# Memorandum

To: Expert Consenting Panel – Environmental Protection Authority

From: Fraser McNutt/Steph Wilson – Barker & Associates Limited

Date: 19 January 2026

Re: Ashbourne [FTAA-2507-1087] – Applicant Response to Minute 9

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This memorandum has been prepared in response to a request received from the Ashbourne Expert Consenting Panel detailed in Minute 9, dated 18 December 2025. The Panel has requested clarification on several items which are addressed below.

The following attachments should be read in conjunction with this response:

- Attachment 1 – Market Economics response to Housing affordability distribution; and
- Attachment 2 – Greenwoods Tree Canopy and Landscape calculations.

# Memorandum

B&A Urban & Environmental

## 1.0 Information Requested

| NPS UD Policy 1: Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum: | Panel Request to Applicant | Applicant Response |
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| (a) Have or enable a variety of homes that: | | |
| meet the needs, in terms of type, price, and location, of different households; and | Please provide evidence whether the anticipated sale costs of proposed housing on small lots will need the needs of lower incomes people. | Please refer to Attachment 1 from Market Economics. This work confirms the end costs of the proposed housing and sections will meet the needs of different households in terms of price, with the provision of a significant proportion of dwellings with an end cost of $750,000 meeting the needs of lower income people. |
| Enable Māori to express their cultural traditions and norms; and | Section 7 of the March 2025 Cultural Impact Assessment advised that Nga Iwi seek support for a 5 percentage of housing within the Ashbourne development to be designated as affordable housing. Can the Applicant please advise if they intend this to be the case and if not advise the reasons. | Yes, at least 5% of the dwellings within the Ashbourne development will be affordable. Based on the findings of the Market Economics memorandum included as **Attachment 1**, over 5% of the Lots are anticipated to meet the threshold of affordable housing, being a value at which 30% or less of the average district or regional mean household income would be required to meet the costs of a mortgage on those properties. This meets the threshold sought by Nga Iwi, and is therefore considered to accord with this portion of the NPS-UD. |

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| (c) Have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and | Can the Applicant please provide advice as to how the proposed development meets this requirement with respect to: accessibility for all people between housing, jobs, community services, including by way of public or active transport. This to include discussion on ease and safety for cyclists to commute from proposed residential areas to the town centre and industrial areas of Matamata. | The project includes a shared path along the spine road along with an extension and upgrade of the footpath within the road reserve of Station Road up to Smith Street, improving the existing connections between Station Road and Smith Street.<br><br>With regard to the ease for cyclists to commute from proposed residential areas to the town centre and industrial areas of Matamata, it is noted that these cycle trips are no more than 15 minutes and relatively flat, with Matamata generally having footpaths on both sides of the road and sufficient road shoulder to accommodate cyclists in a low-speed traffic environment.<br><br>Where cyclists utilise the shared path on Station Road, from Smith Street to the town centre all roads have a posted speed limit of 50km/hr. Regarding the industrial area on Mangawhero Road, it is noted that the speed limit increases to 70km/hr past Earl Road, but that sufficient shoulder along with an existing footpath is provided which could be readily utilised. The portion of the trip on this higher-speed road is also 250m in length before cyclists could move onto Waihou Road to access the industrial estate. Cyclists travelling to the industrial area could also utilise Centennial Drive Reserve shared path to reduce on-road cycling.<br><br>It is therefore considered that cyclists could reasonably commute from the proposed residential area to the town centre and industrial areas of Matamata, and that the Applicant has provided means for connection into the wider Matamata network. |
| (e) Support reductions in greenhouse gas emissions; and | Can more certainty be provided regarding the construction of the proposed solar farms will be constructed. Can this be achieved by way | In terms of certainty, it's our view that the construction of the solar farms isn't something that can be conditioned, rather the FTAA lapse dates and commencement of the development is what can be relied upon in the first instance. Further, the three different activities (Solar, RV, Residential) have different development programmes and requirements, as such any conditionally of one of them upon the other |

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|---|---|---|
| | of consent conditions or other mechanism? If so, please provide an example wording or structure for such a mechanism. | would likely introduce significant project complexity, and more likely jeopardise the delivery of the 3 components, in our view.<br><br>Subsequently the applicant has provided more information to confirm the commercial viability of the solar farms, not to mention the significant investment to date which gives a positive steer towards the commitment of the applicant, with regards to the whole development, (which encompasses the solar components).<br><br>*"Unity Developments Limited (UDL) is the developer of the Ashbourne project and the unconditional purchaser under a confidential sale and purchase agreement with the landowner for the land proposed for the solar farms.*<br><br>*That agreement was entered into on the basis that the solar farm component is commercially viable and forms an integral part of the overall project. Unity has undertaken suitable due diligence in relation to the solar component, including consideration of land suitability, technical and financial feasibility, planning context, commercial viability including confirming significant demand by local commercial enterprises of scale for the new 100% sustainable power generation, and confirms that the proposed solar farms represent a commercially productive development opportunity.*<br><br>*In parallel, Unity has partnered with the very experienced solar farm developer/operator - Lightyears Solar. Lightyears Solar are an established solar industry expert, having a proven track record of delivering and operating many utility-scale grid connected solar projects throughout New Zealand on commercial terms without the need for any subsidies or otherwise. While the specific commercial terms and arrangements with Lightyears are confidential and subject to commercial sensitivity, the pre-construction development work already provide UDL the confidence that the solar farms are deliverable and commercially viable, rather than aspirational or speculative."* |

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| | | Further, while the solar farms present the largest support for reductions in greenhouse gas emissions, the development utilises other typical methods to support the reduction in greenhouse gas emissions, including but not limited to:<br>• Promoting active mode transport through the provision of shared paths on main routes, and the provision of a small commercial centre to the development to promote walking and cycling to local services where feasible;<br>• The site is well-located within the context of Matamata to local services and schools, potentially reducing dependence on vehicles long-term;<br>• Rain gardens are utilised in roadways to reduce embodied carbon and permeable surfaces are promoted where feasible;<br>• Native planting is proposed within the Greenway for carbon sequestration; and<br>• All future buildings will be designed to meet current Building Code standards for ventilation and insulation, with all Lots thoughtfully positioned to provide optimal sunlight access to reduce energy use on heating. |
| (f) Are resilient to the likely current and future effects of climate change | Please advise how this matter will be addressed with respect to the heat island effect caused by climate change that can be expected to result due to proposed new houses (e.g., due to dark coloured roofs, dark coloured paved areas – roads, driveways, | The urban heat island (UHI) effect is caused by a range of factors including an increase in hard, heat absorbing surfaces, heat generated from human activities (e.g. driving), limited vegetation / permeable surfaces as well as having tall buildings in proximity which can reduce wind speeds and help to trap in more heat. Generally, city geometry – the layout of buildings, their density and size is identified as having the most impact on the UHI which means that it is more pronounced in dense inner-city cores as opposed to suburban environments close to a rural boundary (e.g. such as Ashbourne). |

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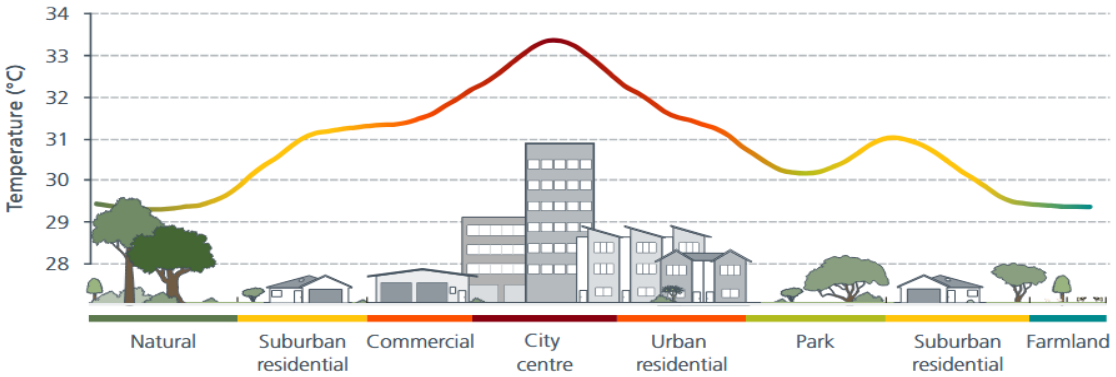
|---|---|---|
| | parking areas and attendant adverse effects on health and well-being). |  <br>Figure 1 - UHI Schematic (source: Parliamentary Commissioner for the Environment)<br><br>Nevertheless, it is reasonable to assume that the application has the potential to result in some degree of temperature increase in the vicinity of the Site. However, the exact extent of this would require detailed modelling / computer simulation supported by detailed climatic observations of the Site itself. We are not aware of this information having ever being undertaken for a stand-alone development project in New Zealand and there is no specific standard or policy against which to measure or assess such information. It is noted that the National Adaptation Plan 2022 only provides high-level strategies that can help reduce the effects of an UHI.<br><br>New Zealand and internal literature highlight several methods to minimise or mitigate against effects associated with an UHI. These include increasing green open space coverage, increasing tree canopy |

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| | | coverage, limiting paved materials and building coverage, utilising "cooler" materials (including colours), building design (e.g. orientation, insulation, ventilation) and providing water in the landscape (e.g. wetlands). Within this context, the following observations around the application are made:<br>• At least 37% of the site is to be retained as landscaped / permeable areas. These areas will not absorb heat as other hard surfaces may and will support also rainwater retention / infiltration helping to facilitate lower temperatures via evaporation / evapotranspiration;<br>• Several large stormwater ponds / wetlands are proposed around the development (in addition to the greenway) which will support evapotranspiration in their immediate vicinity – supporting lower temperatures;<br>• The Landscape Plans and Design Guidelines require the planting of at least 3,214 specimen trees across the development. These are in addition to specimen trees which would be required within the proposed landscape buffers. Cumulatively, it is estimated that these specimen trees and landscape buffers would lead to a mature canopy coverage of at least 21% (139,185m$^2$) across the development. These trees, once mature, will support shade across the development as well as evapotranspiration that helps to reduce ambient air temperatures. This number of trees could also increase if greater levels of tree planting are provided for in private lots (over and above the minimum of 2 required by the design guidelines). For the purpose of comparison, it is noted that Auckland Council's Urban Ngahere Strategy considers neighbourhoods having between 20-30% tree coverage as a good level of cover and have a target that all local boards within the urban area have at least 15% canopy coverage;<br>• Most buildings proposed are a single storey in height (although some may extend to two storeys) and are setback from streets / neighbouring buildings resulting in a relatively high Sky View Factor which will reduce the amount of heat trapped in the development and enable good air flow across the site helping to mediate temperatures;<br>• The Design Guidelines already include provisions related to lightly coloured building façades which would tend to absorb less heat. They have also been amended to specifically encourage the use of lighter coloured roofs (update added in the response); and |

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| | | • Aspects of building design (including thermal comfort) which also impact on how effects of increased heat may be experienced are also directly managed by the Building Code and include insulation, ventilation and mechanical cooling. Such measures, in addition to the personal preferences of future residents regarding design elements such as window coverings, will assist in helping to manage potential effects associated with an UHI. |