

Attachment #3

CODC's comments on Social Impact Assessment and Just Add Lime addendum

There appears to be an absence of adequate baseline data that has resulted in gaps both the GHD Social Impact Assessment (SIA) and Just Add Lime addendum in terms of assessments that would ordinarily have been expected in the context of a SIA for a project of this scale, as outlined below:

1. Individual, Household, and Property-Specific Impact Assessments of personal and property-level effects, but both consultancies chose to exclude this component.

- **GHD's original SIA** explicitly assumed a high-level focus, stating it "has not investigated impacts associated at the individual/household level".
- **The Lime Addendum** maintained this exact boundary, stating it "does not assess impacts at an individual, household, or property-specific level".

2. Cultural Impacts and Mana Whenua Values (Excluded from GHD)

- **GHD's report** completely omitted an assessment of cultural effects or potential impacts on mana whenua values. It deferred this entire component to a separate Cultural Impact Assessment (CIA) commissioned by Aukaha.
- While **Just Add Lime** did incorporate Aukaha's finalized CIA findings into its 2026 update, both reports treat cultural values as a separate, parallel stream rather than a fully integrated component of the core SIA document.

3. Broad-Scale Economic Impact Modelling

- Neither report contains any independent economic modelling. GHD explicitly excludes national, regional, or local economic impacts from its scope, except where they directly relate to employment and local livelihood. The broader economic modelling was entirely delegated to a separate technical report prepared by Benje Patterson.

4. Detailed Baselines for Vulnerable and Sensitive Populations

- **GHD** completely omitted vulnerable and sensitive groups (such as lower-income renters, older residents, and seasonal workers) from its original assessment.
- While **Just Add Lime** highlighted this gap and introduced a high-level overview of these groups, it admitted that baseline data regarding vulnerable groups remains "incomplete" and that existing mitigation measures "do not provide a specific focus on vulnerable or sensitive populations".

5. Actionable Implementation Plans and Funding Commitments

Just Add Lime notes that its report "does not provide implementation plans, consent conditions, funding commitments or operational procedures" unless they were separately confirmed by the developer. The Social Investment Strategy also remains unfinished and is marked as "yet to be developed".