Te Awamutu Developments Limited

Harlow Lifestyle Village

Substantive Application for Approvals and Assessment of Environmental Effects

October 2026



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Client	Te Awamutu Developments Ltd
BBO details	Bloxam Burnett & Olliver Ltd (BBO) Level 5, Building E, Union Square, 192 Anglesea St, Hamilton
BBO representative	Chris Dawson – Principal Planner
BBO rep. contact details	[redacted] [redacted]
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Prepared by	Quinn Langdon / Chris Dawson	[redacted]	30 October 2026
Checked by	Chris Dawson	[redacted]	30 October 2026
Approved by	Kathryn Drew	[redacted]	30 October 2026

Acronyms and Abbreviations

Acronyms and Defined Terms

Acronym	Term
Applicant	Te Awamutu Developments Limited
ARI	Average Recurrence Interval
BBO	Bloxam Burnett & Olliver
CVA	Cultural Values Assessment
DOC	Department of Conservation
DSI	Detailed Site Investigation
EcAR	Ecological Assessment Report
EPA	Engineering Plan Approval
FTAA	Fast-track Approvals Act 2024
FTE	Full-time Equivalent
GDP	Gross Domestic Product
ha	Hectare
HAIL	Hazardous Activities and Industries List
km	Kilometre
m	Metre
mm	Millimetre
m^2	Square metre
m^3	Cubic metre
m^3 / day	Cubic metres per day
MACA	Marine and Coastal Area (Takutai Moana) Act 2011
NES-FW	Resource Management (National Environmental Standards for Freshwater) Regulations 2020
NPS-UD	National Policy Statement on Urban Development 2020
NPS-FM	National Policy Statement for Freshwater Management 2020
NPS-HPL	National Policy Statement for Highly Productive Land 2022
NPS-IB	National Policy Statement for Indigenous Biodiversity 2023
NPS-HZ	National Policy Statement for Natural Hazards 2025
NOD	Notice of Decision under the FTAA
NZTA	New Zealand Transport Agency Waka Kotahi
RL	Reduced Level
RMA	Resource Management Act 1991
RPS	Waikato Regional Policy Statement
SAR	Substantive Application Report
SNA	Significant Natural Area
TTF	Tuatahi First Fibre
The Project	Harlow Lifestyle Village
The Site	2025 Ohaupo Road, Te Awamutu
WDC	Waipā District Council
WRC	Waikato Regional Council
WRP	Waikato Regional Plan
WRTM	Waikato Regional Transport Model
vpd	Vehicles per day

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1. PART ONE – Application Overview

1.1 Overview

This Substantive Application Report (**SAR**) has been prepared on behalf of the authorised person: Te Awamutu Developments Limited (**TADL or the Applicant**) in support of a substantive application under the Fast-track Approvals Act 2024 (**FTAA**) for the approvals required to establish the Harlow Lifestyle Village at 2025 Ohaupo Road, Te Awamutu (**Project**). The Project will provide a comprehensive retirement village comprising approximately 414 retirement living units, a 100-bed aged care facility, and the associated infrastructure and facilities associated with the operation of the retirement village.

The Project is a 'referred project' under the FTAA. On 29 October 2025, the Project was accepted as a 'referred application' via a Notice of Decision (**Appendix 3**), under section 21(1)(c) of the FTAA. The decision enables TADL, the authorised person, to lodge this SAR with the Environmental Protection Agency. As such, the Project as detailed in this SAR is authorised to proceed through the fast-track process. The referral application and decision are available to view at the Fast-Track Website.

The Applicant seeks approval under section 42(4) of the FTAA for resource consents under the Resource Management Act 1991 (**RMA**). No other approvals identified in section 42(4) of the FTAA are sought are part of this SAR. This SAR and its supporting technical reports and appendices provide information required for a substantive application under the FTAA and is presented at a level of detail appropriate for approval under the FTAA.

- The SAR is lodged by the authorised person in form and manner approved by the Environmental Protection Authority.
- Complies with the requirements for approval for a resource consent that would be otherwise be applied for under the Resource Management Act 1991 – **Section 1.5** and **Appendix 17**.
- The Project does not involve ineligible activities as defined in Section 5 of the FTAA – **Section 1.5.**
- The SAR complies with the information requirements specified by the Minister under section 27(3)(b)(ii) – **Section 1.5** and **Appendix 17**.
- The Project is consistent with the purpose of the FTAA – **Section 1.8**.

1.2 The Applicant

In the Notice of Decision, TADL is specified as the '*authorised person*' who is authorised to lodge the SAR for the Project. TADL has one director, Levin Da Costa. TADL are related to the development company of the parent company The Ultimate Global Group Limited (**TUGG**).

TUGG is a New Zealand-owned business conglomerate with operations across New Zealand and the Asia-Pacific region, spanning multiple industries including Property Development, Housing Construction, Agricultural, Hospitality, and Tourism. TUGG's core activity for the last 30 years has been real estate development including through to construction, specialising in the development and conversion of greenfield sites to housing. TUGG and their development arms Ultimate Developments and Ultimate Builders provide confidence that housing will be delivered. Collectively, the entity has a proven track record of developing

greenfield landholdings and building houses for the end purchasers, having delivered over 1000 new dwellings to date. Current and recently completed projects in New Zealand of note include:

- Overdale Estate – Putāruru, South Waikato – 30ha residential estate, providing 400+ houses as the initial stages including a 240 unit retirement village (HARLOW Putaruru). Adjacent land has been purchased for further expansion of the Estate.

- West Melton Holdings – Selwyn, Canterbury – 12.5ha retirement village of over 200 units (HARLOW West Melton) located on West Coast Road.

- River Road Estate- Ngaruawahia, Waikato – A greenfield residential development at the northern end of River Road on the outskirts of Hamilton City, comprising of 184 standalone houses. The final stage of this project is a comprehensive development comprising of 40 standalone houses and a shared outdoor communal space.

- Awatea Park – Wigram, Christchurch – Greenfield residential development south of Wigram runway comprising over 300 standalone houses.

- Herekawe – New Plymouth, Taranaki – Greenfield residential development on South Road in New Plymouth consisting of 18 standalone sections.

- Pattie Lane – Pāpāmoa, Tauranga – Greenfield residential development comprising 34 duplex and standalone houses.

- Dixon Estate – Hamilton - Greenfield residential development comprising over 100 houses.

- Harlow Lifestyle Village Rangiora – Waimakariri, Canterbury – 4ha boutique lifestyle senior living village of over 120 units located in southwest Rangiora.

- High Street Apartments, Hamilton – 2- and 3-bedroom apartment development in Hamilton City.

1.3 The Site

The subject site is located at 2025 Ōhaupō Road (**State Highway 3**) on the northern edge of Te Awamutu within the Waipā District and Waikato Region. The Site comprises a single landholding of approximately 25.7824 ha. It is zoned **Rural** under the Operative Waipā District Plan (**WDP**) and adjoins the urban growth boundary along part of its south-western boundary. The site is located approximately 30 minutes south of Hamilton. State Highway 3 adjoins the eastern boundary of the site and forms a key transport corridor connecting Te Awamutu with Hamilton and the wider Waikato region. Rural land surrounds the site to the north, west and south, while established residential development adjoins the southeastern boundary.

The site comprises rolling hill country that slopes generally from east to west. Existing features include a dwelling, farm buildings, paddocks, a central drain, artificial ponds, thirteen natural wetlands, and indigenous and exotic vegetation. The site contains an identified significant natural area (**SNA**) in the form of a kahikatea remnant (**SNA WP312**) located in the western part of the site.

Further details of the site are detailed in **Part Two** of this SAR. The extent of the site and its location within the wider region are shown in **Figure 1** and **Figure 2** on the following page.

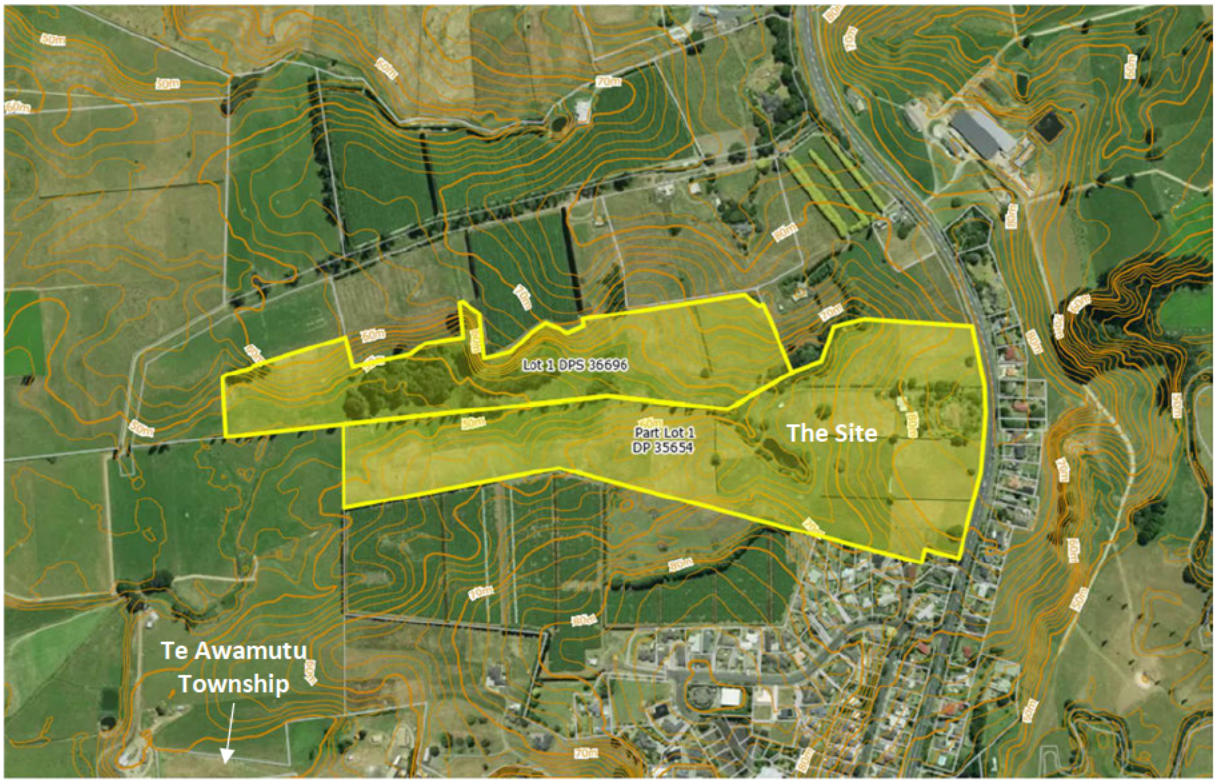


Figure 1. Aerial Photograph of the Site



Figure 2. Aerial Photograph of the Site and the surrounding environment

1.4 The Project

The Project will enable the development of a community for senior living in Te Awamutu, providing approximately 414 dwellings/units (including single-storey houses, duplex units and apartments), a 100-bed care facility, and a village hub over four core stages.

The Project is designed to cater specifically to an ageing population for persons aged over 55, controlled either via covenants or similar mechanisms. The land tenure will be a mix of fee simple, unit title and or Occupation Right Agreements (**ORA**) under the Retirement Villages Act 2003. The development will also feature communal facilities and a neighbourhood centre, riparian planting, wetland restoration, three waters services infrastructure, transport infrastructure, and on-site and off-site walking and cycling pathways.

The project is designed to cater specifically to an ageing population, addressing a critical need for retirement housing and care capacity. There are three key pillars that the development will seek to provide for its residents:

- **Meaningful connections**: Offering a more community-minded alternative to big city living while also incorporating cultural and environmental cues and connections into the design of the development.
- **Sustainable by design**: Low impact neighbourhood design and homes that are designed with sustainable technology and materials that keep residents warm and dry all year round.
- **Ultimate independence**: The values offered by a home and support services in the development frees residents up to enjoy life on their terms.

Figure 3 below is the master plan of the Project showing proposed stages, buildings, roads and associated infrastructure. The further details of each stage are described in **Part 3** of this SAR and **Appendix 6 – Architectural Plans**.



Figure 3. The overall proposed site plan (masterplan)

1.5 Referral Application

The Notice of Decision (**NOD**) for the referral application was issued on 29 October 2025, under Section 21(1)(c) of the FTAA (**Appendix 3**). In terms of this SAR, the Project solely relates to the project identified in the referral application, it complies with the information requirements specified in the NOD and does not contain ineligible activities as detailed in the referral application.

1.5.1 Specified Matters

The NOD identified 'specified matters' for the referred application.

- **Lodgement Due Date**: the SAR must be lodged prior to 9 October 2027.
- **Information Requirements**: the Applicant must provide an Integrated Transport Assessment and the assessment of the relevant wastewater and water services addressing matters identified in the NOD, under section 27(3)(b)(ii) of the FTAA.
- **Identified Persons**: the NOD identifies eight groups the panel must invite comments from includes NZTA and seven iwi groups, in addition to those specified in section 53
- **Waikato-Tainui Raupatu Claims (Waikato River) Settlement Act 2010 Assessment**: requires the panel comply with the applicable requirements of the Act, which includes having regard to Te Ture Whaimana, providing notice to the Waikato River Authority,

The SAR and Project **meet the relevant specified matters for lodgement**. Although some of the specified matters relate to any future panel, the Applicant has pre-empted this by engaging with the identified persons and providing an assessment against the Waikato River Settlement Act 2010. **Appendix 17** demonstrates that the Project meets the specified matters.

1.5.2 Ineligible Activities

The referral application assessed the subject landholdings and confirmed that the Project does not involve any ineligible activities as defined in section 5 of the FTAA.

This SAR confirms that the subject landholdings remain unchanged from those assessed as part of the referral application and the Project therefore **does not contain any ineligible activities**. An updated assessment is provided in **Appendix 5**.

1.6 Need for the Project

The Project responds to a demonstrated need for additional retirement living and aged-care accommodation within Te Awamutu and the wider region. The Project's need is supported by the following reports: Economic and Market Evidence (the **EME**), prepared by Webster Research, dated September 2026 (**Appendix 8**); the Growth Cell Yield Analysis (**GCA**), prepared by BBO, and dated September 2026 (**Appendix 9**), and the Economics Assessment (**EA**), prepared by Insight Economics, and dated September 2026 (**Appendix 10**).

1.6.1 Existing Retirement Village Environment

The EME provides a project-specific assessment of demand for the proposed retirement village and residential care components. The EME identifies a genuine demand for the Project. The key findings supporting this position are identified below:

- **Aging Population**: Te Awamutu and the surrounding rural communities is projected to have an ageing population. Population aged 70 years and over projected to increase by 59% between 2026 and 2048 and the population aged 85 years and over is projected to increase by 164% over the same period. The EME further identifies the Waipā District as having an older and relatively affluent population with high rates of mortgage-free home ownership, providing a strong demographic basis for retirement village demand.

- **Residential Care Shortfall**: There is an existing shortfall in residential care within the primary catchment. Existing facilities are predominantly traditional bed-based accommodation with limited dementia care capacity, no ORA care suites, and an ageing building stock.

- **Retirement Village Shortfall**: Te Awamutu is under-served by both retirement village and residential care accommodation. Te Awamutu presently contains approximately 216 retirement village units across five villages, with supply limited largely to independent-living villas. The EME identifies there is limited diversity in the retirement village supply. Further the demand modelling identifies approximately 737 retirement village units from primary catchment residents by 2048, more than three times the existing local supply.

- **Constraint of Choice**: While the wider Waipā District contains a supply of retirement village accommodation, much of the contemporary, amenity-rich and care-integrated retirement village stock is concentrated within Cambridge. The EME notes that many of these developments operate at higher price points than those proposed by the Project and draw demand from a broad regional market. As a result, older residents of Te Awamutu seeking contemporary retirement living and integrated care options are often required to relocate away from their established social, family, healthcare and community networks to access those services.

The EME concludes the Project's demand is founded on a quantified undersupply of residential care within the primary catchment and supported by demand for retirement village accommodation from both the local and wider regional catchment. The EME also identifies staged delivery, pricing, and product differentiation as important mechanisms for matching the retirement village component to demonstrated demand over time. As such, the EME supports the conclusion that there is an identified demand within this part of the region.

1.6.2 Growth Area Capacity Analysis

The GCA assesses whether the 14 growth cells in Te Awamutu identified in the WDP can provide sufficient and realistically available residential growth and whether they offer a suitable location for integrated senior living with residential care facilities.

The GCA identifies integrated retirement villages require large, contiguous, and accessible sites with limited natural hazard exposure and a development pattern capable of supporting key components of a retirement village development.

The GCA identifies that retirement villages require large, contiguous and accessible sites with limited natural hazard exposure and a development pattern capable of supporting the key components of a retirement village. Of the 15 growth cells identified in the WDP, T2, T4, T5, T10, T13 and T14 were identified as potentially suitable. However, these areas are subject to a range of constraints, including post-2035 development timeframes, reliance on future transport and infrastructure investment, uncertainty associated with structure planning and development sequencing, existing retirement village or development commitments, and the availability of land on commercially feasible terms. On this basis, the GCA concludes the existing growth cells should not be assumed to represent equivalent or immediately deliverable alternatives to the Site.

Overall, the GCA concludes that there is limited capacity within the growth cells to provide for integrated retirement village similar in nature to the Project. This supports the conclusion that the Project represents an appropriate response to the identified and growing demand for retirement living and residential care accommodation within this part of the region.

1.6.3 Demand Summary

Together these reports demonstrate a genuine demand for the Project. The EME identifies a clear and growing demand for both residential care and retirement living within Te Awamutu and the wider region. The GCA complements this assessment by considering the ability of Te Awamutu's identified growth cells to accommodate future residential development and, more specifically, a retirement village of a similar scale and nature to the Project.

Expanding on the GCA, the subject site represents a commercially viable and deliverable opportunity to meet the demand identified in the EME. While other growth cells may theoretically accommodate retirement village development, their ability to do so is influenced by commercial limitations such as infrastructure timing, development uncertainty, and the availability of land on commercially feasible terms that require a willing buyer and willing seller. The subject site does not face these constraints to the same extent and is therefore well positioned to meet the identified demand for retirement living and aged-care accommodation.

Overall, the assessments reinforce that the Project is well positioned to respond to an identified and growing need for retirement living and residential care while providing a development opportunity that is not readily replicated within the current growth cell framework.

1.7 National or Regional Benefits of the Project

In giving effect to the Section 3 of the FTAA, the purpose of the FTAA is to facilitate the delivery of infrastructure and development projects with *significant national or regional benefits.*

Significant national or regional benefits are not further defined in the FTAA. Some guidance is provided by section 22 of the FTAA in relation to the referral stage. The NOD recognised the Project's one-off and ongoing quantified economic benefits as supporting a finding of significant regional benefit. To an extent, this supports the conclusion that the Project will generate significant regional benefits.

In addition to the benefits identified through the referral application, the Project will deliver significant regional economic and social benefits for this part of the region as discussed below.

1.7.1 Economic Benefits

The EA concludes that the Project will generate significant regional economic benefits at very low economic cost.

The EA identifies the following quantified and qualitative benefits of the Project:

- **Total Net Economic Impact**: $160 million of GDP.
- **Employment**: $95 million in wages and 2,830 FTE-years of employment over a 30-year period.
- **Construction Impacts**: $76 million from one-time construction activity.
- **Operational Significance**: $85 million from future onsite activity at the village and care home.

In addition, the EA aligns with the EME in concluding the Project will result in qualitative benefits. Significant qualitative benefits include the increased provision of retirement living and aged care accommodation, responding to the demonstrated and unmet demand identified within this part of the region as stated in the EME. Other significant qualitative benefits include stronger land market competition, moderated housing price pressures, support for healthy ageing and ageing in place, and improved housing choice.

Further, qualitative benefits include the release of existing housing stock, efficiencies associated with a master-planned development, support for the Te Awamutu town centre, positive investment signalling, and the accelerated delivery of benefits through the FTAA process. Overall, the EA recognises these qualitative benefits are cumulatively material.

1.7.2 Social

In addition to the economic benefits, the Project has regional social benefits. The EME concludes the Project firmly addresses the quantified shortfall in residential care in the primary catchment as well as offering an expanded level of choice in the regional market.

- **Residential Care**: The EA and EME identify the provision of additional residential care capacity within the primary catchment as a key benefit of the Project. The proposed 100-bed Stage 1B residential care facility is intended to be delivered early to meet the current unmet demand identified in the EME. The proposed care facility represents approximately two-thirds of the identified local care pipeline and is expected to respond to the identified demand ahead of the forecast demand curve, ensuring that identified residential care needs within this part of the region can be met at an early stage of the development.
- **Senior Housing Supply:** The EA and EME identify that the Project broadens housing choice for older persons through a diverse range of typologies, tenure arrangements, price points and age eligibility. Those factors that broaden market appeal and support demand comprise:
    - **Typologies**: standalone villas, duplexes, apartments, serviced apartments, and care suites at a range of price points.
    - **Tenure**: fee simple allotments, unit title ownership, Occupational Rights Agreements (ORA), and care suites.



- **Indicative pricing**: that aligns with the strongest local demand segment, with core two-bedroom villas priced within the primary catchment's demonstrated equity capacity and preserves its affordability advantage over destination villages in the Tamahere and Cambridge clusters.

- **Age**: The development provides for people aged 55 plus.

The Project will increase the supply of retirement village and residential care accommodation, respond to identified demand, and contribute to a well-functioning urban environment. The Project addresses an identified residential care shortfall and provides a diverse range of retirement living, care and tenure options not currently available within Te Awamutu and the wider district and region. As such, this will deliver benefits through increased choice, care provision, and opportunities for ageing in place.

1.7.3 National or Regional Benefits Summary

Based on the benefits identified above, the Project **will have regionally significant economic and social benefits**, which **weighs in favour** of the Project.

1.8 Consistency with the Purpose of the FTAA

The purpose of the FTAA is to facilitate the delivery of infrastructure and development projects with significant regional or national benefits. The purpose therefore has two key components: first, to enable the efficient delivery of qualifying projects; second, to ensure the qualifying projects provide significant national or regional benefits.

The NOD for the Project under the FTAA recognised it could deliver significant regional benefits and that consideration through the FTAA process would provide a timelier and more cost-effective pathway than the conventional planning process.

The FTAA provides a single integrated approval pathway, enabling the Project and its effects to be considered in a more timely, cost-effective and certain manner than under the standard RMA process, while still allowing a comprehensive assessment of its regional benefits and its technical effects. The EA identifies that this pathway would enable the Project to proceed from 2027, accelerating the delivery of retirement village accommodation and residential care capacity, together with the associated economic, housing and social benefits. This is particularly important given the identified demand for approximately 21 additional residential care beds and suites per year through to 2048. Earlier delivery would therefore provide tangible benefits for older residents and their families while addressing a growing shortfall in care provision.

In addition, the Project will generate significant regional benefits. The NOD recognised the Project's quantified economic benefits as supporting a finding of significant regional benefit at the referral stage, and this conclusion is further supported by the economic analysis contained within this SAR. **Section 1.7** above identifies the Project's significant economic, social and environmental benefits, which extend beyond the immediate locality and are relevant at a regional scale.

Having regard to those benefits and the assessment in **Section 1.7**, the Project's significant regional benefits outweigh the technical effects of the Project that are assessed as being acceptable in the context of the FTAA.

Approval of the Project under the FTAA would therefore facilitate the delivery of the identified benefits in a manner consistent with the purpose of the FTAA.

On this basis, the Project is **consistent** with the purpose of the FTAA; and therefore, **weighs strongly in favour** for the Project.

1.9 Summary of Approvals Sought

To enable the Project, the Applicant seeks resource consent approval under the FTAA.

1.9.1 Resource Consents Requirements

Section 42(4)(a) of the FTAA provides that approvals may be sought for resource consents that would otherwise be applied for under the RMA. Various resource consents are required for the Project. **Part Five** of this Report identifies each resource consent in more detail and includes the information assessment required by clauses 5 to 9, and 17 of Schedule 5 and section 43(3)(a) of the FTAA.

In summary, the SAR seeks the following resource consents:

- Non-complying land use consent under the Waipā District Plan (**WDP**) for land use activities proposed across the site to establish and operate the retirement village in the Rural Zone and other associated land use activities.
- Non-complying subdivision consents under the WDP for the staged subdivision of the site and super allotments, fee simple subdivision of the units in Stage 1, and unit title subdivision for the apartment units and the remainder of the retirement village.
- Resource consents under the Waikato Regional Plan (**WRP**) for groundwater and surface water takes, temporary and permanent diversion of water, placement of culverts and stormwater discharge structures in the bed of a stream, placement of cleanfill and earthworks and vegetation clearance within High-Risk Erosion Areas; with activity statuses ranging from controlled to non-complying status under the WRP.
- Resource consent under the National Environmental Standard for Freshwater (**NES-FW**) for activities within and adjacent to natural inland wetlands that are classified under the NES-FW as Restricted discretionary, non-complying, and prohibited activities, including wetland restoration and maintenance works, vegetation clearance and earthworks within 10 m of a wetland, and earthworks resulting in wetland drainage.

Further details are included in **Part Five** and **Appendix 26 – Rule Assessment** along with any identified permitted activities that form part of the Project.

1.10 Additional Approvals under the FTAA

This SAR only applies for resource consent under the FTAA as defined by the scope of the referral application and the NOD. On this basis, no additional approvals under the Wildlife Act 1953 and Freshwater Fisheries Regulations 1983 are sought as part of this SAR and would be beyond the scope of the Notice of Decision on the referral application.

Permit for the capture and immediate relocation of lizards prior to and during site clearance works will be required under the Wildlife Act 1953 but will be sought from DOC as a separate process to the Fast Track Approvals Act. The proposal does not require consent under the Complex Freshwater Fisheries as all the project culverts will be installed online and have been designed to accommodate fish passage.

2. PART TWO – Site Context

2.1 The Site

The site's general location and physical features are described and shown in **Section 1.3**.

2.1.1 Land Ownership

The site comprises one record of title (**RT**) held by Applicant. The RT is identified as SA 32D/155.

Table 1 below provides the details of RT SA 32D/155. A full copy of SAR32D/155 is in **Appendix 2**.

Table 1 – RT Details

Identifier	Legal Description	Area	Registered Owners
RT SA 32D/155	Part Lot 1 Deposited Plan 35654 and Lot 1 Deposited Plan South Auckland 36696	25.7824 ha	Te Awamutu Developments Limited

The RT contains registered interests relevant to the proposal:

- **Building Line Restriction** – restricts buildings being located within 5m (25 links) of the road boundary.
- **Limited Access Road** – restricts establishing unauthorised vehicle crossings onto Stage Highway 3.
- **Amalgamation Condition** – records that the two allotments are subject to section 308(4) of the Local Government Act 1974 and must remain amalgamated.

If required, approval relating to removing the building line restriction will be obtained separately.

2.2 Planning context

The site is situated within the Waipā District and the Waikato Region. The site is in the **Rural Zone** and is subject to a range of planning controls under the Waipā District Plan (WDP).

The planning layers on the site are summarised in **Table No: 2** below.

Table 2 – Waipā District Plan Zones and Overlays

Zones and Overlays		
Site Details	**Zoning**	• Rural Zone
	Overlays and Features	• Designation D37 • Significant Natural Area – WP312 • Soil Type – High Class Soil • Soil Type – Other Soil • Biodiversity Corridor – 500m River Stream Corridor • Transferable Development Rights - Potential TDR Donor Holdings

2.2.1 Zoning

Under the WDP, the site is located within the Rural Zone. Land adjoining the site to the north, south, east and west is also zoned Rural. The southeast corner of the site adjoins the urban limits boundary, with the land beyond being zoned Medium Density Residential.

Figure 4 below provides an extract of the WDP planning maps showing the zoning of the site and surrounding area.

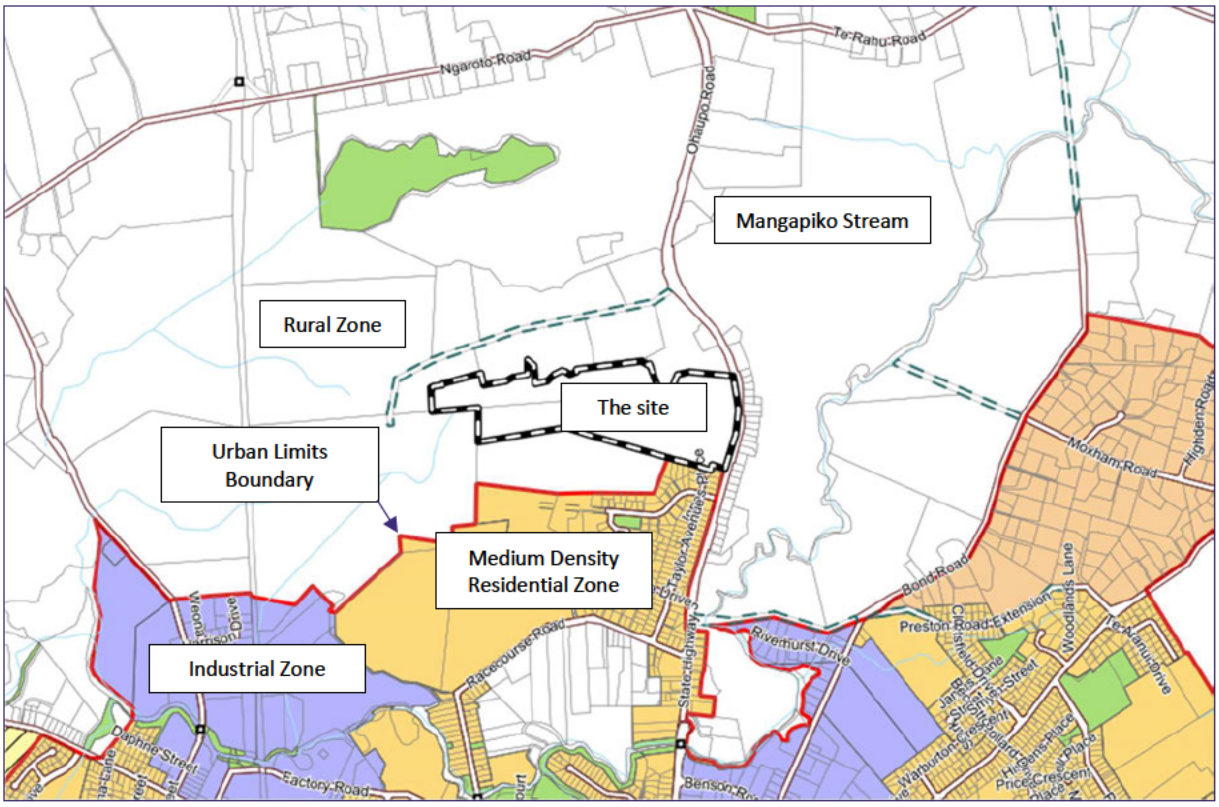


Figure 4: Waipā District Planning Map extract

2.2.2 Planning Overlays

As identified in **Table 2**, the site is subject to the following planning overlays:

- **Designation D37** – Part of Designation D37 extends into the eastern portion of the site adjoining State Highway 3. The designation provides for the maintenance and improvement of the State Highway network.
- **Significant Natural Area (WP312)** – A kahikatea remnant of local ecological significance is located within the north-western portion of the site.
- **High Class Soils** – The majority of the site is identified as High Class Soil, with smaller areas mapped as Other Soil.
- **Road Hierarchy** – State Highway 3, adjoining the eastern boundary of the site, is identified as a Major Arterial Route.

- **Biodiversity Corridor** – A 500 m River Stream Corridor associated with the Mangapiko Stream extends along the eastern portion of the site.

- **Transferable Development Rights Overlay** – The site is identified as a potential donor holding.

Figure 5 below shows the relevant WDP planning overlays.

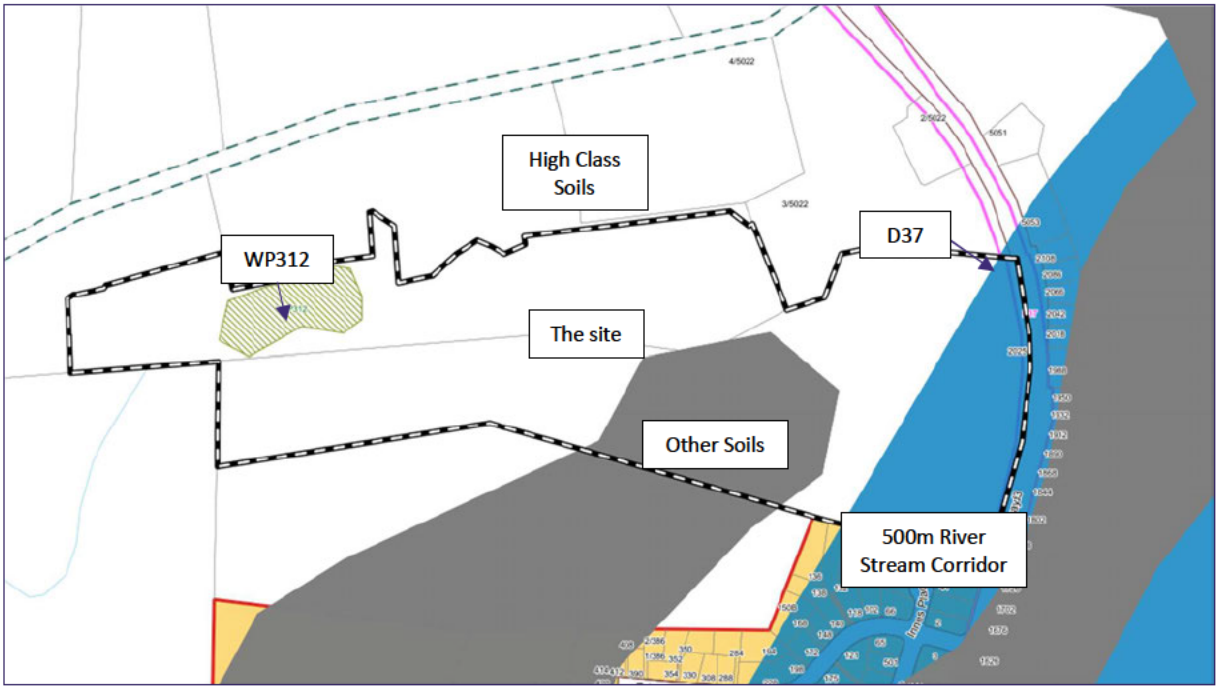


Figure 5. Showing the WDP Planning Overlays

2.2.3 Existing Resource Consents – Section 30 FTAA

On 24 September 2026, WRC confirmed there are no existing resource consents to which sections 124C(1)(c) or 165ZI of the RMA that would apply in relation to the Project (**Appendix 4**).

The site is subject to one existing resource consent issued by Waikato Regional Council (AUTH148817), held by the Applicant. AUTH148817 authorises well drilling for three wells and groundwater monitoring associated with geotechnical investigations for the Project.

2.2.4 Existing Plan Changes

The site is not subject to a Council initiated plan change or identified within a future urban growth area.

The site is subject to Private Plan Change 29 (**PC29**), lodged by the Applicant, with Waipā District Council (**WDC**). PC29 was sought to rezone the site from rural to residential and create a new growth cell enabling 500 new dwellings, a lifestyle village, and care facilities. Prior to public notification, PC29 was placed on hold pending the decision of Plan Change 26: Residential Intensification. As of writing this Report, PC 29 has not been withdrawn and is **on hold.**

2.3 Existing and Historic Land Uses

The site contains one existing dwelling in the eastern part of the site. The previous owners currently lease the site and continue to graze dry stock. Prior to the purchase of land by the Applicant, the site had been used for pastoral grazing. Over this time, the site has been used to graze dry stock, being mostly cattle and sheep.

2.4 Landform and Geology

2.4.1 Geology

The Geotechnical Assessment and Earthworks Report (**GAR**) has been prepared by Titus Consulting Engineers and dated October 2026 (**Appendix 11**). The GAR describes the site as comprising rolling low hills, alluvial plains, and a central gully traversing the site from east to west where the land generally falls from the land generally falls from approximately RL 84 m in the east to RL 47 m in the west. The low hills are generally gently rolling, although steeper slopes occur along the northern gully face in the western part of the site.

Existing artificial ponds are in the middle of the site at the head of the gully, with associated wetlands and a small stream extending through the gully and alluvial plain (flatter lower-lying areas) to the west.

The site's soils are predominantly underlain by Hamilton Ash Formation soils comprising stiff to very stiff silts and clays, with more variable alluvial soils occurring within the gully and alluvial plain areas.

Evidence of localised soil creep in an area not being developed – identified as 'steep slopes' in **Figure 6** below. No significant erosion features were observed elsewhere on the site.

The GAR identifies that the site is not subject to significant active fault, coastal, or volcanic hazards. The primary geotechnical and natural hazard constraints are associated with the gully and alluvial landforms, including liquefaction susceptibility, settlement potential, shallower groundwater levels, and localised slope stability risks.

Figure 6 below shows the two identified landforms and the steep slopes area.



Figure 6. Showing the two key landforms within the site

2.4.2 Surface Water and Ground Water

The site's surface water and groundwater hydrology is detailed in **Appendix 12** – Ground Water Effects Report (the **GWR**), prepared by WGA.

2.4.3 Surface Water Catchment

The GWR report describes the site as being located within the Mangapiko sub-catchment of the Waipā catchment. A tributary of the Mangapiko Stream traverses the site and ultimately discharges to the Mangapiko Stream approximately 1.6 km downstream, which in turn flows to the Waipā River approximately 11 km west of the site and then flows into the Waikato River north of Ngāruawāhia.

The head of the tributary originates from seepage-fed headwaters in the eastern part of the site where the damming has formed the two artificial ponds. The water course starts where the branches meet and runs through a highly modified channel downstream from the site.

The majority of the natural wetlands (**Section 2.7**) occur as localised seepage areas on the lower hill slopes and drain towards the central watercourse. Permanent wetlands and a remnant kahikatea swamp occupy the lower-lying western portion of the site.

2.4.4 Ground Water

Groundwater recharges on the upper slopes and discharges to the site's wetlands, drains, man-made ponds, and the water course running through the site. The GWR states at the eastern edge of the site ground water will likely flow east toward the Mangapiko Stream.

The low-lying hills and low permeability soils result in a high rate of run off from the hill slopes toward the man-made ponds, stream, and wetlands. Groundwater flows beneath the hills will be gradual, reflecting the low permeability of these soils.

In the low-lying areas, infiltrating rainfall flows towards the drains, wetlands and stream. As such, groundwater flows in this area will be higher than beneath the hills but will be limited by the availability of recharge in the limited local catchment.

Groundwater flow is generally directed from the upper hill slopes toward the lower-lying valley floor, wetlands, ponds, drains, and central watercourse, reflecting the Site's topography and strong hydraulic gradient.

Groundwater in the surrounding area is used primarily for domestic and agricultural purposes, with one consented groundwater abstraction (AUTH130695.01.01) located within 1 km of the site.

2.5 Land Use Capability

Section 2.2 shows the WDP identifies the site as containing High Class soils and Other Soils, as defined by the WDP.

A site-specific Soil and Land Use Capability Assessment (**SLUC**), prepared by Land Systems, and dated October 2026 (**Appendix 13**) assessed the land use capability of the site using both regional-scale mapping and a site-specific field assessment.

The SLUC identifies High Class Soils and highly productive land (**HPL**) based on regional and site-specific mapping and the relevant definitions under the WDP and National Policy Statement for Highly Productive Land 2022 (**NPS-HPL**), as follows:

- **Regional Mapping (WDP Definition)**: approximately 22.1 ha of the site is identified as High Class Soil.
- **Regional Mapping (NPS-HPL Definition)**: approximately 5.7 ha is identified as HPL.
- **Site-Specific Mapping (NPS-HPL Definition)**: approximately 7.1 ha of HPL.

The SLUC shows, based on regional mapping and the HPL definition, the site sits at the edge of a cohesive area of HPL.

Based on site-specific mapping, SLUC shows the higher capability soils (LUC 2) identified in green in **Figure 7** below are concentrated within the eastern and southern parts of the site, while lower capability and non-productive land is associated with gullies, wetlands, indigenous vegetation, and steeper terrain. The SLUC notes that the productive land is fragmented by surrounding areas of lower capability soils.

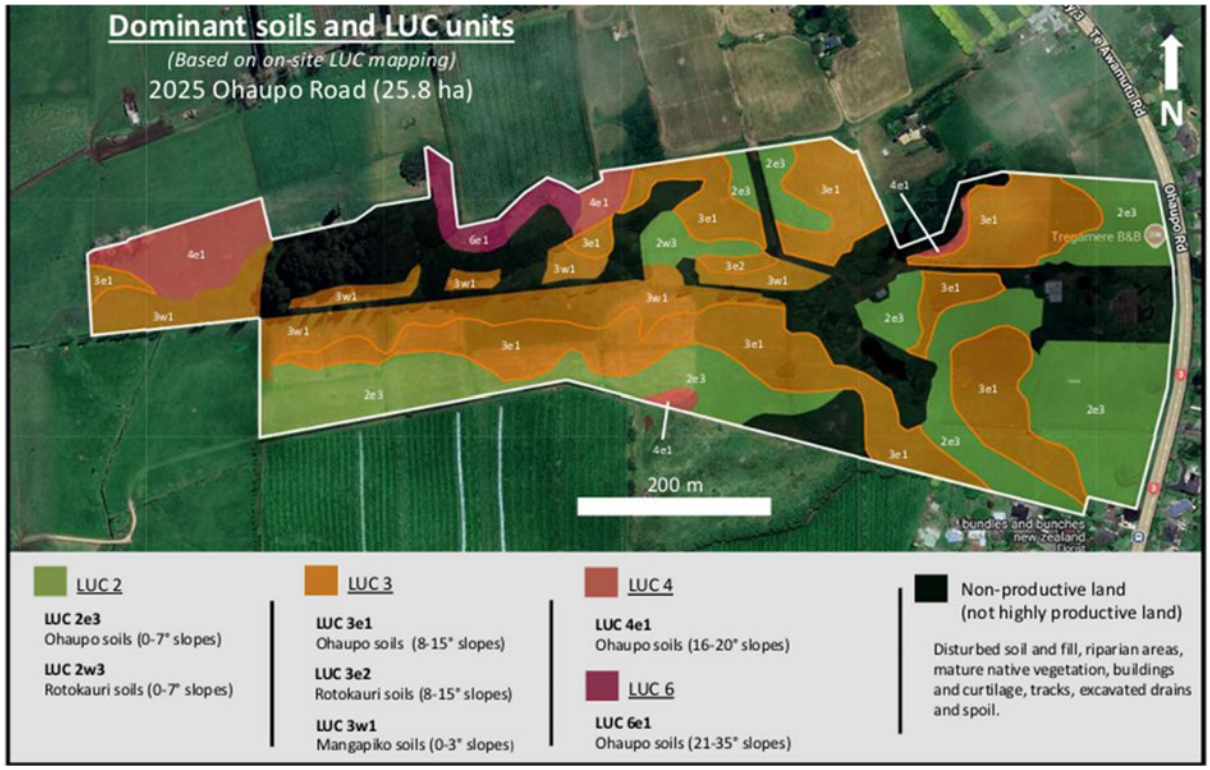


Figure 7. Site Specific Land Use Capability Maps

2.6 Ecology

An Ecological Assessment Report (the **EcAR**), prepared by Phoenix Ecology Limited and dated October 2026 (**Appendix 15a**) assessed the site as having a high ecological value. This assessment is based on the presence of long-tailed bats, together with the kahikatea remnant (SNA WP312) and the network of wetlands and freshwater habitats across the site. The presence of long-tailed bats elevates the significance of these habitat features and contributes to the site's overall ecological value.

2.6.1 Vegetation

The site is predominantly identified as containing grazed pasture. The principal indigenous vegetation feature is SNA WP312. Additional exotic vegetation comprising exotic trees and hedge rows were identified along the paddocks and around the existing dwelling.

Vegetation associated with the ponds, wetlands and drainage channels comprises a mix of indigenous and exotic species. The wetlands and riparian margins are generally modified by historic farming activities and contain several exotic weed species. However, they continue to provide habitat and ecological function for fauna.

2.6.2 Wetlands and Watercourses

The EcAR identifies thirteen natural wetlands, two constructed ponds with riparian vegetation and a modified farm drainage channel. Many of the wetlands have been affected by historical farming activities and stock access and are generally small, fragmented and degraded. Despite their condition, they continue to provide important ecological functions, including habitat provision, flood attenuation, and nutrient and sediment filtration. The drainage channel traversing the site is highly modified and provides limited aquatic habitat due to its degraded condition and water quality. Shortfin eels have been recorded within the drainage network.

2.6.3 Long-tailed Bats and Other Fauna

The EcAR identifies the following fauna and aquatic fauna on site:

- **Bats**: The EcAR confirmed the presence of long-tailed bats, a Threatened – Nationally Critical species. Bat activity was recorded throughout the site, with the highest levels occurring around Kahikatea remnant then the waterways, ponds, vegetation margins, and mature trees. These features provide important foraging, commuting and potential roosting habitat.

- **Birds**: The site also supports common indigenous and exotic bird species associated with wetland, freshwater and forest habitats. No threatened bird species were recorded.

- **Lizards**: No copper skink lizards (at risk) were detected during the site investigations. However, the EcAR notes suitable habitat for the lizards is likely to be limited to the kahikatea remnant and adjacent vegetation.

- **Fish**: The EcAR identified the water course as containing native shortfin eel (not threatened), some invasive species, and suitable habitat for other indigenous species.

Figure 8 below shows the SNA, the identified natural wetlands and the existing drain.

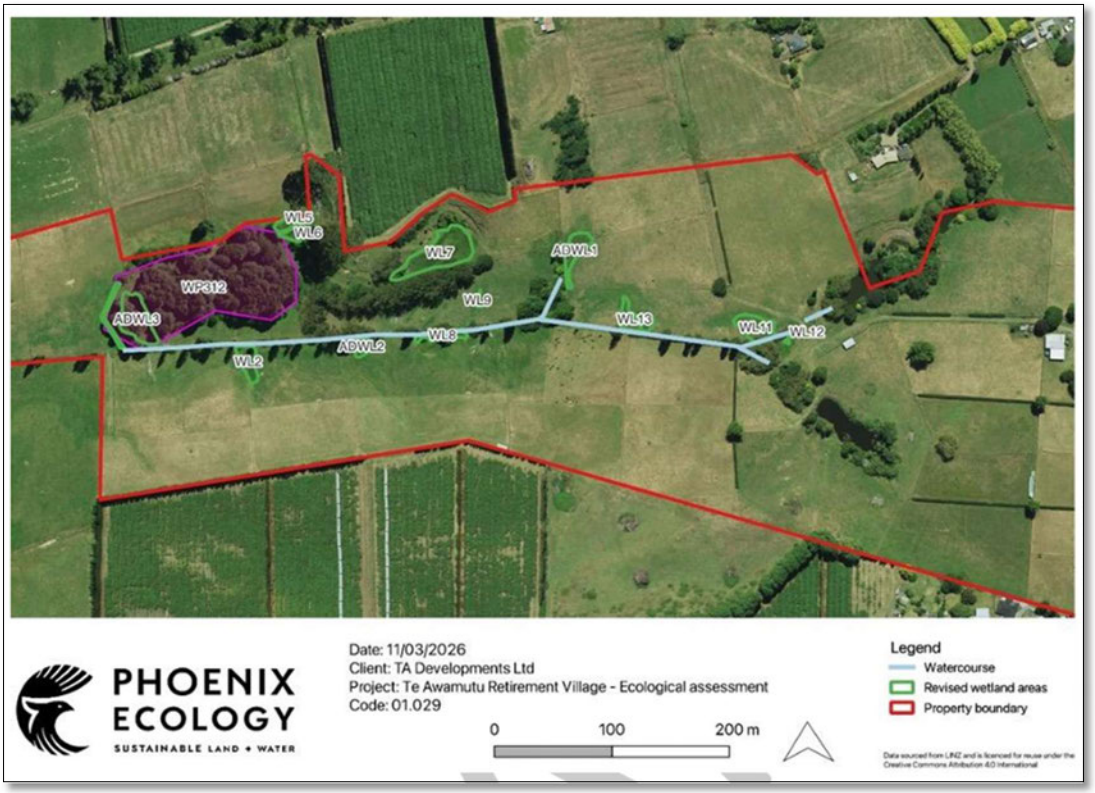


Figure 8. Wetland Plan showing the identified wetlands and watercourse

2.7 Transportation

An Integrated Transportation Assessment (**ITA**), prepared by Boffa Miskell, and dated October 2026 (**Appendix 16**) describes the existing and surrounding transportation environment that has informed the Project's transport response.

The site is located on the western side of State Highway 3 (SH3 / Ōhaupō Road), approximately 2.5 km by road north of central Te Awamutu. SH3 forms the primary transport corridor adjoining the site and provides direct connectivity to Te Awamutu to the south, Hamilton to the north, and the wider Waikato transport network. SH3 is identified by NZTA as a Regionally Strategic State Highway and Limited Access Road, is classified as a Major Arterial Road under the Waipā District Plan, and is identified as a Significant Road Corridor under the Waikato Regional Policy Statement. Under the One Network Road Hierarchy, SH3 is classified as a Regional Route. NZTA is the Road Controlling Authority for SH3.

The site presently has direct access from SH3. Adjacent to the site, SH3 has a posted speed limit of 70 km/h, transitioning to 100 km/h at approximately the northern boundary. The highway comprises a sealed two-lane carriageway approximately 13.5 m wide with a central painted median and rises toward the site from the south along a curved horizontal alignment.

The surrounding local road network includes Greenhill Drive and Taylor Avenue to the south, which are classified as Local Roads, and Racecourse Road, which is classified as a Collector Road and forms a priority-controlled intersection with SH3. Further north, Ngaroto Road and Te Rahu Road form a priority-controlled crossroads intersection with SH3.

Existing active-mode and public transport infrastructure in the immediate vicinity of the site is comparatively limited. There are no established footpaths on the road verges within the existing bus-stop environment near Greenhill Drive, while existing public transport services operate along SH3 between Te Awamutu, Ōhaupō and Hamilton. The existing service operates on a hail-and-ride basis, including existing stopping arrangements near Greenhill Drive.

The ITA reviewed reported crashes on SH3 between Racecourse Road and Ngaroto Road over the 2015–2025 period and available 2026 data. While crashes have occurred along this section of the corridor, the ITA concludes that they are dispersed and reflect a range of intersection-related conflicts, mid-block events, driver behaviours and external factors rather than a single underlying safety issue. In particular, the recorded crash history does not indicate a concentration or pattern suggesting that the site frontage is inherently unsafe or that there is an existing crash issue attributable to property access at the proposed access location.

Based on traffic volume data, existing average daily traffic volumes of State Highway 3 and the surrounding roads are approximately:

- **SH3 between Racecourse Road and Ngaroto Road:** 15,169 vehicles/day, 7.2% heavy commercial vehicles.
- **Racecourse Road:** 1,708 vehicles/day.
- **Ngaroto Road:** 922 vehicles/day.
- **Greenhill Drive:** 683 vehicles/day.
- **Taylor Avenue:** 63 vehicles/day north of Greenhill Drive and 402 vehicles/day south of Greenhill Drive.

The ITA considers these volumes generally consistent with the function and classification of the surrounding road network, noting that SH3 is operating at or slightly above the upper end of the arterial road traffic-volume range identified in the Waikato Regional Infrastructure Technical Specifications. The ITA concludes that the surrounding road hierarchy is operating broadly in accordance with its intended function.

A separate week-long traffic and speed survey undertaken near the northern site boundary recorded five-day average peak-hour flows of 813 vehicles per hour northbound and 560 vehicles per hour southbound during the AM peak, and 702 vehicles per hour northbound and 828 vehicles per hour southbound during the PM peak. The survey also identified mean vehicle speeds generally within 68–72 km/h and 85th-percentile speeds within 75–80 km/h, with southbound speeds approximately 5 km/h higher than northbound speeds as vehicles transition from the 100 km/h to 70 km/h speed environment.

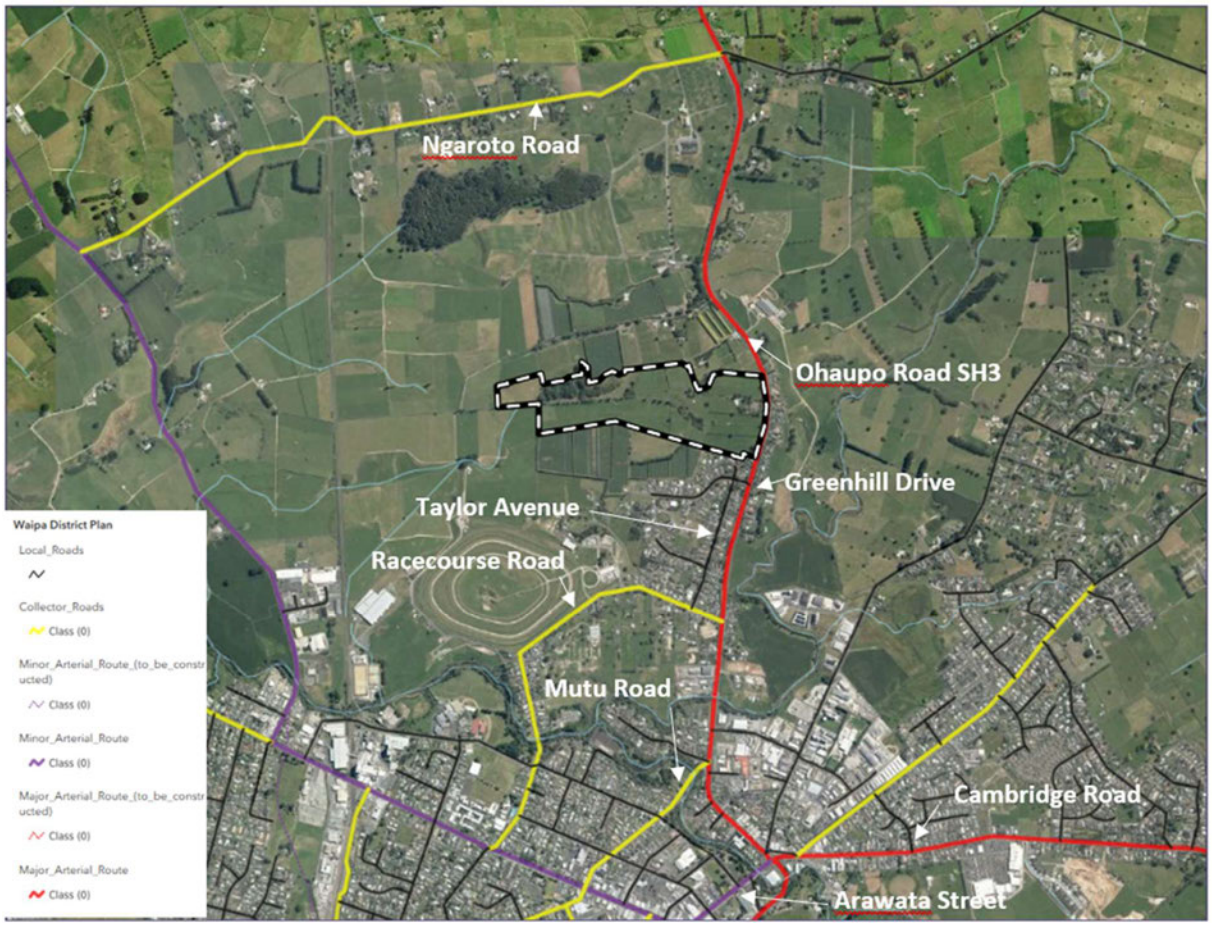


Figure 9. WDP Planning Maps showing the road hierarchy

2.8 Stormwater and Flooding

The Infrastructure Report (**IR**), prepared by Maven, (**Appendix 19);** and Stormwater Management Plan (**Appendix 19a**) identifies the site's existing stormwater catchment as extending beyond the site to an area of over 53 ha. Stormwater is currently managed through a series of ponds, wetlands, culverts, and a central drain that traverses the site. The central drain conveys stormwater to a culvert in the western part of the site, where flows are discharged downstream to the west of the site.

2.9 Water and Wastewater

The site is not currently serviced via Council's water supply and wastewater infrastructure. The IR relies on previous reporting to confirm the existing wastewater and water supply infrastructure within proximity to the site.

The IR confirms that the site is in proximity to Council's existing potable water supply network, which services the neighbouring residential area to the south.

- **Water**: The area immediately south of the site contains the Greenhill Reservoir and an associated booster pump station located approximately 250 m from the site. The Greenhill Reservoir is supplied

from the Te Tahi Water Treatment Plant via the existing water supply trunk main network. The Te Tahi Water Treatment Plant is located near Pirongia.

- **Wastewater**: The existing wastewater network is 4km upstream from the Te Awamutu Wastewater Treatment Plant. Wastewater generated within the residential areas of the surrounding catchment is conveyed south towards Mangapiko Street before flowing west along Factory Road, Alexandra Street, and Pirongia Road to the Te Awamutu WWTP.

In February 2026, Council reported that severe weather caused extensive damage to the Te Tahi Water Treatment Plant and associated infrastructure. This resulted in the loss of a key water source that previously supplied approximately half of the potable water demand for Pirongia, Te Awamutu, and Kihikihi. Water has subsequently been sourced from alternative supplies, reducing overall network resilience and raising concerns regarding the ability to meet peak summer demand.

WDC notes that peak summer demand is approximately 13 megalitres per day, while the current supply capacity from alternative sources is approximately 9 megalitres per day. Although an additional 3 megalitres per day is expected to be provided by the Parallel Road Water Treatment Plant, anticipated population growth within the district is expected to further increase demand and place additional pressure on the water supply network until the supply capacity is restored and or increased.

2.10 Archaeology

No archaeological sites are identified within the site in the Waipā District Plan. An Archaeological Assessment (**AA**), prepared by CFG Heritage, and dated May 2026 (**Appendix 20**) also found no recorded or observed archaeological features within the site. A review of historical aerial imagery, LiDAR data, historical records, and site survey information identified no evidence of archaeological features, deposits, or activities commonly associated with archaeological sites.

2.11 Contamination

A Detailed Site Investigation (**DSI**), prepared by Contaminated Site Investigation, and dated 10 December 2025 (**Appendix 21)** found that the site does not pose a contamination risk to human health and that no further investigation or remediation is required. The site has been used predominantly for pastoral farming since at least the 1940s, with no evidence of intensive industrial activities occurring on the property.

The DSI noted it built from a Preliminary Site Investigation prepared by BTW Consultants, which identified several historical HAIL activities, including treated timber storage, lead and asbestos associated with a former dwelling, and a burn pit. Subsequent soil sampling and laboratory testing confirmed that contaminants were either not detected or were present at concentrations below the relevant human health guideline values.

On 31 August 2026, WRC confirmed it agreed and supports the findings and recommendations of the DSI with no further investigation required.

2.12 Surrounding Environment

2.12.1 Wider Context

The wider context of the Site is shown in **Figures 1** and **2;** the Landscape and Urban Design Assessment (**LUDA**), prepared by Earl Design, and dated October 2026 (**Appendix 22**); and the Cultural Values Assessment (**CVA**), prepared by Ngāti Apakura (**Appendix 23**).

The LUDA identifies the site as forming part of a mixed rural and urban landscape on the northern fringe of Te Awamutu. The site comprises rolling low hills and flatter alluvial areas dissected by a central gully, with open grazed pasture, wetlands, a modified watercourse and ponds, exotic vegetation and a kahikatea remnant identified as an SNA. The site lies adjacent to the Ōhaupō Road (State Highway 3) ridgeline, with the surrounding landform generally containing the site within a gully setting. To the north, the landscape transitions into Rural Zoned land comprising a mix of rural-residential lifestyle properties, pastoral grazing and horticultural activities, while the eastern and south-eastern interfaces are influenced by Ōhaupō Road and established residential development. Collectively, these features place the site within a transitional landscape between the urban edge of Te Awamutu and the wider rural environment.

Cultural Landscape

As described in the CVA, the site is situated within the wider cultural landscape of the Waipā basin, including Ōhaupō, Ngāroto, Rukuhia, Pekapekarau and Moanatuatua. The CVA identifies these areas as having longstanding importance to Ngāti Apakura for food gathering, trade, travel, settlement and cultural practice.

2.12.2 Directly Adjacent Land

The site is surrounded by a mix of rural and residential activities to the north, south, west, and east. The majority of the site occupies a lower-lying landform within the local landscape. A central drain traverses the site through a broad gully system, which forms the site's dominant landform. The surrounding rolling land generally falls towards the drain from either side with many of the surrounding properties located on higher ground.

The owners and occupiers of the adjacent properties are identified in **Appendix 24**.

North

The land to the north comprises a combination of rural lifestyle and small rural lots with a combination of existing residential dwellings, grazing paddocks, and established orchards.

- **4/5022 Ohaupo Road**: contains a recently established orchard and associated immature shelter belt planting. This property does not directly adjoin the site as it is separated by a 7 m wide access leg on Part Lot 2 DPS 36696. The established planting generally reflects this arrangement.

- **Part Lot 2 DPS 36696**: contains two distinct orchards: a recently established orchard, like that at 4/5022 Ohaupō Road but located closer to the site boundary; and a mature orchard with established shelterbelt planting.

- **5022 Ohaupo Road**: is a small rural lot containing a dwelling, part of the northern artificial pond and associated planting, and grazing paddocks. The adjoining landform slopes down to the pond and back up to the site with the existing dwelling partially buffered by the pond's riparian vegetation.

The properties at 4/5022 Ohaupo Road and Part Lot 2 DPS 36696 located in separate titles with different owners.

South

Part of the site is located on the northern edge of the Te Awamutu township with established residential properties located to the southeast and elevated over the site. The remainder of the southern boundary is located within the Rural Zone comprising one property located at 420 Greenhill Drive, which is elevated above the site. The southern property contains an established orchard that wraps around an undulating vacant paddock. The orchard extends approximately 530 m along the shared boundary and is separated from the site by an established shelter belt. There is a gap within the central portion of the shelter belt and corresponding gap within the western kiwifruit block where the land becomes undulating. The kiwifruit vines are generally setback between 7 m and 8 m from the southern site boundary.

East and State Highway Road Environment

In addition, the eastern interface of Ohaupō Road, opposite and north of the site, a ribbon of urban-scaled residential dwellings located within the Rural Zone stretches approximately 100 m beyond the site's north edge. The LUDA describes the Ohaupō Road frontage adjacent to the site exhibits an urban character. The north-eastern corner of the site broadly marks the transition from Te Awamutu's urban edge to the more rural environment to the north.

West

The land to the west of the site comprises grazing paddocks used in conjunction with the dairy farm at 2/405 Racecourse Road. This property also contains the main drain where the site's stormwater discharges to.

3. PART THREE – Proposal

3.1 Project Overview

Part 3 outlines describe the key aspects of the Project. At a high level, the Project will enable the development of a community for senior living in Te Awamutu, providing approximately 414 dwellings/units (including single-storey houses, duplex units and apartments), and a 100-bed care facility.

The Project will be delivered in stages. The principal components of the Project are described in the following sections.

3.1.1 Staging

The masterplan showing the site layout and staging is shown in **Section 1.4**, and **Appendix**. The proposal will comprise four main stages and seven sub-stages (nine total) stages generally progressing from the road frontage towards the rear of the site. The development will proceed in alpha-numeric order as set out in the masterplan, comprising four core stages. Stage 1 has four sub-stages (1A-1D) and Stage 2 has three substages (2A-2C). However, certain downstream infrastructure lies within the latter stages and will be constructed as the earlier stages require.

The general construction timing is expected to be as follows:

- External infrastructure upgrades and extensions and earthworks.
- Civil works and core infrastructure for Stages 1A and 1B are programmed to commence earthworks and civils in Q1–Q2 2027.
- Subsequent stages are programmed at a minimum of nine-month intervals between stage commencements.

Detailed information for the staging is provided in the staging plan (**Appendix 18 – Civil Drawings**).

3.2 Infrastructure Design

The Project includes the construction of the civil infrastructure required to service the staged senior living development, including the internal road network, stormwater and flood management, wastewater and water-supply networks, and power and telecommunications services.

The following sections describe the principal infrastructure proposed and how each component will enable development of the Site. Further technical detail, including design assumptions, modelling, staging and engineering requirements, is provided in the IR.

3.2.1 Site Clearance, Earthworks and Retaining Walls

The Project works will include site clearance, earthworks and retaining walls to establish the internal road network, supporting infrastructure, and suitable building platforms.

The supporting technical reporting includes the IR, Earthworks Management Plan, Construction Management Plan, and the Civil Plans detailing the proposed earthworks stages, cut/fill plan, proposed layout and retaining walls, and the proposed erosion and sediment control plan (**Appendix 18**).

Demolition and Site Clearance

The existing dwelling and associated structures will be demolished, and the vegetation comprising hedgerows, vegetation surrounding the existing dwelling, and vegetation around the existing pond to the south, as identified in the Vegetation Clearance Plan in the EcAR, will be cleared in preparation for earthworks.

Earthworks

The IR, EWMP, and CMP detail that the earthworks will be divided to six distinct work sections: Stage 1-5 and the NZTA Corridor Works. Earthworks will have an approximate total cut of 271,320m^3 and, a total fill of 143,941 m^3, and imported pavement material approximately of 26,846 m^3.

The details of each stage are described in the IR and EWMP.

- **Earthworks Stage 1**: will include bulk earthworks to provide for internal development Stages 1A-1E and part of Stage 2A, the offline partial off-line construction of the State Highway 3 roundabout, in-fill the northern artificial ponds, establish the Stormwater Wetland Pond A, construct Culvert 1, and construct the essential structural retaining walls.

- **NZTA Corridor Works**: will include the bulk earthworks for the NZTA Corridor earthworks that will be undertaken concurrently with the Earthworks Stage 1.

- **Earthworks Stage 2**: will include bulk earthworks for the remaining area of Stage 2A, Stages 2B 2-C, and part of Stages 3 and 4. In addition, the bulk earthworks will establish Stormwater Wetland Ponds B1, and C1, Wastewater Pump Station B, Culvert Crossings 2-4 and the associated structural retaining walls or stabilised batters. To provide for wastewater disposal for Stages 1D-1E, the earthworks and construction of Water Pumpstation B and the associated wastewater pipes will be required prior to the completion of the buildings that will be located within the private infrastructure network (Catchment B).

- **Earthworks Stage 3**: will undertake the bulk earthworks for the remainder of Stage 3; this includes the construction of Stormwater Pond E1 and the any associated structural retaining walls.

- **Earthworks Stage 4**: will include the construction of Stage 4, the proposed Stormwater Pond E1, and the required retaining walls.

Dust Suppression

The CMP provides detailed for the proposed dust suppression. The CMP outlines water is proposed to be supplied from the existing Council supply on Benson Road, supplemented by a groundwater take of up to 100 m^3/day from the existing onsite well and/or onsite storage.

The Project will also utilise an existing groundwater bore within Te Awamutu to provide supplementary water for dust suppression.



Stream Works

The proposed culvert crossings form an important component of the overall stormwater and flood management strategy by maintaining conveyance of channel/drain flows through the site while supporting the proposed transport network.

- **Culvert 1**: will be an open base box culvert with a dimension of 3 m x 1 m for the road crossing between Stage 2 and 4.
- **Culvert 2**: will be a circular pipe culvert of 1.5m in diameter near proposed Stormwater Wetland B1.
- **Culvert 3**: will be a circular pipe culvert of 1.5m in diameter for the road crossing between Stage 2 and 3.
- **Culvert 4**: will be a circular pipe culvert of 1.5m in diameter for a footpath crossing between Stage 2 and 3 near the proposed Stormwater Wetland A1.

The CMP identifies that, during culvert replacement works, the watercourse will be temporarily over-pumped around the works area to enable culvert construction in dry conditions. Clean-water diversion bunds and silt fences will be used to manage runoff and prevent sediment entering the watercourse. Following installation of the culvert, the channel and embankments will be reinstated and stabilised using pinned geotextile and rip-rap erosion protection.

Fish capture, transfer and relocation will occur prior to dewatering, in accordance with the Draft Ecological Management Plan (**EMP**), which includes a fish management plan.

Temporary and Permanent Dewatering and Diversion

The GWR identifies the Project will temporary and permanent dewatering and diversion of groundwater flows during construction and operation.

As detailed in the GWR, the temporary groundwater dewatering is proposed or maybe be required during the construction activities:

- **Stormwater Wetlands A–E**: where construction excavations may intercept groundwater.
- **WWPS B**: located at the western end of the Site, where the wet well excavation will extend below the groundwater table. Dewatering is not anticipated for WWPS A.
- **Wastewater pipeline:** below the water table, particularly within the low-lying western part of the Site. The GWR models the section between MH 4B-2 and MH 4B-3 as the worst-case scenario.
- **Earthworks**: the GWR identifies two areas of earthworks cut to provide for future retaining walls (Wall 1 and 2 as shown in Figure 2 of the GWR) and potential for localised short-term inflows from perched groundwater.

As detailed in the GWR, permanent groundwater interception and diversion is associated with:

- **Subsoil drains beneath building platforms and behind retaining walls**: The GWR identifies two retaining wall/cut locations where the regional groundwater table may be intercepted through which subsoil drains will be installed.

- **Stormwater Wetland B**: which is proposed to be unlined and therefore represents a potential long-term groundwater interception and diversion feature. However, its permanent water level is proposed to be above the surrounding groundwater level and the GWR predicts no long-term drawdown. Wetlands A, C, D and E will be permanently lined.

Integrated Construction and Environmental Management

The earthworks and stream works will be undertaken within a broader construction management framework. In particular:

- Erosion and sediment control will be implemented on a stage-by-stage basis, in accordance with the CMP (**Appendix 19c**). Key features include stabilised site entrances, dust suppression, clean and dirty water diversions, sediment retention ponds, chemical treatment, silt fencing, wellpoint dewatering devices, topsoil management, and monitoring and maintenance.

- Ecological management will include pre-check clearance surveys, fish salvage, retention of ecological areas, and enhancement and restoration of wetland and terrestrial, and aquatic habitats. These works will be in accordance with the Ecological Management Plan (**Appendix 15a**), Lizard Management Plan (**Appendix 15b**) and Wetland Enhancement and Restoration Management Plan (**Appendix 15c**).

- Groundwater and dewatering will be managed in accordance with the GWR (**Appendix 12**) including treatment of pumped water.

- Geotechnical controls identified by the GAR (**Appendix 11**) inform the proposed excavation, material reuse, fill placement, compaction, settlement monitoring and certification of completed development platforms.

Earthworks Construction Management

A draft CMP outlines the methodology associated with the proposed earthworks and infrastructure. It brings together the various specialist management requirements applying across the Site and translate them into an integrated construction management framework covering matters such as site establishment, erosion and sediment control, ecological hold points, groundwater and dewatering, contamination, dust, construction traffic, noise, and vibration management, health and safety, engagement, incident response and reporting.

The CMP is intended to be read alongside the more detailed specialist plans. Those plans retain responsibility for the detailed technical methodologies and controls within their respective areas, while the CMP provides the site-wide structure for coordinating and implementing them during construction. Prior to physical works commencing, the appointed contractor will prepare a final CMP for the relevant works area, to operationalise the consent stage framework for construction.

3.2.2 Transportation

The Project will establish a new four-arm roundabout road access to connect the Site to State Highway 3, internal roads and accessways within the site, and shared pathways both within and beyond the site.

Staging

The proposed staging for the proposed roads occurs over the four core stages and the substages shown in the Proposed Road Plans (**Appendix 18**).

- **Roading Stage 1A**: will include the construction of the new four-arm roundabout and the roading, vehicle crossings, and footpaths that will service Stage 1A. The internal roading includes the start of the Collector Road 1, which is the main spine road that will provide a future connection to Stage 1D. In addition, vested local roads 2 and 3 will be established as well as the private local roads 4 and 5 that will service Stage 1A. There is also provision for a future external connection to the residential area to the south off vested local road 2.

- **Roading Stage 1B**: will establish the proposed access and carpark for the residential care facility and provide for a future connection for Stage 1E.

- **Roading Stage 1C**: will construct the proposed private Local Road 6, right of way (ROW 8), and the associated vehicle crossings and footpaths that will service the apartments in Stage 1C.

- **Roading Stage 1D**: will construct private local roads 2, 5, and the associated vehicle crossings and footpaths that will service Stage 1D and connect future Stage 2A.

- **Roading Stage 1E**: will extend the vested local road 3 and the associated footpath that will service the serviced apartments and provide for a potential external connection to the north of the site.

- **Roading Stage 2A**: will extend the main spine road (Road 1), Road 2, Road 7, Road 9 and the associated vehicle crossings and footpaths to service Stage 2A, which will include the apartment blocks, villas, and the village hub.

- **Roading Stage 2B**: will extend the main spine road (Road 1), Road 2, local road 10, future connection to Stage 3, and the associated vehicle crossings and footpaths that will service Stage 2B.

- **Roading Stage 2C**: will extend the main spine road (Road 1), Road 2, Road 13 that will provide future connection to Stage 4, and the associated vehicle crossing and footpaths that will service Stage 2C. In addition, road 2 will provide a potential future external connection to the west.

- **Roading Stage 3**: will provide the local roads and accesses to service Stage 3.

- **Roading Stage 4**: will provide the local roads and accesses to service Stage 4 with the opportunity for future connections from roads 14 and 16 to the north and to the south of stage 4.

Internal Roads

Hierarchy

The Project's hierarchy of roads is designed to provide access throughout the village. Three main road typologies are proposed:

- **Residential Collector Road** (Road 1): or the main spine road, will run east-west through the middle of the site, contain higher traffic volumes, and connect the site's entrance to the Project's neighbourhoods.
- **Local Roads**: Roads 2 and 3 include sections proposed to be vested, while the remaining local roads are generally proposed to remain private.
- **Shared access lanes**: will serve smaller groups of dwellings.

Cross sections, as shown in **Appendix 18** reflect the intended function of each street within the road network. The proposed road cross-sections are shown in Appendix 18 and vary according to the intended function of each road within the internal hierarchy.

The road layout safeguards potential future connections to adjoining land to the north, west and south, including provision for a future active-mode connection toward Innes Place. The location of these future connection points is shown on the Proposed Road Plans and within the ITA.

Traffic Calming

The internal road network incorporates planting, landscaping, on-street visitor parking in selected locations and traffic-calming treatments to reinforce the intended low-speed residential environment. These measures include the internal roundabout and changes in surface texture and materials at selected locations.

Internal Intersections

The internal road network includes a roundabout at the intersection of Road 1 and Road 3, together with a series of priority-controlled intersections servicing the local road network. Detailed intersection geometry, traffic controls and associated infrastructure will be confirmed through detailed design in accordance with the applicable design standards and conditions.

Parking

Car parking will be provided through a combination of on-site parking within individual residential lots, on-street visitor parking within the internal road network, and dedicated parking areas serving the apartments, Care Home and village hub. In summary, the ITA identified the approximate number of parking spaces for each activity, which is included below:

- **On-street parking bays**: 49 spaces
- **Residential carparks**: 414 (minimum)
- **Off-street parking for apartment blocks**: 120
- **Village Hub**: 29
- **Residential Care Facility**: 55



State Highway 3 Access

Following consultation with NZTA, the internal collector road will connect to the existing State Highway 3 via a new four-arm roundabout intersection.

The design of the proposed roundabout is contained in **Appendix 16**. In summary, the four arms will service the following areas:

- **Northern and Southern Arms:** will service northbound and southbound State Highway 3 traffic
- **Western Arm**: will connect the development to State Highway 3.
- **Eastern Arm**: will provide a connection for the proposed cul-de-sacs that will service the seven existing properties to the east. The new cul-de-sac and intersection will avoid direct vehicle access between these properties and State Highway 3, which is the existing arrangement.

As detailed, a large portion of the proposed roundabout will be located within the Site's boundaries and constructed off-line. The northern, southern, and western arms of the roundabout to be constructed while State Highway 3 remains operational.

Additional design features include pedestrian crossing facilities, bus stops for both north-bound and southbound traffic, and shared paths.

Operational Aspects

The Project will include both internal and external access gates and a combination of public and private waste collection.

Gates

Access and security vehicle and pedestrian gates are proposed between the site and State Highway 3, and the beginning of the Private Collector Road 1 marking the transition between vested public roads and private roads. Gates are also proposed at the western end of Private Local Road 05 and Private Local Road 02

Based on traffic modelling, the ITA notes the proposed gates between the site and State Highway 3 will be located within an open position between 6:00 am and 7:00 pm daily. Outside these hours, vehicle entry through the main gate will be managed through an intercom and keypad system, with RFID and/or other remote access available for residents. The additional gates will operate concurrently with the main gates but will not provide intercom or keypad-controlled vehicle access, thereby directing after-hours vehicle access through the main entrance.

Waste Management

Waste collection on the vested road network will form part of the public collection service, while collection within the private-road areas will be privately managed by an appointed waste collection provider. The internal road and servicing arrangements provide for access by refuse vehicles, with detailed collection points, bin storage and servicing arrangements to be confirmed through final design.

Multi Modal Connections



The ITA (**Appendix 16**), Civil Plans (**Appendix 18**), and Landscaping Plans (**Appendix 22a**) show the proposed multi-modal connections both within and beyond the site.

Internal Connections

The main east-west corridor incorporates a 2.5 m-wide shared path connecting the western residential areas through to the proposed SH3 roundabout. The remaining local access roads will provide a footpath on at least one side.

The proposed footpaths are shown in **Appendix 18**.

External Connections

The Project will provide a pedestrian connection between the Site and the wider Te Awamutu network, including a 2.2 m wide new pathway along State Highway 3 to Greenhill Drive, upgrades along Taylor Avenue, and a new pedestrian crossing on Racecourse Road. The provision of the pedestrian path will be staged with the first section from the site to Greenhill Drive being provided as part of the Stage 1 civil works package. The remainder of the pedestrian path from Greenhill Drive to Racecourse Road will be provided as part of the Stage 2 civil works package which aligns with the installation of the proposed wastewater rising main civil works. These connections and staging requirements are captured in the draft WDC conditions in **Appendix 28**. Alternatively, connectivity may be provided through the future-proofed access to 56 Innes Drive, subject to landowner agreement. This connection will link the development with the township and existing pedestrian facilities forming the wider Te Awamutu walking and cycling network.

The proposed intersection plans show that the roundabout will include two new bus stops on State Highway 3 adjacent to the site's entrance. The north bound stop is proposed on northern edge of the roundabout, and the southbound stop is proposed on the southern edge of the roundabout. The bus stops will provide access to existing public transport services connecting Te Awamutu, Hamilton, and Cambridge.

Three Waters

The IR and the SMP detail the proposed stormwater, water supply and wastewater infrastructure.

Stormwater

The integrated stormwater management system is described and shown in the IR (**Appendix 19**), SMP (**Appendix 19a**) and Civil Plans (**Appendix 18**).

The stormwater management system adopts a four-stage treatment train approach that addresses stormwater quality, quantity, flood management and hydraulic connectivity for the seven post-development catchments. The design includes Water Sensitive Urban Design Principles (**WSUD**) and has been developed in accordance with the RITS V2, and WRC Stormwater Management Guidelines.

- **Stage 1 – Primary Conveyance**: The primary piped stormwater network is designed to convey the adopted 10-year climate-change event. Larger events will be accommodated through the designated overland flow paths and road corridors designed up to a 100-year ARI climate change event that will also utilise the wetlands, high-flow bypasses and existing drainage features.

- **Stage 2 – Retention of Initial Abstraction Volumes**: The stormwater will then flow into the catchment's raingarden. The proposed development is divided into 7 catchments (A-G); each catchment except (F & G) has a designated centralised raingarden (A-E) and is sized to meet the initial abstraction requirements with additional retention measures provided where required. Additional runoff will be directed to the proposed stormwater wetlands and or high/glow bypass systems. Catchment F will be managed separately with runoff directed to a proposed vegetated dry basin; and Catchment G will remain untreated with runoff continuing to discharge to the existing road network as the Project does not increase the impervious area within this catchment.

- **Stage 3 – Treatment and Attenuation**: Stormwater will flow to the corresponding constructed stormwater wetland for treatment and attenuation. The five constructed stormwater wetlands (A–E) will incorporate forebays for sediment capture and provide water quality treatment and extended detention. Each wetland will include a controlled outlet structure with an extended detention orifice and spillway to manage discharge rates. Upstream flow-splitter manholes will direct runoff through the treatment system, while piped high-flow bypasses (HFBs) will provide an alternative conveyance route for flows that exceed the treatment and detention capacity of the wetlands.

- **Stage 4 – Controlled Discharge**: Treated flows will discharge at 80 percent of pre-development rates where practical.

    - **Wetland A**: will service Stage 1 with a catchment area of 6.4 ha and will discharge to the existing artificial pond located within Stage 1.

    - **Wetland B**: will service Stage 2 with a catchment area of 5.42 ha and will discharge to the existing drainage network within the site.

    - **Wetland C**: will service Stage 3 with a catchment area of 2.72 ha and will discharge to the existing drainage network within the site.

    - **Wetland D**: will service Stage 4 with a catchment area of 1.31 ha and will discharge outside the site to the existing discharge point. As Stormwater Wetland D is located outside the site it has been sized to attenuate a 1 in 100-year event within the wetland.

The construction of the proposed stormwater management devices will be undertaken by the consent holder. **Section 3.2.1** provides the timing for the construction of the proposed stormwater ponds.

The proposed stormwater infrastructure includes public stormwater assets that will be located within Stage 1. These public assets within Stage 1 will be vested with WDC at the appropriate time.

Private assets will be managed by the lifestyle village body corporate where appropriate legal instruments will be set up by the body corporate to manage the private infrastructure and ponds to ensure ongoing operation and maintenance.

Wastewater

The IR details the proposed wastewater network extension and connections, on-site reticulation, and wastewater pump stations, and key development triggers.

Proposed Catchments

Developed in consultation with WDC and WW, the Project will implement a split discharge to the existing wastewater infrastructure. The Project divides wastewater flows into two catchments each with their own ownership arrangements and dedicated wastewater pumpstation.

- **Catchment A**: will include publicly vested wastewater infrastructure, Wastewater Pump Station A and individual lot connections that will service Stage 1A and 1B (approximately 20% of the development). Flows from Catchment A will be via a new wastewater rising main that will extend out to State Highway 3, Greenhill Drive and then connect to the existing wastewater manhole located in the Greenhill Drive, Innes Place, Taylor Avenue intersection.

- **Catchment B**: will comprise privately owned wastewater infrastructure which includes Wastewater Pump Station B, the proposed unit connections that will service Stage 1C, 1D, 1E, 2, 3, and 4. Wastewater from Catchment B will discharge via a new wastewater rising main that will be constructed along Road 2 out to State Highway 3, Greenhill Drive, Taylors Avenue, Racecourse Road, and then thrusted underneath State Highway 3 to connect to an existing wastewater water manhole, which is located to the northeast of the State Highway 3 / Racecourse Road intersection.

The IR confirms the wastewater infrastructure, wastewater pumpstations, and lot connections will be constructed in accordance with the RITS guidelines and specifications.

Easements will be provided where appropriate and where fee simple allotments will be draining into the private wastewater infrastructure; and for publicly vested infrastructure, all-weather access and the necessary easements in favour of WDC/WW will be established where required

Stages

The key wastewater infrastructure will be constructed in two wastewater stages.

- **Wastewater Stage 1**: will construct WWPS A and the proposed rising main to the existing infrastructure. Once completed, this will connect Catchment A to the wastewater network. While the rising main for WWPS A is constructed, the portion of the rising main for WWPS B to Greenhill Drive will be laid and capped in the same trench and at the same time. WWPS A will be constructed within a separate wastewater reserve (Lot 5005) to be vested.

- **Wastewater Stage 2**: will construct WWPS B and the proposed rising main, which will be partly constructed in Wastewater Stage 1, to the existing wastewater network. This will connect Catchment B to the wastewater network. As Catchment B will service units within Stages 1C, 1D, 1E, 2, 3, and 4 Stage 2 earthworks will occur prior to Stages 1C-E are progressed, which will enable the wastewater main connecting WWPS B to be constructed.

- **Post Stage 2**: Once the key infrastructure has been established in Wastewater Stages 1 and 2, the remainder of the wastewater infrastructure in the future stages can connect to the rising mains within the respective catchments.

Water

The IR confirms that the Project's water supply infrastructure comprises two upgrades developed in consultation with WDC and WW:

1. **Upgrade 1 - Taylors Avenue Network Non-return Valves**: Upgrade the existing non-return valves (**NRVs**) on Taylors Avenue to improve network performance and available pressure

2. **Upgrade 2 - Greenhill Drive Booster Pump**: Replace the existing Greenhill Drive booster pump and install a secondary standby pump to improve network resilience and maintain required supply pressures during peak demand and fighting events.

Stages

The IR details the staging for the delivery of the water supply infrastructure:

- **Stage 1**: will construct a new water main from the development to the existing water supply infrastructure located within the Greenhill Drive / Taylor Avenue intersection; and the associated water connections for the units within Stage 1 including the managed care centre.

- **Stages 2-4**: The remainder of the water supply reticulation and connections will be established to the remaining units within Stages 2-4.

The IR and Civil Plan show the proposed water supply reticulation (**Appendix 19** and **Appendix 18**); the IR confirms the proposed lot connections will be serviced in accordance with the RITS guidelines and specifications.

Other Services

The IR confirms the Project will also connect to power, communications, and, if required, gas networks.

- **Power**: Power will be provided by Waipā Networks. Waipā Networks has confirmed that the development can be serviced with only minor network upgrades, with detailed design to be undertaken at a later stage.

- **Communications**: Telecommunications services will be provided through the existing Tuatahi First Fibre network via a multi-duct along State Highway 3. Further discussion with TTF will be required to ensure the optimal connection to the multi duct. Existing fibre infrastructure is available within Ōhaupō Road and there are no known constraints to servicing the Site.

- **Gas**: An existing medium-pressure First Gas distribution main is located within the SH3/Ōhaupō Road corridor adjacent to the Site. This provides the opportunity for a future gas connection, with any extension of the network and detailed servicing requirements to be considered during the detailed design stage should gas supply be required by the development.

3.3 Landscape and Ecological Works

The Project incorporates a coordinated package of ecological management, restoration and habitat enhancement, fauna management and landscaping measures across the Site. These measures have been developed through the EcAR and LVA and the associated management plans and landscaping plans.

3.3.1 Restoration and Enhancement

The Project includes restoration and enhancement of key ecological areas.

- **Wetland Restoration and Enhancement**: will comprise an area of approximately 10,983 m^2. Of this area, 4,886 m^2 are current wetlands, with an additional area of 6,468 m2 proposed to be restored to wetland from current pasture area.

- **Terrestrial Habitat Restoration**: will comprise 6,000 m2 of restored terrestrial habitat from current pasture.

- **Riparian Habitat Restoration**: will occur along the existing farm drain for 860 m, which will be converted from pasture.

- **Open-Water Habitat Recreation**: the open water habitat from the southern ponds will be replaced and enhanced through the Stormwater Pond B of 2,500 m^2 that will be unlined and connected to groundwater and the water course to provide for fish passage.

The proposed restoration and enhancement areas are shown in the EcAR. The related works will be implemented through the Draft Wetland Management and Enhancement Plan (**WMEP**) with the goal of enhancing bio-diversity values throughout the site. The timing for this restoration and enhancement has been staged to align with the progressive development of the site with Schedule One to the Waikato Regional Council draft conditions (**Appendix 29**) providing a graphical representation of this restoration rollout.

The restoration and enhancement works are to be staged as follows:

a) Restoration and enhancement of the SNA remnant and the northern areas of Stage 2A to be completed prior to the completion of Stage 1 civil works.

b) Restoration and enhancement of the mature vegetation areas to the north of Stage 2A to be completed at the same time as the Stage 1 civil works.

c) Restoration and enhancement of the central site water course and stormwater pond B to be completed at the same time as the Stage 2A civil works.

d) Restoration and enhancement of the southern part of Stage 2A and the northern part of Stage 2C to be completed alongside the Stage 2C civil works package.

e) Restoration and enhancement of the areas surrounding Stage 3 to be completed at the same time as the Stage 3 civil works.

f) Restoration and enhancement works surrounding Stage 4 to be completed at the same time as the civil works package for Stage 4.

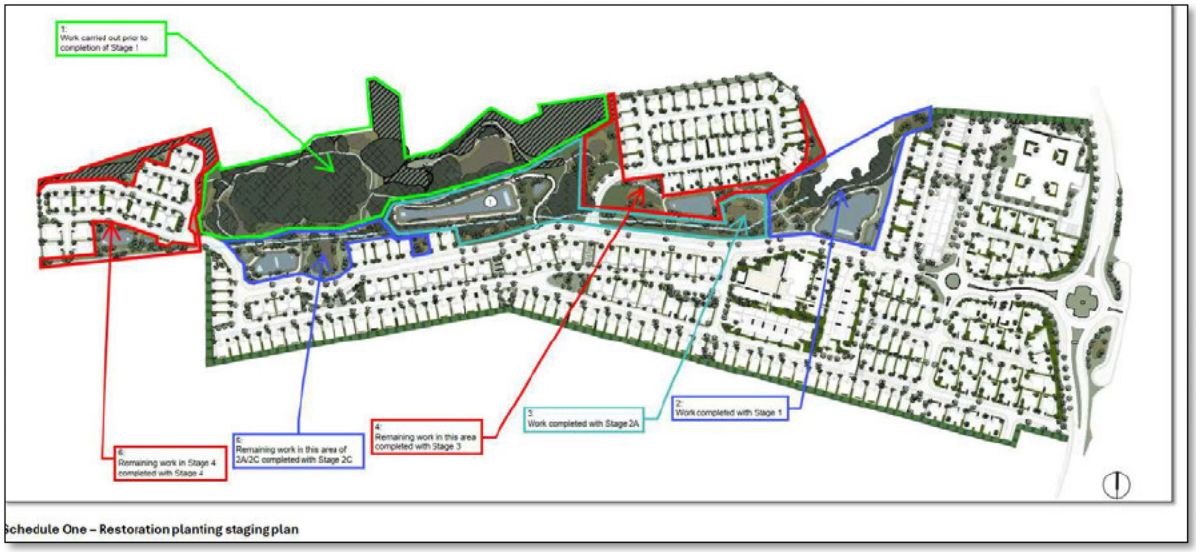


Figure 10: Restoration planting staging plan

3.3.2 Fauna Management

The Project will implement draft Ecological Management Plan (**EMP**) and Lizard Management Plans (**LMP**) that has fauna management protocols for long-tailed bats, native birds, and native fish. These measures include bat roost management procedures, lighting restrictions, seasonal restrictions on tree removal, bird nest checks prior to vegetation clearance, fish relocation plans, and lizard checks.

3.4 Landscaping and Urban Design

The landscaping strategy is implemented through the Landscape Plans and the draft WMEP. The Landscape Plans (**Appendix 22**) show the proposed landscape features, which includes the restoration and enhancement planting, fencing, boundary treatments, street trees, pathways, and active rest areas.

The LUDA (**Appendix 22**) details the Project's proposed landscape approach. It identifies a range of landscape and urban design measures incorporated into the Project, including arranging development around the central gully and existing landform; retaining and enhancing the kahikatea SNA, wetlands, watercourse and other mature vegetation; extensive ecological, streetscape and boundary planting; and the use of predominantly low-rise, articulated built form. The design also provides an integrated pedestrian and open space network connected to key natural features, landscape buffers at sensitive interfaces, and coordinated treatment of the Ōhaupō Road frontage to provide a clear transition between Te Awamutu's urban edge and the wider rural landscape.

3.5 Building Design

The Architectural Plans (**Appendix 6**) show the proposed typologies for the units and the number of each typology. Key typologies include:

- Single-storey retirement village units
- Two-storey retirement village units.

- Two-storey duplexes units (one level per unit)
- Multi-storey Apartments
- Serviced Apartments
- Single-level 100-bed care facility (**Appendix 6a**).

Table 3 details the deliverables for each stage and sub-stage.

Table 3 – Proposed Development Stages

Stage	Sub-Stage	Delivery
Stage 1	**Total**	**134 units plus the 100-bed care facility**
	Stage 1A	Standalone, single-storey retirement village units.
	Stage 1B	100-bed care facility
	Stage 1C	Apartment Block A and two-storey duplex units.
	Stage 1D	Standalone, single-storey and two-storey retirement village units.
	Stage 1E	Serviced Apartment Blocks D and E
Stage 2	**Total**	**200 units**
	Stage 2A	71 Units comprising single-storey standalone units, Apartment Blocks B and C, and the village hub.
	Stage 2B	65 units comprising single-storey standalone units and two-storey duplex units
	Stage 2C	64 units comprising single-storey standalone units and two-storey duplex units
Stage 3	**Total**	**44 units** comprising single-storey standalone units.
Stage 4	**Total**	**36 units** comprising single-storey standalone units and two-storey duplex units

3.6 Subdivision

The proposed scheme plans, prepared by Maven, and dated October 2026 (**Appendix 7**) detail the proposed subdivision stages.

- **Stage 0**: will involve fee simple subdivision of super allotments reflecting the overall stages and substages of the development. In addition, a land covenant is proposed over the SNA; and access and servicing easements are proposed to provide each super allotment with access to State Highway 3.
- **Stage 1**: will involve fee simple and unit title subdivision.
    - The fee simple subdivision will subdivide the super allotments for Stage 1A and 1D to create fee simple residential allotments for future retirement villas. It will also create road reserves and local purpose reserve (WWPS A) to vest in WDC, joint owned access allotments, road to vest with the Crown (new state highway roundabout intersection), and a 5m wide landscape

buffer strip covenant will be established along the northern boundary of Lot 39 and 69 and the southern boundaries of Lots 58-62.

- The unit title subdivision will provide for the units to be constructed in Stage 1C and 1E within their respective super allotments. This will occur once giving substantial effect to the construction of respective dwellings and apartments. In addition, this stage will establish a landscape buffer strip covenant along the northern boundary of the Stage 1C super allotment (Lot 1003).

- **Stages 2-4**: will involve unit title subdivision of the proposed units within the respective super allotments and stages. This will occur once giving substantial effect to the construction of respective dwellings and apartments. For apartments this will occur once the floor slab and external framework of the buildings has been constructed; and for duplex and single standalone units this will occur once the floor slab has been constructed. Easements will be provided for access between the super allotments; and the landscape buffer strip covenant will be located along the southern and southwestern units (PU 2062-2073, 2121-2136, 2165-2193) that adjoin the external boundary.

4. PART FOUR: Engagement and Consultation

This part provides a record of consultation and engagement undertaken with relevant local authorities, administering agencies, iwi authorities, hapū, Treaty settlement entities, infrastructure stakeholders and adjacent landowners. It also records engagement relevant to the written approval and affected-person considerations for the RMA approvals sought as part of the substantive application.

It also addresses the consultation-related information requirements applicable to the approvals sought under the FTAA, including the affected-person requirements in clauses 6 and 12 of Schedule 5. Consultation and engagement remain ongoing and are expected to continue through the Fast-track approvals process.

Consultation and engagement commenced before referral of the Project and has continued as the Project design, and technical assessments have been developed for the substantive application. Matters raised through consultation have been progressively considered through further technical investigations, workshops, modelling, revised design information and development of proposed conditions. Therefore, engagement has informed the development of the Project and the technical assessments supporting this substantive application.

Part Four summarises the consultation and engagement undertaken for the Project. The information includes the principal engagement events, correspondence, and responses received

Following the referral, engagement has commenced and is ongoing with the following entities:

- **Local Authorities**: Waipā District Council (WDC) and Waikato Regional Council (WRC).
- **Relevant Administering Agencies**: NZ Transport Agency (NZTA) and Department of Conservation (DOC).
- **Relevant iwi authorities, hapū and Treaty Settlement entities**: Waikato-Tainui, Ngāti Apakura, Ngati Mahanga, Maniapoto ki te Raki, and Ngāti Hikairo.
- **Key Stakeholders**: The adjacent landowners identified in **Appendix 24**.

4.1 Local Authorities

Engagement has commenced and is ongoing with both Waipā District Council and Waikato Regional Council staff. Engagement commenced with introductory meetings in December 2025 followed by the provision of technical reports and regular fortnightly Teams meetings from March 2026 through to lodgement of the SAR. A summary of the engagement actions with both Councils is set out below.

Waipā District Council

Waipā District Council staff received initial technical information on the proposed water and wastewater servicing for the TADL project in early 2026. The project team then met with Council Infrastructure staff to discuss the servicing approach and review draft information. Regular progress updates were made through fortnightly meetings between the project team and Waipā District Council (and Waikato Regional Council) staff. Waipā District Council was subsequently provided with draft technical reports covering archaeology, highly productive land, contamination, ecology, geotechnical matters, economics, retirement demand, land-



use capability, architecture and groundwater in August. WDC later provided technical feedback on these reports for consideration by the project team. Technical feedback on the geotechnical, water and wastewater aspects of the project was also provided in September for consideration, enabling any further comments to be incorporated. The project team also met with Council's Consent Manager in early October to review and discuss draft consent conditions to ensure the conditions offered to the Fast Track Panel in the Substantive Report were as complete as possible.

WDC confirmed by letter dated 15 October 2026 that the Applicant has actively engaged with these authorities prior to lodging the SAR.

Waikato Regional Council

Waikato Regional Council staff undertook a site walkover on 7 April 2026 which focused on the property's wetlands, streams and ponds, followed by written comments and draft peer-review feedback. The project team subsequently provided draft technical reports covering archaeology, highly productive land, contamination, ecology, geotechnical matters, economics, retirement demand, land-use capability, architecture and groundwater. WRC responded with technical comments on key reports and confirmed that no existing resource consents apply to the site.

WRC acknowledged the engagement and open dialogue by letter dated 16 September 2026 and noted the sharing of draft technical reports allowed feedback to be incorporated into the final reports and included with the Substantive Application.

WRC confirmed that the Applicant has actively engaged with these authorities prior to lodging the SAR.

4.2 Administering Agencies

NZ Transport Agency

NZTA is the Road Controlling Authority for State Highway 3 / Ōhaupō Road. Engagement with NZTA commenced prior to preparation of the ITA, with the transport-specific engagement documented in Section 6 of the ITA commencing with an information memorandum provided to NZTA in February 2026. This was followed by a series of further information requests, response memoranda and technical discussions between NZTA and the Project team, including an online meeting in June 2026 and subsequent written responses as the design was progressively developed and refined. Transport engagement is comprehensively documented in Section 6 of the ITA.

The Project team subsequently provided further information addressing the technical matters raised by NZTA. On 29 September 2026, NZTA issued a further information request relating to a narrower and more detailed range of matters, including connectivity and access; roundabout design, operation and visibility; active modes, public transport and pedestrian provision; Safe System Audits, lighting and approvals; and recommended conditions. As detailed in Section 6 of the ITA, the matters raised in relation to the roundabout are not considered to affect the ability to achieve an appropriately safe and efficient roundabout within the road and land area proposed for that purpose, with further detailed design and safety matters also addressed through the proposed consent conditions (see **Section 6.10** of this Report).

As detailed in the ITA, engagement with NZTA will continue once the application is lodged and, based on the nature of the further information requested, it is considered that the outstanding matters can be resolved between the Applicant and NZTA through following lodgement.

Department of Conservation

Although DOC was consulted in relation to the application, no approvals administered by DOC are sought through this SAR. As such, DOC's involvement has been limited to providing feedback on ecological matters, which has been considered in finalising the application and supporting technical assessments. Any future approvals required from DOC will be obtained separately through the applicable statutory approval processes.

Initial discussions commenced in July 2026, followed by a meeting with DOC staff and the provision of an information package in August 2026. DOC subsequently provided feedback on the Project's ecological assessments, management plans, and proposed mitigation measures. The Project team considered this feedback and, where appropriate, incorporated amendments into the Ecological Assessment Report, draft management plans, and proposed conditions of consent. This included refinements to habitat enhancement measures, management requirements, and ecological mitigation provisions. A number of refinements to the draft WDC and WRC conditions were also completed based on feedback from DOC to provide greater certainty over the mitigation measures (**Appendix 28 & 29**).

4.3 Treaty Settlement Entities

Formal tāngata whenua consultation and engagement has been undertaken with various Treaty settlement entities and iwi and hapu groups.

4.3.1 Treaty Settlement Entities

Waikato-Tainui

Engagement has been undertaken with Te Whakakitenga o Waikato, which is the governance body of **Waikato-Tainui** established following the 1995 Waikato Raupatu Settlement.

Engagement with Te Whakakitenga o Waikato occurred through phone calls and emails beginning in April 2026 with a project information package and an invitation to engage. Waikato-Tainui responded by email on 27 May acknowledging the commitment to engage with NITOW and the other groups.

A follow up discussion and email was undertaken in early October to provide an update on engagement activities over the preceding months with mana whenua groups. A copy of the Ngāti Apakura CVA was also provided along with a copy of the draft conditions and a commitment to continue engagement with Waikato-Tainui.

4.4 Iwi and Hapu Groups

Further engagement commenced with Nga Iwi Toopu o Waipā (**NITOW**), which is an iwi consultative group representing hapū across the Waipā District in New Zealand, via an introductory hui in March 2026 followed by a second hui in April 2026. Direction was sought in relation to which mana whenua groups NITOW should

be engaged with. A response was received on 14 April confirming that the following groups were considered important to contact:

- Waikato-Tainui
- Apakura Rünanga Trust
- Maniapoto ki te Raki
- Ngati Haua Trust
- Te Nehenehenui Trust
- Nga Iwi Toopu o Waipā
- Ngati Koroki Kahukura
- Ngati Mahanga and the
- Raukawa Trust.

An email was sent out to all of these parties on 21 April with a mana whenua summary report and key project plans inviting engagement on the project. Responses were received from Ngāti Apakura, Maniapoto ki te Raki and Ngati Mahanga, each group seeking the opportunity for further engagement and discussion on the project.

Ngāti Apakura

Engagement took place over April to August 2026 with Ngāti Apakura Representatives. A project briefing on 30 April was followed by a site walkover carried out on 20 May and a mana whenua workshop on 11 June along with representatives of Maniapoto Ki te Raki. Ngāti Apakura stated that they considered they had mana whenua status in the project area while Maniapoto ki te Raki did not. Maniapoto ki te Raki responded that they were there to support Ngāti Apakura and a direct hui between the two parties was recommended as a means to clarify this matter. No outcomes are known on this matter.

Further engagement took place with Ngāti Apakura representatives over June, July and a comprehensive **CVA** was provided to the project team by Ngāti Apakura on 13 August 2026. The CVA concluded that the cultural significance of the site was derived not from any individual sites (of which none are identified as being on the site) but from the enduring relationships between people, place, whakapapa and the natural environment. The CVA utilised the Pa Tuna Matauranga Framework to assess the Project. While Ngāti Apakura recongised the Project will result in the permanent conversation of rural land and modification of the environment, it also identified that the project offered significant opportunities to achieve positive environmental outcomes through ecological restoration, wetland enhancement, biodiversity protection and the exercise of kaitiakitanga. The CVA concluded that the project can be supported in principle provided the ecological restoration, wetland enhancement and environmental stewardship outcomes are delivered and maintained.

The Applicant accepts the findings of the Ngāti Apakura CVA and notes that WDC condition 48 requires the implementation of the appropriate accidental discovery protocol while conditions 49-51 in the draft conditions (**Appendix 28**) require the development and certification of a Cultural Effects Management Plan

(**CEMP**). It is considered that this combination of these conditions alongside the other consent conditions requiring the delivery of restoration and enhancement outcomes will ensure that the project enables the enhancement of the relationship of Ngāti Apakura with the whenua and wai of the site.

Ngati Mahanga

The initial information from the project did not result in a response from Ngati Mahanga, however an email was received from NITOW in July requesting a briefing on the project. A project briefing was provided by project team members with Jo Kukutai of Ngati Mahanga on 29 July 2026 and the request for a Cultural Impact Assessment was confirmed to proceed. An email was received from Jo Kukutai on 7 September stating that after recent discussions, Ngati Mahanga had decided not to submit a CIA for the project.

Maniapoto ki te Raki

An email was received on 21 April 2026 from Bill Harris requesting a briefing meeting on the project which was undertaken through a hui in Kihikihi on 13 May. Bill Harris then attended the site walkover along with Rawiri Bidois (also of Maniapoto ki te Raki) on 20 May. A drive of the entire site was completed with a focus on the site wetlands, streams and the remnant Kahikatea stand and the proposal to retain, protect and enhance these features. Rawiri Bidois and Dana Maniapoto attended the 11 June hui along with Ngāti Apakura representatives and it was agreed that an additional hui take place to further discuss the respective mana whenua positions of each party. An additional walkover was conducted with Dana Maniapoto on 18 June to ensure she had a clear understanding of the site context and natural features

An agreement was reached with Maniapoto ki te Raki to prepare a Cultural Values Assessment for the project and a confirmation to proceed was sent on 14 August 2026. However as at the date of the final Substantive Application submission, no CVA has been provided by Maniapoto ki te Raki.

Despite the lack of a CVA from Maniapoto ki te Raki, the project cultural and environmental outcomes will deliver benefits to all mana whenua parties. The applicant is open to further engagement with Maniapoto ki te Raki following lodgement of the Substantive Application and will continue to make this opportunity available.

Other Groups

The section 18 report also identifies Te Whakakitenga o Waikato together with the Waikato River Authority, Ngati Hikairo and the O-Tawhao Marae as relevant Maori groups in relation to the project area. A follow up discussion with NITOW on 15 September resulted in the following response:

Ngāti Hikairo

Ngāti Hikairo is included in our NITOW bulk communications through Frank Taipari-Thorne and also through Tai Huata. If you haven't heard from either of them, you can assume Ngāti Hikairo has no comment on the development. I'm not sure about Frank, but Tai definitely knows about the development.

Ōtāwhao Pā

Ōtāwhao was the original name of Te Awamutu, and the pā was occupied until 1839 but is now a neighbourhood. NIToW currently has no representative for Ōtāwhao and there is no contact to provide.



On the basis of this response, it is considered that appropriate engagement has taken place and will continue to occur through the Fast Track process with mana whenua.

4.5 Directly adjacent landowners

The Applicant undertook consultation with surrounding landowners and occupiers by providing letters containing information about the Project and inviting feedback and comments.

Appendix 24 identifies the landowners and occupiers who were consulted during this process. The owners and occupiers of the following properties have engaged through the Project's development.

4.5.1 420 Greenhill Drive

The owners and operator of the land and orchard at 420 Greenhill Drive contacted the project team via their planning consultant on 10 September requesting a meeting to discuss their potential concerns with the project and the reverse sensitivity associated with residential activity located adjacent to an operating kiwifruit property.

The Applicant has accepted a no complaints covenant in relation to 420 Greenhill Drive is acceptable in principle. Consultation with the landowner included a meeting and follow up emails through which no complaints covenants have been refined. On 27 October 2026, the Applicant sent back the latest iteration of the no complaints covenant for the landowner's review. As at the time of finalising the SAR, the Applicant has not received confirmation that the refined no complaints covenant had been accepted by the owner of 420 Greenhill Drive, but consultation is expected to continue throughout post-lodgement.

Further, details of the appropriateness of the no complaints covenant and the potential reverse sensitivity effects in relation to 420 Greenhill Drive are identified in **Section 6.6.3**.

4.5.2 2/405 Racecourse Road - Chris Venn

The Applicant met with owner of 2/405 Racecourse Road to discuss his questions and concerns. Concerns related to the potential for large volumes of stormwater to run off the developed site and impact his downstream property. It was agreed that the finalised Stormwater report would be shared with the owner when issued and additional consultation be carried out to respond to any remaining questions that they had.

The finalised SMP was sent to the owner of 2/405 Racecourse Road on 23 October 2026, and engagement will continue after the lodgement of the Fast Track application.

4.6 Responses to Feedback

This section provides an overview of the key design features and recommendations incorporated into the Project in response to feedback received from the groups identified above. Groups are only included where feedback resulted in, or informed, a design response.

Key responses to feedback include:

- **NZTA:** The design of the proposed roundabout meeting the relevant NZTA standards with further details confirmed through detailed design; and the timing of the roundabout being operational prior to occupation of Stage 1.

- **Ngati Apakura:** The inclusion of Ngāti Apakura's CVA recommendations in the Cultural Effects Management Plan.

- **Department of Conservation (DOC):** The provision of infill planting and additional terrestrial habitat to enhance the long-tailed bat's habitat to address terrestrial habitat enhancement raised by WRC. Updates to the draft EMP and LMP to require more specific pre-clearance checks for birds; and pre, ongoing, and post clearance checks for lizards. These protocols and mitigation measures were also incorporated into the draft District and Regional consent conditions.

- **DOC**: Conditions relating to the draft EMP were amended to include lighting restrictions within 50m of key habitat areas identified by DOC.

- **Waipa District Council:** The inclusion of a condition requiring restricting a connection to Council's water supply infrastructure for three years or until a new water treatment plant has been established, whichever is earlier (WDC Condition 59).

- **Waikato Fruit Packers:** Inclusion of the condition requiring registering of a no complaints covenant in relation to 420 Greenhill Drive.

- The development of technical reports, design responses, and conditions to address matters raised by WDC, WRC, DOC, and NZTA. Key updates to the technical documents include the EA, EME, GCA, IR, HPL Report, EcAR, ITA, and the GWR and those updates are summarised below:

    - The EME and GCA were updated following WDC's economic peer-review. This primarily related to updating figures and assumptions based on the latest available information.

    - The EA updated the technical assumptions and addressed additionality and displacement, concluding that the possibility of some displacement does not provide an economic reason to withhold otherwise suitable and deliverable capacity, as the Project is demonstrated to materially increase deliverable senior housing capacity, choice and competition in a market where projected demand significantly exceeds the identified pipeline.

    - The IR was developed in consultation with WDC and Waikato Waters. The proposed water and wastewater network connections were developed with WDC and confirmed as being suitable for the proposed development. WDC's Development Engineer reviewed the draft IR and confirmed the proposed network connections were acceptable, subject to further detailed design conditions.

    - The HPL Report was updated to include additional alternative land uses identified by WRC. This did not change the conclusions of the report.

    - The key updates to the EcAR are detailed above under the DOC engagement response.

    - The key updates to the ITA are detailed above. In addition, the proposed shared pathway upgrades from Greenhill Drive to Racecourse Road was developed in consultation with WDC and NZTA.

- The GWR was updated based on comments from WRC. These comments related to the proposed water take for construction dewatering and dust suppression, which enable an accurate identification and assessment of the proposed activities requiring resource consent under the WRP.

4.7 Engagement and Consultation Summary

Consultation and engagement undertaken during development of the Project has identified a number of recurring themes across the relevant local authorities, administering agencies, tangata whenua, infrastructure providers and adjoining landowners. These matters have informed the development and refinement of the Project design, technical assessments, management plans and proposed conditions.



5. PART FIVE: Resource Management Approvals

The purpose of **Part Five** is to identify and assess the RMA approvals required for the Project and to provide the statutory assessment supporting those approvals. This includes the relevant district land use and subdivision consents, regional resource consents, approvals required under applicable National Environmental Standards, and an assessment of the relevant national, regional and district planning and policy framework, Treaty settlement legislation and iwi management plans. The assessment of the Project is against the applicable statutory tests under the RMA and FTAA.

The following sections summarise the consent requirements for each planning document. A detailed assessment of the applicable resource consents under the WDP, WRP, and NES-FW, including any rule infringements, activity statuses, and permitted activities is provided in **Appendix 25**.

5.1 Waipā District Council Consents

The Project requires both land use consent and subdivision consent under the WDP.

5.1.1 Land Use Consent

Overall, resource consent is required as a **Non-complying Activity** under Rule 4.4.1.5(b) of the Waipā District Plan (WDP). The Project proposes a comprehensive retirement village within the Rural Zone, where such development is not anticipated by the activity framework.

In addition, the Project results in built development that will not comply with the applicable Rural Zone performance standards and District-Wide performance standards of the WDP. These non-compliances give rise to a combination of consent requirements.

5.1.2 Subdivision Consent

The Project requires subdivision consent as a **Non-complying Activity** under Rule 15.4.1.1 of the WDP. The Project includes staged fee simple and unit title subdivision to facilitate the retirement village, including lots for residential units, village hub and care facilities, roads, pump stations, infrastructure, and reserves. As the proposed subdivision is not otherwise provided for by the District Plan, it requires resource consent as a Non-complying Activity.

The subdivision is also unable to comply with several other Rural Zone subdivision standards. These include provisions relating to the number and size of additional allotments, road frontage, building platform requirements and other standards designed principally for rural subdivision outcomes. The Project is not intended to comply with all the underlying Rural Zone subdivision standards, as those provisions are not directly relevant to the Project. Instead, the subdivision layout has been designed to create development ready lots to enable retirement village development.

5.2 Regional Council Consents

Overall, the proposal requires several resource consents under the Waikato Regional Plan with the overall activity status for a **Non-complying Activity.**

- **Rule 3.3.4.24 – Discretionary Activity**: for a temporary groundwater take associated with construction dewatering for the proposed stormwater ponds, wastewater infrastructure, and earthworks; and a temporary groundwater take for dust suppression from an existing bore (WRC Unique Identifier 70_1237).
- **Rule 3.3.4.26 – Non-complying Activity**: for a temporary surface water take associated with construction dewatering for the proposed stormwater ponds, existing farm ponds, wastewater infrastructure, and earthworks.
- **Rule 3.5.11.8 – Discretionary Activity**: for the discharge of stormwater to surface water associated with the Project's operational stormwater management system.
- **Rule 3.6.4.13 – Discretionary Activity**: for temporary and permanent damming and diversion of water associated with interception with the proposed stormwater ponds, wastewater infrastructure, earthworks, permanent retaining walls and the proposed building platforms across the site.
- **Rule 4.2.4.4 – Discretionary Activity:** for the placement of culverts and stormwater discharge structures into the unnamed tributary.
- **Rule 5.1.4.15 – Discretionary Activity**: for soil disturbance, roading, tracking, vegetation clearance and riparian vegetation clearance within high-risk erosion areas.
- **Rule 5.2.5.5 – Controlled Activity**: for the placement of cleanfill in areas outside the identified high risk erosion areas.
- **Rule 5.2.5.6 – Discretionary Activity**: for the placement of cleanfill located within high-risk erosion areas.

5.3 National Environmental Standards Consents

Based on a review of the Project and the National Environmental Standards in force, the National Environmental Standard for Freshwater 2020 (**NES-FW**) is the only relevant NES to the Project.

5.3.1 National Environmental Standard for Freshwater 2020

In summary, the Project engages resource consent for three activities, under the NES-FW, one of which has Prohibited Activity status. These activities comprise:

- **Regulation 39 –** restricted discretionary activity: for vegetation clearance for the purpose of restoration of the natural inland wetlands.
- **Regulation 53** – prohibited activity: for the earthworks associated with the removal of the 33m^2 natural inland wetland to provide for the stormwater pond.
- **Regulation 54** – non-complying activity: for vegetation clearance and earthworks associated with the earthworks and construction of the development within 10m setback of a natural inland wetland; and the damming and diversion associated with the infrastructure for the development and discharge of stormwater associated with the stormwater management system within 100m of the natural inland wetlands.

The Project has been assessed against the relevant NES-FW regulations in **Appendix 25**.

6. PART SIX – Assessment of Effects

6.1 FTAA Framework

Schedule 5 clause 5(4) requires a consent application to provide an assessment of an activity's effects on the environment covering the information in clauses 6 and 7.

Table 4 below confirms the Project's assessment of effects relates includes the matters identified in Schedule 5, clause (6)(1) of the FTAA.

Table 4 – Schedule 5, Clause 6(1) Assessment of Effects Requirements

Clause 6(1) of Schedule 5 of the FTAA	Location of information
(a) an assessment of the actual or potential effects on the environment:	Addressed in **Part Six** of this report.
(b) if the activity includes the use of hazardous installations, an assessment of any risks to the environment that are likely to arise from such use:	Not applicable. No hazardous installations are proposed.
(c) if the activity includes the discharge of any contaminant, a description of— (i) the nature of the discharge and the sensitivity of the receiving environment to adverse effects; and (ii) any possible alternative methods of discharge, including discharge into any other receiving environment:	Not applicable. The Project does not involve contaminated land.
(d) a description of the mitigation measures (including Safeguards and contingency plans where relevant) to be undertaken to help prevent or reduce the actual or potential effect of the activity:	Addressed in **Part Six** of this SAR. The proposed mitigation measures for any actual or potential effects have been discussed for each effect. Further, the mitigation measures are implemented either through the design of the project or as conditions of consent.
(e) identification of persons who may be affected by the activity and any response to the views of any persons consulted, including the views of iwi or hapū that have been consulted in relation to the proposal:	**Part Four** identifies persons or groups who may be affected by the Project. Regarding iwi and hapu groups, **Appendix 23** includes a cultural values assessment for Ngaati Apakura.
(f) if iwi or hapū elect not to respond when consulted on the proposal, any reasons that they have specified for that decision:	**Part Four** details the instances and reasons for iwi or hapuu not electing to respond.
(g) if the scale and significance of the activity's effects are such that monitoring is required, a description of how the effects will be monitored and by whom, if the activity is approved:	Not applicable. The Project is for the development of a retirement village which requires no ongoing monitoring as the effects associated with the Project are well understood and secured through conditions of consent.
(h) an assessment of any effects of the activity on the exercise of a protected customary right.	Not applicable. No protected customary rights have been identified as being relevant to the site and consequently the Project.

In terms of the matters to be covered, of the FTAA identifies the assessment must cover the matters identified in Schedule 5, clause 7(a)-(g).

Table 5 below identifies the matters in clause 7 and identifies the specific effects to be assessed. Noting specific effects may relate to more than one effects classification under (a)-(g).

Table 5 – Schedule 5, Clause 6(1) Assessment and Level of Effects

Clause 6(1) of Schedule 5 of the FTAA	Specific Effects Assessed	Overall Level of Effect
(a) any effect on the people in the neighbourhood and, if relevant, the wider community, including any social, economic, or cultural effects:	Economic effects – **Section 6.2**	**Positive effects.**
(b) any physical effect on the locality, including landscape and visual effects:	Landscape and Urban Design Effects – **Section 6.3**	**Acceptable** with **moderate** and **positive** landscape effects and **positive** urban design effects.
	Groundwater and Surface Water Effects – **Section 6.5**	**Minimal** and therefore **Acceptable.**
	Rural Production Effects – **Section 6.6**.	**Less than minor** and therefore **acceptable.**
	Transport Network Effects – **Section 6.10.**	**No more than minor** and therefore **acceptable.**
	Water and Wastewater –**Section 6.11**	**Less than minor** and therefore **Acceptable.**
	Earthworks and Construction – **Section 6.13**	**Less than minor** and therefore **Acceptable.**
(c) any effect on ecosystems, including effects on plants or animals and physical disturbance of habitats in the vicinity:	Ecological Effects – **Section 6.8**	**Positive.**
(d) any effect on natural and physical resources that have aesthetic, recreational, scientific, historical, spiritual, or cultural value, or other special value, for present or future generations:	Archaeological Effects – **Section 6.7**	**Less than minor** and therefore **acceptable.**
	Cultural Effects – **Section 6.9**	**Positive.**
(e) any discharge of contaminants into the environment and options for the treatment and disposal of contaminants:	Stormwater and Flooding Effects – **Section 6.12**	**Less than minor** and therefore **Acceptable.**
(f) any unreasonable emission of noise:	Earthworks and Construction – **Section 6.13**	**Less than minor** and therefore **Acceptable.**
(g) any risk to the neighbourhood, the wider community, or the environment through natural hazards or hazardous installations.	Geotechnical Suitability – **Section 6.4**	**Less than minor** and therefore **Acceptable.**

The following sections assess the specific effects identified above on a topic-by-topic basis. Each section describes the relevant environmental effects arising from the Project, including construction, operational,



temporary, and permanent effects where applicable. The assessment relies on the conclusions of the relevant technical experts and records the residual level of effect remaining after avoidance, remediation, mitigation, and other management measures have been considered.

In undertaking this assessment, it is important to recognise that the FTAA establishes a different decision-making framework from that typically applied to resource consent applications under the RMA. While the nature, extent, duration, and significance of effects remain important considerations, the FTAA does not require the achievement of a particular effects threshold before consent may be granted. Rather, the assessment of environmental effects forms part of a broader statutory evaluation. Under section 85(3) of the FTAA, effects must be considered in the context of the Project as a whole, including the extent to which those effects are acceptable when weighed against the regional and national benefits expected to result from the Project. Accordingly, the purpose of the following assessment is not solely to determine the scale of individual effects, but to identify their significance to provide a basis for determining whether they are acceptable within the broader balancing exercise contemplated by the FTAA.

6.2 Economic Effects

Section 1.7 of this Report outlines the Project's significant economic benefits at a regional level. For this SAR benefits and positive effects are used interchangeably.

6.2.1 Economic Benefits

The EA identifies the following quantified benefits of the Project:

- **Total Net Positive Impact**: $160 million of GDP.
- **Employment**: $95 million in wages and 2,830 FTE-years of employment over a 30-year period.
- **Construction Impacts**: $76 million from one-time construction activity.
- **Operational Significance**: $85 million from future onsite activity at the village and care home.

6.2.2 Economic Costs

Economic benefits must be viewed in the context of the economic costs. The EA concludes that the Project's net economic benefits substantially outweigh both the quantified opportunity cost of approximately $0.5 million associated with forgone rural production on the site and the limited qualitative costs relating to infrastructure servicing requirements, transport emissions, and the loss of a small and fragmented area of highly productive land.

6.2.3 Economic Effects Summary

The EA concludes the Project delivers significant regional economic benefits that outweigh any costs by a wide margin. In reaching this conclusion, the EA identifies and quantifies the Project's net economic impacts, alongside a range of significant qualitative benefits that collectively contribute to the overall economic benefits of the Project.

On this basis, the EA provides a robust basis for concluding that the Project will generate an **overall positive net economic benefit/effect for the region**.



6.3 Landscape and Urban Design Effects

6.3.1 Landscape Effects

The LUDA considers the effects of the Project on the physical, perceptual and associative dimensions of landscape values, including the design responses to manage the transition from rural to urban.

Physical Landscape Values

The development has been designed around the central gully and generally aligning roads and buildings with the existing landform. Building platforms and roads will generally be lowered approximately 1.5–5 m below existing ground levels, while the up/down villa typologies and JOAL arrangements distribute level changes across the site and reduce the extent and prominence of retaining structures. The retention of the central gully, watercourse, wetlands, kahikatea remnant and mature vegetation will maintain important physical landscape features. Boundary and internal planting will further integrate modified slopes, retaining structures and built development. The restoration and expansion of wetlands, riparian planting, approximately 2.5 ha of vegetation management and enhancement, and approximately 11 ha of proposed planting will also strengthen the vegetated landscape framework as planting establishes.

Perceptual

The visual prominence of development is moderated through predominantly single-storey buildings, the lower position of building platforms, retention of mature vegetation, boundary planting and the use of varied and articulated building forms. The larger aged-care building is specifically moderated through its single-storey form, modulation, varied roof forms, cladding and glazing, setbacks and surrounding landscape treatments. The assessment identifies visual effects from public viewpoints as low-moderate (less than minor) and expects these effects to reduce as planting matures. Wider views toward Pirongia and the rural landscape are also expected to remain available from many public locations.

Associative

The Project will change the site's contribution to the rural character and amenity values recognised by the District Plan and provide a defined rural and urban boundary. The LUDA identifies this effect is considered in the context of the existing residential development and Ohaupō Road, which already influence the northern entrance to Te Awamutu. The predominantly low-rise built form, extensive landscape treatment, landscape buffers and setbacks associated with the kahikatea remnant and wetlands will establish a more defined transition between the existing urban area and the wider rural environment. The assessment considers that the Project, together with the roundabout and streetscape treatments, will create a clearer and more legible northern entrance to Te Awamutu, while acknowledging that the site's existing rural character will change.

Summary

Overall, the LUDA finds the Project will provide a high-quality, high-amenity lifestyle village with the retained natural features and clear northern entrance to Te Awamutu. However, these outcomes are moderated by the change from open pastoral land to residential character. As such, the LUDA concludes the Project's landscape effects are moderate while providing positive landscape effects.

6.3.2 Urban Design

The Urban Design Effects Assessment considers how the Project responds to the site and surrounding context, including the existing urban-rural interface, site topography and adjoining properties. It assesses the proposed layout, built form, movement network, public and private interfaces, landscaping and CPTED measures, including their effects on character and amenity, connectivity, legibility, safety and neighbouring properties.

The proposed built form responds to a number of these matters through predominantly low-rise buildings, gabled and varied roof forms, familiar materials and varied façade treatments, with larger apartment and communal buildings incorporating modulation and articulation to reduce their apparent bulk. Taller buildings are generally concentrated towards the centre of the site, while single-storey buildings are generally located closer to neighbouring properties. Dwellings and their outdoor spaces have also been configured to maximise sunlight access, with private outdoor living areas complemented by communal open spaces and recreational facilities throughout the village. Together with landscape buffers and the integration of buildings and retaining structures with the site's topography, these measures will moderate building bulk and support integration with the surrounding residential and rural environment.

The Project also addresses the relationship between development and the public realm. Along Ohaupō Road, building setbacks, relatively low building forms and coordinated streetscape planting will provide a landscaped interface with the road. Within the development, buildings are oriented towards internal streets and common spaces, while visually permeable fencing, low planting and maintained sightlines will retain visual connections and provide opportunities for passive surveillance. The JOALs incorporate consistent surface treatments, planting and paving to distinguish them from adjoining streets and provide legible accessways.

A connected pedestrian network will link housing with the community hub, open spaces and recreational areas, with connections also provided to Ohaupō Road and provision made for a potential future connection to Innes Place. Pocket parks, relaxation areas, vegetable gardens, native restoration areas and retained natural features contribute to the open-space character and provide a range of communal spaces. The combination of passive surveillance, clearly identifiable entrances, permeable fencing, controlled access and clear distinctions between public, communal and private spaces also support CPTED outcomes.

In terms of adjoining properties, the principal urban design effects identified are visual dominance, shading, privacy and interface amenity. The predominantly single-storey development near boundaries, concentration of taller buildings towards the centre of the site, lower elevation of parts of the development and proposed landscape buffers will moderate building bulk and opportunities for overlooking. The LUDA concludes that the urban design effects associated with building dominance on the adjoining neighbours will be low (**less than minor**).

In terms of urban design, the LUDA considers how the Project responds to its site and surrounding context, including the existing urban-rural interface, site topography and adjoining properties. It assesses the effects of the proposed layout, built form, movement network, public and private interfaces, landscaping and CPTED measures on urban character, amenity, connectivity, legibility, safety and neighbouring properties.

Overall, the LUDA concludes the Project will provide **positive** urban design in relation to its opportunities and constraints.

6.3.3 Landscape and Urban Design Effects Summary

The LUDA identifies that the Project will result in positive urban design outcomes and positive landscape effects associated with the high-quality development integrated with the existing site features, the enhancement and restoration of natural features, and clear definition of a legible northern entrance to Te Awamutu. The LUDA also notes that from a landscape perspective, "*the permanent change of the site from rural land to a retirement village of urban character will result in moderate landscape effects".* The overall landscape effects assessment considers the Project against the physical, perceptual and associative landscape values of the site and surrounding environment. This assessment is informed by the visual effects assessment in **Appendix 22**, which considers views from public locations. Public visual effects are assessed as ranging from low-moderate to very low (less than minor) once vegetation matures.

The LUDA has been prepared in accordance with Section 104(1A) of the RMA which requires a consent authority, when considering the effects of a district land-use activity, to disregard views from private property. Accordingly, effects on views from adjoining private properties are not relied upon for the purposes of this effects assessment. This does not, however, alter the LUDA's broader assessment of landscape effects, which encompasses changes to physical, perceptual and associative landscape values beyond the effects on specific views.

The Project's moderate landscape effects are due to the permanent transformation of the site from an open pastoral landscape to an urban retirement village. However, the public visible change will be experienced from the Ohaupō Road frontage, where visual effects are assessed as low-moderate to very low.

On balance, the Project incorporates measures to address the **moderate** landscape effects as far as practical while providing **positive** landscape and urban design outcomes and is therefore considered **acceptable** from a landscape and urban design perspective.

6.4 Geotechnical Suitability

The geotechnical suitability of the Site for the proposed development has been assessed in the GAR (**Appendix 11**). The GAR considers the underlying ground conditions and relevant geohazards, together with the earthworks, ground improvement and foundation measures required to establish suitable residential building platforms and supporting infrastructure.

The key findings and recommendations of the GAR are included below:

- **Earthworks**: The GAR confirms the site's Hamilton Ash Formation (HAF) soils are generally suitable for use as engineered fill provided the moisture content does not impact the compaction target. Nevertheless, the GAR considers this can be avoided and mitigated through the HAF generally extending to the depth of the proposed cut, avoiding the use of Rangitawa Tephra and Walton Subgroup soils as engineered fill, mixing deeper (wetter) cuts with overlying cut soils, and unforeseen cut to fill waste confirmed by a geoprofessional engineer during quality control. Permanent cut and fill batters are recommended to be limited to a maximum gradient of 1V:2.5H where up to 3 m high, with batters exceeding 3 m adopting a maximum gradient of 1V:3H. Subsurface drainage, including drainage blankets and subsoil drains, will also be incorporated beneath areas of deep fill over existing overland flow paths and where groundwater is encountered. The final earthworks design will be subject to review by the project geoprofessional.

- **Retaining Walls:** The GAR confirms that the proposed retaining walls are globally stable. The walls will be subject to specific engineering design to account for surcharge loads and site-specific ground conditions.

- **Slope Stability**: The proposed retaining walls and gabion structures are suitable to achieve the desired form of the village. Specific design requirements are identified for the gabion wall adjacent to Pond B, including shear keys, subsurface drainage, and stormwater management measures to be confirmed during detailed design.

- **Liquefaction**: will be addressed through the proposed building foundations and the engineered fill within the gully and removal of potentially liquefiable alluvium beneath buildings in Stage 2A.

- **Settlement:** will be addressed through preloading, temporary overfilling, settlement monitoring and, in some areas, removal of alluvium and softened soils prior to placement of engineered fill. Settlement monitoring will continue until greater than 90% of the anticipated settlement has occurred, with a monitoring period of approximately six months considered appropriate based on the assessed low level of secondary settlement. Alternatively, buildings within higher-risk areas may be supported on piles founded within competent soils beneath the fill.

- **Preliminary Foundations**: the variable ground conditions have been recognised and are addressed by the proposed engineered fill and foundation design approach. While the bearing capacity of the existing soils within the alluvial plain and gully areas is variable, buildings within these areas will be founded on engineered fill capable of providing the required geotechnical bearing capacity. The low hills soils are similarly assessed as providing suitable bearing capacity.

Overall, the GAR concludes that the Site is suitable for the proposed retirement village development. The identified geotechnical and natural hazard risks can be appropriately mitigated through implementation of the recommended earthworks, retaining structure, drainage, settlement monitoring, and foundation design measures, which are reflected in proposed WDC Conditions 43 and 55.

On that basis, geotechnical and natural hazard risks are expected to be **less than minor** and therefore **acceptable**.

6.5 Ground Water Effects

As detailed in in the GWR, groundwater conditions across the Site vary according to local topography and geology. The GWR identifies and recommends measures to managed groundwater effects associated with

- temporary construction dewatering associated with the proposed stormwater wetlands and wastewater infrastructure,

- long-term groundwater interception and diversion to the proposed unlined stormwater pond (Pond B), and

- long-term groundwater interception and diversion by subsoil drains.

6.5.1 Temporary Groundwater Effects

Short-term temporary dewatering effects are associated with the construction earthworks for the proposed stormwater wetlands and wastewater infrastructure. In addition, groundwater abstraction is required during construction for dust-suppression.

Temporary Dewatering

The GWR identifies that temporary dewatering will be required for during the construction of the stormwater wetlands (ponds), Wastewater Pump Station B (WWPS B), and any wastewater pipeline trenching below the ground water level.

In relation to construction dewatering, the GWR assessed a conservative worst-case scenario and identified that the largest groundwater abstraction rates would occur during construction of Stormwater Pond B (19 m^3/day), WWPS B (3.2 m3/day), and the deepest section of wastewater pipeline between MH4B-2 and MH4B-3 in the lower-lying western portion of the Site (37.6 m^3 / day).

The GWR concludes that potential construction drawdown effects on nearby bores; surface water flows and downstream hydrology; the hydrological regime, extent and ecological function of retained natural inland wetlands; and ground subsidence can be managed through the proposed design and construction management measures:

- Implementing a water management plan and erosion and sediment control plan to manage the abstracted groundwater and diverted inflows.
- The maximum groundwater take being above the nearest consented groundwater take.
- Intercepted groundwater is discharged back to the receiving drainage upstream of the proposed works.
- The natural inland wetlands are located upgradient of the proposed stormwater wetlands.
- The projected groundwater drawdown will not extend beneath nearby residential dwellings.

Temporary Abstraction for Dust Suppression

The GWR assessed the potential drawdown effects of this take using conservative hydrogeological parameters and a pumping scenario of 100 m^3/day for 120 days. The modelling identified drawdown of less than 10% of the available water column in all surrounding bores assessed.

Accordingly, the GWR concludes that effects on nearby bores will be minimal and that the effects of the proposed groundwater take for dust suppression are less than minor.

Summary of temporary effects

Based on the above, the GWR concludes the short-term groundwater effects associated with construction dewatering and groundwater abstraction for dust suppression are localised and temporary and are managed through the design and management measures.

The design measures have been incorporated into the design of the Project, and the proposed recommendations are secured by the relevant draft conditions proposed for the groundwater take and land wells in the Waikato Regional Council consents in **Appendix 29**.

On this basis, the temporary groundwater effects are expected to be localised and short-term and will result in **less than minor effects** on groundwater users, connected surface waters, ecological features, or neighbouring land and therefore result in an **acceptable** level of effect.

6.5.2 Permanent Groundwater Drawdown and Diversion Effects

Permanent groundwater diversion and drawdown are associated with the operation of the proposed stormwater wetlands and subsoil drainage network following completion of the development.

The GWR confirms the long-term groundwater drawdown effects are avoided and mitigated through the design and location of the subsoil drains and the proposed stormwater ponds:

- Subsoil drains will be installed beneath building platforms and behind retaining walls to capture and divert groundwater seepage flows to the Site's stormwater system.
- Stormwater Ponds A, C, D and E will be lined, which avoids associated mounding or drawdown effects.
- Stormwater Pond B will be unlined and has been designed with a permanent water level above the existing ground level in combination with the continual recharge from upgradient and the low permeability of in-situ materials.

6.5.3 Groundwater Effects Summary

The GWR concludes the potential short-term and long-term groundwater effects associated with the construction and operation of the Project are short-term (construction related only), localised within the site, and can be appropriately managed through the proposed design and management measures. Further, the GWR anticipates the Project over time will result reduced nutrient inputs into shallow groundwater and the Mangapiko Stream tributary relative to the existing rural baseline.

The design measures have been incorporated into the design of the Project, and the proposed recommendations are secured by the groundwater take conditions in the draft Waikato Regional Council conditions in **Appendix 29**.

On this basis, the project appropriately avoids and mitigates the residual long-term effect of groundwater drawdown to a scale that is **less than minor** while **improving** the site's groundwater and downstream surface water quality when compared to the existing environment. As such, the long-term groundwater effect is assessed as being **acceptable**.

6.6 Rural Production Effects

To establish the proposed integrated senior living village, the Project will change the predominant use of the Site from rural production to a retirement village and aged-care development while restoring and enhancing over 1.6 ha of high value ecological features. The actual and potential effects associated with the loss of

highly productive land and the establishment of the proposed development within a rural environment on rural land use are considered in the following sections

An assessment of the Project against the relevant requirements of the NPS-HPL (namely the Exemption Test under Clause 3.10) is provided in **Section 7.1.3**. The assessment concludes that, due to considerable site constraints and the benefits of the Project outweighing the cost of losing productive land, the Project meets the requirements of Clause 3.10 and can be developed.

6.6.1 Loss of HPL

To provide for the retirement living, the proposal will reduce the availability of highly productive land for primary production by permanently converting 7.1 ha of rural zoned land identified as being highly productive under the definition of the National Policy Statement for Highly Productive Land. This loss is permanent. However, the extent of the effect is influenced by the functionality of the HPL to support primary production activities and its location within highly productive land resource.

The SLUC Report (**Appendix 13**) identifies that the highly productive land on the Site occurs as small, isolated pockets surrounded by steeper topography and lower-class soils. As a result, the report concludes that these areas lack the size and continuity necessary to function as a cohesive productive land resource.

Productive Capacity of the Site

The HPL Report assessed the Site against the NPS-HPL and concluded that several permanent constraints limit its productive potential and economic viability. Despite exploring a range of improved land management practices, alternative production strategies, water efficiency measures, and boundary adjustments, the assessment found that no economically viable primary production use could be established on the Site. This included a specific assessment of kiwifruit production, recognising the presence of established kiwifruit orchards on adjoining land to the north and south. The assessment concluded that kiwifruit production would not represent a viable use of the Site due to factors constraining yield and profitability. Similarly, when considering a range of primary production activities, including dairy farming, support land for dairy farming, sheep and beef grazing, arable cropping, and intensive vegetable production, the assessment found that none were economically viable on the Site.

The report attributes this outcome to fragmentation of the surrounding and on-site land resource, the limited and discontinuous nature of the highly productive land, and the influence of adjacent urban development. It also notes that the Site's proximity to the urban boundary has contributed to land values that significantly exceed those associated with productive rural land, reducing the likelihood of ongoing investment in primary production.

Productive Capacity of the District

In terms of wider productive capacity, development on highly productive land can fragment larger, contiguous productive land resources and reduce the efficiency of primary production activities.

In this case, the AgFirst Report concludes that fragmentation effects would be limited. The report notes that the surrounding highly productive land resource is already fragmented by major infrastructure, smaller landholdings and rural-residential development. In addition, the highly productive land on the Site occurs as isolated pockets rather than a single contiguous resource. The Site is also located on the edge of a wider

highly productive land area, meaning its development would not materially fragment or isolate the remaining highly productive land resource to the west.

Furthermore, in terms of the wider productive capacity, the AgFirst concludes that the loss of 7.1 ha of highly productive land would not result in a material reduction in productive capacity within the Waipā District. While the proposal would permanently remove this land from productive use, it represents approximately 0.01% of the district's highly productive land resource.

Removal of HPL Summary

The proposal will result in the permanent conversion of some highly productive land to retirement village and residential care facility. While there is a direct loss of HPL, the AgFirst Assessment notes the site is not viable for land based primary production, the overall loss of HPL in the context of the district's resource is less than minor, and the location of the HPL being at the edge of a continuous highly productive area will not fragment areas of highly productive land.

Having regard to these factors and the conclusions of the technical assessments, the residual effects relating to the loss of highly productive land both rural land uses are assessed to be **less than minor** and therefore **acceptable**.

6.6.2 Reverse Sensitivity Effects

The site is zoned Rural and shares boundaries with both rural-zoned land to the south, west and north and residentially zoned land to the south-east. The Project seeks to establish residential development within a rural fringe environment adjoining land located within the Rural Zone that are used for rural production. This conflict in land uses raises the potential for reverse sensitivity effects particularly regarding existing rural production activities currently taking place on neighbouring sites. The established rural activities adjoining the Site comprise:

- Established Kiwifruit Orchard located at 4/5022 Ohaupo Road to the north.
- Established Kiwifruit Orchard at 420 Greenhill Drive to the south.
- Grazing paddocks at 2/405 Racecourse Road and the adjoining paddocks to the west.
- Grazing paddocks as part of a small rural lot located at 5022 Ohaupo Road to the north.

Reverse sensitivity is generally a secondary effect that arises where a new sensitive activity is established in proximity to an existing lawful activity and subsequently creates pressure for constraints to be imposed on that activity. Therefore, the assessment of reverse sensitivity requires consideration of the direct effects that future occupants are likely to experience from surrounding activities, as these effects provide the basis upon which complaints or restrictions may arise. It is also recognised that future occupants of the site are choosing to establish within a rural – peri-rural environment and they are expected to accept a reasonable level of amenity effects in the context of the surrounding established activities.

Against that framework, the assessment below considers the nature and extent of direct effects likely to be experienced by future residents, together with the design features and mitigation measures incorporated into the Project to ensure that new residents will experience a level of direct effects from the adjacent rural

activities that is acceptable and realistic. From there, a conclusion as to the secondary reverse sensitivity effects can be determined.

Kiwifruit Interfaces

In terms of the adjoining operational kiwifruit orchards, the AgFirst Report identifies direct effects relating to spray drift, noise, and effects associated with general operations.

In general, the direct effects are managed in part by the following planning constraints.

- **Spray Drift**: Agrichemical spraying forms part of the normal operation of the adjoining kiwifruit orchards. The Waikato Regional Plan manages spray drift effects. Section 6.2 contains permitted activity rules related to spot spraying (handheld spraying) and the widespread application of agrichemicals. Both rules require no significant adverse effect of off-target drift and the notification of adjoining properties within where there is spraying within 50m of an adjoining boundary. In addition, the Waikato Regional Plan and the New Zealand Standard for the Management of Agrichemicals (NZS 8409:2004) identifies shelter belts greater than 3m in height and 1m thick result in a low drift hazard.

- **Noise**: The Rural Zone noise provisions recognise that noise is an inherent component of primary production. This is reinforced by Rule 4.4.2.15, which permits noise from general farming activities, such as farm animals, agricultural vehicles or equipment, provided they are carried out in accordance with accepted farming practices and use the best practicable measures to minimise noise. Further, any noise effects are not expected as frost fans require resource consent as a restricted discretionary activity (Rule 4.4.2.42) and audible bird scaring devices are not permitted as the adjoining properties do not meet the minimum 10ha or cropping area required by the Rule 4.4.2.20.

- **Operational Effects**: Effects arising from general operations of the kiwifruit orchards primarily relate to those that differ from general rural expectations. The HPL Report identifies this is likely associated with the operation of machinery. However, the primary effect associated with the operation of machinery is noise which is addressed above.

4/5022 Ōhaupō Road

The HPL Report identifies the direct effects between the northern orchard and the development mitigated through the design and location of the proposed villas.

- First, the number of villas adjoining the orchard at 4/5022 Ōhaupō Road is limited with five villas directly adjoining the established orchard, while the remainder of the orchard to the northwest is separated from the Project by wetlands, stormwater infrastructure, and other non-residential areas.

- Second, the cross-sections in the Landscaping Plans (**Appendix 22a**) show that the future villas will be set back approximately 7 m from the adjoining boundary and positioned at a lower elevation than the land to the north. A retaining wall approximately ranging 0 m – 4.5 m in height (**Appendix 18**) will be located between the villas and the northern boundary, with vegetation established along the top of the retaining wall, providing additional separation.

Additionally, the HPL Report identifies that the proposed mitigation measures are supported by the physical separation between the adjoining orchard activity and the proposed villas, the presence of existing shelterbelt planting, and the implementation of a prior notification process for spray application events. The orchard activity to the north is separated from the site by a 7 m wide accessway, with the nearest vines are established at least 15 m from the common boundary. Accordingly, a minimum separation distance of approximately 22 m is maintained between the productive orchard area and the proposed villas. This separation is further supported by existing shelterbelt planting and notification systems, which form part of the orchard's operational management practices and assist in reducing the potential for cross-boundary spray drift effects.

420 Greenhill Drive

In terms of the southern orchard, 54 villas will directly adjoin the common boundary, noting that only 37 dwellings are adjacent to the existing kiwifruit operation with the remaining 17 dwellings adjacent to rural pasture. The HPL Report identifies that the direct effects can be managed through building setbacks and proposed buffer planting treatment.

For the 37 villas directly adjoining the kiwifruit operation, the HPL Report identifies that the direct effects on future residents will be mitigated through the building setbacks in combination with the 5m wide buffer planting along the adjoining boundaries (shown in cross section drawings in **Appendix 22a**). The proposed villas will be setback at least 6.5 m from the adjoining boundary. Taken together, the HPL Report confirms the proposed mitigation measures adequately mitigate the reverse sensitivity effects.

In addition, the HPL Report identifies features within the existing environment that further support the mitigation measures. The HPL Report identifies the southern orchard has an established mature shelterbelt buffer and operates within a peri-urban environment with residential dwellings adjoining it to the south-west. As such, the HPL Report identifies these features show the existing orchard already operates within a semi-urban environment and manages its cross-boundary effects within the site.

As detailed in **Part Four**, the owner of 420 Greenhill Drive requested reverse sensitivity matters be addressed through the no complaints covenant. To address the matters raised, the Applicant proposed a no complaints covenant through conditions applicable to those dwellings adjacent to the southern site boundary within Stages 1D, 2A, 2B and 2C to manage the expectation of rural production activities occurring at 420 Greenhill Drive.

As at the date of this SAR, confirmation from the adjoining landowner is outstanding. However, the revised conditions were sent to the landowner's consultant planner for review on 27 October 2026 with consultation expected to continue following lodgement. Nevertheless, implementing these clauses will ensure the existing orchard can continue to operate lawfully without complaints and strengthens the future residents' reasonable expectation of lawful rural production occurring at 420 Greenhill Drive.

On this basis, the proposed mitigation measures appropriately address the identified reverse sensitivity effects in relation to 420 Greenhill Drive.

Other adjoining rural land

The Project also establishes villas along boundaries adjoining rurally zoned land to the west and the north. The adjoining land to the west is currently used for grazing paddocks as part of a dairy farm with the land to

the north comprising rural lifestyle land. The HPL Report does not identify any significant reverse sensitivity effects arising between the proposal and these adjoining properties.

This conclusion is further supported by the reasonable expectation that future residents of the villas will be living within a rural environment where a degree of rural production activity is anticipated. Compared to the adjoining orchard to the south, the surrounding grazing activities are generally less intensive and are less likely to generate significant cross-boundary effects. Furthermore, should the surrounding land be converted to a more intensive rural activity in the future, the responsibility remains with those landowners to manage any direct effects within their own property boundaries and the relevant regulatory requirements remains unchanged.

Summary of Reverse Sensitivity Effects on Rural Production

Overall, the HPL concludes the Project's risk of reverse sensitivity effects on the adjoining rural land used for grazing purposes is low; and its can appropriately mitigate potential reverse sensitivity effects associated with the adjoining kiwifruit orchards through building setbacks and buffer treatments (vegetation and retaining walls). Further, the Project includes a condition developed in consultation with the adjoining neighbour on 420 Greenhill Drive that will impose a no complaints covenant relevant to the villas directly adjoining the operational kiwifruit orchard (WDC Condition 88).

When assessing the proposed mitigation measures against existing environment and the reasonable future resident's expectations of future residents of lawful rural production to occur on adjoining properties the Project's effect on the operation on adjoining operational rural production activities is mitigated to an **acceptable** level.

6.6.3 Rural Production Effects Summary

Having regard to these factors, the Project is not anticipated to result in a material reduction in productive rural capacity, either on the Site or within the wider district. The residual rural land use effects, including the loss of highly productive land and potential reverse sensitivity effects, are therefore assessed as **less than minor** and **acceptable**.

6.7 Archaeological Effects

The WDP, Archaeological Assessment, and engagement with mana whenua did not identify any known archaeological features or archaeological deposits within the site.

The Applicant proposes accidental discovery protocol conditions to manage the unexpected discovery and potential damage of unknown archaeological features. The proposed accidental discovery condition (Condition 48) provides protection for unidentified archaeological sites, which will avoid any known archaeological effects.

Given the nature of the existing environment, with no known features present, and proposed accidental discovery conditions, any potential archaeological effects are **less than minor** and therefore **acceptable**.

6.8 Ecological Effects



6.8.1 Effects on Fauna

Section 2.7 identifies the fauna present and likely to be present on-site. The Project's construction and operation have been designed to address potential effects on fauna to an acceptable level.

Long-tailed Bats

The EcAR identifies the Site as providing habitat for long-tailed bats and concludes that potential effects can be appropriately managed through the implementation of the draft Ecological Management Plan (EMP), which includes a bat management specification. In relation to bats, the draft EMP incorporates specialist ecological oversight, roost identification and protection protocols, vegetation retention measures, construction management procedures, monitoring requirements, and lighting controls within 50 m of the SNA and other key habitat areas. These lighting controls require outdoor lighting to be amber coloured (2700K), blue-filtered, downward facing (zero upward tilt), and for security lighting to operate via motion sensors and timers. The BMP also ensures that any vegetation clearance has regard to potential bat roosting habitat and that active roosts are identified and protected where present.

In addition to the draft EMP, the Project incorporates a range of design responses to avoid and mitigate the permanent effects associated with the urbanisation of long-tailed bat habitat. These include locating all units a minimum of 25 m from the SNA, establishing enhancement planting around Stormwater Pond B and the main watercourse to provide additional buffering from development, and implementing a comprehensive ecological restoration programme that will improve habitat quality and foraging opportunities over time.

Lizards

The EcAR identifies the Site as likely containing habitat for indigenous lizard species and concludes that potential effects can be appropriately managed through the implementation of the draft EMP, which includes a the draft LMP. The LMP incorporates the identification of lizard habitat and refugia, seasonal timing considerations, pre-construction surveys, search and salvage methodologies, relocation protocols, habitat enhancement measures, post-relocation protection mechanisms, and adaptive management and reporting requirements. The measures in the LMP provide for the protection and enhancement of suitable habitat, ensuring the long-term viability of relocated populations and minimising potential effects associated with vegetation clearance, earthworks, and construction activities.

In addition, the LMP will ensure that areas supporting lizard habitat are identified prior to construction activities and that any lizards present are safely located, captured, and relocated where required, subject to approval under the Wildlife Act 1953, which will be obtained separately.

Birds

The EcAR did not identify any native birds within the site. However the vegetation clearance and earthworks will be undertaken in accordance with the draft EMP, which includes bird management specifications. The EMP's bird management specifications incorporate seasonal avoidance measures, pre-clearance nest inspections, protocols for managing the accidental discovery of threatened or at-risk indigenous birds and nests, site induction requirements, and reporting procedures. These measures ensure that nesting birds are identified and protected prior to vegetation clearance and that any sensitive species encountered during construction are appropriately managed. In addition, also minimise potential disturbance effects during the

breeding season while supporting the longer-term enhancement of bird habitat through the proposed restoration and enhancement planting programme as part of the draft WMEP.

Indigenous Fish

The EcAR identified the site as containing shortfin eel (tuna). The EcAR concludes that effects on indigenous fish can be appropriately managed through the design and installation of the replacement culverts and the implementation of the draft EMP, which includes an indigenous fish management specification. The fish management specifications incorporate requirements for fish capture, transfer and release, permitting, and monitoring and reporting. These measures ensure that indigenous fish are safely relocated from affected areas prior to works occurring and that construction activities are undertaken in a manner that minimises the potential for injury or mortality. While the installation of replacement culverts and infilling of the southern pond will result in temporary habitat disturbance and the permanent modification of a component of the existing aquatic environment, the proposed management measures, together with wetland restoration, riparian enhancement, fish passage provisions, and the creation of new aquatic habitat within the stormwater pond network, will maintain and enhance aquatic habitat values across the Site.

Conditions

The EcAR concludes through the design of the Project and implementation of the management plans, any temporary or permanent effects on fauna associated with the construction phase are avoided and mitigated.

These management plans and measures have been secured through **Conditions 72** to **74** (Lizards) and **75** to **78** (Bats and Birds) of the draft Waipā District Council consent in **Appendix 28** and **Conditions 13** to **16** (Fish) in the General Conditions for the draft Waikato Regional Council consents in **Appendix 29**.

Summary

Through securing these recommendations through conditions, it is reasonable to conclude the adverse effects are **low** and therefore **acceptable**.

6.8.2 Effects on Wetlands

The EcAR identifies the wetlands across the site as being generally small, fragmented and degraded. The conditions of these areas have been influenced by historic agricultural use, grazing and stock access. However, the EcAR notes the wetlands within the site perform ecological functions, including flood attenuation and nutrient and sediment filtration, and provide some fauna habitat, including foraging habitat for birds and long-tailed bats.

The EcAR confirms that the proposed wetland enhancement and restoration programme will, once established, deliver a net improvement in the quality and extent of wetland habitat across the Site. This includes the removal of the small 33 m² Wetland 9 to accommodate Stormwater Pond B and the restoration and enhancement planting, which the EcAR concludes is appropriately mitigated through the retention and enhancement of existing wetlands and the restoration of additional wetland areas.

In total, approximately 4,886 m² of existing wetland will be enhanced and approximately 6,468 m² restored, resulting in around 10,983 m² of wetland restoration and enhancement across the Site. In addition, the Project will restore 6,000 m^2 of pasture for terrestrial habitat.



To ensure the effectiveness of the restoration and enhancement works, the EcAR recommends the implementation of the draft WMEP, secured through **Conditions 12** to **14** of the General Conditions for the draft Waikato Regional Council consents in **Appendix 29.** The WMEP will guide restoration planting within existing degraded wetlands and the proposed stormwater ponds and will address planting locations, species selection, establishment methodologies, weed management, and ongoing maintenance requirements to support the successful establishment of wetland habitat.

Subject to implementing the recommendations within the WMEP, the EcAR concludes the proposed restoration planting is expected to address the loss of the small wetland area while providing for good restoration outcomes.

On this basis, and with the implementation of the WMEP secured through the draft conditions, the conclusions of the EcAR can be relied upon. Accordingly, any adverse effects on wetland values are appropriately managed, and the proposal will result in a **positive effect** through the enhancement and restoration of wetland habitat and the overall improvement in the quality and extent of wetlands across the Site.

6.8.3 Effects on Water Bodies

In addition to wetland enhancement and restoration, the Project includes riparian habitat restoration and open water habitat re-creation. Riparian restoration is proposed along approximately 860 m of retained watercourses and pond margins and will include indigenous planting, weed control, and predator management. In addition, open water habitat lost through the removal of the existing artificial pond will be replaced through the creation of permanent aquatic habitat within the proposed stormwater pond network, including habitat features and fish passage provisions. The EcAR concludes that these measures will enhance habitat quality and connectivity across the Site and result in an overall improvement in aquatic biodiversity values over time.

To give effect to the proposed works, the Project requires vegetation clearance and earthworks some of which may occur within erosion risk areas as defined in the WRP. To minimise erosion and sedimentation effects, the EcAR recommends any areas left temporarily unvegetated will be stabilised using best-practice erosion and sediment control measures. Areas outside the development footprint will be replanted or re-seeded as soon as practicable within the appropriate planting season to promote rapid vegetation establishment and site stabilisation. This will be implemented through the CMP.

The enhancements to the riparian restoration and open water aquatic habitat are secured through implementing the WMEP (**Conditions 12** to **14** in the draft WRC consent conditions); and the sediment and control measures recommended in the EcAR are proposed **Conditions 5** to **9** in the Land Disturbance consent conditions in **Appendix 29** will ensure there are no sediment and erosion effects on the water bodies.

The WMEP and sediment and erosion controls will be secured through the proposed conditions. The EcAR identifies the Project's restoration will "*adequately address the anticipated habitat loss and effects associated with residential development*".

On this basis, the Project manages the effects associated with the infilling of the artificial pond and sediment and erosion to an **acceptable** level; and will result in a **positive** effect for aquatic biodiversity values associated with the riparian planting.

6.8.4 Weed and Pest Plant Effects

Earthworks and vegetation clearance will create areas of exposed ground that may facilitate weed establishment and dispersal. The site already contains several exotic weed species, including gorse, privet, barberry and woolly nightshade. The proposed restoration works create an additional need to control weed growth during establishment of new planting. The draft WMEP will address weed management and ongoing maintenance in relation to the SNA. Given the limited existing weed prevalence and the proposed management measures, the residual effects associated with weed dispersal will be **less than minor** and therefore **acceptable**.

6.8.5 Summary of Ecological Effects

Overall, the EcAR concludes if the recommendations are adopted, "*the proposed effects management and restoration measures will enhance overall biodiversity values at the site, improving the quality of fauna habitat including bat foraging habitat available at the site*".

As detailed in the sections above, the Project secures the EcAR's recommendations through the proposed conditions of consent and therefore will result in a **positive** ecological effect overall.

6.9 Cultural Effects

The Site is located within the Waipā and Waikato landscape, an area of significance to Ngāti Apakura, Maniapoto ki Te raki, and Ngāti Māhanga, these groups identify as having a relationship with the site and the wider landscape.

6.9.1 Ngāti Apakura Perspective

The Site is located within the wider landscape over which Ngāti Apakura identify as having a relationship with. The Cultural Values Assessment (**CVA**) prepared by Ngāti Apakura (**Appendix 23**) describes the significance of the Waipā catchment to Ngāti Apakura, including its relationship with the whenua, wai, wetlands, and interconnected ecological systems. Ngāti Apakura's connection to the Site arises from its place within this wider catchment and the network of cultural and environmental systems that have sustained occupation and use of the landscape over generations.

While the CVA confirms there are no known sites or areas of specific cultural significance within the Site, it notes that cultural values are not confined to discrete locations. Rather, they derive from the broader relationship of Ngāti Apakura with the surrounding landscape and its natural systems. As the Project proposes the conversion of rural land to predominantly residential use, consideration is therefore required of its potential effects on these cultural values and relationships.

The CVA assessed the proposal using the Pā Tuna Mātauranga Framework, which provides a holistic approach to evaluating cultural effects. The framework is based on four interconnected pou encompassing spiritual and cultural relationships (Atua), tikanga and kaitiakitanga responsibilities (Tikanga), environmental science and evidence (Pūtaiao), and legislation, policy, and governance (Ture). The CVA recognises the proposal presents a mixed but ultimately positive outcome for Ngāti Apakura. On this basis, the CVA ties the framework together: "*The framework therefore concludes that, while some cultural and environmental change will occur, the proposal has the potential to achieve positive outcomes where restoration, enhancement, and long-term stewardship commitments are implemented and maintained*".



The CVA identifies recommendations to be incorporated at detailed design, construction, and the operational phases to ensure the Project supports environmental improvement and cultural wellbeing. In this regard, the protection of wai, restoration and enhancement of wetland environments, support for indigenous biodiversity, and recognition of Ngāti Apakura cultural values are important components of the Project and are reflected in the proposed mitigation and management measures. The key recommendations are related to the following:

- **Cultural Landscape Recognition.**
- **Wetland Restoration and Enhancement.**
- **Bio-diversity and Habitat Protection.**
- **Kaitiakitanga and Ongoing Stewardship.**
- **Accidental Discovery Protocol**.

Overall, the CVA confirms that Ngāti Apakura **support** the Project in principle, provided the recommendations within the CVA are implemented. On this basis, Ngāti Apakura conclude the Project will "*contribute positively to the environmental, cultural, social and intergenerational wellbeing of the Waipā landscape while recognising and respecting the relationship of Ngāti Apakura with the whenua and wai of this place*".

Accordingly, the recommendations of the CVA are implemented through the proposed Cultural Effects Management Plan, which is secured through **Condition 49** to **51** in the draft Waipā District Council conditions in **Appendix 28**. In addition, the wetland enhancement and restoration and the proposed stormwater system are secured through conditions implementing their respective management plans.

On this basis, the position of Ngāti Apakura being that the Project will result in **positive cultural effects,** subject to the implementation of the proposed recommendations, can be **relied on**.

6.9.2 Maniapoto ki Te Raki Perspective

Maniapoto ki Te Raki refers to the northern portion of Maniapoto. **Part Four** details the engagement undertaken with Maniapoto ki Te Raki, through which no response has been received to date.

It is also noted that the Maniapoto Environmental Management Plan identifies the Maniapoto rohe as not extending beyond the Puniu River, which is located south of Te Awamutu and joins the Waipā River north of the Mangapiko Stream. Accordingly, the Site is identified as being adjacent to, rather than within, the Maniapoto rohe.

Nevertheless, the engagement undertaken reflects a recognition of the interests of Maniapoto ki Te Raki and provides an ongoing opportunity for input into the Project. Opportunities for engagement and consultation will not cease upon lodgement of the SAR and may continue throughout the consideration and implementation of the Project.

6.9.3 Ngati Mahanga Perspective

On 7 September 2026, Ngāti Mahanga advised that they would not provide a cultural values assessment for the Project (**Part Four**). Cultural effects are inherently linked to the values, associations, and perspectives of



the relevant iwi. While Ngāti Apakura have indicated that the Project would result in positive outcomes, it would not be appropriate to assume the same position is held by Ngāti Mahanga.

While no view has been provided by Ngāti Mahanga at this time, opportunities for engagement and consultation will remain available.

6.10 Transportation Effects

6.10.1 Construction Transportation Effects

The staged delivery, implementation of a Construction Traffic Management Plan (**CTMP**), and the proposed recommendations of the ITA will manage the potential construction transportation effects.

- The Project will establish a temporary construction access to support initial site establishment, bulk earthworks and construction of the SH3 roundabout. The ITA recommends that the proposed SH3 roundabout be established prior to occupation of the first dwelling or other activity on the site. This will ensure that subsequent resident, staff and construction traffic can be safely accommodated through the permanent site access (WDC Condition 20).

- The Project will establish a temporary construction access for Stage 1 and the roundabout works. The proposed roundabout on State Highway 3 will be operational prior to occupancy of Stage 1 and the latter construction stages of the site. As such, the ITA concludes this arrangement will ensure the safe accommodation of residents and staff alongside the construction vehicle generation associated with the latter stages of the development. In addition, the ITA identifies a Temporary Traffic Management Plan (**TTMP**) can manage vehicle movements turning to and from the site.

- Construction traffic will be managed through a CTMP establishing construction access arrangements, haul routes, the timing and frequency of heavy vehicle movements, temporary traffic management measures, and measures to maintain the safety and accessibility of the surrounding road network. Where construction activities directly interact with the public road network, site-specific TTMPs will also be prepared and implemented in accordance with the approved CTMP (Conditions 24-25).

On this basis, the ITA concludes the proposed staging and CTMP will manage effects arising from the construction methodology, earthworks fill source locations, haul routes, and access arrangements can be appropriately managed.

Summary

The proposed staging and CTMPs and TTMPs, and recommendations of the ITA are proposed through the design of the Project and WDC conditions in **Appendix 28**. The recommended framework provides a robust mechanism for managing construction traffic effects throughout the staged development of the site. On this basis, the transport effects associated with construction activities are expected to be temporary, localised, and **less than minor**.

6.10.2 State Highway Access

While the strategic transport modelling demonstrates that the Project will not materially affect the operation of the wider transport network, the ITA undertook further assessment of the proposed SH3 access and nearby intersections. This included consideration of alternative intersection forms, detailed intersection modelling and sensitivity testing to determine whether development-generated traffic and future growth can be safely and efficiently accommodated.

The ITA evaluated priority-controlled, signalised and roundabout options for the proposed SH3 access. While a priority-controlled intersection could accommodate the earlier stages of the Project to approximately the 2035 assessment horizon, the ITA identifies that a four-arm, single-lane roundabout provides the appropriate long-term access arrangement for the full development.

Engagement undertaken with NZTA during development of the ITA identified additional considerations in support of providing the roundabout from commencement of the Project. These included avoiding successive temporary traffic management associated with initially constructing a priority-controlled intersection and subsequently replacing it with a roundabout, and avoiding uncertainty associated with a future upgrade trigger that could arise from regional traffic growth irrespective of whether later stages of the Project proceed. Having regard to the ITA findings and NZTA's operational and network management considerations, the Project therefore proposes a four-arm, single-lane roundabout from commencement of the development.

Engagement with NZTA has continued as the design has developed. A further information request was received from NZTA on 29 September 2026. The request noted that “substantial progress had been made”, while seeking further information principally in relation to detailed design matters. Engagement with NZTA will continue following lodgement of the application. Having regard to the nature of the further information requested and the progress made through engagement to date, the outstanding matters are considered capable of being resolved between the Applicant and NZTA through the subsequent detailed design and approval process. The further information relates to connectivity and access; roundabout design, operation and visibility; active modes, public transport and pedestrian provision; and Safe System Audits, lighting and approvals.

The ITA has incorporated further information addressing a number of these matters and identifies that the matters raised do not affect the ability to achieve an appropriately safe and efficient roundabout within the road and land area proposed for that purpose. The remaining detailed design, Safe System Audit and approval matters will be addressed through the detailed design process and proposed conditions. The ITA and **Part Four** of this Report provide further detail on the technical design responses incorporated into the proposed roundabout.

6.10.3 Traffic Generation

The Project’s traffic generation for the state highway and local road (council controlled) network is identified in the ITA. The ITA notes from a transportation perspective, the site is strategically located adjacent to SH3 and in close proximity to Te Awamutu, enabling good accessibility for residents, staff, visitors and service providers. In addition, no existing safety or operational issues with the existing road network were identified.

In terms of traffic generation, the ITA modelled it over two stages: Stage 1 reflects Stage 1, which will comprise 134 retirement units and the 100-bed care facility. Stage 2 reflects Stages 2-4 described in, which

includes the remaining 280 units and the village hub. At full development, the proposal is assessed to result in 1690 two-way vehicle movements per day (**vpd**) with a peak AM hour of 162 vehicles per hour and a peak PM hour of 176 vehicles per hour. The ITA considers these peak-hour traffic demands to be comparatively low relative to the capacity of the surrounding strategic road network.

Strategic and Detailed Modelling

The vehicle generation effects of the proposal have been assessed through both strategic and detailed transport modelling.

Strategic Modelling

At a strategic level, the ITA used the Waikato Regional Transport Model (**WRTM**) to assess the extent to which development-generated traffic would affect the operation of the wider transport network under future growth conditions.

The assessment first considered the extent to which the proposal would affect the wider transport network. Strategic transport modelling assessed future network conditions both with and without the proposal and evaluated traffic distribution, link performance and intersection performance. That assessment found the proposal would not result in any material deterioration in link or intersection level of service, and no network capacity mitigation beyond the proposed site access will be required.

Detailed Modelling

Detailed modelling enables key areas to be assessed. In consultation with WDC, the ITA provided detailed intersection modelling for four key intersections near the site due to their relevance with the site:

- The proposed site access roading intersection;
- SH3 / Racecourse Road Give Way controlled intersection;
- SH3 / Mutu Street Give Way controlled intersection; and
- SH3 / Arawata Street / Cambridge Road roundabout controlled intersection

The ITA's strategic modelling was supplemented by detailed intersection modelling based on validated traffic and speed data collected from Ohaupo Road SH3 adjacent to the site. The traffic and speed data identified the AM north bound traffic and PM Peak south bound traffic counts were observed to be higher than the modelling. The ITA adjusted the 2026 data to reflect the observed levels and relied on the WRTM for the future growth demands. The ITA included the AM and PM Peak worst periods for 2026, 2035 and 2045 with and without the development (expecting full development 2035 onwards) to determine if the proposal impacts intersections' levels of service (**LOS**) and overall function. The detailed modelling confirms that the proposed SH3 roundabout will operate efficiently through all stages of development, with the worst-performing movement operating at LOS B at full development in 2045 and with substantial reserve capacity. The modelling also demonstrates that development-generated traffic will not result in material deterioration in the overall performance of the assessed intersections on SH3 or require additional development-related capacity mitigation.



The ITA included a sensitivity assessment that assumed a substantially greater proportion of development traffic travelled south towards Te Awamutu than predicted by the regional transport model. Under the conservative sensitivity scenario, some reductions in individual movement performance were identified, principally for right-turn movements from Racecourse Road and Mutu Street onto SH3 and the southbound movement at the Arawata Street/Cambridge Road roundabout. However, the ITA concludes that these changes do not result in material deterioration in overall intersection performance or warrant additional development-related mitigation.

Summary

Overall, the ITA concludes that the nature, location, proposed roundabout access, and staging of the access ensure the traffic generated by the Project can be accommodated within the transportation network.

6.10.4 Internal Road Network (Road Hierarchy, Access, Parking, Waste Management)

The preceding section discusses the external related effects of the Project. The Project's internal transportation network is described in the ITA and **Part Three** of this Report. The Project's transportation response has been designed with regard to the key transport-related provisions of the WDP, including the provision of safe and suitable internal access and manoeuvring areas, on-site car parking, consideration of Crime Prevention through Environmental Design (**CPTED**) principles, and connectivity for a range of transport modes.

Internal Road Hierarchy

As detailed in the **Section 3.3.2** of the SAR and the ITA, the Project's internal access has been designed with specific consideration of the internal road hierarchy, intersection design, sight distance provisions, traffic calming and speed management measures, internal multimodal connections, and provision for waste management vehicles.

Regarding the road connection to the external road hierarchy, the Project does not strictly comply with the WDP road hierarchy provisions, as the proposed Collector Road connects directly to the State Highway. Notwithstanding this non-compliance, the ITA identifies that the main spine road performs a collector road function, collecting and distributing vehicle movements from the internal local road network to the State Highway, while the local roads principally provide access to adjacent properties. The Collector Road is not proposed as a through-route and will therefore carry vehicle movements associated with destinations within the development rather than performing a wider strategic movement function. Accordingly, despite the technical non-compliance, the functional intent of the road hierarchy is maintained.

Internal Road Design and Intersections

The ITA concludes that the Project has been designed to locate vehicle crossings in accordance with the relevant WDP provisions or, where a non-compliance occurs, within low-speed, low-traffic-volume environments where the associated transportation effects are limited.

The ITA also assessed the operation of the internal Road 1/Road 2/Road 3 roundabout. SIDRA modelling confirms that the single-lane roundabout will readily accommodate full development traffic at LOS A, with 95th-percentile queues of approximately one vehicle on the east and west approaches. The ITA concludes



that these queues will remain well separated from both the SH3 roundabout and the proposed security gate, avoiding interaction between these elements of the internal and external transport networks.

Internal Access and Manoeuvring

The ITA assesses internal access, manoeuvring and intersection sight-distance requirements. While several locations within the concept design have constrained sight distances when assessed against a standardised 40 km/h approach-speed assumption, the ITA identifies that these can be addressed through detailed design by minor adjustments to retaining structures or property interfaces and/or traffic-calming measures that establish an appropriately low-speed environment. The proposed conditions require safe sight distances at intersections, accessways and vehicle crossings to be established in accordance with the relevant Austroads guidance, unless otherwise approved by the relevant road controlling authority.

Parking

The proposed parking arrangements for the independent units, apartment blocks, care facility and village hub, and the on-street parking are described in SAR of the ITA. The ITA assesses parking demand for the retirement village against the recommendations contained within the NSW Guide to Transport Impact Assessment and the Waipā District Plan and confirms the proposal exceeds the relevant parking rates.

Waste Management

The ITA states that the road network has been designed to provide for waste collection through a combination of direct pick up and pick up via designated collection points to ensure safe and efficient collection. Vehicle tracking demonstrates that 8 m and 11.5 m rigid vehicles can safely enter, manoeuvre within and exit relevant parts of the development.

Vehicle tracking shown in **Appendix 16** demonstrates that collection vehicles can safely enter, manoeuvre within and exit the relevant parts of the development.

Summary

The ITA concludes the Project incorporates a comprehensive internal transport network with a clear road hierarchy, low-speed street environment, traffic calming measures, pedestrian facilities and shared path connections; and

The Project design responses and transportation features are secured through the proposed roading plans and **Conditions 15** to **30** in the draft WDC conditions in **Appendix 28**.

6.10.5 Connectivity and Accessibility

As identified in **Section 3.2**, the site is located outside the anticipated urban growth areas of Te Awamutu. As a result, there is potential for residents to experience reduced accessibility to services, facilities, and alternative transport modes. The proposal addresses these constraints through internal transport design, and the external roundabout design which provides connections to public transport and wider walking and cycling network.

Internal Connections



The internal site design provides for future road and footpath connections to adjoining properties to the west and south. Development in the adjoining properties is not anticipated under the relevant planning documents, but this design ensures future road and or footpath connections to adjoining properties can be made.

The internal walking and cycling routes are identified in the Landscaping Plans (**Appendix 22a**). The Project provides at least one footpath along all the internal roads. In addition, key roads such as the spine road include footpaths on both sides of the road. The spine road then provides connections for internal transport movements to the proposed roundabout with bus stops and the walking and cycling pathway

External Connections

The Project includes external multi-modal connections for walking, cycling, and public transport that will connect to the site's internal walking and cycling network.

Future road connections

The internal site design also safeguards potential future transport connections to adjoining land to the north, west and south, including provision for a future active-mode connection toward Innes Place and connections toward the T13 Growth Cell. While those adjoining connections cannot presently be secured and are not required to service the Project, the ITA concludes that the proposed layout appropriately future-proofs integration with surrounding land and could enable future network connectivity.

Walking and Cycling

As detailed in **Section 3.2** and the Civil Plans (**Appendix 18**), the Project will provide an external pathway through to Racecourse Road. The proposed pathway has been designed in consultation with NZTA and WDC. Further, the connection to Racecourse Road is intended to align with the urban mobility plan for Te Awamutu identified in WDC's Transport Strategy 2022-2052, which identifies Racecourse Road as forming part of the identified network. The ITA finds the proposed shared path connection will provide a new connection for future residents, residents along Taylor Avenue, and a new connection to the proposed bus stop facilities that will be located at the proposed roundabout.

Public Transport

State Highway 3 has an established regional public transport network connecting Te Awamutu to Hamilton. WDC advise there are existing bus stops located to the south of the site. However, they occur within the live lane and can periodically block traffic.

The ITA identifies the proposed bus stop arrangements provide for safe passenger access and operation, including a shared path along the western side of State Highway 3 connecting Greenhill Drive and Taylor Avenue to the bus stops. Staged crossings at the roundabout will allow pedestrians to cross each traffic lane separately, with a protected central median providing refuge between movements. The crossings are located within the lower-speed roundabout environment, while recessed bus bays separate stopping buses and passenger movements from through traffic. The ITA and Civil Plans show the proposed bus shelters. These bus shelters will provide defined and sheltered waiting areas, and the bus stop locations are separated from the painted median and right-turning movements at Greenhill Drive.

Summary

The ITA concludes the proposal provides walking, cycling and public transport accessibility through a new path connection to Te Awamutu, improved pedestrian facilities and provision for bus stops on SH3.

The future proofed connections, pathway connection to the existing residential area (Greenhill Drive / Taylor Avenue intersection), and the proposed public transport connections will ensure the Project will provide for connectivity for a range of transport modes in the context of the scale and location of the Project. On this basis, any potential connectivity effects will be **less than minor** and therefore **acceptable**.

Further, the widening of the footpath between Greenhill Drive and Racecourse Road will improve pedestrian connectivity beyond the immediate Project area and is considered to result in a **positive** connectivity effect.

6.10.6 NZTA Reverse Sensitivity Effects

In addition to potential reverse sensitivity effects associated with surrounding rural production activities, the Project adjoins State Highway 3 and introduces a noise-sensitive residential activity in proximity to an established transport corridor. Reverse sensitivity effects may arise where future residents are exposed to the operational effects of the state highway such as noise and subsequently seek to constrain the operation, maintenance, upgrading, or future development of the corridor.

The Waipā District Plan manages this issue by requiring noise-sensitive activities, including retirement village accommodation and care facilities, located within 80 m of the edge of the carriageway of State Highway 3 where the posted speed limit is 70 km/h or greater, to comply with Rule 4.4.2.26. Rule 4.4.2.26 also reflects the corresponding rule in the Medium Density Residential Zone (Rule 2A.4.2.44).

The Project will comply with the requirements of Rule 4.4.2.26 at the time the relevant buildings are constructed through WDC **Condition 94(a)**. Unlike the reverse sensitivity issues associated with adjoining rural production activities, the retirement village component of the Project does not create a unique or heightened sensitivity to state highway effects when compared with other residential activities contemplated by the District Plan.

It is also relevant that the Project includes upgrades to the adjoining state highway, which will alter the location of the carriageway and posted speed limits. The Acoustic Insulation plan in Schedule 3 to the draft Waipā District Council conditions in **Appendix 28** shows 27 units will likely need to comply with the provisions. However, given the Project proposes changes to the state highway it is appropriate that compliance with Rule 4.4.2.26 is assessed at the building consent stage for individual units, once the state highway upgrades have been completed and the final carriageway configuration is established.

On this basis, reverse sensitivity effects associated with the proximity of future units to the state highway can be managed through compliance with Rule 4.4.2.26 at the time the buildings are constructed and will be **acceptable**.

6.10.7 Transportation Effects Summary

The ITA concludes the Project can be developed and operated in a manner that maintains the safe and efficient functioning of the surrounding transport network while providing a high-quality and accessible transport environment for residents and visitors. Subject to the implementation of the proposed



infrastructure, staging requirements and recommended conditions, the ITA concludes the Project's transportation effects will be **no more than minor**.

Separately, potential reverse sensitivity effects arising from the location of noise-sensitive activities adjacent to SH3 will be managed through compliance with the applicable acoustic insulation requirements of Rule 4.4.2.26 at the time the relevant buildings are constructed.

The Project secures the ITA's recommendations through the proposed and implementing the Civil Plans. Reverse sensitivity effects on the State Highway are secured through the proposed consent notice condition. On this basis, the Project's actual and potential transportation effects will be **acceptable**.

6.11 Water Supply and Wastewater Effects

The Project generates a demand for water supply and wastewater servicing as the site is developed. The principal potential effects arise if development proceeds ahead of available network capacity. These matters have been assessed in the Infrastructure Report (**IR**) prepared by Maven and dated October 2026 (**Appendix 19**) and the corresponding Civil Plans (**Appendix 18**).

The servicing strategy has been developed on a staged basis, with interim and ultimate water supply and wastewater solutions linked to development staging and confirmed network capacity. Proposed consent conditions require the necessary servicing capacity and infrastructure to be available before each relevant stage proceeds.

6.11.1 Information Requirements

The Notice of Decision outlined key information requirements in relation to water and wastewater under section 27 of the FTAA. **Appendix 17** identifies and summarises how each information requirement is addressed in this SAR and associated technical reporting.

6.11.2 Water Supply

As detailed in Section 3.23 IR, the Applicant will undertake two water network upgrades, a new connection to the existing water supply, and provide the internal water supply reticulation within the site.

The IR confirms the proposed water supply arrangement detailed in the Civil Plans (**Appendix 18**), which includes network upgrades were identified and developed in consultation with WDC. Overall, the IR confirms the proposed upgrades, the network connection, and the internal reticulation will provide adequate water reticulation, potable water supply and firefighting water supply.

WDC's Development Engineer and Waikato Waters (**WW**) have reviewed the proposed water supply arrangements. WDC's Development Engineer states, subject to the proposed water upgrades and servicing arrangements, there are no identified water servicing constraints.

WW did not raise any concerns relating to the proposed water supply arrangements.

Easements will be provided where applicable, to provide for ongoing maintenance and access for the respective owners.

Conditions 56 to 61 in **Appendix 28** will ensure the proposed water supply infrastructure is established in accordance with the IR and the associated Civil Plans.

6.11.3 Wastewater

Section 3.23, the IR, and the Civil Plans (**Appendix 18**) detail the proposed wastewater network connection and the proposed wastewater reticulation for the Project.

The proposed split catchment discharge was chosen following discussions with WDC and WW.

The IR confirms that the proposed split-catchment network connections will reduce the demand on the existing network. Consequently, the implementation of the proposed networks connections do not require additional upgrades to the existing wastewater infrastructure.

WDC's Development Engineer identified no fundamental wastewater servicing constraints to prevent the development from proceeding, subject to further detail relating to capacity of the downstream wastewater pumps, emergency storage, pump station design, ownership arrangements, and operational requirements.

Waikato Waters did not identify any concerns regarding the capacity of the wider wastewater network. Waikato Waters also expressed a preference, at the detailed design stage, to avoid locating infrastructure within the State Highway corridor where practicable. This preference is reflected in the proposed alignment of the Catchment B wastewater main, which is now proposed to extend along Taylors Avenue before connecting to State Highway 3, rather than extending along State Highway 3 for a greater length.

Easements will be provided where applicable. The easements will provide for ongoing maintenance and access for the respective owners.

WDC **Conditions 62 to 65** will ensure the proposed wastewater infrastructure is established in accordance with the IR and the associated Civil Plans.

6.11.4 Water and Wastewater Effects Summary

Overall, the IR confirms the proposed water and wastewater infrastructure is designed in a manner suitable for the proposed development and through the network upgrades ensures there is adequate capacity within the networks to service the developments. The proposed design and upgrades are secured through implementing the civil plans and the conditions of consent. On this basis, the adverse water and wastewater servicing effects will be **less than minor** and therefore **acceptable**.

6.12 Stormwater and Flooding Effects

The Project will result in the urban development of land that currently comprises predominantly pastoral land traversed by existing drains, channels, wetlands and overland flow paths. To address stormwater quality, quantity, flood management and hydraulic connectivity for the post-development catchments, the Project includes a stormwater management system, as described in **Section 3.2.3**, developed in accordance with WSUD Principles, the RITS V2, and WRC Stormwater Management Guidelines.

The existing catchment comprises the approximately 58.37 ha area that currently drains through the site via the established network of drains and channels toward the Mangapiko Stream. The catchment includes both



the development site and upstream contributing land and therefore forms the baseline hydrological environment against which post-development stormwater effects have been assessed.

The proposed stormwater management framework outlined in the SMP, provides an integrated solution addressing stormwater quality, stormwater quantity, flood management, and hydraulic connectivity across the site.

6.12.1 Stormwater Quality and Quantity

The SMP identifies that the proposed stormwater management system has been developed to address both stormwater quality and stormwater quantity requirements through the proposed 'treatment train'. The following assessment the key mitigation measures of the treatment train.

- **Raingarden**: The proposed raingardens are designed to capture and treat the first flush of stormwater runoff from impervious surfaces, providing approximately 252 m^3 of retention volume compared to the 172 m^3 required. In addition, each raingarden provides retention volume more than the requirements for its corresponding catchment. Overall, the proposed system exceeds Waikato Regional Council's initial abstraction requirements. As such, the raingardens contribute to both stormwater quality and stormwater quantity management.

- **Forebays**: Forebays are provided upstream of the proposed stormwater wetlands. Each constructed wetland incorporates a forebay that exceeds the minimum sizing requirements of the Waikato Regional Council and RITS guidelines. The forebays provide sediment capture and energy dissipation, reducing erosion and scour within the wetlands and improving the overall performance of the stormwater treatment system.

- **Wetlands**: The five constructed wetlands (A-E) are designed in accordance with Waikato Regional Council and RITS standards. The proposed stormwater ponds have been designed to meet or exceed the required stormwater wetland areas, water quality treatment volume, and extended detention volume for their respective catchments and overall. Collectively, the wetland system provides approximately 5,574 m^3 of live storage volume, compared to an extended detention volume requirement of approximately 3,810 m^3. As such, the wetlands play a key role in managing both water quality and the quantity and rate of stormwater discharged from the site.

- **High Flow Bypass**: High-flow bypass structures provide a secondary conveyance pathway for larger rainfall events that exceed the treatment and detention capacity of the wetlands. These structures assist in managing stormwater quantity by safely conveying larger flows through the site while protecting the effectiveness of the stormwater treatment system during more frequent rainfall events.

- **Wetland Outlet and Overflow Strategy**: Stormwater is stored in the proposed wetlands and released gradually to provide attenuation and water quality treatment, while emergency spillways and high-flow bypasses ensure excess flows can be safely conveyed during larger storm events. Once downstream water levels recede, stored stormwater is progressively discharged, with the wetland system designed to fully drain within approximately 48 hours following the design storm event.

- **Live Wetland**: Stormwater Wetlands A, C-E are lined whereas Stormwater Wetland B is unlined. As a result, it functions as both a stormwater treatment system and an ecological enhancement feature.



As detailed above will operate as part of the treatment train by providing stormwater quality treatment, conveyance and detention functions, while also contributing to habitat replacement and ecological outcomes (**Section 6.8**).

- **Culverts**: The four culvert crossings are designed to maintain hydraulic connectivity through the site while supporting the proposed road and footpath network. The culverts include Riprap protection and energy dissipation measures at the inlet and outlets; and wingwalls will be incorporated at detailed design to provide a stable transition between the stream channel and culvert structures. The culvert's design will safely convey both frequent and extreme storm events.

- **Catchment F and G**: Catchments F and G does not form part of the treatment train. Catchment F is managed via a Stormwater basin that has been designed to exceed the required treatment area and water quality volume requirements. Project does not increase the impervious area within Catchment G and therefore the stormwater runoff will remain unchanged.

The SMP concludes the treatment train provides an integrated stormwater management solution that addresses water quality, water quantity, flood management, and hydraulic connectivity objectives while supporting the staged development.

The proposed stormwater management measures are secured through the proposed **Conditions 66 to 70 in Appendix 29**.

6.12.2 Flooding

The SMP modelled both the pre-development and post-development scenarios under a 100-year event and confirms that the proposed stormwater system will not result in adverse flooding effects both within the site and downstream.

The Site

In terms of the site, the hydraulic modelling demonstrates that the Project will not increase flow rates or water surface elevations beyond the site relative to the pre-development scenario. The retained drainage corridors, wetlands, culverts, and flood storage areas temporarily store stormwater and, while water surface elevations increase in some locations, this is an intentional outcome of the attenuation design that reduces downstream discharge and peak flow rates.

Further, the Project's earthworks have been designed to reduce the risk of flooding through infill earthworks raising the existing ground levels, so the habitable portions of the sites are no less than 1 m above the existing flood areas.

Downstream

For downstream discharge, the SMP modelling considered the runoff volumes, peak discharge, and downstream water levels.

- **Runoff Volume**: Runoff volume refers to the total quantity of stormwater generated during a storm event. While the Project results in an increase in runoff generation due to the introduction of additional impervious surfaces, the proposed stormwater management system attenuates and temporarily stores that runoff within the site. The SMP identifies that the post development peak



event run-off is 1,900 m^3 less than the pre-development run-off. As such, the SMP concludes the stormwater management effectively attenuates the Project's increased total run-off

- **Peak Discharge**: Peak discharge refers to the maximum rate at which that stormwater is discharged. The modelling further indicates that post-development peak discharge rates are lower than under the existing scenario. This outcome is achieved through the proposed treatment train that will provide flow attenuation and controlled discharge.

- **Downstream Water Level**: The SMP identifies the proposed attenuation, and outlet will not increase the water surface elevation compared to pre-development levels. On this basis, the SMP concludes the Project will not increase the risk of flooding to downstream properties, and the overall effect on the downstream receiving environment is considered reliable.

The design and implementation of the recommendations in the SMP concludes that the proposed stormwater system will not result in adverse flooding effects both within the site and downstream.

The SMP and recommendations are secured through the WDC conditions.

Overland Flows

The Project has been designed to convey overland flow paths within the road carriageway. The SMP models the flood depths and velocity, based on the 2081-2100 RCP 8.5 climate change scenario at key locations throughout the development and identified two sections (4 and 5) exceeding the recommended maximum flow depth of 150 mm. The SMP identifies that the corresponding depth-velocity values remain within the applicable Austroads safety criteria and therefore do not pose a risk to vehicles and pedestrians.

6.12.3 Stormwater and Flooding Effects Summary

The SMP concludes the proposed stormwater management framework provides a practical and integrated solution that supports future urban development while maintaining catchment function, managing flood risk, protecting receiving environments, and aligning with the long-term objectives of the Waikato administered land drainage plan.

On this basis, the Project is not expected to result in material adverse effects on downstream peak flows, flood levels, velocities or drainage performance. Stormwater quality effects are expected to be appropriately managed through the proposed treatment-train approach, while the residual runoff-volume and duration effects can be appropriately managed through the proposed stormwater and consent framework. Therefore, the Project stormwater effects will be **less than minor** and therefore **acceptable**.

6.13 Earthworks and Construction Effects

The Project will involve earthworks and associated construction activities across the site to provide for the earthworks, retaining walls, roads, services and building platforms.

The proposed earthworks and construction methodologies are detailed in **Section 3.2.1** of this SAR and the relevant IR reports. The principal construction effects will be temporary and will relate to erosion and sediment generation, dust, noise and vibration, construction traffic, groundwater and dewatering effects, and freshwater and terrestrial ecological values.



Two draft management plans have been prepared to establish a construction phase environmental management framework. The management plans include the Construction Management Plan (**CMP**) and the Earthworks Management Plan (**EWMP**). The CMP provides the overarching methodology for the proposed earthworks and infrastructure on-site. The plans will be secured through proposed conditions (**Conditions 8** to **10** in **Appendix 28**).

6.13.1 Earthworks

Section 3.2 identifies the proposed earthworks will occur over five stages. The EWMP and CMP will be implemented to manage the proposed earthworks. The EWMP and CMP identify the following specific measures:

- **Erosion and Sediment**: will be managed through a range of measures designed generally in accordance with WRC TR2009/02, including stabilised construction entrances, clean-water diversion drains and bunds, decanting earth bunds (DEBs), sediment retention ponds (SRPs), silt fences and, where appropriate, chemical treatment. Clean runoff will be diverted around exposed earthworks areas, while sediment-laden runoff will be directed to treatment devices prior to discharge. Dewatering from areas of high groundwater will similarly be directed to a DEB or SRP for treatment before discharge. These controls will be regularly inspected and maintained, including following rainfall events and before and after forecast major storm events.

- **Dust:** will be managed through water application from a combination of the groundwater bore and Council's reticulated water supply. Further, progressive stabilisation of completed surfaces and stockpiles, reduced vehicle speeds and, where necessary, chemical dust suppressants. Wind conditions will also be monitored to inform the daily planning of works. Topsoil removed during earthworks will be stockpiled for subsequent reuse, with stockpiles stabilised through measures such as mulching and grass seeding to minimise erosion and sediment generation.

- **Construction access:** will initially be provided from the existing farm access and subsequently from the western leg of the proposed roundabout. Internal haul roads will provide access between earthworks areas, with drainage swales and other runoff controls incorporated where required. Stabilised entrances and wheel-wash facilities will be used to assist in preventing sediment and debris being tracked onto the road network.

- **Noise and Vibration:** The CMP also identifies measures to manage construction noise and vibration, including restrictions on working hours, maintenance of construction plant, use of appropriate compaction equipment near dwellings, notification of nearby residents and investigation of complaints.

- **Environmental Performance**: will be monitored throughout the works, including regular inspection and maintenance of erosion and sediment controls, environmental training and inductions, incident reporting, compliance monitoring and a complaints process. Site-specific methodologies will also be developed in response to the environmental risks associated with particular works.

Construction of Infrastructure

In addition to the section above, the CMP identifies the construction methodology for the proposed stormwater ponds and wastewater pump stations. In general, the earthworks methodology involves



establishing temporary stormwater diversions and sediment controls prior to undertaking earthworks, minimising the extent of exposed earthworks, and progressively stabilising completed areas. The specific methodology for the proposed infrastructure is in Section 5 of the CMP.

In addition, the CMP identifies post construction monitoring and maintenance that will include erosion and sediment control decommissioning, vegetation establishment, defect liability period inspections, and final certification with WDC.

6.13.2 Earthworks and Construction Effects Summary

The IR confirms subject to implementation of the proposed measures detailed in the EWMP and CMP, the associated earthworks effects can be appropriately managed.

Effects associated with groundwater diversion and drawdown are detailed in **Section 6.5**.

Overall, the EWMP and CMP establish a comprehensive framework for managing the temporary effects associated with the earthworks. The proposed EWMP, CMP and proposed earthworks plans (**Appendix** 19b, 19c) will be secured through **Conditions 8** to **10** in **Appendix 28**. On this basis, the Project's earthworks and construction effects will be **acceptable**.

6.14 Actual and Potential Effects Summary

Overall, the Project's adverse effects have been appropriately avoided, remedied, or mitigated to an acceptable level while providing for various positive effects. When viewed in the context of its significant regional benefits, these matters **weigh in favour** of the Project and support the conclusion that the Project is **consistent with the purpose of the FTAA**.

7. PART SEVEN- Relevant Policy and Planning Documents

This section identifies Te Ture Whaimana o Te Awa o Waikato and the national, regional, local and strategic policy and planning documents relevant to the assessment of the Project. These documents provide the statutory and strategic framework for assessing the Project, including its consistency with national direction, regional policy outcomes, regional resource management requirements, district plan provisions and the wider strategic planning framework applying to the Hamilton-Waikato metropolitan area.

Table 5 – Relevant Planning Documents

Category	Relevant Planning Document
Treaty Settlement Instruments	• Te Ture Whaimana o Te Awa o Waikato – Vision and Strategy for the Waikato River
National	• National Policy Statement on Urban Development (NPS-UD) • National Policy Statement for Freshwater Management 2020 (NPS-FM) • National Policy Statement for Highly Productive Land 2022 (NPS-HPL) • National Policy Statement for Indigenous Biodiversity 2023 (NPS-IB) • National Policy Statement for Natural Hazards 2025 (NPS-HZ)
Regional	• Waikato Regional Policy Statement (RPS) • Waikato Regional Plan (WRP)
Local	• Waipā District Plan
Strategic and spatial	• Future Proof Strategy • Ahu Ahke – Waipā Spatial Plan • Waipā Growth Strategy 2050 • Transport Related Plans and Documents

A detailed assessment of the Project against the relevant objectives and policies of these documents is provided in **Appendix 26**. The following sections summarise the principal policy considerations and conclusions arising from that assessment.

7.1 Te Ture Whaimana o Te Awa o Waikato – Vision and Strategy for the Waikato River

Te Ture Whaimana o Te Awa o Waikato – Vision and Strategy for the Waikato River (**VS**) is the primary direction-setting document for the Waikato and Waipā Rivers and activities within their catchments that affect the Waikato River.

The Waikato-Tainui Raupatu Claims (Waikato River) Settlement Act 2010 and the Ngāti Tuwharetoa, Raukawa, and Te Arawa River Iwi Waikato River Act 2010 inserted the Vision and Strategy into the RPS. Under s104(1)(b), the Council must "have regard to" the RPS when considering any application for resource consent. However, additionally, the river settlement legislation also requires that the Council must have "particular regard" to the Vision and Strategy for the Waikato River when carrying out any of its functions under RMA 1991.

The Vision and Strategy is acknowledged as the primary direction-setting policy for the Waikato River and its tributaries. The Vision and Strategy seeks not only the management of adverse effects, but also the restoration and protection of the Waikato River through enhancement and betterment measures that are proportionate to the scale of the activity and its effects. Given the scale of the proposal and its associated effects on wetlands, watercourses, and freshwater habitats, it is appropriate that the proposal delivers appropriate restoration and enhancement outcomes.

The VS requires the health and wellbeing of the Waikato River must be placed at the forefront of activities that can affect the river. The VS is relevant to the Project because it is located within the wider Waikato/Waipā catchment and drains into the Mangapiko Stream and then the Waipā and Waikato rivers. As such, the VS requires that the Project must protect water quality and avoid downstream degradation.

The Project addresses water quality and downstream degradation through its design and proposed implementation. The Project's constructed wetlands, on-site detention and treatment, stream daylighting, and sediment and contaminant removal will manage runoff, maintain more natural hydrology, and reduce contaminant loads compared with the existing pastoral land use. Further, the project will retain 12 of the site's natural inland wetlands, protect the existing kahikatea remnant, a SNA, and provide enhanced wetland and riparian margins, native planting, stock exclusion, pest and weed management, and connected habitat corridors. Together, these measures will strengthen biodiversity, mauri, climate resilience, and the long-term health of the wider catchment, delivering net positive environmental outcomes consistent with kaitiakitanga.

Collectively, these measures provide meaningful enhancement and restoration outcomes that are proportionate to the scale of the activity and its effects which have been assessed as being less than minor and acceptable. On this basis, the Project is **consistent** with the VS.

7.2 National Policy Statement for Urban Development

The NPS-UD provides national direction for urban environments, including the need to enable well-functioning urban environments, provide sufficient development capacity for housing land, and support planning decisions that are integrated with infrastructure and responsive to significant development opportunities.

The NPS-UD is relevant because the Project is located within the Waipā District Tier 1 Local Authority and will provide additional retirement village and residential care development within the Waipā District and Waikato Region. While the NPS-UD is primarily directed at regional policy statements, district plans and local authority planning decisions, its objectives and policies are relevant because of the role the Project plays in supporting a well-functioning urban environment and providing additional retirement village land capacity.

Objective 1 and Policy 1

Objective 1*: New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic and cultural wellbeing, and for their health and safety, now and into the future.*

Policy 1*: Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum,*



a) *Have or enable a variety of homes that:*

(i) *meet the needs in terms of type, price, and location, of different households; and*

(ii) *enable Maori to express their cultural traditions and norms; and*

(iii) *have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and*

(iv) *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*

(v) *support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and*

(vi) *support reductions in greenhouse gas emissions; and*

(vii) *are resilient to the likely current and future effects of climate change.*

The EME concludes that the retirement village market is a growing sector of the population that is not currently well served in Te Awamutu. That market is characterised as being small, fragmented and narrow; 216 units across five villages, all independent-living villas, with no apartment product of any kind, whether independent or serviced, no care suites, and no operating village delivering a full contemporary amenity programme or integrated continuum of care. The Webster report also notes that there is a forecast demand for 737 retirement village units from the primary catchment residents by 2048, which is more than three times the current local supply .

This is reflective of a nation-wide issue with aged care. The release of the Ministerial Advisory Group Report: "A Place to Grow Old" stated; There are not enough beds in residential care for the number of older people who are going to need them, and not enough workforce to care for people. This is not only a projection for the future – it is already starting to happen. The whole of New Zealand's aged care system is under real pressure today, and those pressures will only grow as the population ages.

Objective 1 emphasises the need to develop well-functioning urban environments that provide a range of homes suited to different households, locations and business needs. Although demand for retirement living is forecast to grow, Te Awamutu currently lacks a continuum of care that would enable residents to age locally as their needs change. This gap is particularly significant because the town has no primary-level hospital which may increase reliance on distant health care services.

The project will deliver the areas first independent apartments and serviced apartments, an intermediate duplex villa tier and the areas first care suite offering. It will offer a choice of tenure across both Fee Simple, Unit Title and ORA in a single integrated village offering. The project will also offer a locally based, more affordable alternative to the higher priced villages that are currently on offer within Cambridge and Tamahere. This combination strongly aligns with the direction in **Policy 1 a) (i)** which requires a range of homes suited to different households' needs, budgets and locations.

The project will provide an easily accessible, integrated retirement living development that will be easily navigable both within the village and out to State Highway 3. A network of internal paths will enable residents to access the mature Kahikatea stand, the restored and enhanced wetlands and the stormwater treatment



wetlands which will also operate as an ecological feature. The proposed new roundabout on State Highway 3 will provide safe access to this key transport corridor with easy vehicular access southward to the main Te Awamutu shopping area and north to the alternative offerings of Hamilton. A walking/cycling connection path is also proposed that will facilitate active mode connections to and from the adjacent residential area to the south and further to the retail and commercial areas of Te Awamutu. This aspect of the project is directly aligned with **Policy 1 (a) (iv)**.

Objective 1 clearly states that well-functioning urban environments help people to provide for their health and safety now and in the future. The EME states that the increasing aged population in and around Te Awamutu already need a continuum of care in their local community which is not currently available. The project will assist to create a well-functioning urban environment in Te Awamutu by meeting the needs of an ageing population and enabling residents to remain within their established social, family and cultural networks. On this basis, the project is **consistent** with the direction set out in **Objective 1**.

Objective 2 and Policy 8

Objective 2: *Planning decisions improve housing affordability by supporting competitive land and development markets.*

Policy 8: Local Authority decisions affected urban environments are responsive to plan changes that would add significantly to development capacity and contribute to well functioning urban environments, even if the development capacity is:

(a) unanticipated by RMA planning documents; or

(b) out of sequence with planned land release.

Objective 2 outlines the importance of competitive land and development markets that in turn assist housing affordability. The project will introduce a supply of housing specifically designed for the retirement market using an age range and selection of tenure models that will be unique to the Waikato. The EME highlights a forecast demand for 737 retirement village units in Te Awamutu by 2048, which is more than three times the current local supply. The project will go some way to addressing that shortfall and introduce more competition and choice which in turn will assist in keeping the retirement village market affordable.

The project will add significantly to the development capacity for retirement village provision in the Te Awamutu area, a market that is not well served by the current growth cells given its specific physical criteria. The project will also free up larger homes within the Te Awamutu urban area, vacated by those seeking the smaller, low maintenance offering within the project. The project will therefore both directly add to the development capacity available in the Te Awamutu area and contribute to well-functioning urban environments as defined in the NPS-UD.

Based on the above, the project will be consistent with **Objective 2** and **Policy 8** by introducing competition and therefore choice into the retirement housing market and by adding significantly to development capacity.

Objective 4 and Policy 6

***Objective 4**: New Zealand's urban environments, including their amenity values, develop and change over time in response to the diverse and changing needs of people, communities and future generations.*

***Policy 6:** When making planning decisions that affect urban environments, decision makers have particular regard to the following matters:*

(a) The planned urban built form anticipated by those RMA planning documents that have given effect to this National Policy Statement.

(b) That the planned urban form in those RMA planning documents may involve significant changes to an area, and those changes;

(i) may detract from amenity values appreciated by some people but improve amenity values appreciated by other people, communities, and future generations, including by providing increased and varied housing densities and types; and

(ii) are not, of themselves, an adverse effect

(c) the benefits of urban development that are consistent with well-functioning urban environments (as described in Policy 1)

(d) any relevant contribution that will be made to meeting the requirements of this National Policy Statement to provide or realise development capacity.

Objective 4 recognises that urban environments and their amenity values will change over time in response to the diverse and evolving needs of communities. Retirement villages require a specific type of development where the urban environment may be required to change and develop to respond to the changing needs of people and communities. A senior living village requires a site that meets several specific physical criteria, which can make appropriate sites scarce within existing identified growth areas. These criteria include: a minimum block size with a suitable shape factor, an integrated site not significantly severed by public roads, streams or other physical features, minimum natural hazards constraints such as flooding, topography capable of facilitating accessible internal movements through the site and a land ownership structure that does not constrain the ability to deliver an integrated village. As demonstrated in the Growth Cell Capacity report, there are only 6 growth cells surrounding Te Awamutu that could potentially accommodate a retirement village and none of these are currently available for development. As Te Awamutu's population ages, its urban environment must adapt by providing more retirement living options to facilitate a continuum of care that enables residents to age in place. Accordingly, the Project represents a response to changing community needs and is consistent with the direction of **Objective 4**.

Objective 5

***Objective 5**: Planning decisions relating to urban environments, and FDS's take into account the principles of the Treaty of Waitangi (Te Teriti o Waitangi).*

The Project is consistent with **Objective 5** through the Applicant's ongoing engagement with mana whenua and the incorporation of cultural values into the design and management of the development. TADL has engaged with Waikato-Tainui, Ngāti Apakura, Ngāti Mahanga and Maniapoto ki Te Raki throughout the project, including site visits and review of key design documents. The Ngāti Apakura CVA supports the Project



in principle, subject to the implementation of its recommendations and the delivery of long-term ecological restoration and environmental stewardship outcomes. The Project reflects these outcomes through the protection and enhancement of wetlands, restoration planting, naturalisation of waterways, and a stormwater management approach that supports Te Mana o te Wai. Opportunities for continued mana whenua participation in ecological restoration, monitoring and cultural design are proposed to be secured through a Cultural Effects Management Plan. Collectively, these measures demonstrate recognition of Treaty principles and mātauranga Māori and are **consistent** with the intent of **Objective 5**.

Objective 6 and Policy 2

Objective 6: Local authority decisions on urban development that affect urban environments are:

a. Integrated with infrastructure planning and funding decisions; and

b. Strategic over the medium term and long term, and

c. Responsive, particularly in relation to projects that would supply significant development capacity.

Policy 2: Tier 1, 2 and 3 local authorities, at all times, provide at least sufficient development capacity to meet expected demand for housing and for business land over the short term, medium term and long term.

Objective 6 and **Policy 2** seek urban development that is responsive to demand and provides sufficient development capacity to meet current and future needs. The use of the words "at least" in Policy 2 signals that this is a minimum requirement, not a maximum requirement to provide sufficient development capacity.

The Project will make a significant contribution to retirement living capacity in Te Awamutu, a sector that the EME identifies the existing retirement offering as being small, fragmented and narrow. Both the EME and EA agree that the project responds to the identified demand with significant development capacity, specifically for the retirement sector of the population and widens the retirement offering in terms of housing typology, tenure and price point. In doing so, it will increase development capacity for an ageing population and assist in meeting forecast growth in demand for retirement living. As such, the Project will be **consistent** with **Objective 6** and **Policy 2**.

Appendix 26 provides a specific assessment of the direction provided by the objectives and policies.

7.3 National Policy Statement for Freshwater Management 2020

The NPS-FM provides national direction for the management of freshwater, including rivers, streams, groundwater and associated receiving environments. It is underpinned by Te Mana o te Wai, which establishes a hierarchy of obligations that prioritises first the health and wellbeing of water bodies and freshwater ecosystems, second the health needs of people, and third the ability of people and communities to provide for their social, economic and cultural wellbeing.

The existing site has been utilised for pastoral grazing, and the existing watercourse, ponds and wetlands all exhibit the adverse effects of this use. The farm watercourse that bisects the centre of the site is straightened, incised and only partially shaded by riparian vegetation. There are thirteen natural inland wetlands identified on the site of which all are open to stock grazing and trampling activity. An existing farm

pond (formed by this historical damming of the watercourse) has also developed in the eastern part of the site. The existing water features of the site therefore provide limited ecological value.

Significant ecological enhancement is proposed as part of the project; comprising the restoration and enhancement of twelve natural inland wetlands, the naturalisation of the existing farm drain with additional riparian planting, upgraded culverts placed in existing locations and the creation of additional open water habitat through the development of an unlined Stormwater Pond B. The entire property will also be progressively destocked as the land is developed for housing. A large-scale planting programme is also proposed including approximately 25,000 m2 of restoration planting (comprising 10,983 m2 of wetland restoration, 6,000 m2 of terrestrial planting and 9,000 m2 of riparian planting and infill planting alongside predator control across all restoration areas). This will have the effect of improving water quality

These mitigation actions will be locked in place through the consent conditions and result in an integrated treatment of freshwater resources across the site aligning with **Policy 3**, **Policy 5** and **Policy 9** of the NPS-FM. While the Project will result in the loss of a small 33 m² wetland, it will also deliver 6,468 m² of newly restored wetland adjoining existing wetlands that are to be retained and enhanced, resulting in a total wetland restoration area of 10,983 m² and an overall net positive wetland outcome. This aligns with the intent of **Policy 6** of the NPS-FM.

The overall management of the freshwater resources within the project will result in a **significant improvement** in freshwater management, quality and quantity.

7.4 National Policy Statement for Highly Productive Land 2022

The NPS-HPL provides national direction for the management of highly productive land. Its objective is to protect highly productive land for use in land-based primary production, both now and for future generations.

The NPS-HPL gives effects to this objective through nine policies and implementation measures. The relevant policies recognise highly productive land as a finite resource and seek to protect it for land-based primary production by avoiding inappropriate subdivision, use, and development, except where expressly provided for under the NPS-HPL.

The NPS-HPL also includes a range of implementation measures that support local authorities in giving effect to these objectives and policies. The relevant implementation measure is clause 3.10. Where subdivision, use, or development is not otherwise provided for under Part 3, clause 3.10 provides a mechanism for giving effect to the NPS-HPL objectives and policies by identifying an exemption for the subdivision, use, and development of highly productive land. The relevant requirements and an assessment of the Application against each are set out below.

Clause 3.10 (1)(a) Constraints and economic viability

Clause 3.10 requires there to be permanent or long-term constraints on the land that mean the use of the highly productive land for land-based primary production is not able to be economically viable for at least 30 years.

The HPL Report identifies several interrelated physical and operational constraints affecting the site. While the property has a total area of 25.78 ha, only approximately 19.8 ha is available for productive use, of which



7.1 ha comprises highly productive land. The highly productive land is not contained within a single contiguous area but instead occurs in a number of smaller and isolated pockets separated by lower-class land, an open drain, existing infrastructure, vegetation and other non-productive areas. The shape of the site, coupled with its fragmented pattern of land capability classes, variable topography and varying drainage characteristics, limits opportunities to efficiently utilise the highly productive land as a coherent productive unit.

The HPL Report demonstrates that the area surrounding the project site is already fragmented with State Highway 3 to the east, rural residential lots to the east and residential lots to the southeast along with an unformed road to the north. The site is also internally fragmented with areas of highly productive land spread in pockets throughout the site. This creates challenges to effectively and efficiently use the smaller areas of highly productive land across the site. AgFirst conclude that the proximity to the urban edge of Te Awamutu and the current market value of the land place significant constraints on utilising the site for productive purposes. In addition, the site is only 25.78 ha in size with 19.8 ha of useable land whereas the average size of a dairy farm is 136 ha while the average size of a sheep and beef block is 349 ha. The HPL Report concluded that grazing the property with dairy and beef heifers would make an economic loss. Based on the HPL Report, there are permanent and long-term constraints on the land that mean it will not be viable for at least 30 years.

Clause 3.10 (1) (b) Avoidance of significant loss of productivity capacity, fragmentation of large and geographically cohesive areas of highly productive land, and reverse sensitivity effects

The AgFirst report acknowledges the loss of 7.1 ha of highly productive land due to the retirement village development but considers that loss to be less than minor at the Waipā District level (0.01%). In this regard, the loss of significant productive capacity is avoided.

The AgFirst report also concludes that the titles surrounding the project site are fragmented and the project site lies on the edge of a larger area of highly productive land, therefore that soil resource will not be fragmented by the project. The limited extent and fragmented distribution of highly productive land is also relevant when considering whether the proposal would result in the fragmentation of a large and geographically cohesive area of highly productive land. The evidence demonstrates that the highly productive land resource on the site is already fragmented and isolated and does not form part of a large contiguous area capable of efficient productive use. Consequently, the proposal will not fragment a large and geographically cohesive area of highly productive land.

The discussion of reverse sensitivity effects is relevant given the location of the site generally surrounded by rural land uses to the west (rural pasture), to the north (kiwifruit and rural) and to the south (kiwifruit). A combination of physical setback from the boundary for new dwellings, a planted 5 metre landscape buffer and a difference in relative height between the orchard operations and the residential dwellings will assist in mitigating reverse sensitivity effects which generally comprise noise and sprays arising from orchard operations. Conversations with the adjacent kiwifruit operator to the south of the site have confirmed that the combination of distance, buffer planting along with a no complaints covenant for the adjacent row of dwellings appropriately addresses any reverse sensitivity issues.

Clause 3(10)(1)(c) Environmental, social, cultural and economic costs/benefits.

Highly productive land may only be used for non-productive activities if the environmental, social, cultural and economic benefits of the use outweigh the long-term environmental, social, cultural and economic costs.

- **Environmental**: The environmental benefits of the project include the protection and enhancement of twelve natural inland wetlands, the naturalisation and planting of the farm drain into a more natural stream configuration, the creation of five new stormwater wetlands that will attenuate and treat the stormwater runoff via the proposed treatment train. The existing Significant Natural Area (SNA) will be protected and enhanced along with comprehensive landscape planting across the site. The Ecological assessment concludes that overall biodiversity values will be improved at the site by improving the quality and quantity of habitat on the site.

- **Social**: The EA stated that qualitative (social) benefits of the project include; a contribution to the supply of senior housing, improved housing affordability, an opportunity to age-in-place with confidence and dignity, safe, secure and fit for purpose homes and more spending in the Te Awamutu town centre by residents, visitors and staff.

- **Cultural**: The archaeological reporting for the site concluded that there were no archaeological features or deposits observed at the site and none are expected to be present. Engagement with mana whenua associated with the site comprising Ngāti Apakura, Ngati Mahanga and Maniapoto ki te Raki. A Cultural Values Assessment was provided by Ngāti Apakura which concluded that: Överall, the Pa Tuna Matauranga assessment concludes that the Harlow Lifestyle Village can be supported in principle, provided that the recommendations contained in this assessment are implemented and that the proposed ecological restoration, wetland enhancement, and environmental stewardship outcomes are delivered and maintained over the long term."

- **Economic**: The current land use makes an annual loss of -$16,857 while the project provides net quantified impacts of approximately +$159 million of Gross Domestic Product, +$94 million of wages and +2,814 FTE years of employment. The project is strongly supported on economic grounds.

The assessment demonstrates that the environmental, social, cultural and economic benefits of the project will far outweigh the costs associated with the loss of the highly productive land for land-based primary production, stated as foregone rural production worth about $0.5 million of GDP (NPV) over 30 years, deliberately overstated.

This analysis against the NPS-HPL draws on the SLUC (**Appendix 13**), which comprises an on-site property scale field soil and land use capability assessment; and the HPL Report (**Appendix 14**) which provides a highly productive land assessment. Based on the SLUC, the site has a total area of 25.78 ha of which an estimated 19.8 ha is available for primary production purposes and a total of 7.1 ha of the site comprises highly productive land (28%).

Clause 3.10 (2) Alternatives to retain productive capacity

An assessment of reasonably practical alternative options that would retain the productive capacity of the highly productive land must be carried out. The HPL Report undertakes a detailed assessment of reasonably practicable alternatives that could retain productive capacity, including alternative forms of land-based primary production, improved management strategies, alternative production systems, amalgamation opportunities and lease arrangements. In each case, the report concludes that the identified constraints either prevent the option from being reasonably practicable or materially limit its economic viability.



Accordingly, the evidence demonstrates that the permanent and long-term constraints affecting the site cannot be overcome through reasonably practicable alternatives that would retain productive capacity.

Clause 3.10 (3) Evaluation of reasonably practical options requirements

The HPL Report does not take account of any economic benefits other than land based primary production and does not consider the loss of highly productive land on the overall landholding as the entire property will be removed from primary production. The assessment also concludes that no alternative primary production activities are feasible and improvements in land management practices are insufficient to overcome the economic deficits. Further, the HPL Report concludes that the constraints of a limited highly productive land area, both internal and surrounding land fragmentation and proximity to the existing urban boundary are permanent or long-term constraints meaning the property is not economically viable nor will it be over the next 30 years.

Conclusion on Clause 3.10

The HPL Report concludes that the Project satisfies the requirements of clause 3.10 and provides a detailed assessment of the physical, operational and economic constraints affecting the site. The evidence demonstrates that the site is subject to enduring constraints that materially limit its productive capacity and that those constraints cannot be overcome through any reasonably practicable alternative land-based primary production use.

Summary

The Project is considered to satisfy the requirements of clause 3.10 and falls within the exception expressly anticipated by the NPS-HPL. While Clause 3.1 identifies implementing Clause 3.10 gives effect to the objectives and policies of the NPS-HPL, it makes it clear that Part 3 does not limit the broader obligation to give effect to the NPS-HPL objective and policies. When viewed holistically, no matters have been identified that suggest the Project would be inconsistent with that framework. On this basis, it is reasonable to conclude that the Project is **consistent** with the objectives and policies of the NPS-HPL.

7.5 National Policy Statement for Indigenous Biodiversity 2023

The NPS-IB provides national direction for the protection, maintenance and restoration of indigenous biodiversity. Its objective is to maintain indigenous biodiversity across Aotearoa New Zealand so that there is at least no overall loss in indigenous biodiversity, while recognising the mana of tangata whenua as kaitiaki, the role of people and communities as stewards of indigenous biodiversity, and the social, economic and cultural wellbeing of people and communities.

The EcAR provides a detailed analysis of the ecological values inherent in the existing site. Although heavily modified by agricultural use over many decades, the site is characterised as having high ecological value due to the kahikatea remnant, the existing wetlands, the farm ponds and watercourse. Several mitigation measures are captured in the EcAR and translated into the draft consent conditions and the draft Management Plans. These measures include the careful management of construction activities such as earthworks and vegetation removal on wildlife, minimisation of lighting effects, extensive restoration planting and erosion and sediment control.

In combination these measures will address the loss of a small 33 m^2 wetland and the loss of potential bat foraging habitat. The loss of the farm ponds and existing riparian habitat will be addressed through the creation of habitat within Stormwater Pond B and riparian habitat planting along the length of the watercourse. The Kahikatea remnant SNA will be fenced out from stock and enhancement planting implemented both within and around the stand. Extensive restoration planting is also proposed in key habitat areas and degraded wetlands and will recreate lost terrestrial and aquatic habitat and preserve the key fauna corridor on the site. The overall ecological effect following the implementation of all effects management measures, including wide-scale restoration and predator control is assessed to be Low.

7.6 National Policy Statement for Natural Hazards 2025

The NPS-HZ provides national direction for managing natural hazard risk associated with subdivision, use and development. Its objective is that natural hazard risk to people, property and the environment is managed using a risk-based and proportionate approach (Objective 1). The NPS-HZ applies to specified natural hazards including flooding, landslip and liquefaction, which are the principal hazards relevant to the Project.

Natural Hazard risk for the identified hazards has been assessed though the GAR, GWR, SMP, and supporting infrastructure assessments. These investigations have informed the Masterplan, earthworks strategy, finished ground levels, stormwater and flood management system and geotechnical design requirements.

Policy 1 and **2** establish a risk matrix (**Appendix 1 – NPS-HZ**) and ensure the natural hazard is managed proportionate to the identified risk. Section 5 and Appendix K of the GAR provide an assessment of the Project against the natural hazard matrix in Appendix 1 for both the low hills and alluvial plains areas within the site. The GAR identifies all the natural hazards except for liquefaction will have a low degree of damage in accordance with this matrix. However, the GAR concludes while potentially susceptible soils occur within parts of the site, the proposed earthworks and foundation approach address the identified risk, and the GAR concludes that no specific liquefaction mitigation is required for the development as currently proposed.

Policy 4 seeks to avoid or mitigate any potential effects on other sites. Flood risk has been a particular consideration in the design of the Project. The SMP assesses the existing and post-development flooding environment and incorporates stormwater wetlands, attenuation and conveyance infrastructure, high-flow bypasses and overland flow paths to manage stormwater generated by the development. Hydraulic modelling undertaken for the Project demonstrates that the proposed stormwater system can manage post-development flows without increasing off-site flood effects.

Climate change has also been incorporated into the SMP to ensure that the proposed system responds to increased rainfall and flood risk over the life of the development (**Policy 6**).

Overall, the Project is considered **consistent** with the objective and relevant policies of the NPS-HZ. The natural hazards relevant to the site have been identified and assessed through the supporting technical investigations, and the Project incorporates design, engineering and management measures proportionate to the identified risks.

7.7 Regional and District Planning Framework

The Project has been assessed against the objectives and policies of the Waikato Regional Policy Statement (**RPS**), the Waikato Regional Plan (**WRP**), and the Waipā District Plan (**WDP**). Where relevant, these planning



documents give effect to or complement the national direction documents and Te Ture Whaimana addressed above.

The RPS, WRP, and WDP documents contain several overlapping and complementary provisions. To avoid repeating substantially the same assessment for each document, the principal regional and local planning issues are addressed thematically below. A detailed provision-by-provision assessment is contained in **Appendix 26**.

Urban Growth and Retirement Village Development

The RPS (Part 2 – Urban Form and Development) and WDP seek integrated and coordinated development of the built environment, including alignment between land use, transport, and infrastructure, and the provision of sufficient development capacity to meet identified growth needs.

The Project provides an integrated development that responds to an identified need for retirement village living and residential care facilities within this part of the region. It responds to this demand by providing 414 independent living units and a 100-bed care facility through a diverse range of accommodation typologies and tenure options for a growing elderly population. The development has been comprehensively master planned, with an integrated and staged framework for transport, stormwater, wastewater, water supply, utilities, open space, and ecological restoration.

The Project is located north of Te Awamutu's urban growth boundary and is not identified within the Future Proof urban land-use pattern. Accordingly, it is unanticipated to that extent. However, the RPS provides a framework for considering such development through Policy UFD-P11 and the responsive planning criteria in APP13.

The detailed assessment in **Appendix 26** concludes that the Project generally meets the requirements of both Criteria A and B. The Project makes a significant contribution towards meeting an identified demand for retirement village living and residential care facilities within this part of the region, contributes to a well-functioning urban environment, is well connected to existing and planned infrastructure and employment areas within both Te Awamutu and the wider region, and can be efficiently serviced and staged. While it does not directly implement the mapped Future Proof land-use pattern, it responds positively to the broader growth management direction promoted by Future Proof.

This approach also aligns with the strategic objectives for urban growth in the WDP. There is a degree of tension within the WDP between providing for a consolidated urban form and accommodating the needs of an identified ageing population (Objective 1.1.44), particularly where the GCA identifies constraints affecting land within the identified urban growth areas that may otherwise be suitable for an integrated retirement village.

The overarching objective seeks to achieve a consolidated urban form focused in and around existing settlements. The associated policies refine this direction by seeking to ensure that new urban development is located within identified urban growth boundaries (Policy 1.3.2). However, Policy 1.3.2.2 c) recognises that accommodation facilities supporting the existing and future elderly population may appropriately be located on the edge of towns outside current urban limits.

The Project responds to the broad strategic objectives of the WDP. In particular, it assists in addressing the tension between providing appropriately located retirement living opportunities for an ageing population



and consolidating urban development within identified growth areas, noting that suitable sites capable of accommodating a comprehensive retirement village in and around Te Awamutu are limited.

The Site is located on the edge of the urban growth boundary, adjoining established residential development to the south-west. While the land to the east of State Highway 3 remains zoned Rural, it accommodates a pattern of development and built form that is comparable in scale and intensity to the adjoining residential environment. As a result, the Site occupies a transition area between urban and rural environments and is adjacent to an existing developed landscape rather than a predominantly productive rural setting. When considered in the context of the need to provide for a growing elderly population, the Project is considered to meet the relevant expectations of the WDP.

While there is some tension with provisions that direct urban growth to occur within identified growth areas and urban boundaries, both the RPS and WDP recognise circumstances where development outside those areas may be appropriate. The Project responds to those circumstances through the provision of an integrated development that aligns with the broader strategic direction of concentrating development in proximity to existing settlements, infrastructure, services, and established residential communities.

Accordingly, the Project is considered to be generally **consistent** with the overall direction of the urban development objectives and policies within the RPS and WDP.

Integrated Development

The Project demonstrates alignment with the integrated development outcomes sought by APP1 of the RPS and Section 15 of the WDP.

The Project provides a comprehensively planned and coordinated development supported by integrated transport, infrastructure, stormwater, ecological enhancement, and open-space networks. While there is some tension with provisions relating to urban consolidation and the retention of rural land for primary production, these tensions arise principally from the Site's location outside the urban growth boundary and the conversion of rural land to retirement village and aged-care activities. As such, when viewed in the context of the urban growth objectives and policies and strategic direction of the RPS and WDP the Project is **consistent** with the overall direction set by the objectives and policies within those provisions.

Transportation Integration and Network Efficiency

The regional and district framework seeks the integration of land use and transport, efficient use of existing networks and protection of the safe and efficient operation of significant transport infrastructure.

The Project adjoins State Highway 3, which is identified as a regionally significant road corridor. The Project provides a new roundabout to connect to State Highway 3. The new access will primarily be located within the site’s boundaries, and the ITA confirms this will ensure the construction and operation of the Project does not result in unacceptable adverse effects on the safety and efficiency of the State Highway and the nearby roads managed by WDC. The Project is therefore considered **consistent** with the relevant transport and network-integration provisions.

Tangata Whenua, Cultural Values, and Te Ture Whaimana

The RPS and WRP recognise tangata whenua relationships with land and water, kaitiakitanga and the particular significance of the Waikato River and its catchment. These documents have been developed with regard to Te Ture Whaimana and the Waikato-Tainui Environmental Management Plan.

In relation to the Project, Waikato-Tainui and mana whenua groups have been involved through the consultation process. Ngāti Apakura provided a CVA that concludes their position on the Project as being positive subject to the implementation of recommendations to enhance their participation through the implementation of the Project. On this basis, the Project is **consistent** with the direction provided with the relevant objectives and policies within the RPS and WRP.

Freshwater, Stormwater, and Receiving Environments

The RPS and WRP promote integrated management of land and water, maintenance and enhancement of water quality and ecosystem health, management of discharges and protection of freshwater values. The Project adopts an integrated catchment approach. Stormwater will be managed through a treatment train design in accordance with WRC's stormwater guidelines. The Project will modify parts of the existing freshwater environment, but those effects are proposed to be managed through avoidance and minimisation where practicable, stream creation and restoration, riparian planting, and fish relocation and passage. As such, the Project is **consistent** with the relevant objectives and policies relating to freshwater and stormwater matters.

Indigenous Biodiversity and Ecological Enhancement

The RPS and WDP (**Section 24**) seeks to maintain and enhance the existing levels of biodiversity within the District and manage any adverse effects on indigenous vegetation. The EcAR assessed the site as having a high ecological value due to the presence of long-tailed bats, the SNA, and the associated foraging habitats. Further, the EcAR also recognises there are areas of the site that are highly modified which include the existing paddocks, modified natural inland wetlands, and the farm drain. Effects will be managed through draft EMP, LMP, and WREP. Overall, the EcAR confirms the implementation of the management plans will enhance the overall biodiversity value of the Site. On this basis, the Project is **consistent** with the direction provided by the relevant objectives and policies relating to indigenous biodiversity and ecological enhancement.

Earthworks, Discharges, and Groundwater

Large-scale earthworks, construction dewatering, groundwater interception and associated sediment and discharge effects are addressed through the GAR, Hydrogeological Effects Assessment, EWMP, CMP and proposed consent conditions. The Project includes staged erosion and sediment controls, groundwater monitoring and management, stabilisation and construction methodologies designed to avoid or minimise effects on receiving environments and adjoining land. The proposed framework responds appropriately to the relevant RPS and WRP land-disturbance and discharge provisions and is therefore **consistent** with the direction provided by the relevant objectives and policies.

Natural Hazards, Flooding, and Climate Resilience

The RPS (Part 2 – HAZ) and WDP (Section 15) seeks to avoid or appropriately manage natural hazard risk and to ensure new development does not increase risk on other land. The GAR confirms geotechnical risks such as flood, liquefaction, lateral-spread and slope-related risks are addressed through the Project's engineering



controls and design (**Section 6.4**). The stormwater system provides attenuation, flood conveyance and overland-flow management, with hydraulic modelling demonstrating that development-related peak flows and off-site flood effects can be appropriately managed. Climate-change-adjusted rainfall has been incorporated into the stormwater and flood assessment (**Section 6.12**). As such, the Project is **consistent** with the natural hazard, flooding and climate resilience objectives and policies

Rural Zone Provisions

Chapter 4 of the WDP outlines the provisions of the Rural Zone. Generally, the direction set by the Rural Zone's objectives and policies provide for rural activities with a focus on maintaining high class soils for rural production, rural character, and amenity values.

Like the strategic direction objectives and policies, Rural Zone does provide for non-farming activities when there is a functional and compelling requirement to locate within the Rural Zone and primary production and rural character is maintained (4.3.12). This aligns with Chapter 1, which identifies specific instances where development outside the urban growth boundary may occur.

- **Compelling Requirement**: As detailed in Section 1.6, the EME and GCA identify a shortage of retirement village and residential care accommodation within Te Awamutu and confirm that the Project responds to this unmet demand. The assessments also demonstrate that the Project is unable to be suitably accommodated within the existing growth cell network. Therefore, the site has a functional and compelling reason to establish at the site located within a peri-rural area located at the edge of the township.

- **Primary Production**: The Applicant recognises the Project will result in the loss of land from primary production. However, as demonstrated in **Section 6.6**, **7.1.4** and the HPL Report, the loss is moderated by the lack of economically viable primary production able to occur on the site. Further, those sections and the HPL Report confirm the Project mitigates potential reverse sensitivity effects to an acceptable level that will not result in constraints for adjacent farming operations.

- **Rural Character**: The Project will change the existing rural character of the Site. The new buildings, roads, lighting, and traffic have informed the landscape response. When assessed against the peri-urban character of the surrounding environment, the proposed measures are considered to manage the rural character effects to an acceptable level.

Objective 4.3.12 recognises that the WDP provides a pathway for non-farming activities within the Rural Zone where specific criteria are satisfied. The Project meets the key requirements of demonstrating a functional and compelling need to locate within the Rural Zone and avoiding unreasonable constraints on primary production activities.

The Project will result in a change to the existing rural character of the Site, giving rise to some tension with those provisions that seek to maintain rural character. However, the Project incorporates a range of mitigation measures that are considered to manage the resulting effects to an acceptable level.

On this basis, and when viewed in the context of the WDP as a whole, the Project is considered to be generally **consistent** with the overall direction and intent of the Rural Zone objectives and policies.

Landscape



The RPS and WDP primarily refer to landscapes in terms of protecting outstanding landscape areas or maintain cultural landscapes or any other identified landscape areas. The site is not located within or adjacent to any identified landscapes within the WDP. As such, the only relevant consideration is for cultural landscapes. Similar, the CVA prepared by Ngāti Apakura does not identify any specific area within the site rather that it forms part of a wider and broader cultural landscape that can be modified in response to the implementation measures being included. Ngāti Apakura recognise the Project will change the existing cultural landscape. However, when viewed in the context of the social, ecological, and cultural benefits they consider the Project has an overall positive effect. On this basis, the Project is **consistent** with the direction provided by the objectives and policies in the RPS and WDP as they relate to landscape values.

7.8 Iwi Management Plans

7.8.1 Waikato-Tainui Environmental Management Plan

The Site is located within the rohe of Waikato-Tainui. The Section 18 Report recommends that the SAR '*has regard*' to the Waikato-Tainui Environmental Management Plan (WTEP). The WTEP was developed pursuant to the Waikato-Tainui Raupatu Claims (Waikato River) Settlement Act 2010. Key strategic objectives of the WTEP include maintaining tribal identity and integrity, including the objective of "growing our tribal estate and managing our natural resources." More broadly, the WTEP is intended to enhance Waikato-Tainui participation in resource and environmental management and to ensure that Waikato-Tainui values, interests, and aspirations are recognised in resource management decision-making.

The Project responds to the overarching purpose of participation. The Project demonstrates this in two principal ways. First, through engagement and consultation undertaken with Waikato-Tainui and the relevant iwi and mana whenua groups throughout the development of the Project (**Part Four).** Second, through a design response that has recognised and incorporated key themes and outcomes promoted by the WTEP and the CVA prepared by Ngāti Apakura, including wetland restoration and enhancement, improved freshwater outcomes, and opportunities for ongoing mana whenua involvement in ecological restoration initiatives. On this basis, the Project is consistent with the overarching purpose of the WTEP by facilitating participation in the resource management process and responding to the key environmental, cultural, and social outcomes sought by the plan and a Ngāti Apakura.

In addition, **Appendix 26 – Assessment of Relevant Planning Documents** includes a detailed assessment of the key matters identified in the WTEP. The Project addresses these matters through implementing wetland, freshwater, and biodiversity enhancements, managing natural hazard risks, recognising cultural values associated with the Site, and will result in positive environmental and social outcomes. Accordingly, the Project is considered to be generally **consistent** with the objectives and policies of the WTEP.

7.8.2 Additional Tainui Iwi Groups

In addition to having regard to the Waikato-Tainui Iwi Management Plan (**WTEP**), the Section 18 Report identified seven Māori groups that may have relevant interests in the Project area; of the seven groups, three iwi management plans have been identified:

- Raukawa Environmental Management Plan
- Maniapoto Environmental Management Plan

- Ngati Haua Environmental Management Plan.

The areas of interest identified in the relevant iwi management plans do not directly overlap the Site. Rather, the Site is located adjacent to the identified areas. Nevertheless, the Project has had regard to the values, interests, and outcomes identified in those plans through the assessment and consultation processes undertaken.

Each iwi management plan expresses the particular values, aspirations, and resource management priorities of the relevant iwi. While recognising these distinct perspectives, there is substantial overlap between the matters addressed in the identified iwi management plans and those addressed in the WTEP particularly in relation to freshwater health, wetland restoration, indigenous biodiversity, cultural recognition, and tangata whenua participation in resource management processes.

As discussed above, the Project is considered to be consistent with the key themes and outcomes sought by the WTEP. Having regard to the overlap between the relevant provisions of the identified iwi management plans and noting that the Site is located adjacent to rather than within the identified areas of interest, the Project is also considered to be generally **consistent** with the direction of those plans.

7.9 Strategic and Spatial Documents

A number of strategic and spatial documents are relevant to the Project area. Key documents include the Future Proof Strategy, Waikato Land Transport Plan, Waipā 2050 Growth Strategy (**WGS 2050**), and Ahu Ake – Waipā Spatial Plan.

Future Proof

Future Proof identifies the importance of providing thriving communities and neighbourhoods, including quality, denser housing options that increase housing choice, together with integrated infrastructure, multi-modal transport and water-sensitive urban development. It also promotes iwi aspirations and urban water management that is sensitive to natural hydrological and ecological processes. Future Proof identifies a settlement pattern for the subregion while recognising that out-of-sequence or unanticipated development opportunities may warrant consideration where they can be appropriately integrated with existing and planned infrastructure.

The Project responds to that direction by providing substantial additional retirement living capacity adjoining the existing Te Awamutu urban area, together with an integrated framework for transport, three-waters infrastructure, stormwater management, open space and ecological enhancement. The proposed restoration and enhancement of existing wetlands, riparian restoration and planting, and engagement with tangata whenua also respond to the environmental and cultural outcomes sought through Future Proof.

While the site is not within an identified future development area, the Project is generally **consistent** with these broader strategic outcomes of Future Proof that has also been implemented through the RPS.

Waipā 2050 Growth Strategy

The Waipā 2050 Growth Strategy provides the strategic framework for managing growth within the Waipā District. Its vision is focused on valuing and protecting the characteristics that make Waipā a special place, providing a policy framework to guide future growth, defining the preferred pattern of settlement growth,

providing certainty regarding where living, working and recreational opportunities are to be provided, and informing Council's infrastructure planning to support the efficient timing and scale of infrastructure provision. The WGS is currently being reviewed by WDC, and the findings of the associated Market Economics Housing Assessment have been incorporated into the GCA.

Following the preparation of the WGS 2050, the WDP implemented its strategic direction through the incorporation of key objectives and the identification of revised growth cells.

The Project has generally followed the approach anticipated for the development of a growth cell, including the preparation of a master plan setting out the key components of the development, consultation with key stakeholders regarding the infrastructure required to service the Project (**Appendix 19**), and evidence through the EME and GCA demonstrating demand for retirement village living that is not readily accommodated within the existing growth cells. As identified above, the Project is also generally consistent with the overall direction of the WDP. While the Project is located outside an identified growth cell, it responds to an identified unmet demand for retirement living and represents a strategic extension of Te Awamutu, having regard to the residentially zoned land to the southwest and existing residential properties to the east of the site.

On balance, the Project is generally **consistent** with its broader strategic direction by providing a planned response to identified demand and coordinating growth with the infrastructure necessary to support it. Although there may be some tension with WGS 2050 insofar as the Project is located outside an identified future growth area, the Project responds to a specialised form of housing and care that has particular site and locational requirements. Suitable sites must be capable of accommodating the scale, configuration and operational requirements of an integrated retirement village and aged-care facility, and may not be readily available within identified growth areas. Accordingly, while the Project does not align directly with the spatial direction anticipated by WGS 2050, this does not, in itself, result in an identifiable adverse effect.

Ahu Ake – Waipā Spatial Plan

Ahu Ake is a high-level community spatial plan with an overall vision of building connected communities with the four key outcomes: socially resilient, cultural champions, environmental champions, and economically progressive.

Consultation undertaken for Te Awamutu identified community support for greater housing choice, including good-quality apartments and multi-unit development supported by appropriate community spaces and facilities. This was balanced against concern that intensification could adversely affect Te Awamutu's character, including its small town feel and community cohesion. Other key themes included protecting high-class soils for primary production, maintaining and expanding tree canopy and habitat, providing quality stormwater management, improving parks and community facilities, and supporting safe and connected walking and cycling infrastructure.

The Project responds to a number of these themes through the provision of additional housing choice specifically for the retirement sector, together with communal facilities, open space, landscaping, ecological restoration and integrated stormwater infrastructure. The Project also provides for pedestrian and cycling connections and has been designed to integrate with the adjoining urban environment. Further, the tension with the identified desire to retain high-quality soils are addressed in the HPL Report as not resulting in

unacceptable adverse effects for primary production due to level, location and permanent long-term constraints for the HPL on the site.

On this basis, the Project is generally **consistent** with the direction provided by Ahu Ake.

Transportation Plans and Strategies

Sections 3 and 4 of ITA (**Appendix 16**) provide an assessment of the Project against the key transport related provisions of the relevant planning documents and the transport related plans and strategies that have informed the Project's transport design. In addition to the planning documents identified above, key transport related plans and strategies include, the Government Policy Statement on Land Transport 2024, Waikato Regional Land Transport Plan, Waikato Public Transport Plan, Waipā Transport Strategy 2022-2052, and the Waipā Long-term Plan 2025-34.

In summary, the ITA considers the Project has particular regard to its relationship with SH3 and the strategic Hamilton–Te Awamutu corridor, integration with the existing Te Awamutu urban area, and provision for walking, cycling and public transport. The accessibility needs of an ageing population are also particularly relevant, given the importance of safe and accessible pedestrian environments and transport options for people with restricted mobility.

The Project's transport infrastructure has therefore been assessed on the basis of the existing and committed transport network, without reliance on uncommitted future network improvements. The proposed pathway also provides for integration with the urban mobility network identified in WDC's Transport Strategy 2022–2052. Overall, while the Project is outside the planned growth pattern, the relevant strategic direction does not prevent such development and instead places particular importance on demonstrating that it can be safely and efficiently integrated with the transport network without undermining planned infrastructure investment.

This assessment relies on the assessment undertaken in the ITA to conclude the Project is **consistent** with the direction provided by the key transport specific plans and strategies.

7.10 Summary of Policy and Planning Documents

The Project is **generally consistent with the broad direction provided by the** relevant planning provisions. The Project comprises an integrated development that aligns with the key outcomes sought by the relevant statutory and non-statutory planning documents. While some tensions have been identified with specific objectives and policies, they do not undermine the overall consistency of the Project with the strategic direction of those documents when assessed as a whole or give rise to adverse effects that are not appropriately addressed through the Project design, mitigation measures, and management plans.



8. PART EIGHT – Treaty Settlements

The relevant provisions of the Treaty settlements identified in the Section 18 Report have been reviewed as part of the statutory assessment in **Appendix 27 – Treaty Settlement Summaries**. The applicable Treaty Settlements are detailed below:

- Waikato Raupatu Claims Settlement Act 1995
- Waikato-Tainui Raupatu Claims (Waikato River) Settlement Act 2010;

The following sections identify the key Treaty provisions identified in the settlement act and how the Project is consistent with the relevant provisions identified in **Appendix 27**.

8.1 Waikato Raupatu Claims Settlement Act 1995

The Waikato Raupatu Claims Settlement Act 1995 records the historical raupatu (confiscation) of Waikato land, the Crown's acknowledgements of the resulting loss, suffering, and deprivation experienced by Waikato-Tainui, and the Crown's apology for those actions. The settlement established a framework for redress and the restoration of the Crown's relationship with Waikato-Tainui, including the return of certain lands and the establishment of governance and trust arrangements associated with the settlement.

The Project is within the wider Waikato Tanui rohe and will convert rural land for retirement village living. The settlement act is relevant to understand the historical and contemporary relationship of Waikato-Tainui with the whenua and the need for ongoing engagement. The Project engaged with this relationship through engagement with Waikato-Tainui, as detailed in **Part Four**, the Project aligned with key objectives of the Waikato-Tainui Environmental Plan (**Appendix 26**). As such, this demonstrates the formation of a partnership in the context of the FTAA.

The redress included in the Raupatu Settlement Act does not affect the natural and physical resources relevant to the project or project area.

8.2 Waikato-Tainui Raupatu Claims (Waikato River) Settlement Act 2010;

The Waikato-Tainui Raupatu Claims (Waikato River) Settlement Act 2010 built from the Waikato Raupatu Claims Settlement Act 1995. The Waikato River Settlement Act 2010 establishes an integrated framework for the restoration and protection of the Waikato River, including Te Ture Whaimana o Te Awa o Waikato as the primary direction-setting document for the Waikato and Waipā Rivers and activities within their catchments affecting those rivers. The settlement framework also establishes the Waikato River Authority, provides for joint management arrangements with local authorities and provides for the Waikato-Tainui Environmental Plan.

The Project includes the discharge of water into a tributary flowing into the Waipā River and then the Waikato River. As detailed in **Section 7.1.1**, the Project is consistent with the overall direction of Te Ture Whaimana. Broadly, this is achieved through the Project's integrated design that provides for the restoration and protection of the Waikato River's health and wellbeing. In addition, **Section 7.1.8** and **Appendix 26**, demonstrates the Project is consistent with the Waikato-Tainui Environmental Plan's relevant objectives and policies and direction for partnership through engagement through the FTAA process.

The Treaty settlement also establishes Joint Management Agreements with Waikato Regional Council and Waipā District Council. The proposed discharge of stormwater falls within the scope of the Waikato Regional Council JMA. The Project does not fall within the scope of the WDC JMA as that relates to activities on the surface water in the Waikato River.

The JMA including provisions relating to information sharing and limited notification through the resource consent process. The FTAA does not have the same notification process at the RMA. However, Waikato-Tainui have been notified of the application in advance. Further, **Part Four** details the inclusion of Waikato-Tainui throughout this process, including continued information sharing and consideration of inputs. On this basis, the procedural requirements of the JMA continue to be met.

8.3 Other Obligations

A review of the relevant statutory and customary interests confirms that the Project area is not located within, subject to, or affected by any of the following:

- A statutory area as defined in any of the relevant Treaty settlements as there are no 'statutory areas' within the Treaty settlements (**Appendix 27**).
- Any customary marine tittle applications, orders, planning documents prepared by a customary marine title group or a protected customary rights area under the Marine and Coastal Area (Takutai Moana) Act 2011.
- Ngaa rohe moana o ngaa hapuu o Ngaati Porou as defined in Section 11 of the Ngaa Rohe Moana o Ngaa Hapuu o Ngaati Porou Act 2019. For avoidance of doubt, the Project area is not adjacent to ngā rohe moana o ngā hapū o Ngāti Porou.
- Any taiāpure-local fisheries, mātaitai reserves, or areas that are subject to bylaws or regulations made under Part 9 of the Fisheries Act 1996.

8.4 Treaty Settlement Summary

To date, the Project has and will continue to meet the obligations arising under the identified Treaty settlements. As such, those matters **do not weigh against approval** of the Project under the FTAA.

9. PART NINE – RMA FRAMEWORK

The resource consent application forming the Project will be determined under the FTAA. Under the FTAA, Schedule 5 of the FTAA requires an assessment of the Project against Part 2, sections 5, 6, and 7 of the RMA and any relevant provisions of the RMA that direct decision-making on an application for resource consent.

In evaluating a decision for a Project under the FTAA, the decision-maker must give greatest weight to the purpose of the FTAA and then the relevant provisions under the RMA. The decision-making framework under the FTAA prioritises the purpose of the FTAA over the RMA's framework.

The following sections address the principal RMA provisions relevant to the Project and the statutory decision-making framework.

9.1 Section 104

Section 104 of the RMA sets out the matters that must be considered when assessing an application for resource consent.

Section 104(1)(a) – Actual and Potential Effects.

Regard must be had to the actual and potential effects on the environment of allowing the activity. The actual and potential effects of the Project are assessed in **Part Six** and are addressed in further detail within the technical assessments supporting the Application. Those assessments conclude that the relevant effects can be appropriately managed through the Project design, mitigation and enhancement measures, management plans and proposed consent conditions.

Section 104(1)(ab) – Offsetting or Compensation

Regard must be had to any measure proposed or agreed by the Applicant for the purpose of ensuring positive effects on the environment to offset or compensate for adverse effects. The Project includes a substantial programme of environmental restoration and enhancement, including stream restoration, riparian planting, habitat creation and ecological enhancement. The characterisation of those measures, including whether they constitute mitigation, offsetting or compensation, is addressed in the relevant technical assessments. The measures relied upon in the assessment are secured through the proposed consent conditions where appropriate.

Section 104(1)(b) – Relevant Provisions of Statutory Plans or Proposed Plans

Regard must be had to the relevant provisions of national environmental standards, national policy statements, regional policy statements and plans and the applicable district plan.

Section 104(1)(b) is modified by Section 104(1B) which directs a decision maker that they may disregard a statutory plan or proposed plan to the extent it relates to Section 104(1A).

The Project has been assessed against the relevant statutory planning instruments in **Part Seven** and **Appendix 26**. That assessment identifies that the Project is consistent with the overall direction provided by the relevant provisions of the identified planning documents.

Section 104(1)(c) – Other Matters

Regard must also be had to any other matters considered relevant to determine the Project. Relevant other matters include the wider strategic and spatial planning context for planned-growth within the Waikato Region and the Waipā District, as addressed in **Part Seven**. The Project area is also within the scope of Joint Management Agreements between the Waikato Raupatu River Trust and each of Waikato Regional Council and Waipā District Council. Those agreements are relevant to the resource consent approvals sought for the Project and provide for information sharing, engagement and Waikato-Tainui participation in resource consent processes. The relevant JMA arrangements are addressed in **Part Eight** above. No Mana Whakahono ā Rohe has been identified as applying to the Project. The Project's status as a referred project and the purpose and decision-making framework of the FTAA are addressed separately through the statutory requirements of the FTAA.

Section 104(1A) – Out-of-Scope Effects

When considering effects of a district land use activity, Section 104(1A) directs that decision makers must **disregard** the following effects:

a. *any of the following where they relate to residential activities (except in relation to the protection of historic heritage):*

   i. *the area of glazing:*

   ii. *the presence or absence of balconies:*

   iii. *the outdoor living space:*

   iv. *the internal layout:*

   v. *the size of a residential unit:*

   vi. *the size of landscaped areas (except in relation to permeability):*

b. *negative effects of development on trade competition, including on competing providers of input goods and services:*

c. *effects on retail distribution:*

d. *In relation to a project,—*

   i. *any lack of demand for the project; or*

   ii. *the fact that the project is not financially viable:*

e. *the type of residents to be housed in a new development:*

f. *views from private property.*

Part Six of this SAR and the relevant supporting technical reports have disregarded the out-of-scope effects identified above.



In particular, the LUDA, and the assessment of landscape and urban design effects in this SAR, has specifically excluded views from private property (**Section 6.3**).

Sections 104(1B)-(1D)

Sections 104(1B)-(1D) are summarised below.

- **Section 104(1B)** states when considering a land use application, the consent authority may disregard a relevant national environmental standard, a plan or proposed plan, a national policy statement, or a regional policy statement to the extent that it relates to an out-of-scope effect. This SAR and its assessment of objectives has been developed on this basis.

- **Section 104(1C):** this SAR has not considered any elements or instruments of the Planning Act 2026 and the Natural Environment Act 2026, except as those provided under schedule 1 of the PA.

- **Section 104(1D)**: as of the date of finalising this SAR, there is no relevant decided regional spatial plan under the Planning Act 2026. In terms of a future development strategy, Future Proof has been assessed in Section 7.1.9.

Summary

Having regard to the matters in section 104 within the modified decision-making framework established by the FTAA, the resource consent applications are considered appropriate. But for the prohibited activity status arising from the drainage of the natural inland wetland to provide for Stormwater Pond B, the Project would otherwise have an overall non-complying activity status under the RMA. The threshold tests in Section 104D of the RMA do not apply to the determination of a substantive application under the FTAA. The effects of the Project have been comprehensively assessed and can be appropriately managed through the Project design, proposed mitigation and enhancement measures, management plans and consent conditions.

9.2 Section 105

Section 105 of the RMA requires that, for an application for a discharge permit, regard be had to the nature of the discharge and the sensitivity of the receiving environment to adverse effects, the Applicant's reasons for the proposed choice, and any possible alternative methods of discharge, including discharge into another receiving environment.

The site is located within an unnamed tributary of the upper Mangapiko Stream catchment, which flows into the Waipā and then the Waikato. The catchment is sensitive to increased runoff, erosion and contaminant loads associated with urban and industrial development, which has informed the Project's stormwater treatment and attenuation approach.

Construction Related Discharge

Construction-related discharges will principally comprise treated sediment-laden runoff and water generated through temporary dewatering. These discharges will be treated through the Project's erosion and sediment control measures before discharge to the relevant receiving environment, consistent with existing catchment drainage pathways and avoiding unnecessary transfer of water between catchments.

The erosion and sediment control framework provides for progressive stabilisation, sediment treatment and management of construction-phase discharges in accordance with the proposed regional consent conditions and supporting management plans. Temporary dewatering will similarly be managed so that water is appropriately treated before discharge and effects on receiving environments are minimised.

The proposed construction discharge methods are considered appropriate having regard to the nature of the discharges, the sensitivity of the receiving environments, the reasons for the proposed discharge methods and the alternatives available.

Operational Discharge

Operational stormwater will comprise runoff from the developed Site and associated roads and infrastructure. The Project adopts an integrated stormwater treatment and attenuation system that manages downstream discharges. The proposed approach provides for water-quality treatment, peak-flow attenuation and erosion management while avoiding unnecessary transfer of runoff between receiving environments.

Stormwater treatment will be provided through an integrated treatment train incorporating source controls, raingardens, vegetated conveyance systems, constructed wetlands and other treatment measures appropriate to the future retirement village development. This approach has been developed in accordance with WRC's stormwater guidelines and the Regional Infrastructure Technical Specifications (RITS V2 (2025).

9.3 Section 106

Sections 106 and 106A of the RMA applies to subdivision and land use consents and provides for a decision-maker to refuse consent or impose conditions where the subdivision or land use activity would give rise to specified risks relating to natural hazards, human health and safety, or access.

In considering applications under sections 106 and 106A, the relevant matters include:

- Significant risk from natural hazards
- Whether sufficient provision has been made for legal access for each allotment.
- The likelihood of a natural hazard(s), whether the proposed activity would increase or exacerbate the hazard risk, and the resulting effects on people, property and land.

The GAR does not consider there is significant risk from natural hazards in the context of the Project.

The Project proposes a new physical and legal access to State Highway 3 that will be delivered prior to completion of Stage 1. Further, the proposed scheme plans ensure the new super allotments have legal access to State Highway 3.

The natural hazard risks associated with the Project have been assessed in the GAR, IR, and GWR, prepared with the SAR. As detailed in **Section 6.4** and **7.1.6**, these assessments consider, subject to implementation of the proposed recommendations, the conditions proposed through the SAR will ensure any adverse effects relating to settlement, liquefaction and associated ground deformation, lateral spreading, slope stability, groundwater and flooding/inundation are managed to an acceptable level.

On this basis, the Project is not considered to give rise to circumstances warranting refusal under Section 106 or 106A of the RMA.

9.4 Section 107

Section 107 of the RMA restricts the granting of discharge permits where, after reasonable mixing, the discharge is likely to give rise to any of the following effects in the receiving waters:

- The production of conspicuous oil or grease films, scums or foams, or floatable or suspended materials;
- Any conspicuous change in colour or visual clarity;
- Any emission of objectionable odour;
- The rendering of freshwater unsuitable for consumption by farm animals; or
- Any significant adverse effects on aquatic life.

As set out in the section 105 assessment above, construction-related discharges will be managed through erosion and sediment controls, including implementation of the relevant erosion and sediment control plans and progressive stabilisation of disturbed areas.

Operational stormwater will be managed through the proposed treatment train, source controls, attenuation and erosion-management measures. The proposed regional consent conditions also establish receiving-water and discharge-performance requirements directed at ensuring that the effects specified in section 107 do not occur after reasonable mixing.

Based on the above, the proposed discharges are not expected to give rise to any of the effects listed in section 107, and the restriction on the granting of discharge permits under that section are not applicable.

9.5 Section 108, 108A and 220

Section 108 of the RMA enables conditions to be imposed on resource consents to ensure that activities are undertaken in accordance with the approved proposal and that associated effects are appropriately managed.

A comprehensive suite of draft consent conditions has been prepared for the Project, informed by the technical assessments and management measures identified throughout the SAR. The conditions address the matters necessary to manage the construction, implementation and ongoing operation of the Project, including requirements relating to detailed design, management plans, monitoring, environmental performance standards, staging and ongoing operational controls.

The proposed conditions include both standard and Project-specific requirements and are intended to secure the mitigation and management measures relied upon in the assessment of effects. They also provide for further detailed design and contractor input where appropriate, while ensuring that the environmental outcomes established through the SAR are maintained.

Overall, the proposed condition framework is considered appropriate in terms of section 108 and provides a suitable mechanism for ensuring that the Project is constructed and operated in accordance with the assessed environmental outcomes.

9.1 Assessment against Part 2

Part 2 of the RMA sets out the purpose and principles of the Act and provides the overarching framework for resource management decision-making. The relevant provisions of Part 2 are assessed below, having regard to the nature, scale and effects of the Project and the matters addressed elsewhere in this Application.

9.1.1 Section 5 – Purpose

The purpose of the Act, as stated in Section 5, is to promote the sustainable management of natural and physical resources.

The Project will enable the use and development of a strategically located land resource to provide for a substantial retirement village and residential care capacity with resulting economic and employment benefits within this part of the region.

As detailed in **Part 6**, the Project will avoid, remedy and mitigate adverse environmental effects and impacts to an acceptable level through the Project's design, enhancement measures, management plans, and proposed conditions.

The Project also incorporates a substantial programme of freshwater and ecological restoration, stormwater treatment, habitat enhancement, riparian planting and infrastructure investment. These measures form an integral part of the proposed development rather than being separate from the land-use outcome.

On this basis, the Project will enable people and communities to provide for their social and economic wellbeing while sustaining the potential of relevant natural and physical resources to meet the reasonably foreseeable needs of future generations. Therefore, the Project is **consistent** with section 5 of the RMA.

9.1.2 Section 6 – Matters of National Importance

In achieving the purpose of the RMA, Section 6 identifies matters of national importance that shall be recognised and provided for. The matters of national importance relevant to the Project are 6(a), (c), (e), and (h).

6(a) – Preservation of the natural character of wetlands and protection from inappropriate development

As detailed in **Section 6.8**, the Project's wetland enhancement and restoration works will result in at least 10,983 m² of existing wetlands identified as being highly modified and degraded. While the Project requires the removal of Wetland 9, the smallest wetland on the Site, the EcAR concludes that the resulting effects are addressed by the draft WMEP, which will deliver net positive ecological outcomes through improvements in wetland extent, quality, and function. On this basis, the Project recognises and provides for the preservation of wetland values and natural character. Through the restoration and enhancement of degraded wetland and riparian habitats, the Project will improve the natural character, ecological function, and biodiversity values of wetlands across the Site.

6(c) – Protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna.



As detailed in **Section 6.8**, the Project protects areas of significant indigenous vegetation, including the Site's Significant Natural Area (SNA), which has confirmed long-tailed bat presence and potential copper skink refugia. The Project does not involve the removal of indigenous vegetation within the SNA. In addition, the Project incorporates the measures set out in the Ecological Management Plan (EMP), including lighting controls around the SNA and other potential habitat areas, together with pre-construction surveys and checks for long-tailed bats and copper skinks where required. Together with the restoration and enhancement works, the EcAR concludes these measures will enhance the existing ecological values within the site. As such, the Project is therefore consistent with the direction to protect areas of significant indigenous vegetation and significant habitats of indigenous fauna

6(e) – the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, wāhi tapu and other taonga;

Part Four, **Part Eight**, and **Section 6.9** of the SAR demonstrate that the Project has recognised and provided for the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, wāhi tapu, and other taonga.

The Project has involved engagement with Treaty settlement entities, iwi, and hapū through information sharing and opportunities to provide input into the Project.

The CVA prepared by Ngāti Apakura sets out their perspective on the relationship of the Site within the wider cultural landscape and identifies the wetlands and watercourses as being of cultural significance. Ngāti Apakura acknowledge that the Project has the potential to deliver positive outcomes through the proposed stormwater management system and the wetland restoration and enhancement programme.

On this basis, the Project recognises and provides for the matters identified in section 6(e) of the RMA.

6(h) – the management of significant risks from significant natural hazards

As detailed in **Section 6.4** and **9.1.3**, the Project's design and conditions ensure there will be no significant risk from natural hazards.

9.1.3 Section 7 – Other matters

In achieving the purpose of the RMA, section 7 identifies other matters to which particular regard must be had. The relevant "other matters" are 7(a), (aa), (b), (c), (d), (f), and (g).

7(a) and (aa) – Kaitiakitanga and the ethic of stewardship

Kaitiakitanga and the ethic of stewardship have been recognised through engagement with the Treaty settlement entities and specific iwi and hapu groups through the incorporation of cultural, freshwater and ecological outcomes into the Project design and proposed conditions, consistent with the responses received during engagement. Further, engagement will also be ongoing during the FTAA process and the implementation of the Project.

7(b) – The efficient use and development of natural and physical resources:

The Project represents an efficient use and development of a strategically located Site adjoining the established residential area and major transport corridor. It will provide substantial additional senior living

capacity together with the transport, three-waters and other infrastructure required to support the development.

7(c) – Maintenance and enhancement of amenity values:

Amenity values have been considered through the Project design and supporting LUDA. While the Project will result in a substantial change to the existing character and amenity of the site, the development has been designed to appropriately manage that change through its development form, building scale and location, setbacks, landscape buffers, planting and treatment of sensitive interfaces. The landscape strategy will also establish a high level of on-site amenity through an integrated network of planting, streets, pedestrian connections, communal spaces and enhanced natural features, including wetlands, riparian margins and the SNA.

On this basis, while the existing rural amenity of the site will change, the Project will establish positive amenity values for future residents while appropriately maintaining the amenity values of the wider receiving environment.

7(d) – Intrinsic values of ecosystems:

The intrinsic values of ecosystems have similarly been considered through the ecological assessments and the proposed management and enhancement of wetlands, riparian areas, and terrestrial habitats with the EcAR demonstrating the Project will manage effects to an acceptable level while improving bio-diversity values within the site.

7(f) – Maintenance and enhancement of the quality of the environment

The Project incorporates extensive wetland restoration and enhancement, riparian planting, aquatic habitat creation, indigenous biodiversity enhancement, and stormwater management measures that will improve environmental quality across the Site over time. While the Project involves some modification of existing environmental features, the EcAR concludes that these effects are addressed through the proposed restoration and enhancement programme, resulting in net positive ecological outcomes.

7(f) – Finite characteristics of natural and physical resources:

Section 7(f) requires particular regard to be had to the finite characteristics of natural and physical resources. The finite characteristics of highly productive land have been expressly recognised through the Project's site selection, design process, and assessment against the NPS-HPL. Both regional and site-specific mapping indicate that only a limited area of the Site is identified as highly productive land, and the Project has been assessed as satisfying the requirements of clause 3.10 of the NPS-HPL. In this context, the Project appropriately recognises the finite characteristics of highly productive land while providing for a strategically located retirement village and aged-care development that delivers significant economic, social, and environmental benefits.

7(i) – Finite characteristics of natural and physical resources:

The effects of climate change have been considered in the design and assessment of the Project, particularly in relation to stormwater management, flooding and the resilience of the proposed infrastructure. Climate-



adjusted rainfall has been incorporated into the stormwater and hydraulic assessments and informs the long-term design of the development.

9.2 RMA Framework Summary

Overall, the Project is consistent with the relevant decision-making provisions of the RMA. As such, this consistency **weighs in favour** of the Project in the context of the FTAA.

10. PART TEN: Conclusion

10.1 Determination under the FTAA

The Project does not meet any of the criteria in Section 85(1)-(2) which would require the Application to be declined. In consideration of an Application under the FTAA, Section 85(3) provides that an Expert Panel may decline an approval where it considers the adverse impacts of the proposal are out of proportion to the Project's national or regional benefits after considering any proposed conditions, mitigation, offsetting, compensation, or modifications. In addition, the Section 85(4) expressly provides that an adverse impact cannot be regarded as meeting the threshold in section 85(3)(b) solely because it is inconsistent with, or contrary to, a provision of a relevant planning document. Inconsistency with a relevant planning document does not constitute an adverse impact. Accordingly, if adverse impacts are identified, an assessment is required for an overall planning judgement as to whether the adverse impacts are sufficiently significant to be out-of-proportion to the Project's regional or national benefits.

10.1.1 Proportionality Evaluation

The Project's design and proposed conditions of consent demonstrate the effects are well understood and can be avoided, remedied, or mitigated to an acceptable level while securing positive economic, social, environmental, and cultural effects.

On this basis, the Project does not result in any residual adverse impacts. Accordingly, there are no residual adverse impacts that would require the Panel to undertake a proportionality assessment under s 85(3) of the FTAA.

10.2 Conclusion

The Project is a strategically significant development that will deliver substantial benefits for Te Awamutu and the Waikato region.

It directly responds to an identified need for retirement village living and aged care facilities through providing a diverse range of retirement village units and a residential care facility which is significant for this part of the region.

In responding to this need, the Project will have significant one-off and ongoing economic benefits through investment and employment alongside environmental and cultural benefits associated with the restoration, enhancement and water body improvements that will provide positive long-term outcomes for the receiving environment and mana whenua.

The Project's design and conditions will ensure that the Project avoids, remedies, or mitigates potential adverse effects to an acceptable level while securing the positive outcomes identified above.

The FTAA requires the Panel to give the greatest weight to the purpose of the Act, namely facilitating development projects that deliver significant regional or national benefits. As demonstrated throughout this Application, the Project is consistent with that purpose and is also generally consistent with the relevant RMA planning framework. Together, the consistency with the purpose of the FTAA and the decision-making provisions of the RMA, **weigh strongly in favour of approval under the FTAA**.