴ Average occupation rate as per the latest JLL review.

⁵ Current and expected.

Assuming gradual growth in retirement village penetration, the estimated shortfall grows to approximately 660 RV units in the medium term and over 5,000 in the long term.

Need for the Proposal

These shortfalls indicate clear gaps in regional RV provision. As shown in **Appendix A**, well-timed strategic developments can unlock latent demand and act as catalysts for accelerated growth. In our view, a large, high-quality proposal of this nature could elevate growth trajectories, drawing residents from further afield (e.g., Auckland). We therefore consider it appropriate to lean toward Scenario 2.

Alternative Locations for the Proposal

The subject site has a unique combination of attributes including scale, rural amenity, and proximity to Hamilton and other key centres. It is a large, strategic site that can support substantial development. At present, we are not aware of any alternative sites of comparable size and character that are available for development.

Implications for the Proposal

The proposal acknowledges and responds to the need for additional RV capacity in the region, with a unique proposition that is unlikely to be replicated elsewhere.

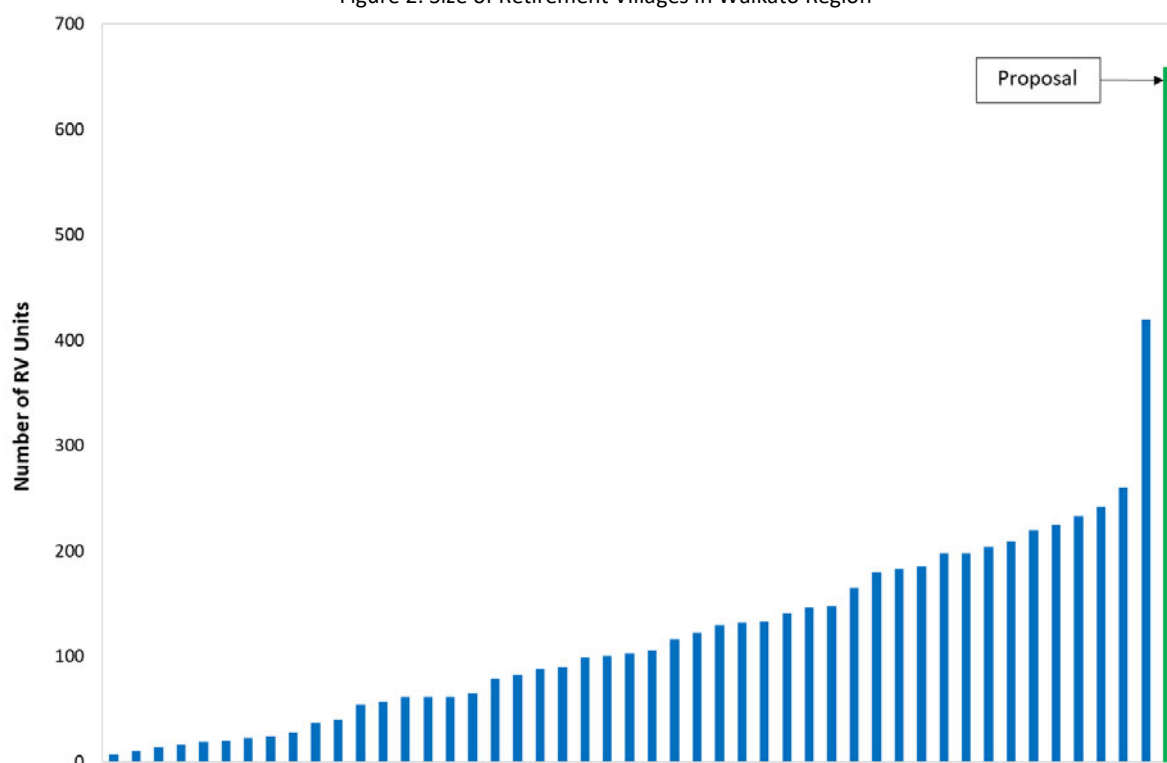
SIGNIFICANCE OF CONTRIBUTION TO HOUSING SUPPLY

With 659 RV units, the proposal is over eight times the regional average village size (approximately 75 units per JLL)⁶ and larger than any other village in the country—including Ryman’s Edmund Hillary Village in Auckland (432 units). For context, Figure 2 shows the size of the proposal compared to other villages in the region.⁷

⁶ JLL (2024). *Retirement Villages Market Review 2024*. Jones Lang LaSalle. Retrieved from <https://www.jll.com/en-au/insights/retirement-villages-market-review>, p.12.

⁷ Including existing and anticipated capacity.

Figure 2: Size of Retirement Villages in Waikato Region



significant share for a single project.⁹ This highlights the disproportionately large economic contribution of the development.

Ongoing Impacts of Future Uses

In addition, future onsite activities could sustain the following regional benefits at full build-out:

- Full-time employment for 58 people;
- Annual GDP of nearly \$5.5 million; and
- \$4.1 million paid annually in salaries / wages.

See **Appendix C** for further information.

Wider Economic Impacts

Finally, the proposed development will generate a range of wider economic impacts, as indicated in our referral assessment.

OTHER CONSIDERATIONS

Current State of The Economy

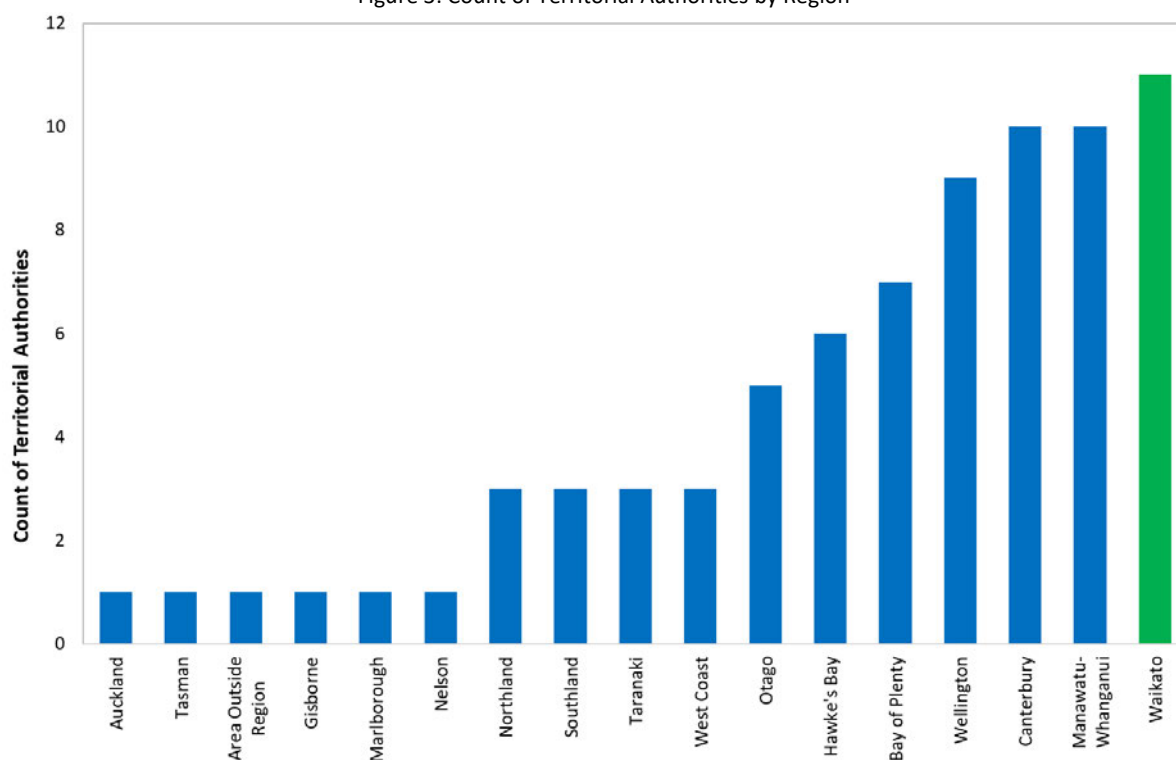
New Zealand's economy is emerging from recession, with key indicators showing early recovery. The Official Cash Rate is easing, and green shoots are visible across the economy. The outlook is more positive than 12–18 months ago, providing a more favourable environment for investment and development. As a result, developments of the scale and nature of the proposal are becoming more financially viable, increasing the likelihood that this proposal will proceed and deliver the benefits described.

Sub-Regional Relevance

While the FTAA focuses on regional significance, not all regions are equal. Waikato is New Zealand's fourth-largest by area and has more territorial authorities than any other region (see Figure 3). In our view, given the Future Proof sub-region's distinct profile, it is also appropriate to consider sub-regional effects in this case. This would further amplify the proposal's economic significance.

⁹ Stats NZ employment statistics count all paid jobs—including part-time and casual roles—within a given month. Because our modelling is based on FTE positions, the proposal's employment contribution is likely understated when compared to these figures.

Figure 3: Count of Territorial Authorities by Region



CONCLUSION

The Waikato region is facing a critical shortfall in retirement village capacity. This proposal addresses that need directly and:

- Delivers a **regionally significant** boost in RV supply;
- Makes a **regionally significant** contribution to housing supply; and
- Generates **significant regional economic benefits**.

On that basis, we consider the proposal meets criteria 22(2)(a)(iii) and 22(2)(a)(iv) of the FTAA and we continue to support it on economic grounds.

Sincerely,

Fraser Colegrave
Managing Director

APPENDIX A: POKENO CASE STUDY

Pokeno is a thriving township in the northern reaches of the Waikato district, which was once only sparsely populated and barely growing, if at all. That changed when Plan Change 24 (**PC24**) to the Operative District Plan enabled the development of thousands of homes plus large areas of business land. Figure 4 shows how PC24 rewrote the growth trajectory for Pokeno, thereby invalidating any population growth allocations based on historic data.

For reference, please note that in Figure 4 the:

- **Blue line** shows Pokeno's actual population using an index that equals 100 in 1996.
- **Green line** shows the district's actual population (also via an index set to 100 in 1996); and
- **Dashed black line** shows Pokeno's projected population based on growth between 1996 and 2013 (i.e., prior to Plan Change 24). Again, using an index set to 100 in 1996.

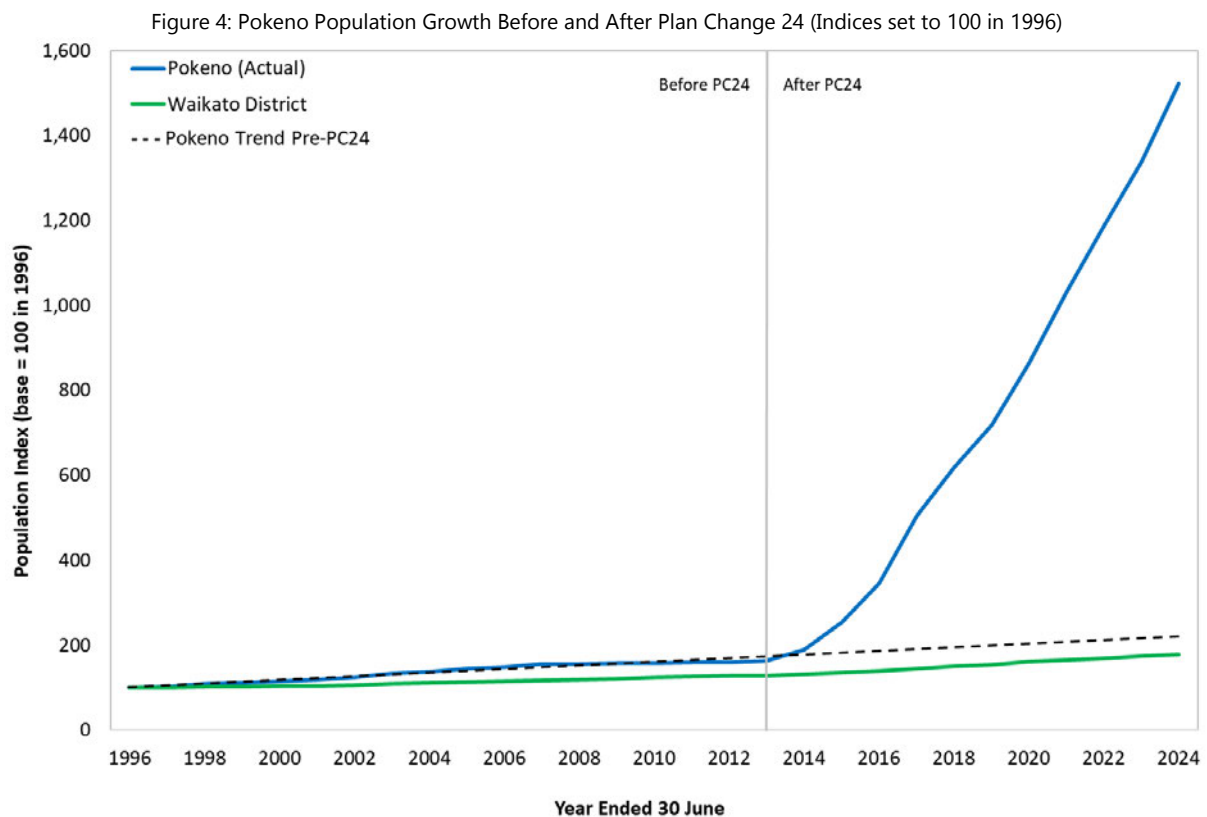


Figure 4 shows that projections of Pokeno's future growth in 2013 based on business as usual (BAU) would have dramatically understated its true potential, because the previous lack of market opportunity suppressed historic development. However, when PC24 became operative and enabled market demand to properly "express" itself, Pokeno's population exploded. In fact, the estimated resident population in 2024 was seven times higher than the BAU projection in 2013 would have suggested.

APPENDIX B: ONE-TIME IMPACTS OF DEVELOPMENT

Introduction

The proposal enables the development of a new retirement village comprising approximately 659 units, including a mix of one-, two-, and three-bedroom dwellings, as well as serviced apartments. The development will also include supporting non-residential components such as a café and communal facilities. Constructing these new buildings and facilities, and preparing the land for development (not to mention installing all necessary infrastructure and obtaining all necessary consents) will have significant one-time economic impacts on GDP, jobs, and wages.

Methodology

We quantified these one-time economic impacts using a special technique called multiplier analysis, which traces the impacts of additional economic activity in one sector – such as construction – through its supply chain to estimate the overall impacts, including flow-on effects. These comprise two parts:

- **Direct impacts** – which capture all on-site and off-site activities directly related to the proposal's development, e.g., home builders and their various subcontractors and suppliers, some of which will be on-site, and some of which will be off-site.
- **Indirect effects** – which capture additional (supply-chain) impacts arising when businesses working directly on the project source goods and services from their suppliers, who in turn may need to source goods and services from their own suppliers, and so on.

These economic impacts are measured in various ways, including:

- **Contributions to GDP (or value-added)** – GDP measures the difference between a business' inputs (excluding wages and salaries) and the value of its outputs. It captures the value that a business adds to its inputs to create its own outputs, hence the term "value-added."
- **Total FTEs** – which equals the total number of full-time equivalent workers employed.
- **Total Jobs** – which is the total number of people employed, i.e., including both part-time and full-time workers.
- **Total wages and salaries** – which equals the total amount paid in wages and salaries.

For example, when a construction firm wins a new project, they will subcontract various parts of the build to other companies, such as glaziers, tilers, plumbers, electricians etc. Those subcontractors, in turn, will then usually need to source additional materials and services from their suppliers, who may then need to source materials and services from their suppliers, and so on. Multiplier analysis enables the impacts of these supply chain interactions to be captured to estimate the overall impact of the new building project, including its direct and flow-on (supply chain) effects.

For completeness, we also provide broad-brush estimates of potential GST payments based on the GDP (i.e., value-added) created.

Development Assumptions

Our analysis incorporates various assumptions about the likely scale and cost of future development. Because information was available on the expected residential yields, we started with those. For the non-residential components—such as the café and communal facilities—we adopted indicative gross floor areas (GFA), as specific details are not yet confirmed. We then estimated the costs of all residential and non-residential construction based on assumed GFA and benchmarked build costs. Then, we estimated planning/consenting and earthworks/infrastructure costs as percentages of those. Specifically, we estimated planning and consenting costs equal to 2% of total construction costs, and earthworks/infrastructure equal to 20% of construction costs (based on our experience with similar developments elsewhere in New Zealand).

Table 4 and Table 5 display our residential and non-residential development assumptions, which include assumed average dwelling sizes by type and associated build costs,¹⁰ for the 659 new dwellings and supporting facilities.¹¹ As detailed design work is still pending, the non-residential GFAs have been adopted as nominal figures for modelling purposes. Overall, construction costs are estimated at \$306 million in today's dollars.

Table 4: Residential Development Assumptions

| Dwelling Types | Share of Dwellings | # of New Dwellings | Average Size GFA m ² | Build Cost \$/m ² GFA | Total Build Cost \$m |
|---------------------|--------------------|--------------------|---------------------------------|----------------------------------|----------------------|
| 1 Bedroom | 40% | 259 | 130 | \$3,000 | \$101 |
| 2 Bedroom | 30% | 200 | 150 | \$3,000 | \$90 |
| 3 Bedroom | 15% | 100 | 185 | \$3,000 | \$56 |
| Serviced Apartments | 15% | 100 | 100 | \$5,300 | \$53 |
| Total | 100% | 659 | n/a | n/a | \$300 |

Table 5: Non-residential Development Assumptions

| Type | Total GFA m ² | Build Cost \$/m ² GFA | Total Build Cost \$m |
|---------------------|--------------------------|----------------------------------|----------------------|
| Café | 165 | \$4,300 | \$1 |
| Communal Facilities | 1,000 | \$5,100 | \$5 |
| Total | 1,165 | n/a | \$6 |

Based on the tables above, total construction costs equal \$306 million, from which we then derived:

- \$6 million for planning, designing, and consenting costs (i.e., 2% of build costs); and
- \$61 million for infrastructure and civil works costs (i.e., 20% of build costs).

Summary of Development Costs

Table 6 summarises the estimated total cost of the proposal across the four key activities based on the assumptions set out above, which equal \$373 million in today's dollars.

¹⁰ Estimated build costs were benchmarked using average building consent values for the Waikato region (annual to February 2025), as reported by Stats NZ. These were used to ensure that the construction cost assumptions applied in our model are broadly consistent with recent market activity.

¹¹ While the proposal also includes outdoor amenities, construction costs for these elements have been excluded to provide a conservative estimate.

Table 6: Summary of Estimated Development Costs (\$ millions)

| Development Activity | \$ millions |
|--|--------------|
| Planning/design/consent | \$6 |
| Civil works & infrastructure provision | \$61 |
| Residential construction | \$300 |
| Non-residential construction | \$6 |
| Total Development Cost | \$373 |

Finally, these costs were mapped¹² to sectors of the regional/national economy then overlaid with the latest economic multipliers to derive the one-off impacts of the proposal's development, as set out below.

Estimated Impacts on GDP, Jobs, and Wages

Table 7 presents the one-time national impacts¹³ of the proposal's development based on the methodology, inputs, and assumptions described above. All activities are assumed to occur over a ten-year period.

Table 7: One-Time National Economic Impacts of the Proposal (spread over 10 years)

| | Planning & Design | Infrastructure & Civil Works | Residential Construction | Non-Resi Construction | Development Totals |
|------------------------|-------------------|------------------------------|--------------------------|-----------------------|--------------------|
| Annual Jobs | | | | | |
| Direct impacts | 2 | 15 | 44 | 1 | 61 |
| Indirect impacts | 2 | 19 | 123 | 3 | 147 |
| Total | 4 | 34 | 166 | 4 | 208 |
| Annual FTEs | | | | | |
| Direct impacts | 2 | 14 | 42 | 1 | 59 |
| Indirect impacts | 1 | 18 | 114 | 2 | 135 |
| Total | 3 | 32 | 156 | 3 | 194 |
| Total Wages \$m | | | | | |
| Direct impacts | \$2 | \$15 | \$30 | \$1 | \$48 |
| Indirect impacts | \$1 | \$15 | \$95 | \$2 | \$113 |
| Total | \$3 | \$30 | \$125 | \$3 | \$161 |
| Total GDP \$m | | | | | |
| Direct impacts | \$4 | \$20 | \$50 | \$1 | \$75 |
| Indirect impacts | \$2 | \$30 | \$165 | \$4 | \$201 |
| Total | \$6 | \$50 | \$215 | \$5 | \$276 |

¹² This exercise is straightforward for property development projects like this because three of the four key activities identified map directly to sectors in the economic multipliers dataset. Only the fourth activity – planning, design, and consenting – required a more detailed mapping. It was allocated to three sectors: scientific, architectural, and engineering services; legal and accounting services; and advertising, market research, and management services.

¹³ In some countries, regional I-O tables are commonly used to estimate subnational economic impacts. However, in New Zealand, the regions are generally too small and economically interlinked to produce reliable standalone I-O tables. Regional data is often sparse, outdated, or lacks the industry granularity required for robust modelling. Accordingly, we have used national multipliers.

In summary, we estimate that:

- Future planning/design/consenting will create full-time employment for 3 people over the ten-year development period, generating total wages/salaries of \$3 million;
- Land development (including infrastructure provision and all other civil works) will create full-time work for 32 people, with \$30 million paid in wages and salaries;
- Residential construction will provide full-time work for more than 155 people, with \$125 million paid in wages and salaries; and
- Non-residential construction will create full-time work for 3 people, with \$3 million paid in wages and salaries.

Overall, the proposal's development is estimated to provide full-time work for nearly 200 people for ten years, generating \$161 million in wages/salaries, and boosting GDP by \$276 million.

Top 10 Industries by FTEs Employed

To better understand the likely impacts of future development, Table 8 reveals the 10 industries likely to experience the greatest employment boosts. Those top 10 industries account for more than three-quarters of all full-time employment generated by the proposal's development, with the balance spread across numerous other sectors.

Table 8: Top 10 Industries by Annual FTEs Generated during Development

| Industries | Annual FTEs | Shares |
|---|-------------|-------------|
| Residential building construction | 50 | 26% |
| Construction services | 39 | 20% |
| Heavy and civil engineering construction | 17 | 9% |
| Scientific, architectural, and engineering services | 10 | 5% |
| Public order, safety, and regulatory services | 7 | 4% |
| Wood product manufacturing | 7 | 3% |
| Fabricated metal product manufacturing | 6 | 3% |
| Legal and accounting services | 4 | 2% |
| Employment and other administrative services | 4 | 2% |
| Non-metallic mineral product manufacturing | 3 | 2% |
| Top 10 Subtotal | 147 | 76% |
| | | |
| All Other Industries | 47 | 24% |
| All Industries | 194 | 100% |

Indicative GST Payments

Finally, we estimated indicative GST payments potentially associated with the proposal's future development. This is difficult to do accurately, though, because such payments depend on factors not explicitly captured in our analysis. That said, a broad-brush, indicative estimate can be derived from the national GDP generated, which was \$276 million. Applying the current (15%) GST rate to this figure gives an indicative GST payment of \$41 million in today's dollars.

Regional Share of One-Time Impacts

Based on the location and nature of the proposal, we conservatively estimate that around 85% of the national one-time economic benefits are likely to accrue to the Waikato region. On that basis, the proposal is expected to generate a regional GDP boost of approximately \$235 million, support around 165 full-time jobs over ten years, and contribute around \$137 million in regional wages and salaries.

APPENDIX C: ONGOING IMPACTS OF FUTURE USES

Introduction

In addition to the one-off economic impacts of the proposal's development estimated in **Appendix B**, its future café, communal facilities, and serviced apartments will also sustain ongoing economic activity over time. Accordingly, this section briefly estimates those impacts in terms of annual contributions to GDP, jobs, and wages.

Methodology

We estimated the potential annual economic impacts of this future activity by:

1. Inputting the likely operational workforce supported at full build-out, as follows:
 - a. **Café and Communal Facilities:** The 1,165 m² of non-residential GFA was divided by an industry-standard worker density of ~30 m² per employee¹⁴ to estimate 38 permanent roles.
 - b. **Serviced Apartments:** Workforce needs for the 100 serviced apartments were estimated at 49 permanent roles, based on a reduction of the national ratio of ~0.98 employees per aged-care bed.¹⁵ While the national ratio reflects higher staffing levels typical of aged-care hospitals, we have conservatively halved this figure to reflect the lower care needs of serviced apartment residents. These roles are expected to span carers, medical and hospitality staff, management, cleaning, maintenance, administration, and other support roles.
2. Allocating those roles to their respective input-output industries.
3. Applying the same economic multipliers from the previous section to translate future ongoing employment into corresponding measures of annual GDP and wages/salaries.
4. Summarising the findings as provided in the following section.

Annual GDP, Jobs, and Wages

Table 9 summarises the annual economic impacts of future activity sustained by the proposal in terms of FTEs employed, GDP contributed, and wages generated.

Table 9: Estimated Annual Economic Impacts of the Proposal (at full build-out)

| Activity | Jobs | FTEs | GDP \$m | Wages \$m |
|------------------------------|-----------|-----------|--------------|--------------|
| Café and Communal Facilities | 38 | 29 | 2.5 | 1.9 |
| Serviced Apartments | 49 | 40 | 4.0 | 2.9 |
| Totals | 87 | 69 | \$6.5 | \$4.8 |

¹⁴ M.E Consulting (2024). *Business Development Capacity Assessment 2023: Future Proof Partners – Hamilton City, Waikato District, Waipā District and Waikato Regional Council*. Final Report, 3 April 2024. p. 58.

¹⁵ The national ratio of ~0.98 employees per aged-care bed is sourced using 2022-2023 data from Stats NZ Business Demography (ANZSIC Q860100) and JLL's Aged Care Database (NZACD). This ratio reflects total staff headcount (not FTEs) and assumes one bed per aged-care unit.

In summary, the proposal's future non-residential components could sustain the following activity at full build-out:

- Full-time employment for 69 people;
- Annual GDP of nearly \$6.5 million; and
- \$4.8 million paid annually in salaries / wages.

Indicative GST Payments

Finally, based on the estimated national GDP of \$6.5 million, we calculated indicative/ballpark GST payments of \$970,000.

Regional Share of Ongoing Impacts

Assuming 85% of ongoing national impacts accrue to the region, the proposal is expected to contribute around \$5.5 million to regional GDP and \$4.1 million in wages annually, while supporting 58 full-time equivalent jobs in the Waikato Region.

Wider Ongoing Employment Impacts

Importantly, the jobs enabled by the proposal offer more than just a variety of employment opportunities; they also provide pathways for professional development and career progression. For example:

- **Career Development:** Staff can upskill through on-the-job training, seminars, and professional development programs tailored to the retirement living sector — ranging from health and safety to specialised geriatric care.
- **Local Workforce Opportunities:** The diverse scope of roles creates positions suitable for various skill levels, including entry-level roles (e.g., cleaners, gardeners) and more specialised positions (e.g., management, therapy, or marketing).
- **Stable, Year-Round Employment:** A retirement villages' supporting facilities operate continuously, thereby providing permanent, stable roles rather than seasonal or transient employment.
- **Community Engagement:** The nature of a retirement village encourages strong ties with the surrounding community (e.g., local suppliers, schools, and volunteer groups), potentially creating further employment and training opportunities beyond the immediate village workforce.

Overall, by accommodating a broad mix of jobs and contributing both reliable and meaningful career paths, the proposal generates tangible and long-lasting social and economic benefits for the region.