# Appendix 9 – Growth Cell Yield Analysis



# Te Awamutu Developments Ltd

# Te Awamutu Growth Cell Yield Analysis Report

September 2026

TV9

# Document control

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## Statement of Qualifications and Experience

Philip Pirie is a Senior Surveyor with 13 years' experience in land development; he holds a Bachelor of Surveying from the University of Otago. He was part of the civil design team and construction supervision team between 2013 – 2016 for Pacific Coast Village in Papamoa. Pacific Coast Village (PCV) is a retirement village with over 300 units and hospital level care. Since then, he has worked on a range of land development projects both residential and industrial.

I confirm that I have read the Code of Conduct for Expert Witnesses contained in the Environment Court of New Zealand Practice Note and have complied with it in preparing this report. Except where I expressly state that I have relied on the advice or information provided by others, the matters addressed in this report are within my area of expertise. I have not omitted to consider any material facts known to me that might alter or detract from the opinions expressed in this report.

# 1. Executive Summary

This report has been prepared to support Te Awamutu Developments Ltd's (TADL) substantive application for the proposed Harlow Lifestyle Village on the northern fringe of Te Awamutu. It assesses whether the existing Te Awamutu growth cells identified in the Waipā District Plan provide sufficient and realistically available residential capacity, and whether they offer a suitable location for an integrated senior living village with managed care facilities.

Council's June 2026 *Waipā District Housing Market Assessment* prepared by Market Economics Ltd provides the more appropriate basis for considering overall housing demand and capacity in Te Awamutu. That assessment identifies sufficient reasonably expected to be realised housing capacity within the planned Te Awamutu growth cells to meet projected demand over the relevant assessment periods.

The assessment undertaken in this report serves a different purpose. It considers the physical and development characteristics of the individual growth cells and provides an indicative comparison of likely conventional residential yield having regard to matters including flooding, topography, stormwater requirements, existing and approved development, structure-plan requirements and infrastructure dependencies.

The assessment also considers whether each growth cell contains land capable of accommodating the particular form of integrated senior living development proposed by TADL. A senior living village requires a large, contiguous and accessible site that can operate as an integrated community, with limited natural hazard exposure and a development pattern capable of supporting the residential, care, communal and infrastructure components as a coordinated outcome.

At a high level, T2, T4, T5, T10, T13 and T14 have been identified as containing land that is potentially capable of accommodating a senior living village of this general nature. However, those growth cells are subject to differing timing, infrastructure, structure-plan, access and development constraints and should not be assumed to represent equivalent or immediately deliverable alternatives.

Overall, the assessment confirms that while several Te Awamutu growth cells are potentially capable of accommodating a senior living village at a high level, each is subject to differing physical, planning, infrastructure and timing considerations. The existence of sufficient overall residential capacity does not, of itself, establish that an equivalent and immediately deliverable site exists within the current growth-cell framework. This report has highlighted that there is very limited scope for a new senior living village within the existing growth-cells to meet the future senior living demands highlighted by the WEBSTER report[1] and the development site proposed at 2025 Ōhaupō Road proposed by Te Awamutu Developments Limited is a viable solution to meet this need.

[1] WEBSTER Research's updated Economic Report: Demand, Competition & Price Point Report dated 14 September 2026

# 2. Introduction

The Waipā District Plan identifies a series of residential growth cells around Te Awamutu that are anticipated to accommodate the future urban growth of Te Awamutu. The growth cells are shown in **Figure 1.1** below. Appendix S1 section on *Growth Management and Structure Plans and Concept Plans* specifies that the pre 2035 growth cells are anticipated to provide for approximately 2,988 dwellings and a further 3,036 dwellings between 2035 and 2050 for a total yield of 6,024 dwellings.[2]

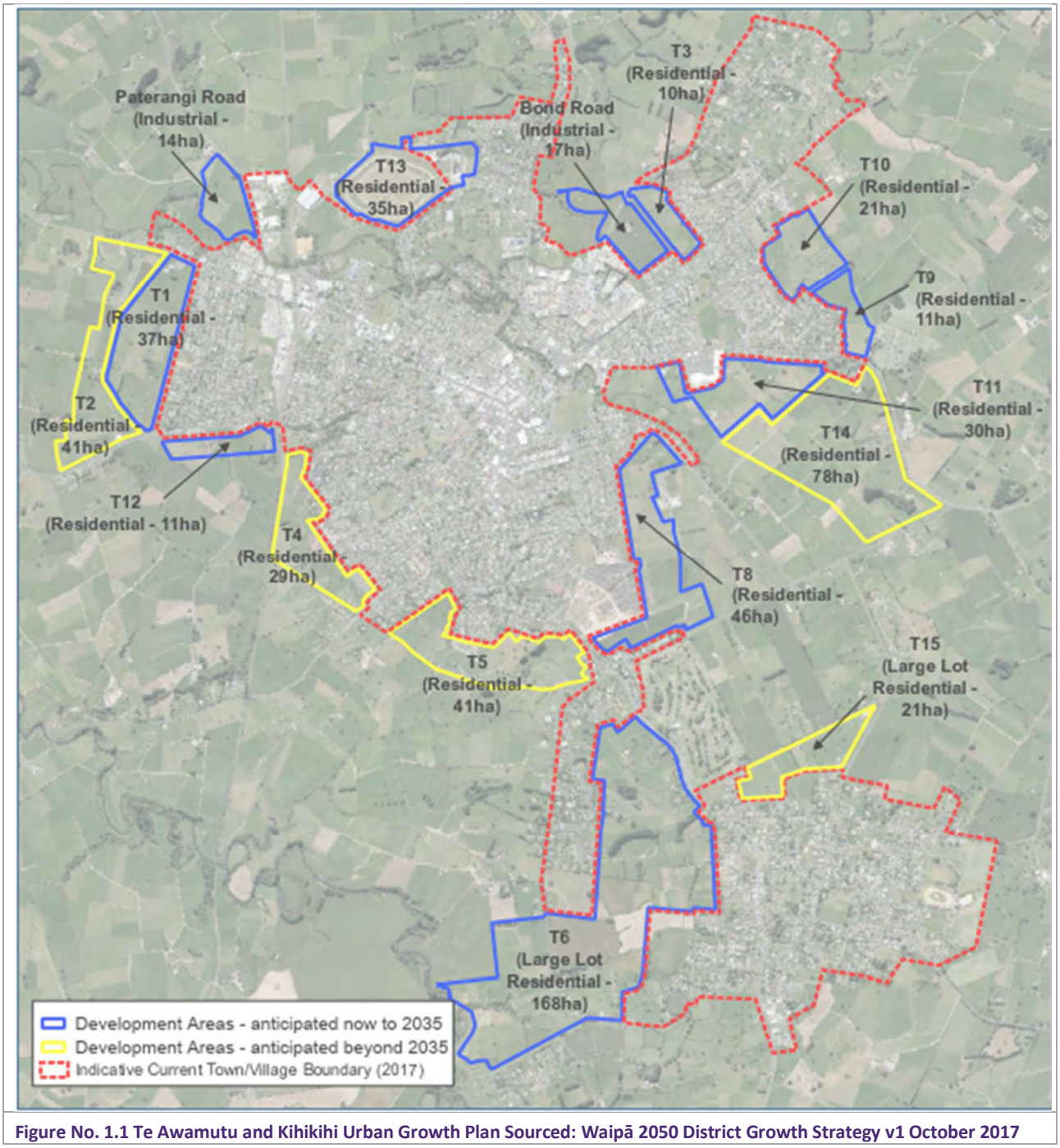



**Figure No. 1.1 Te Awamutu and Kihikihi Urban Growth Plan Sourced: Waipā 2050 District Growth Strategy v1 October 2017**

The number of dwellings set out above is based on a relatively high-level assessment and does not necessarily reflect the physical characteristics and constraints applicable to each growth cell. As an example, some of

[2] Based off capacity figures in Appendix S1 of the Waipā District Plan.

the growth cells have significant challenges from issues such as low-lying areas, wetlands, flooding and undulating topography which affect the actual yield able to be achieved.

Since Waipā 2050 and Appendix S1 were prepared, Council has commissioned a more recent district-wide assessment of housing demand and capacity. The Waipā District Housing Market Assessment prepared by Market Economics Ltd (M.E) in June 2026 assesses plan-enabled, commercially feasible and reasonably expected to be realised housing capacity. That assessment is addressed in Section 5.4 of this report and provides the more appropriate basis for considering the overall sufficiency of housing capacity in Te Awamutu.

This report has been prepared to support the substantive application by Te Awamutu Developments Ltd (TADL) for the Harlow Lifestyle Village under the Fast-track Approvals Act 2024 (FTAA). It provides a more detailed assessment of the extent to which the existing identified Te Awamutu growth cells can reasonably accommodate future residential growth having regard to their physical and development characteristics, and whether those growth cells contain land capable of accommodating an integrated senior living village of the nature proposed by TADL.

BBO has undertaken a desktop assessment of the identified growth cells to consider the extent of developable land within each cell and the potential residential yield that could reasonably be accommodated having regard to identified physical and development constraints. As part of this assessment, BBO has considered matters including flooding, topography, stormwater requirements, existing structure plans and other practical development constraints. The methodology applied is described in Section 4 of this report.

WEBSTER Research's updated *Economic Report: Demand, Competition & Price Point Report* dated 14 September 2026 provides a project-specific assessment of demand for the proposed retirement village and residential care components. That assessment identifies a genuine demand foundation for the Project, with the strongest evidence relating to the residential care component, while also identifying the importance of staged delivery, pricing and wider catchment demand for the retirement village component. The WEBSTER assessment is discussed further in Section 5 and provides relevant context for considering the particular form of development proposed by TADL.

The purpose of this report is to:

a) Assess the indicative development characteristics and residential yield of the existing Te Awamutu growth cells, having regard to identified physical and development constraints; and
b) Consider whether those growth cells contain land capable of accommodating the proposed senior living village.

# 3. Background

TADL is proposing a master-planned senior living community on the northern fringe of Te Awamutu. The location of the site relative to Te Awamutu is shown in **Figure 2.1**.

The development is intended to provide accommodation for residents aged 55 years and over, together with an on-site managed care facility, providing a full continuum of care and allowing residents to age in place as their needs evolve.

The current masterplan provides for approximately 414 dwellings/units, together with a 100-bed residential care facility, communal facilities and a neighbourhood centre. The proposed residential component comprises a mix of standalone villas, duplex units, independent apartments and serviced apartments, with a mixed land tenure structure.

The site is currently zoned Rural under the Waipā District Plan. To enable the proposed development, the substantive application seeks to authorise the development outcome and associated activities.

The proposed development comprises an integrated senior living community, rather than a conventional residential subdivision. Its land requirements, site configuration, accessibility and relationship with the managed care facility are therefore relevant when considering whether the development could reasonably be accommodated within an existing Te Awamutu residential growth cell. In particular, the integrated nature of the proposal requires sufficient contiguous land to accommodate the residential component, care facility, communal facilities, internal movement network and supporting infrastructure as a coordinated development outcome.




**Figure No. 2.1 Site Location**

# 4. Scope and Methodology

## 4.1 Review Objectives and Scope

The review examines the available residential zoned land in the immediate vicinity of Te Awamutu. The two key objectives of this review are to answer the following questions:

1. *What indicative residential yield could reasonably be achieved within the identified Te Awamutu growth cells having regard to their physical characteristics and development constraints?*
2. *Do the live-zoned and deferred Te Awamutu growth cells contain land capable, at a high level, of accommodating an integrated senior living village with managed care facilities?*

The assessment is based on a desktop review of the identified Te Awamutu growth cells using publicly available information. The growth cells identified in Figure 2.1 have been reviewed using available flood modelling, contours and relevant planning information to estimate the developable land and indicative residential yield within each growth cell, having regard to identified physical and development constraints. The assessment also considers whether each growth cell contains land that is physically and practically capable, at a high-level, of accommodating a senior living village with managed care facilities.

Council's June 2026 *Waipā District Housing Market Assessment* provides the more recent assessment of overall housing demand and capacity for Te Awamutu. WEBSTER Research's economic assessment provides the project-specific assessment of retirement village and residential care demand. Those matters are relied on as contextual inputs and are not independently reassessed in this report.

The assessment is undertaken at a growth-cell level and is not intended to represent detailed subdivision design or a site-specific engineering feasibility assessment for each growth cell.

## 4.2 Limitations of Use

The report is based on a high-level desktop analysis for estimating yields for growth cells considering recent plan changes and flood modelling data and other publicly available information.

The assessment is intended to provide a comparative indication of potential development capacity and yield and physical characteristics across the Te Awamutu growth cells. It does not comprise detailed subdivision design, engineering design, infrastructure capacity assessment or a detailed commercial feasibility assessment for each growth cell.

Detailed design, engineering cost estimates, and independent financial and legal advice would be required before undertaking a land development project.

## 4.3 Residential Yield Assessment Methodology

For the purposes of estimating residential yield, the assessment first identifies the land within each growth cell that is considered potentially developable. Due to the high-level nature of this review, potentially developable land has generally been identified as land that is free from identified flooding and has a slope of less than 1 in 4.

Where land within a growth cell is identified as flood prone, that land has generally either been treated as unavailable for residential development or an equivalent area has been allowed for stormwater management. The basis for this approach is that filling flood-prone land may increase flood levels or alter

overland flow paths and drainage patterns on adjacent land. Development of such areas would therefore require more detailed assessment to demonstrate that effects on surrounding properties can be appropriately managed.

Where no significant flooding occurs within a growth cell, an indicative allowance of 12–15% of the site has generally been made for stormwater treatment and management devices, such as constructed wetlands.

In relation to gradient, land with slopes steeper than 1 in 4 has not been considered financially feasible for conventional residential development for the purposes of this high-level assessment. This is considered a generous allowance, as sites approaching a 1 in 6 gradient may begin to require special foundations, retaining or other engineering responses that affect the practical developability and yield of a site.

Once the potentially developable area has been identified, an indicative residential yield has been applied having regard to the relevant zoning, minimum lot sizes, anticipated average lot size and the proportion of developable land likely to be required for roads and access. The assumptions used for this assessment are summarised in Table 4.1.

***Table 4.1 – Residential Yield Assessment Assumptions***

| Zone/development type | Relevant District Plan vacant lot minimum | Assumed Average Lot Area | Indicative Allowance for Roads/Access | Indicative yield per developable hectare |
|---|---|---|---|---|
| Medium Density Residential Zone | 500m² | 500m² | 30% (35m lot depth + half of the road width 10.5m) | 15 dwellings per ha |
| Mix of Residential + Medium Density Residential | 500m² | 510m² | 30% (35m lot depth + half of the road width 10.5m) | 14 dwellings per ha |
| Residential Zone (sewered) | 500m² | 550m² | 33% (32m lot depth + half of the road width 10.5m) | 12 dwellings per ha |
| Picquet Hill Structure Plan Area - vacant site | 600m² | 600m² | 35% (30m lot depth + half of the road width 10.5m) | 11 dwellings per ha |
| Large Lot Residential Zone | 2500m² | 2600m² | 20% (50m lot depth + half of road width 10) | 3 dwellings per ha |

The indicative yields in Table 4.1 are not intended to represent the maximum theoretical capacity enabled by the District Plan. In particular, it is recognised that the Medium Density Residential Zone enables development outcomes at greater densities than would result from subdivision into 500 m² vacant lots, including multiple dwellings on a site and comprehensive or combined land use and subdivision proposals.

Rather, the assumptions in Table 4.1 are intended to provide a comparative estimate of likely conventional greenfield residential yield having regard to the physical characteristics of each growth cell and the form of development reasonably expected to occur[3].

[3] This approach is broadly consistent with the methodology adopted in the June 2026 *Waipā District Housing Market Assessment*. For undeveloped greenfield areas, Market Economics adopts a baseline average net lot size of approximately 500–550 m² for urban detached dwellings, a higher-density range of approximately 475–500 m², and a

For conventional residential development, carriageway widths and road allowances have been derived having regard to Appendix T4 of the Waipā District Plan – Criteria for Public and Private Roads.

It is recognised that higher densities may in some circumstances be achieved through alternative subdivision layouts, multiple dwellings on individual sites, comprehensive development or combined land use and subdivision applications.

Where a growth cell has an existing structure plan, approved subdivision or other more detailed site-specific information that provides a more reliable indication of the likely development yield, that information has been considered and, where appropriate, adopted in preference to the generic yield calculation above.

The developable area identified for each growth cell is shown on the drawings contained in Appendix A. The resulting yield estimates are compared with the anticipated yields identified in Appendix S1 of the Waipā District Plan.

## 4.4 Senior Living Assessment Parameters

Further commentary is provided on whether a suitable site for a senior living village exists within each growth cell.

The general requirements for a senior living village considered in this assessment include:

- A minimum 10 ha contiguous block;
- A site width-to-length ratio of 1:3 or less;
- An integrated site that is not significantly severed by public roads, streams or other physical features;
- Minimal natural hazard constraints;
- Topography capable of accommodating accessible internal movement; and
- A development pattern that does not materially constrain the formation and delivery of a contagious integrated village.

### 4.4.1 Site Area

Te Awamutu Developments Limited is proposing a master-planned senior living community with an on-site managed care facility. TADL has advised that an aged care facility of approximately 80–100 beds is required to provide sufficient operational scale, supported by a wider senior living community of approximately 350 or more dwellings.

Allowing for the residential units, managed care facility, internal access, communal facilities, open space and other supporting amenities, a contiguous site area of approximately 10 ha has therefore been adopted as the minimum area required for the purposes of this assessment.

### 4.4.2 Site Configuration, Security and Connectivity

The configuration of the site is important to the establishment of a walkable and integrated community. A site width-to-length ratio of approximately 1:3 or less has therefore been used as an indicative assessment parameter.

conservative assumption of 600 m². It also assumes that approximately 96% of sites within Te Awamutu urban-density growth cells will be developed for detached dwellings

For a 10 ha site with a width-to-length ratio of 1:3, the site would be approximately 185 m wide by 547 m long. This provides a reasonable basis for maintaining walking distances between residential units and central communal facilities.

Perceived security is also an important consideration for senior living communities. A site that can operate as an integrated village environment, without a public road passing through the centre of the development, provides greater control over access and supports the sense of security sought by residents.

Significant severance through the site can also affect connectivity and community cohesion. A public road, stream or similar feature bisecting the site may make it more difficult to establish a connected internal movement network and can separate residents from communal facilities and services.

Internal roads within senior living villages typically operate at low speeds, commonly in the order of 5–10 km/h, to support safe movement by residents, including those with reduced mobility or visual impairment. The ability to establish this type of low-speed, pedestrian-focused environment is therefore an important consideration in assessing site suitability.

Walkability is also relevant. NZTA guidance[4] identifies approximately five minutes as a typical walking catchment before people are more likely to use another mode of travel, while research into walkability for older people identifies shorter comfortable walking distances for elderly populations. These considerations support the use of site configuration and internal walking distance as assessment parameters.

### 4.4.3 Natural Hazards

The assessment also considers the extent to which a potential site is affected by natural hazards, particularly flooding.

Sites subject to significant flooding or other natural hazard constraints may require substantial engineering works, reduce the contiguous developable area available, or otherwise constrain the ability to provide an integrated and accessible village layout.

### 4.4.4 Topography and Accessibility

Topography is particularly relevant to a senior living village due to the accessibility requirements of its residents.

NZS 4121:2001 *Design for Access and Mobility – Buildings and Associated Facilities* provides guidance on making buildings and associated facilities accessible to and usable by people with disabilities. The Standard identifies relatively flat grades as desirable for accessible pedestrian routes, with steeper grades requiring additional design responses such as rest areas.

As a general guide, grades of less than approximately 1 in 33 are desirable, while steeper grades may be accommodated in particular circumstances up to approximately 1 in 12. This is materially flatter than the gradients that may otherwise be acceptable for conventional residential streets.

Steeper sites may therefore require significant earthworks, retaining, specialised access arrangements or other engineering responses to achieve an accessible internal environment. This can materially affect both the physical suitability and the financial feasibility of a site for a senior living village.

[4] https://www.nzta.govt.nz/partners/design-guidance/public-transport-design-guidance/getting-to-and-from-public-transport/walking

### 4.4.5 Practical Delivery

In addition to physical suitability, the assessment considers known development-status and delivery constraints capable of affecting whether an integrated senior living village can be formed.

Relevant considerations include:

- The number and pattern of land ownership;
- Whether land is already developed or committed to another development;
- Existing structure plan requirements;
- Infrastructure dependencies; and
- Whether existing roads or other planned infrastructure would materially constrain an integrated village layout.

The assessment does not assume that privately owned land is unavailable merely because there are multiple landowners or because landowner intentions are unknown. Where no information is available regarding a landowner's willingness to sell or develop land, that matter is treated as unknown rather than as a constraint.

A site may therefore be physically capable of accommodating a senior living village but still be considered unsuitable where there are significant practical constraints on its availability or delivery.

# 5. Planning and Growth Context

This section summarises the planning and growth framework relevant to the Te Awamutu growth cells. It identifies how the growth framework has changed since Waipā 2050 was prepared and the factors that may affect whether the dwelling yields identified in Appendix S1 can actually be achieved.

## 5.1 Waipā Growth Strategy

The Waipā 2050 District Growth Strategy (Waipā 2050) provides the strategic framework for managing future residential and business growth within the District. For Te Awamutu and Kihikihi, future residential growth is primarily directed to a series of identified growth cells surrounding the existing urban area.

Waipā 2050 anticipated that the population of Te Awamutu and Kihikihi would increase over the period to 2050 and identified additional residential land required to accommodate that growth. In identifying the land required, Waipā 2050 applied broad assumptions regarding future residential density and the anticipated form of future housing.

The anticipated residential capacity of the Te Awamutu growth cells was subsequently incorporated into the Waipā District Plan through Plan Change 5. Plan Change 5 rezoned growth cells identified in Waipā 2050 that were then zoned Rural to a Deferred Zone and introduced provisions relating to their staged release and infrastructure requirements. Plan Change 5 became operative on 14 March 2019.

Appendix S1 of the District Plan identifies the anticipated dwelling yield and timing of the individual growth cells. As outlined in Section 2 of this report, Appendix S1 anticipates approximately 2,988 dwellings within the pre-2035 growth cells and a further 3,036 dwellings between 2035 and 2050, providing for a total anticipated yield of approximately 6,024 dwellings[5].

These figures provide a strategic indication of the scale and location of future growth. They do not represent detailed subdivision designs and do not necessarily account for all of the physical, environmental, infrastructure and implementation constraints that may ultimately affect the development yield of individual growth cells.

Waipā 2050 itself anticipated that more detailed planning would occur as growth cells progressed towards development. The subsequent District Plan framework requires the release and development of deferred growth areas to be supported by matters including structure planning and infrastructure provision. The Appendix S1 yields are therefore appropriately treated as strategic estimates. The yield assessment in this report considers those figures at an individual growth-cell level having regard to the more detailed physical and development information now available. It is not intended to replace Council's district-wide housing capacity assessment.

## 5.2 Subsequent Te Awamutu Plan Changes

Since Waipā 2050 was prepared, a number of plan changes have progressed or altered the planning framework applying to individual Te Awamutu growth cells. Those plan changes are described below:

**Private Plan Change 12 – T2 Growth Cell**
Private Plan Change 12 rezoned the approximately 41 ha T2 Growth Cell from Deferred Residential Zone to Residential Zone and introduced a structure plan for the growth cell. The structure plan provided for

[5] The 6,024-dwelling figure reflects the strategic growth assumptions that informed Waipā 2050 and the subsequent District Plan growth-cell framework. Council's more recent assessment of housing demand and capacity is addressed in Section 5.4.

approximately 9.5 ha to be developed as a retirement village, with the remaining approximately 31.5 ha available for general residential development. PC12 became operative on 27 September 2021.

**Plan Change 13 – Uplifting Deferred Zones**
Plan Change 13 (PC13) amended the process for bringing Deferred Zones forward for development. PC13 removed the previous process of uplifting Deferred Zones by Council resolution and introduced or amended structure plans for a number of growth areas. Of particular relevance to Te Awamutu, PC13 added new structure plans for the T6 and T11 Growth Cells and amended the existing T1 Structure Plan. PC13 became operative on 28 July 2022.

**Plan Change 26 – Residential Zone Intensification**
Plan Change 26 – Residential Zone Intensification (PC26) subsequently introduced the Medium Density Residential Zone and associated intensification provisions for residentially zoned land within Te Awamutu, Cambridge and Kihikihi. Most of PC26 took effect in August 2024, with the remaining Ministerial decisions taking effect on 20 November 2025.

PC26 materially increased the level of residential development enabled within existing residentially zoned areas. Council's current guidance records that properties in Te Awamutu, Cambridge and Kihikihi that are residentially zoned are now within the Medium Density Residential Zone, subject to applicable qualifying matters and infrastructure requirements.

**Proposed Private Plan Change 31 – T4 Growth Cell**
Proposed Private Plan Change 31 (PC31) seeks to rezone approximately 28 ha within the T4 Growth Cell from Deferred Residential Zone to Medium Density Residential Zone and Reserve Zone. PC31 was publicly notified on 11 June 2026 and remains under consideration. PC31 also demonstrates that some growth cells identified for later development are being advanced earlier than the timing originally anticipated in Appendix S1.

**Proposed Private Plan Change 35 – Te Awamutu Retail Centre**
Proposed Private Plan Change 35 (PC35) applies to land at 638 and 670 Cambridge Road. Among other matters, PC35 seeks to rezone 638 Cambridge Road from Medium Density Residential Zone to Commercial Zone and amend Appendix S1 to remove that land from the T11 Residential Growth Cell. The Independent Hearing Commissioner’s decision on PC35 was publicly notified on 27 August 2026. PC35 is relevant because it demonstrates that the spatial extent and residential capacity attributed to individual growth cells can continue to change through subsequent planning processes.

Collectively, these plan changes demonstrate that the Te Awamutu growth framework has continued to evolve since Waipā 2050 was prepared. They also demonstrate that the zoning status, spatial extent and anticipated dwelling yield of individual growth cells are not fixed and may change as more detailed structure planning, rezoning and development proposals progress. PC26 has also materially increased the theoretical residential capacity enabled within residentially zoned areas, a distinction between plan-enabled and likely realised capacity that is addressed further in Section 5.4.

## 5.3 Ahu Ake – Waipa Community Spatial Plan

Council adopted Ahu Ake – Waipā Community Spatial Plan on 26 March 2025. Ahu Ake now provides the Council’s long-term spatial framework for coordinating growth, infrastructure and investment across the District.

Ahu Ake does not replace the growth-cell framework established through Waipā 2050 and the District Plan, but it reinforces that future development needs to be coordinated with infrastructure provision, funding and implementation.

This is relevant to the assessment in this report because the identification of land for future residential growth does not, on its own, determine the timing or form of development within an individual growth cell. Development remains dependent on matters including infrastructure provision, structure planning and the physical characteristics of the land.

## 5.4 Waipā District Housing Market Assessment 2026

Waipā District Council commissioned M.E to prepare the *Waipā District Housing Market Assessment*, which was finalised in June 2026. The assessment provides a more recent district-wide assessment of projected housing demand and residential development capacity than the strategic dwelling yields contained in Waipā 2050 and Appendix S1 of the District Plan.

The M.E assessment considers three different measures of housing capacity: plan-enabled capacity, commercially feasible capacity and reasonably expected to be realised (RER) capacity. Plan-enabled capacity represents the maximum theoretical development opportunity enabled under the District Plan, while RER capacity estimates the amount and type of housing likely to be realised having regard to the development opportunity, infrastructure, commercial feasibility and development patterns likely to be sustained by the market.

For Te Awamutu/Kihikihi, M.E projects a net increase in dwelling demand, including the required competitiveness margin, of approximately 800 dwellings to 2035 and 2,800 dwellings to 2055. Of the latter, approximately 2,500–2,700 dwellings are projected to be accommodated within greenfield areas, depending on the scenario adopted.

Against that demand, the assessment identifies RER capacity within the Te Awamutu growth cells of approximately 3,300 additional dwellings in the medium term, increasing to approximately 5,200–5,300 dwellings in the long term. The ME assessment therefore identifies sufficient planned growth-cell capacity to meet projected Te Awamutu housing demand over the relevant assessment periods under its baseline assumptions.

The M.E assessment is accordingly the more appropriate basis for considering the overall sufficiency of housing capacity within Te Awamutu. The assessment undertaken in this report serves a different purpose. It does not seek to recalculate NPS-UD housing sufficiency or to demonstrate an overall shortage of residential capacity. Rather, it considers the physical and development characteristics of the individual Te Awamutu growth cells and provides a comparative indication of likely conventional residential yield and their ability to accommodate the particular form of integrated senior living development proposed by TADL.

There is nevertheless a useful degree of consistency between the two assessments at the level of likely greenfield development form. In estimating RER capacity within undeveloped greenfield areas, M.E assumes that approximately 96% of sites within Te Awamutu urban-density growth cells will accommodate detached dwellings. Its baseline scenario applies average net lot sizes of approximately 500–550 m², with a higher-density scenario of approximately 475–500 m² and a conservative scenario of 600 m².

Those assumptions are broadly comparable with the conventional residential yield assumptions adopted in Section 4.3 of this report. The difference is that the M.E assessment operates as a district-wide housing capacity and sufficiency model, whereas the BBO assessment applies a more detailed growth-cell-level review of matters such as flooding, topography, stormwater requirements, approved development and structure planning.

## 5.5 National Policy Changes

The national planning framework applying to residential development has also changed since Waipā 2050 was prepared in 2017. Of particular relevance to the assessment undertaken in this report are changes relating to freshwater, natural hazards and urban development.

These instruments do not necessarily prevent development within identified growth cells. They do, however, affect the matters that must now be considered through more detailed planning and consenting and may influence the amount of land that can practically be developed, the form of development, and the residential yield that can ultimately be achieved within the individual growth cells.

### 5.5.1 National Policy Statement on Freshwater (NPS-FM)

The National Policy Statement for Freshwater Management 2020 (NPS-FM) came into force on 3 September 2020 and has subsequently been amended. The most recent amendments came into force on 15 January 2026.

The NPS-FM provides national direction on freshwater management, including integrated management of land use and freshwater and specific provisions relating to natural inland wetlands.

For the purposes of assessing growth-cell capacity, this is relevant because areas containing natural inland wetlands or other freshwater features cannot simply be assumed to contribute to residential yield without further investigation. The presence of those features may reduce the developable area or require development layouts to be altered to appropriately manage effects.

Accordingly, where the dwelling yields in Appendix S1 were established before the current freshwater framework and before detailed site investigations, those figures should be treated as indicative rather than as confirmed development outcomes.

### 5.5.2 National Policy Statement for Natural Hazards (NPS-NH)

The National Policy Statement for Natural Hazards 2025 (NPS-NH) came into force on 15 January 2026. It establishes a national framework for managing natural hazard risk associated with subdivision, use and development using a risk-based and proportionate approach.

The NPS-NH applies to hazards including flooding, landslips and liquefaction and requires decisions to be based on the best available information, including where that information is uncertain or incomplete.

This is particularly relevant to the Te Awamutu growth cells where flooding has been identified. For the purposes of this high-level assessment, flood-prone areas have generally not been assumed to provide unconstrained residential development potential because development or filling in those areas may affect flood storage, overland flow paths or flood risk on surrounding land.

The implications are particularly relevant to Growth Cells T3, T8, T12 and T15, where the assessment undertaken in this report identifies material areas affected by flooding.

### 5.5.3 National Policy Statement on Urban Development (NPS-UD)

The National Policy Statement on Urban Development 2020 (NPS-UD) came into force on 20 August 2020. It seeks to ensure that urban environments are well functioning and that sufficient development capacity is provided to meet the different needs of people and communities.

For Waipā, the NPS-UD has been an important driver of subsequent planning changes, including PC26 and and of Council's ongoing assessment of housing demand and development capacity.

As discussed in Section 5.4, the June 2026 *Waipā District Housing Market Assessment* provides Council's current assessment of plan-enabled, commercially feasible and reasonably expected to be realised housing capacity. That assessment identifies sufficient residential capacity within the planned Te Awamutu growth cells to meet projected demand over the relevant assessment periods.

This report does not seek to revisit that district-wide sufficiency assessment. Rather, the relevance of the NPS-UD to this report is that overall housing capacity is distinct from the characteristics and development potential of individual growth cells. A sufficient aggregate level of residential capacity does not mean that every identified growth cell will achieve its Appendix S1 yield, nor does it determine whether a particular growth cell contains land capable of accommodating the specific form of integrated senior living development considered in this report.

The individual growth-cell assessments in Section 6 therefore focus on the physical and known development characteristics of each cell, including matters such as flooding, topography, existing or committed development, structure-plan requirements and infrastructure dependencies.

## 5.6 Development and Delivery Constraints Relevant to Individual Growth Cells

### 5.6.1 From Enabled Capacity to Realisable Supply

Identified residential capacity does not necessarily translate directly into the same development outcome within each individual growth cell.

As discussed in Section 5.4, the June 2026 *Waipā District Housing Market Assessment* distinguishes between plan-enabled capacity, commercially feasible capacity and reasonably expected to be realised (RER) capacity. Plan-enabled capacity represents the maximum theoretical development opportunity enabled under the District Plan, whereas RER capacity reflects the amount and form of housing likely to be realised having regard to matters including infrastructure, commercial feasibility and development patterns likely to be sustained by the market.

For Te Awamutu, the Market Economics assessment identifies sufficient RER capacity to meet projected demand over the relevant assessment periods. Accordingly, this report does not seek to establish that there is an overall shortage of residential capacity.

The relevance of implementation constraints to this report is instead at an individual growth-cell level. A growth cell may have a strategic or theoretical dwelling yield attributed to it, but the actual form and yield achieved may differ because of matters such as flooding, topography, stormwater requirements, structure-plan provisions, infrastructure dependencies, existing development and approved or committed development proposals.

These matters are therefore considered in Section 6 when assessing the likely yield and physical suitability of each growth cell.

### 5.6.2 Infrastructure Funding and Sequencing

Infrastructure provision is an important constraint on the timing and realisation of residential development. The growth framework established through Waipā 2050 expressly seeks to integrate growth with

infrastructure provision, and the District Plan identifies infrastructure requirements and staging for individual future growth cells.

Growth Cells T9 and T10 provide a practical example. Further development within these cells is dependent on supporting transport infrastructure, including the planned roundabout serving the eastern growth area. The timing and funding of that infrastructure therefore affects when the residential capacity attributed to those growth cells can practically be delivered.

The more detailed implications of infrastructure requirements are considered as part of the individual growth-cell assessments in Section 6.

### 5.6.3 Development Status and Site Assembly

The existing development status and ownership pattern of land can also be relevant to the practical delivery of an integrated senior living village.

Where land is already developed, subject to subdivision works, committed to an approved development or otherwise affected by a known development proposal, those matters are relevant to whether a sufficiently large contiguous site remains available within a growth cell.

The pattern of land ownership may also be relevant where it creates an objective constraint on assembling a contiguous site of the scale and configuration required for an integrated senior living village.

However, this assessment does not assume that privately owned land is unavailable merely because it is held in separate ownership or because a landowner's future intentions are unknown. In the absence of evidence as to a landowner's willingness to sell or develop, that matter is treated as unknown rather than as a constraint.

These matters are considered in the individual growth-cell assessments in Section 6, together with the physical and planning characteristics of each cell.

# 6. Findings

This section sets out the findings of BBO's assessment of the Te Awamutu growth cells. Each growth cell has been assessed separately for:

(a) The residential yield reasonably able to be achieved having regard to the methodology in Section 4; and

(b) Whether the growth cell contains land that is physically and practically capable, at a high level, of accommodating a senior living village of the nature proposed by TADL.

The assessment uses the information currently available for each growth cell, including existing development, structure plans, proposed plan changes, identified flooding and topographical constraints and, where known, current development proposals. Where a more detailed structure plan, consented development or current plan-change proposal provides a more reliable indication of likely yield than the generic assumptions in Section 4, that more detailed information has generally been adopted.

**Appendix A** contains drawings showing the areas BBO has identified as potentially developable within each growth cell.

## 6.1 Summary of Findings

Overall, BBO's assessment identifies a lower indicative conventional residential yield across the existing Te Awamutu growth cells than the 6,024 dwellings anticipated in Appendix S1 of the Waipā District Plan.

Those differences are not uniform across all growth cells. In some cells, more detailed structure planning, approved subdivision or current development information provides a more reliable indication of the likely yield than the generic assumptions in Section 4. In others, flooding, topography, stormwater requirements, existing development or more detailed structure planning materially reduce the developable area or achievable yield.

The assessment of suitability for a senior living village also shows that the amount of residential land identified within the growth framework does not necessarily equate to the availability of a suitable site for this form of development. Some growth cells are physically constrained, while others are already developed, committed to another development outcome, subject to infrastructure or structure-plan requirements, or are not known to be practically available.

At a high level, six growth cells (T2, T4, T5, T10, T13 and T14) have been identified as containing land that is potentially capable of accommodating a senior living village of the scale considered in this report. However, those cells are subject to differing growth timing, infrastructure dependencies, structure-plan requirements, access arrangements and known development constraints.

The findings for each growth cell are summarised in Table 6.1 and discussed in Sections 6.2 to 6.15.

*Table 6.1 – Residential Yield Assessment Assumptions*

| Growth Cell | Senior living assessment | Adopted yield for this assessment | Appendix S1 Anticipated yield[6] | Difference |
|---|---|---|---|---|
| T1 | Unlikely | 362 | 444 | -82 |
| T2 | Potentially | 539 | 492 | +47 |
| T3 | No | 79 | 120 | -41 |
| T4 | Potentially | 220 | 348 | -128 |
| T5 | Potentially | 343 | 492 | -149 |
| T6 | Unlikely | 470 | 504 | -34 |
| T8 | No | 459 | 552 | -93 |
| T9 | No | 112 | 132 | -20 |
| T10 | Potentially | 200 | 252 | -52 |
| T11 | Unlikely | 567 | 432 | 135 |
| T12 | No | 141 | 132 | +9 |
| T13 | Potentially | 474 | 420 | +54 |
| T14 | Potentially | 727 | 1452 | -725 |
| T15 | No | 51 | 252 | -201[7] |
| **Total** | | **4205** | **6024** | **-1280** |

[6] Based on the dwelling capacity figures currently recorded in Appendix S1 of the Waipā District Plan. As discussed in the individual growth-cell assessments, some Appendix S1 figures do not align with the current spatial extent, zoning or more detailed development information available for particular growth cells and are therefore retained for comparison only.

[77] The Appendix S1 figure for T15 is not considered representative of the Large Lot Residential development form applying to the growth cell and has not been relied on in assessing likely yield.

## 6.2 Growth Cell T1

The T1 Growth Cell is located on the western periphery of Te Awamutu, generally between Pirongia Road to the north and Frontier Road to the south. It is zoned Medium Density Residential (MDR) and is subject to an approved land use consent for a master-planned residential development. The approved masterplan layout has subsequently been incorporated into Appendix S17 of the Waipā District Plan as per **Figure 6.2**. Subdivision of the growth cell has commenced under various subdivision approvals[8]. The growth cell is not subject to any relevant District Plan overlays. Titles have been issued for approximately one third of this growth cell, and earthworks have been completed for the entire cell.

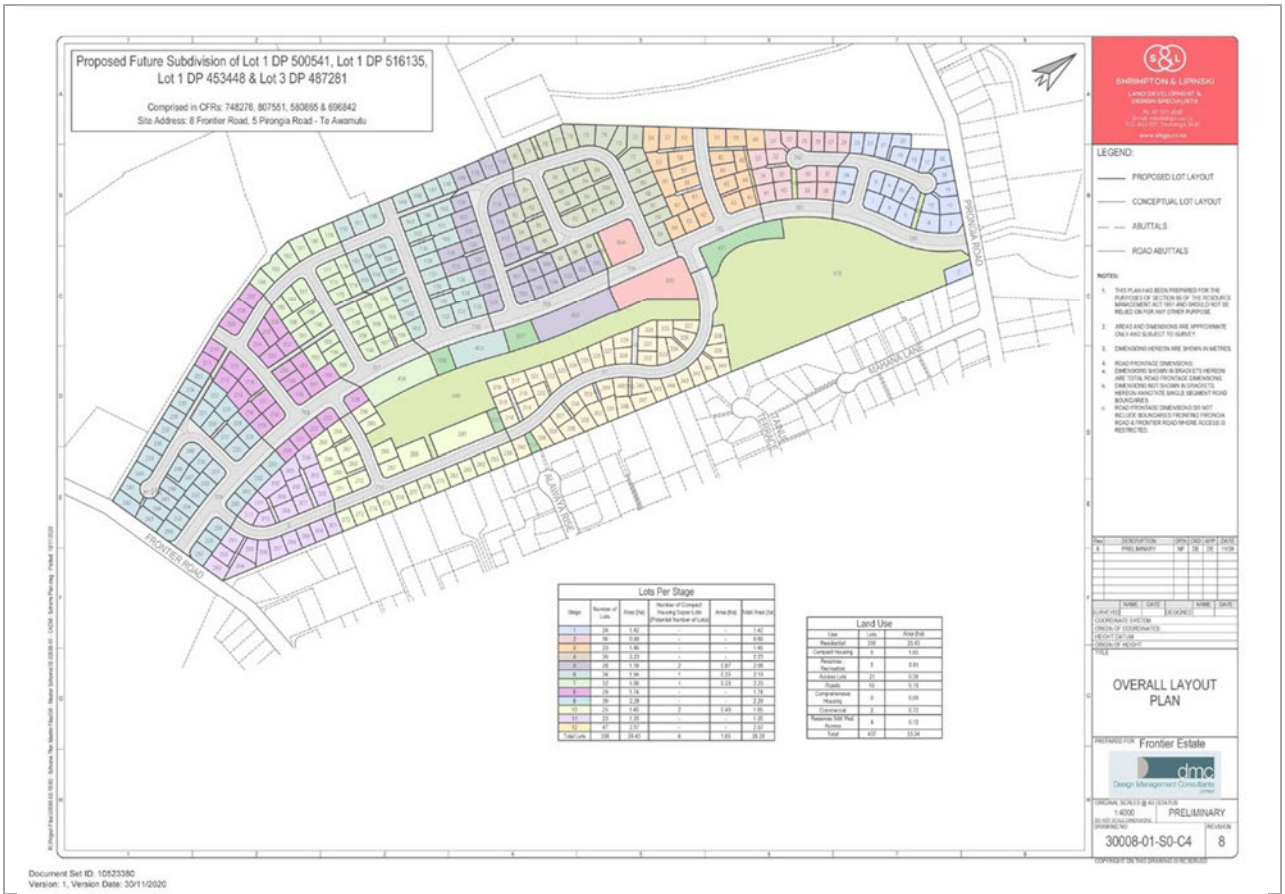



**Figure No. 6.2 T1 Overall Layout Plan**

### 6.2.1 Expected Yield

The approved Structure Plan provides for 362 dwellings and sets aside approximately 6.9 ha, or 17% of the growth cell, for stormwater management. Lot sizes are generally between approximately 550 m² and 650 m².

BBO's indicative yield assessment results in a similar yield of approximately 360 dwellings. Given the detailed structure planning already undertaken, the subdivision approvals granted and the consistency with BBO's assessment, the approved yield of 362 dwellings has been adopted for this growth cell.

Appendix S1 anticipates a yield of 444 dwellings for T1. The adopted yield is therefore 82 dwellings lower than the Appendix S1 figure. Given the extent of detailed planning, consenting and development already undertaken, the approved yield provides the most reliable indication of the likely development outcome for T1.

[8] Including SP/0004/19 and SP/0171/20

| Growth Cell T1 | |
|---|---|
| Cell Size | 39.5Ha |
| Developable Land - BBO Estimate | 30.3Ha |
| Yield per a developable Hectare | Residential Zone (sewered) - 12 dwellings per ha |
| Yield BBO Estimate | 360 dwellings |
| Yield Structure Plan – S&L | 362 dwellings |
| Appendix S1 anticipated yield | 444 dwellings |
| Adopted yield for this assessment | 362 dwellings |
| Difference from Appendix S1 | -82 |

### 6.2.2 Suitability For a Senior Lifestyle Village

| Parameter | Condition Met | Commentary |
|---|---|---|
| 10 Ha Contiguous Block | Yes | |
| Site shape between 1:1 ≤ 1:3 | Yes | |
| Connectivity and Security | Yes | |
| Minimal Natural Hazards | Yes | |
| Suitable Topography and Serviceability | Yes | |
| Practicable delivery | Unlikely | The growth cell is already being developed for residential purposes, with bulk earthworks and subdivision works underway. The existing approved and commenced development therefore represents a known constraint on accommodating an alternative integrated senior living village within T1. |
| Conclusions | Unlikely | |

T1 is physically suitable for a senior lifestyle village and meets the site area, configuration, connectivity, natural hazard and topographical criteria adopted in this assessment. However, the growth cell is already committed to residential development, and subdivision works are underway. It is therefore unlikely to be practically available for an alternative senior lifestyle village development. Accordingly, the existing committed development represents an objective constraint on T1 being redeveloped for an alternative integrated senior living village. T1 is therefore assessed as unlikely to provide an alternative location for the proposed development. A retirement village (Arvida Whai Mauri Ora) is also currently under construction within the adjacent T2 Growth Cell.

## 6.3 Growth Cell T2

The T2 Growth Cell adjoins T1 to the west and is located between Pirongia Road and Frontier Road. As discussed in Section 5.2, the southern portion of the growth cell was rezoned to MDR, with the balance remaining zoned Deferred Residential. The rezoning both provided for residential and retirement village development within the MDR zoned portion of the growth cell and established the T2 Growth Cell Structure Plan for the whole growth cell.

Based on the latest information, the residential subdivision has created 83 residential allotments. The Retirement Village has established 56 units, with 131 units and 36 residential care suites identified in its development pipeline (Figure 6.3).

The balance of the growth cell remains zoned Deferred Residential, is approximately 16 ha in area, and is held in four separate certificates of title. That deferred portion is identified for post-2035 development and has not yet been developed or committed to another identified development outcome.

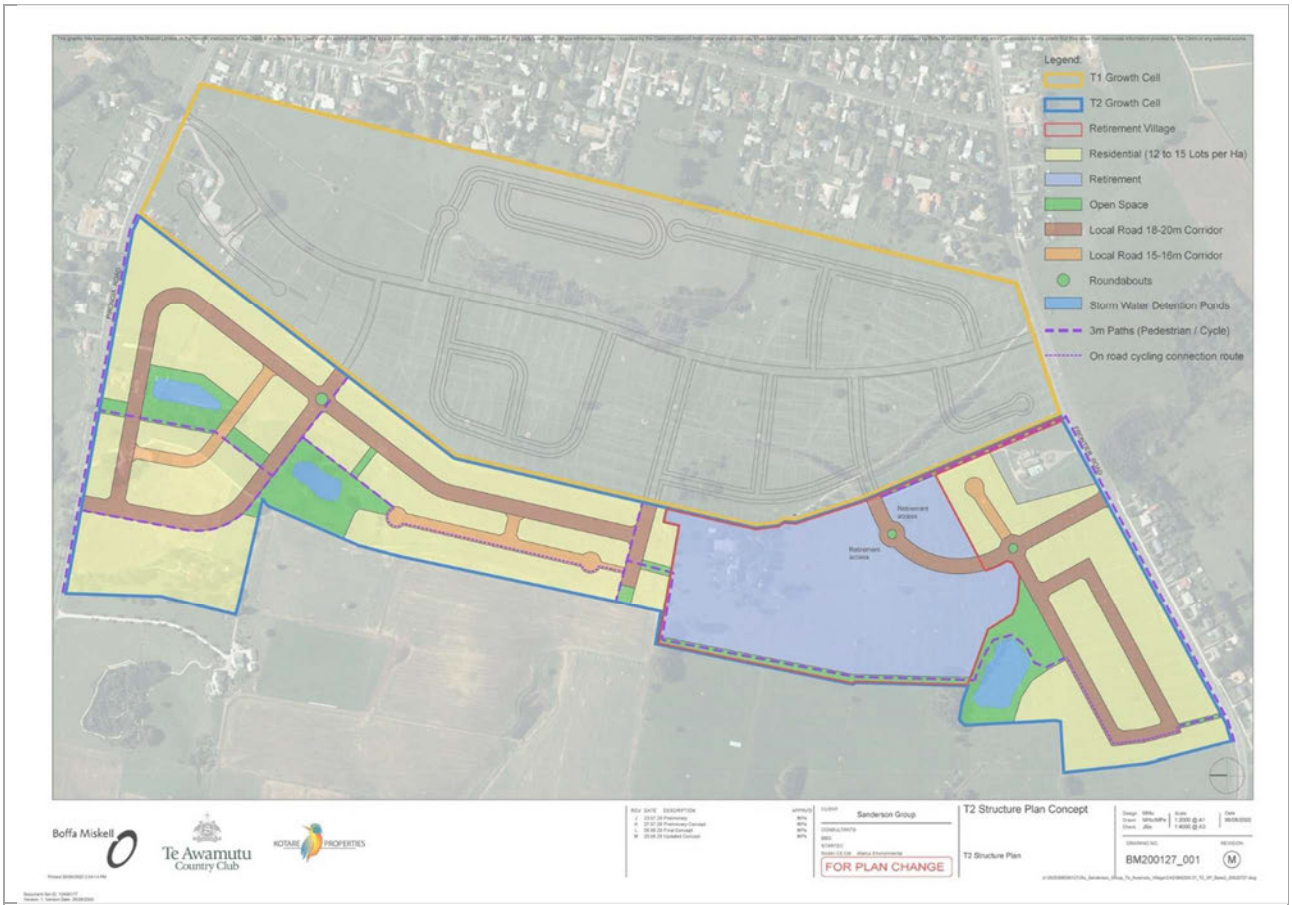



**Figure No. 6.3 T2 Structure Plan**

### 6.3.1 Expected Yield

The T2 Structure Plan provides a more detailed basis for assessing likely yield than applying the generic assumptions in Section 4 across the entire growth cell. The Structure Plan identifies the growth cell as suitable for a mix of residential development and retirement village activities. While part of the growth cell has been rezoned and developed, the balance remains zoned Deferred Residential and has not yet been developed."

BBO's indicative assessment identifies approximately 24.1 ha of developable residential land and 8.9 ha associated with the retirement village. Applying the generic yield assumptions in Section 4 would result in an indicative yield of approximately 361 residential dwellings and 178 retirement units.

However, given the existing development and the structure plan applying to the growth cell, the adopted yield should be based on the more detailed development information available for T2 rather than the generic BBO calculation alone.

Approximately 3.6 ha, or 9.5% of the growth cell, is identified for wetland and stormwater purposes. This is at the lower end of the allowance generally adopted in BBO's methodology but is not considered unreasonable given the more detailed planning undertaken for the site.

| Growth Cell T2 | |
|---|---|
| Cell Size | 38.8ha |
| Developable Land- BBO Estimate | 24.1ha Residential and 8.9ha retirement |
| Yield per a developable hectare | Medium Density Residential Zone - 15 dwellings per ha, Retirement village – 20 dwellings per ha |
| Yield BBO Estimate | 361 residential dwellings 178 retirement villas |
| Appendix S1 anticipated yield | 492 dwellings |
| Adopted yield for this assessment | 361 residential dwellings, 178 retirement villas |
| Difference | +56 |

### 6.3.2 Suitability For a Senior Lifestyle Village

| Parameter | Condition Met | Commentary |
|---|---|---|
| 10 ha Contiguous Block | Yes | |
| Site shape between 1:1 ≤ 1:3 | Yes | |
| Connectivity and Security | Yes | |
| Minimal Natural Hazards | Yes | |
| Suitable Topography and Serviceability | Yes | |
| Practical delivery | No | The live-zoned portion of T2 is already substantially committed to residential subdivision and the Whai Mauri Ora retirement village. The deferred approximately 16 ha portion, however, is not currently identified as committed to development and appears to meet the high-level physical criteria adopted in this assessment.. |
| Conclusions | Physically suitable | The live-zoned portion of T2 is not considered to provide an alternative location for the proposed Harlow Lifestyle Village because it is already substantially committed to residential development and the Whai Mauri Ora retirement village.<br>The deferred portion of the growth cell is different. That land comprises approximately 16 ha, appears to meet the high-level site area, configuration, connectivity, natural |

| Parameter | Condition Met | Commentary |
|---|---|---|
| | | hazard and topographical criteria adopted in this assessment, and is not currently identified as committed to another development outcome.<br>T2 is therefore assessed as potentially suitable at a high level, subject to its post-2035 timing and the relevant future planning and infrastructure processes. |

The deferred portion of Growth Cell T2 meets the physical criteria adopted in this assessment for a senior lifestyle village. However, part of the live-zoned portion of T2 is committed to the Whai Mauri Ora retirement village, making another senior living village nearby commercially less attractive.

## 6.4 Growth Cell T3

The T3 Growth Cell is located north of the Te Awamutu CBD, between Te Rahu Road and Bond Road. The growth cell is zoned MDR, with approximately 35% of the growth cell already developed for residential purposes. The remaining approximately 6.6 ha of undeveloped land is held in a single certificate of title as shown in **Figure 6.4**. A significant part of the remaining undeveloped land is affected by mapped 1% AEP flooding, as discussed below.




**Figure No. 6.4 T3 Undeveloped Land**

### 6.4.1 Expected Yield

A significant part of the remaining undeveloped land is affected by ponding and flood risk, which reduces the area that can reasonably be assumed to be available for residential development. Based on the flooding information reviewed, BBO has identified approximately 3.1 ha of the remaining land as potentially developable.

A yield of 12 dwellings per developable hectare has been adopted for the undeveloped part of T3. This is lower than the standard MDR assumption in Section 4 because the developable land is fragmented by the flood-affected areas and does not form one contiguous development area.

Together with the 42 dwellings already developed within the growth cell, BBO estimates a total yield of approximately 79 dwellings. This is 41 dwellings lower than the 120 dwellings anticipated in Appendix S1.

| Growth Cell T3 | |
|---|---|
| Cell Size | 10.6 ha, with 6.6 ha remains undeveloped |
| Developable Land - BBO Estimate | 3.1ha |
| Yield per developable hectare | MDR - 12 dwellings per ha, reduced to reflect fragmentation of the developable land |
| Yield BBO Estimate | 42 already developed + 37 in undeveloped part of site = 79 dwellings |
| Appendix S1 anticipated yield | 120 dwellings |
| Adopted Yield for this assessment | 79 dwellings |
| Difference | -41 |

### 6.4.2 Suitability for a Senior Lifestyle Village

| Parameter | Condition Met | Commentary |
|---|---|---|
| 10 ha Contiguous Block | No | The growth cell is approximately 10.6 ha in total, but only approximately 6.6 ha remains undeveloped and a significant part of that area is affected by flooding. |
| Site shape between 1:1 ≤ 1:3 | No | The remaining developable land does not provide a sufficiently large and contiguous site of the required configuration. |
| Connectivity and Security | No | The fragmented developable area would make it difficult to establish an integrated senior lifestyle village. |
| Minimal Natural Hazards | No | A significant part of the remaining undeveloped land is affected by the mapped 1% AEP flood extent. |
| Suitable Topography and Serviceability | Potentially | Development may require substantial earthworks and imported fill to manage the identified flood risk. |
| Practicable delivery | Not determinative | The physical constraints affecting the remaining land are sufficient to determine the suitability outcome without relying on landowner intentions or availability. |
| Conclusions | Not Suitable for Development | The remaining undeveloped land is insufficient in area to meet the adopted 10ha screen threshold and is materially constrained and fragmented by flooding. |

T3 is not physically suitable for a senior lifestyle village. The remaining undeveloped land does not provide a sufficiently large contiguous developable area and is materially constrained by the mapped 1% AEP flood extent. Accordingly, T3 does not meet several of the high-level site criteria adopted in Section 4.4.

## 6.5 Growth Cell T4

The T4 Growth Cell is located on the southwestern edge of Te Awamutu, and is identified in Appendix S1 for development post-2035. Proposed Private Plan Change 31 (PC31),publicly notified on June 11, 2026, seeks to rezone approximately 28 ha within the growth cell from Deferred Residential Zone to MDR and Reserve Zone. PC31 therefore has the potential to bring forward development of T4 relative to the timing originally anticipated in Appendix S1.

Appendix S1 also identifies the Western Arterial as relevant to the future development of this growth cell. The timing and delivery of that infrastructure remains a relevant consideration in assessing when and how T4 may be developed.

The growth cell also contains areas affected by wetland, flooding, ecological and topographical constraints. These matters are reflected in the PC31 structure plan and are discussed below.

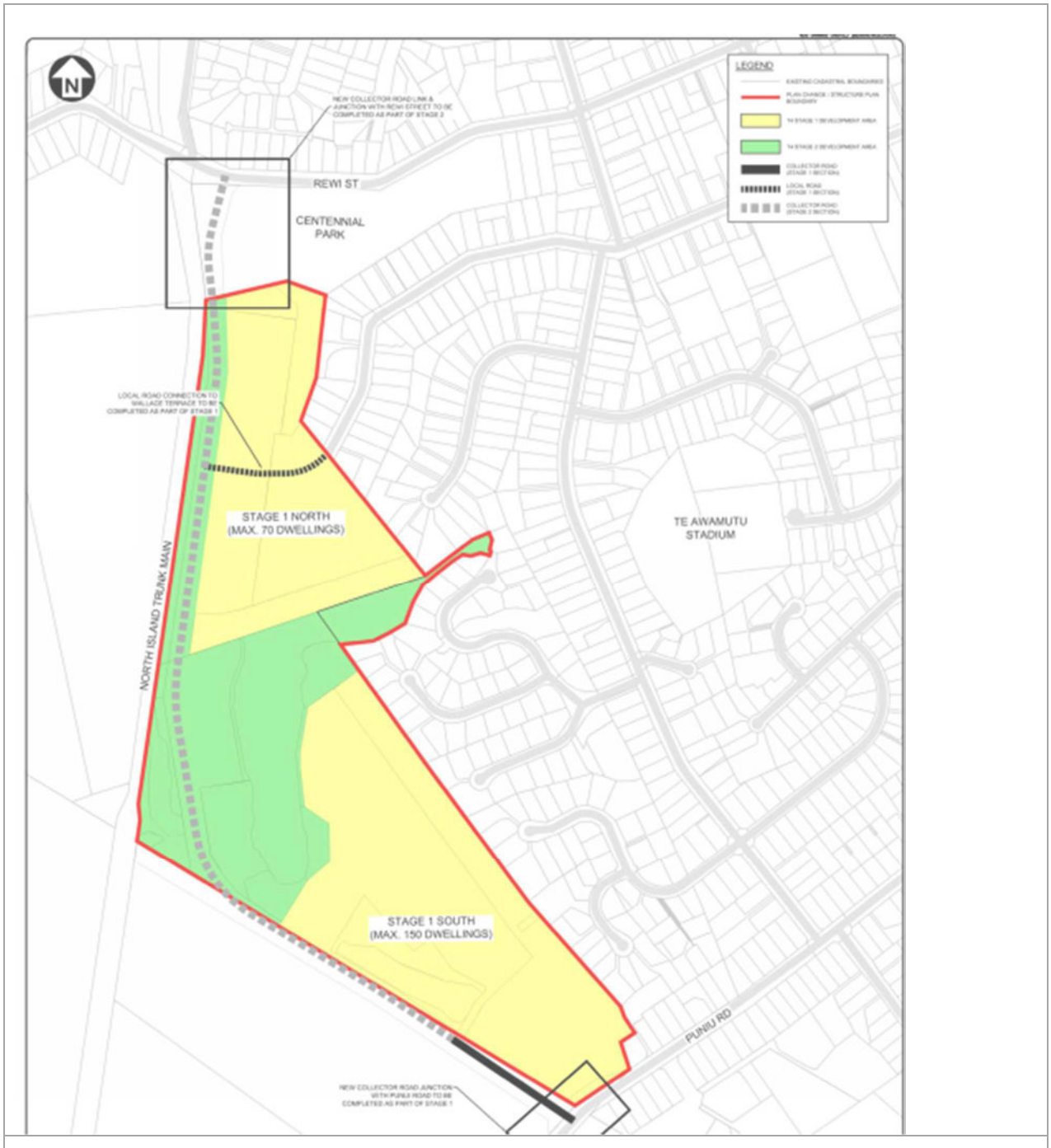



**Figure No. 6.5.1 T4 Staging Plan**

### 6.5.1 Expected Yield

The PC31 structure plan provides a more detailed and current basis for assessing the likely development outcome for T4 than the generic assumptions in Section 4.

BBO's generic methodology identifies approximately 18 ha of potentially developable land, which at 15 dwellings per developable hectare would result in an indicative yield of approximately 270 dwellings.

PC31, however, provides for a lower residential yield of approximately 220 dwellings and allocates approximately 8.9 ha of the growth cell to reserve, wetland and community purposes. The structure plan reflects the more detailed consideration of site-specific matters including wetlands, ecological features, topography, flooding and geotechnical conditions. The structure plan also takes into consideration the existing designations that affect the site.

Given the greater level of site-specific assessment underpinning PC31, the PC31 yield of approximately 220 dwellings has been adopted for the purposes of this assessment.

This is consistent with the methodology in Section 4, which adopts more detailed structure-plan or development information where that provides a more reliable indication of likely development outcome than the generic yield assumptions.

| Growth Cell T4 | |
|---|---|
| Cell Size | 29.7 ha |
| Developable Land - BBO Estimate | 18.0 ha |
| Yield per developable hectare | Medium Density Residential Zone - 15 dwellings per ha |
| Yield BBO Estimate | 270 dwellings |
| Appendix S1 anticipated yield | 348 dwellings |
| PC31 proposed yield | 220 dwellings |
| Adopted Yield for this assessment | 220 dwellings |
| Difference from Appendix S1 | -128 |

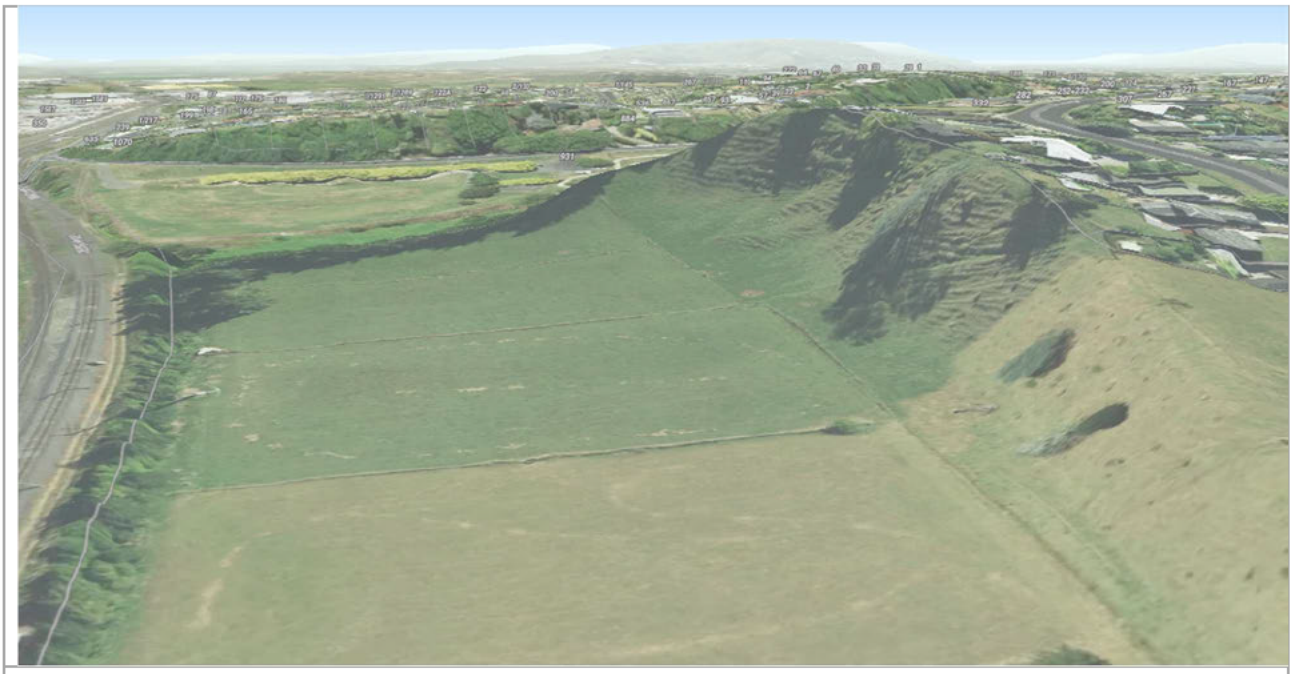


Figure No. 6.5.2 Northern Portion of Site has excessive grades to easily develop.

### 6.5.2 Suitability for a Senior Lifestyle Village

| Parameter | Condition Met | Commentary |
|---|---|---|
| 10 Ha Contiguous Block | Uncertain/potentially | PC31 identifies approximately 11.5 ha of developable residential land relevant to this assessment, but that land is not shown as one contiguous block and is divided between northern and southern areas. |
| Site shape between 1:1 ≤ 1:3 | Potentially | The overall growth cell is of sufficient scale, but the configuration of developable land under the current PC31 structure plan would require further assessment for an integrated village layout. |
| Connectivity and Security | Potentially | The PC31 structure plan includes a public road network through the growth cell. An integrated senior living village may require amendments to that layout to achieve the level of internal integration and security contemplated by the proposed Harlow model. |
| Minimal Natural Hazards | Yes | Some localised flooding, wetland and geotechnical constraints are identified, but these do not appear to preclude development at a high level. |
| Suitable Topography and Serviceability | Potentially | Parts of the northern area have steeper grades and may require substantial earthworks. |
| Practical delivery | Potentially | T4 is presently identified for post-2035 development, although PC31 may bring that timing forward. The outcome and timing of PC31, the Western Arterial and any structure-plan amendments required for a retirement village remain relevant delivery considerations. |
| Conclusions | Possibly suitable for development | T4 remains potentially capable of accommodating a senior living village, but the current PC31 structure plan does not provide a straightforward contiguous integrated site and would likely require further planning and design changes. |

T4 remains potentially suitable for a senior lifestyle village at a high level. The growth cell is of sufficient overall scale and does not appear to be subject to physical constraints that would preclude this form of development.

However, the current PC31 structure plan introduces more detailed considerations that are relevant to delivery. In particular, the developable residential land appears to be divided between northern and southern areas rather than forming a single contiguous block, and the proposed public road network and reserve pattern have been designed for a conventional residential outcome.

Accommodating an integrated senior living village within T4 would therefore likely require amendments to the current structure-plan outcome, together with resolution of the timing and infrastructure matters associated with PC31 and the Western Arterial.

T4 is accordingly identified as potentially suitable, rather than as an immediately deliverable or equivalent alternative location.

## 6.6 Growth Cell T5

The T5 Growth Cell is located on the southwestern edge of Te Awamutu and is identified in Appendix S1 for development post-2035. Appendix S1 identifies delivery of the Western Arterial as relevant to the future development of the growth cell. Land immediately to the south of T5 has been acquired by Waipā District Council for the Western Arterial corridor.

T5 comprises rolling topography and is crossed by a number of streams, gullies and overland flow paths. While these features reduce the area and configuration of land readily available for conventional residential development, the growth cell is of sufficient scale that substantial areas remain potentially developable.

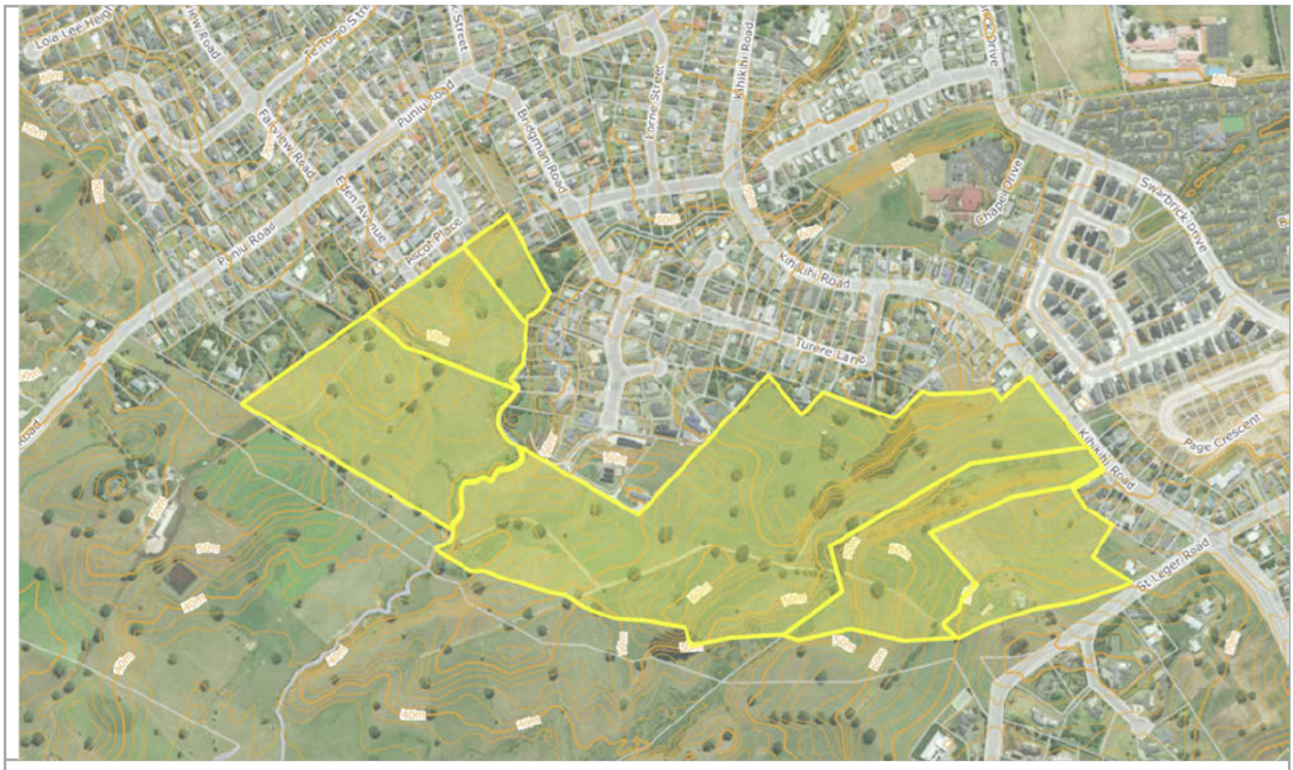



Figure No. 6.6 Growth Cell T5

### 6.6.1 Expected Yield

| Growth Cell T5 | |
|---|---|
| Cell Size | 41 ha |
| Developable Land - BBO Estimate | 28.6 ha |
| Yield per developable hectare | Medium Density Residential Zone – A yield of 12 dwellings per hectare has been adopted due to the topography of the site and numerous overland flow paths |
| Yield BBO Estimate | 343 dwellings |
| Appendix S1 anticipated yield | 492 dwellings |
| Adopted Yield for this assessment | 343 dwellings |
| Difference | -149 dwellings |

The BBO assessment identifies a lower indicative yield than the 492 dwellings anticipated in Appendix S1. The principal reason for the difference is the more detailed consideration in this assessment of the rolling topography and the network of streams, gullies and overland flow paths crossing the growth cell.

A yield of 12 dwellings per developable hectare has therefore been adopted, rather than the standard 15 dwellings per hectare applied to less constrained MDR land. This provides an allowance for the additional land and layout constraints associated with those features.

### 6.6.2 Suitability for a Senior Lifestyle Village

| Parameter | Condition Met | Commentary |
|---|---|---|
| 10 Ha Contiguous Block | Yes | The overall scale of T5 appears sufficient to provide a contiguous area of the size required, subject to detailed layout around streams, gullies and overland flow paths. |
| Site shape between 1:1 ≤ 1:3 | Yes | |
| Connectivity and Security | Potentially | The future development pattern and access arrangements are linked to the wider structure-planning and transport framework, including the Western Arterial. |
| Minimal Natural Hazards | Generally Yes | Flooding is principally associated with streams, gullies and overland flow paths rather than an extensive floodplain across the growth cell. |
| Suitable Topography and Serviceability | Potentially | The site contains rolling and locally steep terrain, although there appear to be areas of gentler topography capable of accommodating development. Detailed earthworks and servicing assessment would be required. |
| Practical delivery | Potentially | T5 is identified for post-2035 development and its development is linked to delivery of the Western Arterial. The timing of that infrastructure is therefore a material delivery consideration. |
| Conclusions | Possibly suitable for development | T5 appears physically capable of accommodating a senior living village at a high level, but its timing and integration with the wider transport and growth framework would require resolution. |

T5 is assessed as potentially suitable for a senior lifestyle village at a high level. The growth cell is of sufficient overall scale and contains areas that appear capable of accommodating an integrated development, although the streams, overland flow paths and rolling topography would influence the detailed layout.

## 6.7 Growth Cell T6

The T6 Growth Cell comprises approximately 168 ha area located to the west of State Highway 3 between Te Awamutu and Kihikihi. The growth cell is predominantly characterised by rolling pasture and farmland, with scattered existing dwellings, areas of exotic vegetation and a substantial gully and stream network draining south toward the Puniu River.

Parts of the growth cell are affected by overland flooding from the upper catchment and by Puniu River inundation during larger flood events. The T6 Structure Plan reflects these physical characteristics and provides for development around the central gully and open-space network.

Development of T6 also depends on supporting transport infrastructure. The Waipā Development Contributions Policy identifies a new roundabout serving T6 and T8, and the timing and delivery of that infrastructure is therefore relevant to when development of the growth cell can proceed.

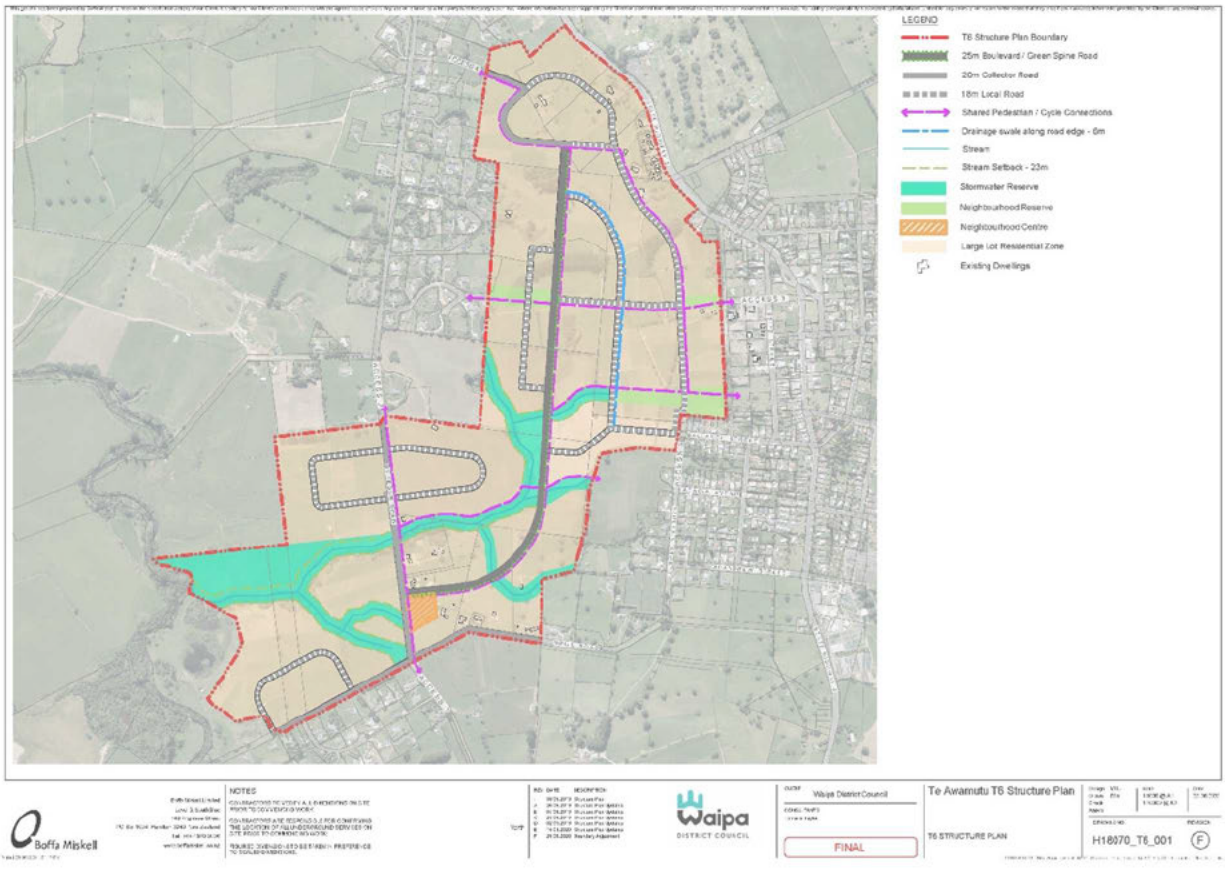



Figure No. 6.7 T6 Structure Plan

### 6.7.1 Expected Yield

| Growth Cell T6 | |
|---|---|
| Cell Size | 167.7ha |
| Developable Land - BBO Estimate | 119 ha |
| Yield per developable hectare | Large Lot Residential Zone – 4 dwellings per ha |
| Appendix S1 anticipated yield | 504 dwellings |
| Adopted Yield for this assessment | 470 dwellings |
| Difference | -34 |

The T6 Structure Plan anticipates approximately 470 allotments across the 168-ha growth cell. Section 24.2.3 of the District Plan records that this is a provisional estimate based on the net developable area and takes account of land required for roads and open space, particularly the central gully system.

BBO's generic methodology identifies approximately 119 ha of potentially developable land. Applying the Large Lot Residential assumption of three dwellings per developable hectare would produce an indicative yield of approximately 357 dwellings. However, consistent with the methodology in Section 4, the T6 Structure Plan provides a more detailed and site-specific basis for estimating likely yield than BBO's generic calculation. The Structure Plan yield of approximately 470 allotments has therefore been adopted for this assessment.

### 6.7.2 Suitability for a Senior Lifestyle Village

| Parameter | Condition Met | Commentary |
|---|---|---|
| 10 Ha Contiguous Block | Yes | T6 is of sufficient overall scale to contain an area of the size required, subject to detailed consideration of the gully and flood-affected land. |
| Site shape between 1:1 ≤ 1:3 | Yes | |
| Connectivity and Security | Potentially | The Structure Plan provides for a wider low-density residential environment and movement network. An integrated senior living village would need to be accommodated within that framework or require changes to it. |
| Minimal Natural Hazards | Potentially | Flooding and the central gully system materially affect parts of T6, although the growth cell is sufficiently large that development may be capable of avoiding or integrating those constrained areas. |
| Suitable Topography and Serviceability | Potentially | Rolling and locally steep topography would require careful site selection and earthworks, although flatter areas exist. |
| Practical availability | Constrained | Development depends on delivery of the roundabout and associated infrastructure. The current Large Lot Residential framework and T6 Structure Plan also anticipate a materially different development form. |
| Conclusions | Unlikely | T6 is not physically precluded from accommodating a senior living village, but it presents greater planning, infrastructure and layout complexity than the six growth cells identified as potentially suitable. |

From a purely physical perspective, T6 contains sufficient land to potentially accommodate a senior lifestyle village. Its overall size means that areas affected by the central gully, flooding and steeper topography may potentially be avoided through more detailed site selection.

However, T6 is presently planned and structured for a Large Lot Residential development form, and development of the growth cell is dependent on significant supporting transport infrastructure. An integrated senior living village of the nature proposed by TADL would therefore need to demonstrate how it could be accommodated within, or appropriately modify, the existing planning and structure-plan framework.

For those reasons, T6 is considered a less straightforward and lower-order alternative than other growth cells.

## 6.8 Growth Cell T8

The T8 Growth Cell is located between Kihikihi and Te Awamutu and a portion of the growth cell is subject to an existing Structure Plan (see Figure 6.8.1).

A significant portion of the growth cell is affected by flood risk associated with the Mangaohoi Stream, with materially constrains the developable area.
A substantial part of the land within T8 is currently being developed as an extension to the Highfield Country Estate Retirement Village. The combination of existing development commitments and flood-affected land materially reduces the amount of unconstrained land remaining within the growth cell.

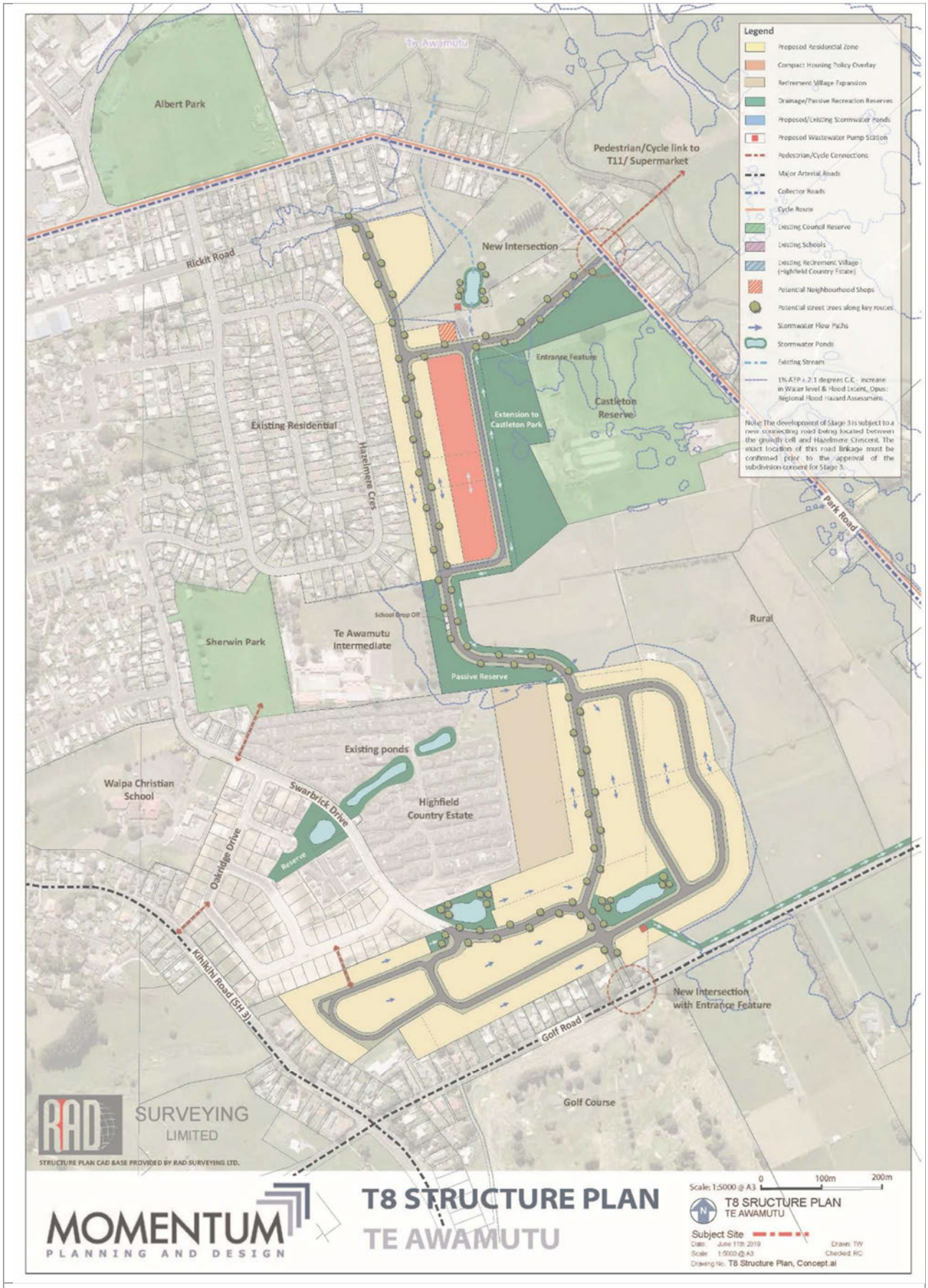



**Figure No. 6.8.1 T8 Structure Plan**

### 6.8.1 Expected Yield

| Growth Cell T8 | |
|---|---|
| Cell Size | 62.7 ha |
| Developable Land - BBO Estimate | 23.7 ha residential + 5.2 ha retirement. |
| Yield per developable hectare | Medium Density Residential Zone – 15 dwellings per ha, Retirement village – 20 dwelling per ha |
| Yield BBO Estimate | 355 residential dwellings + 104 retirement villas = 459 |
| Appendix S1 anticipated yield | 552 dwellings |
| Adopted Yield for this assessment | 459 dwellings |
| Difference | -93 |

BBO's indicative assessment identifies a lower residential yield than the 552 dwellings anticipated in Appendix S1, principally due to the extent of flood-affected land associated with the Mangaohoi Stream.

### 6.8.2 Suitability for a Senior Lifestyle Village

| Parameter | Condition Met | Commentary |
|---|---|---|
| 10 Ha Contiguous Block | No readily available unconstrained block identified | A substantial proportion of T8 is flood affected. The remaining land capable of accommodating a retirement village of the required scale overlaps with land already being developed or planned for the Highfield Country Estate expansion. |
| Site shape between 1:1 ≤ 1:3 | Potentially | The configuration is not, of itself, the determining constraint. |
| Connectivity and Security | Yes | The growth cell is subject to an existing structure plan and is already accommodating retirement-village development. |
| Minimal Natural Hazards | No | A significant proportion of the growth cell is affected by flooding associated with the Mangaohoi Stream. |
| Suitable Topography and Serviceability | Generally yes | Physical servicing and topography are not the principal constraints identified. |
| Practical delivery | No | The principal non-flood-prone land capable of accommodating the required footprint is already committed to the Highfield Country Estate expansion. |
| Conclusions | Not suitable | The combination of extensive flood-affected land and committed development means T8 does not provide a sufficiently large unconstrained alternative site. |

T8 is not considered suitable for an alternative integrated senior lifestyle village. While parts of the growth cell are physically capable of residential and retirement-village development, a significant proportion of T8 is affected by flooding associated with the Mangaohoi Stream.

The remaining land capable of accommodating a development of the scale considered in this report overlaps with land already committed to the expansion of Highfield Country Estate. Accordingly, the combination of

natural-hazard constraints and known committed development means T8 does not provide a sufficiently large unconstrained alternative site.

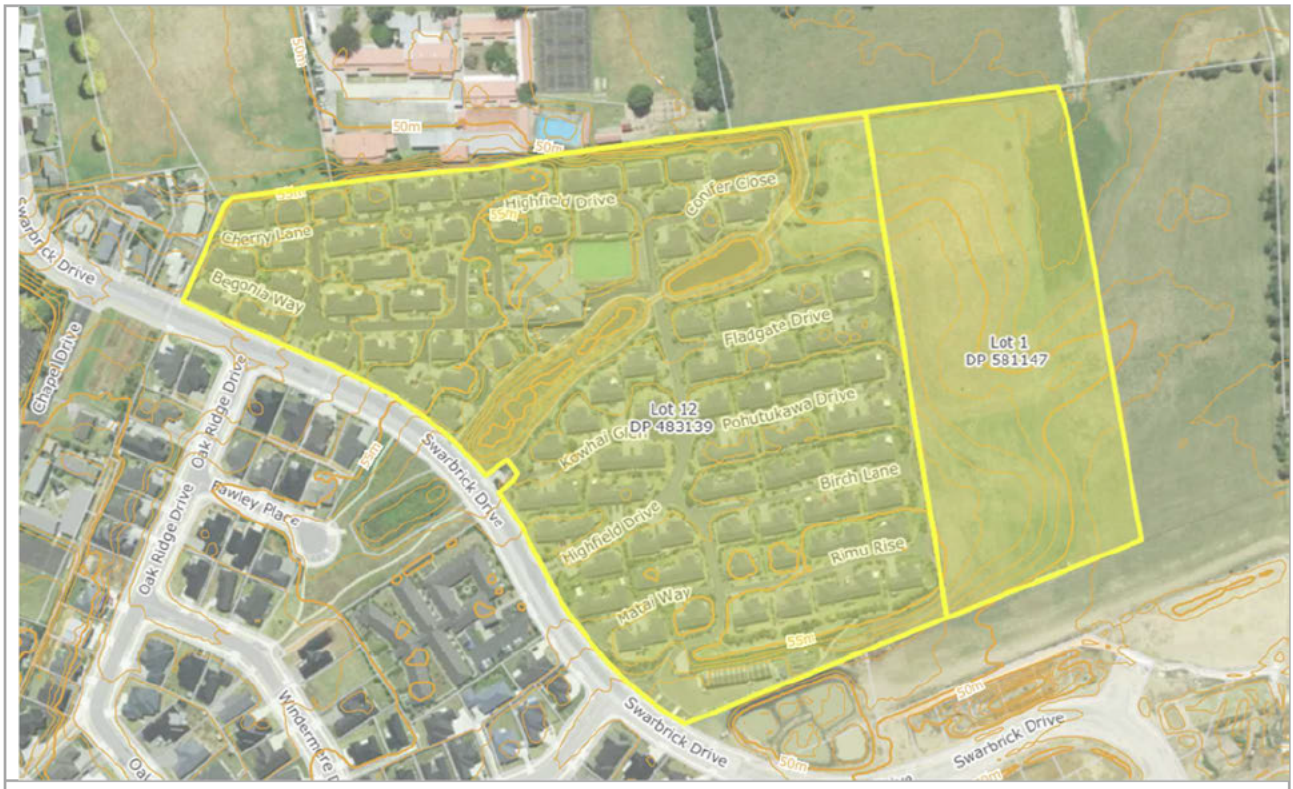



**Figure No. 6.8.2 Growth Cell T8 – Extent of Highfield Country Estate Retirement Village**

## 6.9 Growth Cell T9

The T9 Growth Cell is located on the north-eastern periphery of Te Awamutu, north of Thorncombe Road and Cambridge Road. The growth cell is known as Picquet Hill and is subject to an existing Structure Plan.

T9 comprises approximately 11.4 ha and has rolling to moderately steep topography. The Structure Plan provides for a collector road through the growth cell, and a central depression also affects the ability to form a single integrated development area.

T9 is identified for development prior to 2035. Its development is also dependent on supporting transport infrastructure, including the planned roundabout serving the eastern growth area.

### 6.9.1 Expected Yield

| Growth Cell T9 | |
|---|---|
| Cell Size | 11.4 ha |
| Developable Land - BBO Estimate | 10.2 ha |
| Yield per developable hectare | Picquet Hill Structure Plan Area - vacant site - 11 dwellings per ha |
| Yield BBO Estimate | 112 dwellings |
| Appendix S1 anticipated yield | 132 dwellings |
| Adopted Yield for this assessment | 112 dwellings |

| Growth Cell T9 | |
|---|---|
| Difference | -20 |

BBO's indicative yield is approximately 20 dwellings lower than the Appendix S1 estimate. The difference reflects the site-specific yield assumption adopted for the Picquet Hill Structure Plan Area and the physical configuration of the growth cell. Given the relatively small difference, the two estimates are broadly comparable for the purposes of this high-level assessment.

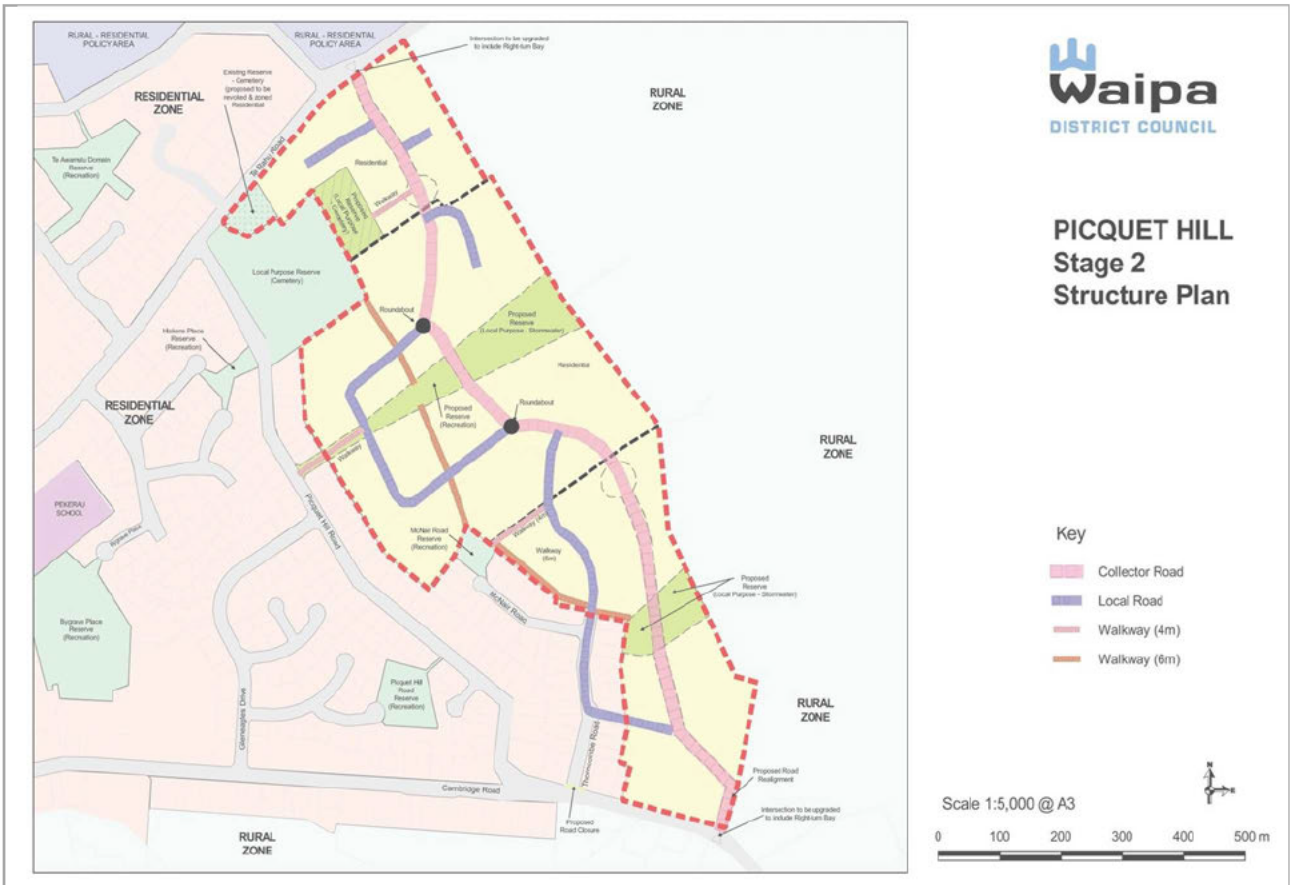



**Figure No. 6.9.1 Piquet Hill Structure Plan**

## 6.9.2 Suitability for a Senior Lifestyle Village

| Parameter | Condition Met | Commentary |
|---|---|---|
| 10 Ha Contiguous Block | Marginal, no | The growth cell is only approximately 11.4 ha in total. Although around 10.2 ha is identified as potentially developable, the central depression and structure-plan road reduce the ability to form a single contiguous integrated development area. |
| Site shape between 1:1 ≤ 1:3 | Yes | |
| Connectivity and Security | No | The Structure Plan provides for a collector road through the growth cell, which would bisect an integrated senior living village unless the Structure Plan was amended. |

| Parameter | Condition Met | Commentary |
|---|---|---|
| Minimal Natural Hazards | Yes | No material natural-hazard constraint is identified as the determining issue. |
| Suitable Topography and Serviceability | Unlikely to be financially feasible | The rolling to moderately steep topography would require substantial earthworks and careful grading to achieve accessible internal streets and pedestrian connections. See Figure 6.9.2 below. |
| Practical delivery | Constrained | Development is linked to the planned eastern roundabout and would also require reconsideration of the current Structure Plan if the collector road were to be relocated. |
| Conclusions | Not suitable | T9 is too constrained in scale and configuration to provide a straightforward integrated senior living site. |

T9 is not considered suitable for the proposed integrated senior lifestyle village. While the growth cell is close to the minimum area threshold adopted in Section 4.4, its relatively small overall size, central depression, rolling topography and the collector road identified in the Structure Plan materially constrain the ability to form a single integrated and accessible village layout.

Accommodating a senior living village within T9 would therefore likely require substantial earthworks and amendment of the existing Structure Plan, including reconsideration of the collector-road alignment. Given the limited overall land area, those changes would leave relatively little flexibility for accommodating the full integrated residential, care, communal and infrastructure requirements of the proposed development.




Figure No. 6.9.2 T9 Topography Source: LINZ Basemaps

## 6.10 Growth Cell T10

The T10 Growth Cell is located directly north of T9 and comprises approximately 20.5 ha of generally gentle rolling terrain. The growth cell is subject to the Picquet Hill Structure Plan and is identified for development prior to 2035.

Development of T10 is dependent on supporting transport infrastructure, including the planned roundabout serving the eastern growth area. The Structure Plan also provides for a collector road through the growth cell and identifies stormwater infrastructure that would need to be integrated with any future development.

### 6.10.1 Expected Yield

| Growth Cell T10 | |
|---|---|
| Cell Size | 20.5 ha |
| Developable Land - BBO Estimate | 18.2 ha |
| Yield per developable hectare | Picquet Hill Structure Plan Area - vacant site – 11 dwellings per ha |
| Yield BBO Estimate | 200 dwellings |
| Appendix S1 anticipated yield | 252 dwellings |
| Adopted Yield for this assessment | 200 dwellings |
| Difference | -52 |

BBO's indicative yield is approximately 52 dwellings lower than the Appendix S1 figure. The difference reflects the site-specific development assumptions adopted for the Picquet Hill Structure Plan Area and the physical and infrastructure requirements affecting the growth cell.

### 6.10.2 Suitability for a Senior Lifestyle Village

| Parameter | Condition Met | Commentary |
|---|---|---|
| 10 Ha Contiguous Block | Yes | A depression in the centre will sever the site |
| Site shape between 1:1 ≤ 1:3 | Yes | |
| Connectivity and Security | Potentially | The Structure Plan provides for a collector road through the growth cell. An integrated senior living village may require that alignment to be modified or located around the village site to maintain internal integration and security. |
| Minimal Natural Hazards | Yes | No material natural-hazard constraint has been identified at a level that would preclude development. |
| Suitable Topography and Serviceability | Yes | The generally gentle rolling terrain appears capable of accommodating development, with cut/fill expected to be manageable at a high level. |
| Practical delivery | Potentially | Development is dependent on the planned roundabout and associated infrastructure. The relationship between the retirement village, collector road, stormwater infrastructure and development of the balance of T10 would need to be resolved through more detailed planning. |
| Conclusions | Potentially suitable | T10 is physically capable of accommodating a senior living village, subject to infrastructure delivery and potential modification of the Structure Plan. |

T10 is assessed as potentially suitable for a senior lifestyle village at a high level. It is of sufficient scale, has generally favourable topography and does not appear to be subject to material natural-hazard constraints that would preclude this form of development.

However, the current Structure Plan provides for a collector road through the growth cell and development is dependent on delivery of the planned roundabout and associated infrastructure. Stormwater infrastructure and the relationship between a retirement village and development of the balance of T10 would also require more detailed consideration.

Accordingly, accommodating an integrated senior living village within T10 may require amendment of the existing Structure Plan and would be more straightforward if coordinated with development of the wider growth cell, rather than occurring in isolation.

## 6.11 Growth Cell T11

The T11 Growth Cell is located on the eastern side of Te Awamutu and comprises approximately 80 ha. It is predominantly characterised by rural farming and cropping land, with some existing residential development. The land generally slopes from the north and east toward the Mangaohoi Stream, which runs along the southern boundary of the growth cell.

T11 is subject to the T11 Structure Plan introduced through Plan Change 13. The Structure Plan identifies the principal developable areas, transport connections, reserves and the Mangaohoi Stream corridor.

A significant part of the growth cell is affected by flooding associated with the Mangaohoi Stream and associated overland flow paths. Those constraints were recognised through preparation of the Structure Plan and influence the location and configuration of development within T11.

Private Plan Change 35 (PC35) also affects the north-eastern part of the growth cell at 638 Cambridge Road. PC35 seeks to rezone that land from Medium Density Residential Zone to Commercial Zone and remove it from the T11 Residential Growth Cell. The Independent Hearing Commissioner's decision on PC35 was publicly notified on 27 August 2026.




**Figure No. 6.11.1 Plan Change 35**

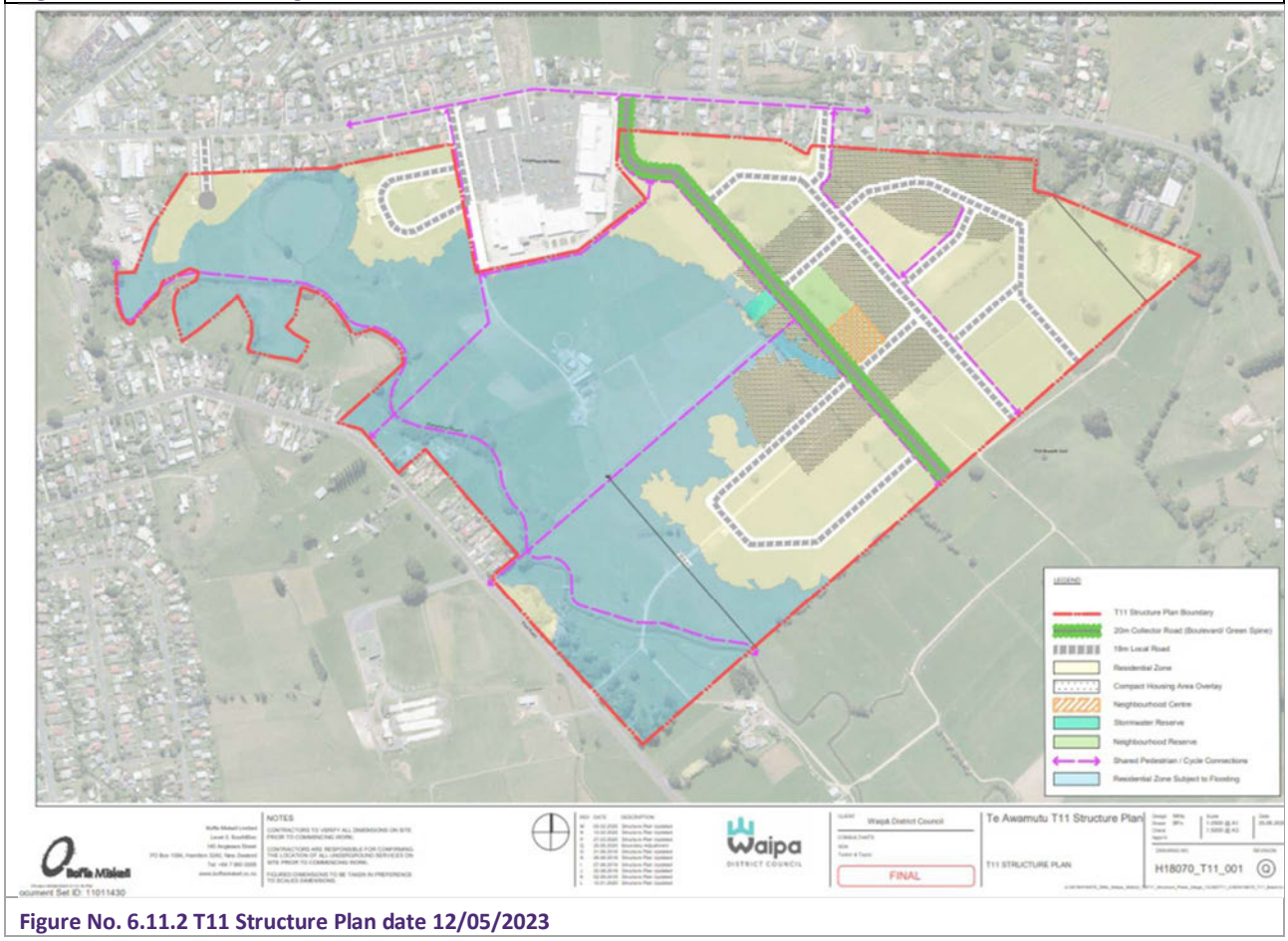



**Figure No. 6.11.2 T11 Structure Plan date 12/05/2023**

### 6.11.1 Expected Yield

The T11 Structure Plan provides the most appropriate starting point for assessing the likely residential yield of the growth cell. Appendix S1 identifies an anticipated yield of approximately 432 dwellings, while the Structure Plan identifies an anticipated yield of approximately 380 dwellings.

PC35 further alters the residential extent of the growth cell by removing land at 638 Cambridge Road from T11 for commercial development. Existing and approved residential development also provides more detailed information regarding the development form being realised within the cell.

Accordingly, the adopted yield for T11 should be based on the Structure Plan, adjusted to reflect the PC35 area and the current approved and developed residential areas, rather than applying the generic yield assumptions in Section 4 across the whole growth cell.

| Growth Cell T11 | |
|---|---|
| Cell Size | 80 ha - Note area is based on structure plan in figure 6.11.2 above, growth cell areas have not been updated in the Council GIS portal |
| Developable Residential Land - BBO Estimate | 37.8 ha |
| Yield per developable hectare | Medium Density Residential - 15 dwellings per ha |
| Yield BBO Estimate | 567 dwellings |
| Growth Cell Anticipated | 432 dwellings |
| Structure Plan Anticipated | 380 dwellings |
| Recommended Number of dwellings | 244 dwellings |
| Difference | -188 |

### 6.11.2 Suitability for a Senior Lifestyle Village

| Parameter | Condition Met | Commentary |
|---|---|---|
| 10 Ha Contiguous Block | Potentially | T11 is sufficiently large overall, but the Mangaohoi Stream corridor, flood-affected land, existing and approved development, planned roads and reserves and the PC35 area affect the configuration of the remaining undeveloped land. |
| Site shape between 1:1 ≤ 1:3 | No | |
| Connectivity and Security | Potentially | The Structure Plan establishes a public road network and conventional residential development pattern. An integrated senior living village would need to be accommodated within or modify that framework. |
| Minimal Natural Hazards | Partially | Significant land adjoining the Mangaohoi Stream is flood affected, although other parts of the growth cell are outside the mapped flood extent. |
| Suitable Topography and Serviceability | Generally, yes | Topography and servicing do not appear to be the principal determining constraints. |

| Parameter | Condition Met | Commentary |
|---|---|---|
| Practical delivery | Constrained | Existing and approved residential development, the Structure Plan road and reserve network, flood-affected land and PC35 materially influence the configuration of the remaining undeveloped land. |
| Conclusions | Unlikely | No clearly defined contiguous and unconstrained site of the scale required for an integrated senior lifestyle village has been identified within the remaining undeveloped land. |

T11 is a substantial growth cell and contains sufficient land in overall area to potentially accommodate a senior lifestyle village. However, the relevant consideration is whether a sufficiently large contiguous and unconstrained site remains within the established Structure Plan and development framework.

The Mangaohoi Stream floodplain and associated overland flow paths constrain significant parts of the cell, while planned roads and reserves, existing and approved residential development and the PC35 commercial area further influence the configuration of the remaining land.

On the information currently available, BBO has not identified a clearly defined contiguous area within T11 that meets all of the high-level criteria in Section 4.4 without further restructuring of the planned development pattern. T11 is therefore assessed as unlikely to provide a suitable alternative location for the proposed integrated senior lifestyle village.

## 6.12 Growth Cell T12

The T12 Growth Cell is located on the western edge of Te Awamutu, south of Rewi Street.

T12 is now subject to subdivision consent SP/0107/24, granted on 24 February 2025 to Duo Living 1 Limited for a four-stage residential subdivision at 1599 Rewi Street. The consent provides for 141 residential lots, together with a balance rural lot and various road and reserve lots to vest (see **Figure 6.12.2**). The approved subdivision includes new public roads, water, wastewater and stormwater infrastructure, together with stormwater and recreation reserves. The consent requires those works to be undertaken at the consent holder's cost, subject to the applicable development contribution or development agreement requirements.

The approved subdivision therefore establishes a detailed and committed residential development pattern across the site.



Figure No. 6.12.2 Approved subdivision layout

### 6.12.1 Expected Yield

| Growth Cell T12 | |
|---|---|
| Cell Size | 11.5 ha |
| Developable Land - BBO Estimate | 9 ha |
| Yield per developable hectare | Medium Density Residential Zone – 12 dwellings per ha. Normal density has been revised down due to flooding risk and site topography. |
| Yield BBO Estimate | 141 dwellings |
| Appendix S1 anticipated yield | 132 dwellings |
| Adopted Yield for this assessment | 141 dwellings |
| Difference | +9 |

The granted subdivision consent provides a more detailed and reliable basis for assessing likely residential yield than the generic assumptions in Section 4.

SP/0107/24 authorises a four-stage residential subdivision creating 141 residential lots. The approved plans show a mix of lot sizes, generally ranging from approximately 350 m² to 700 m², together with roads, stormwater infrastructure and reserve land.

Given the level of detailed design and consenting that has occurred, the approved yield of 141 residential lots is adopted for the purposes of this assessment.

This is slightly higher than the 132 dwellings anticipated in Appendix S1 and demonstrates that the generic BBO calculation is no longer the most appropriate basis for assessing T12.

### 6.12.2 Suitability for a Senior Lifestyle Village

| Parameter | Condition Met | Commentary |
|---|---|---|
| 10 Ha Contiguous Block | No | The growth cell is approximately 11.5 ha overall, but the approved subdivision layout, roads, reserves and stormwater infrastructure mean there is no longer a contiguous undeveloped block of the scale required. |
| Site shape between 1:1 ≤ 1:3 | No | The site is relatively narrow and its approved development pattern further limits the ability to accommodate an integrated village layout. |
| Connectivity and Security | No | The approved subdivision provides for a conventional public-road residential layout rather than a single integrated senior living environment. |
| Minimal Natural Hazards | Partially | Flooding and stormwater constraints have influenced the approved subdivision layout and reserve pattern. |
| Suitable Topography and Serviceability | Yes | Council has granted consent on the basis that the site can be appropriately serviced and developed for the approved residential subdivision. |
| Practical availability | No | T12 is subject to an approved four-stage residential subdivision for 141 residential lots, together with roads and reserves to vest. |
| Conclusions | Not suitable | The site is now committed to an approved conventional residential development and does not provide a sufficiently large contiguous area for an alternative integrated senior living village. |

T12 is not considered suitable for an alternative integrated senior lifestyle village. While the site is capable of residential development and Council has granted consent on the basis that the proposed subdivision can be appropriately serviced, the growth cell is now subject to a detailed four-stage residential subdivision consent for 141 residential lots, together with associated roads, stormwater infrastructure and reserves.

The approved subdivision establishes a committed development pattern across the site and removes the ability to form a contiguous undeveloped area of the scale and configuration required for the proposed senior living village.

T12 is therefore excluded on the basis of known approved development commitments, rather than assumptions about landowner intentions or practical availability.

## 6.13 Growth Cell T13

The T13 Growth Cell comprises the Waipā Racecourse site at the northern end of Te Awamutu. Appendix S1 identifies the site as a potential future residential growth cell if it is no longer required for its current purpose and anticipates approximately 420 dwellings within the cell.

Waikato Thoroughbred Racing is progressing a wider facilities strategy involving the future consolidation of racing activities at a new Greenfield facility. Its current public information indicates that the Waipā site is intended to be sold at an appropriate time prior to the Greenfield facility becoming operational, subject to racing-industry requirements. The current programme targets the new facility being operational by around 2035.

No significant physical constraints have been identified across the majority of T13. However, the site adjoins industrial-zoned land and other industrial activities, which will need to be considered through future structure planning and detailed design.

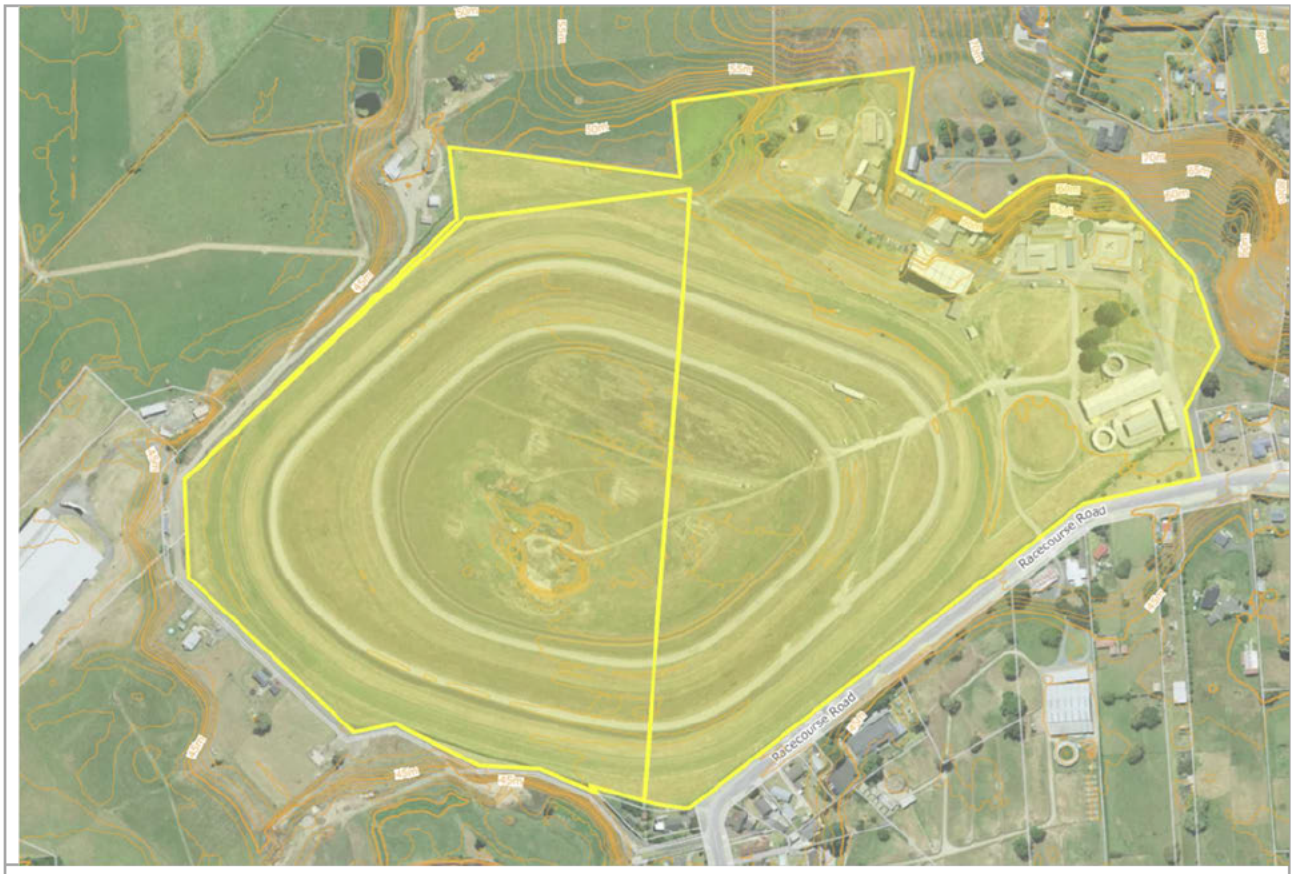



Figure No. 6.13.1 T13 Site Source: Grip

### 6.13.1 Expected Yield

| Growth Cell T13 | |
|---|---|
| Cell Size | 35.7 ha |
| Developable Land - BBO Estimate | 31.6 ha |
| Yield per developable hectare | Medium Density Residential Zone - 15 dwellings per ha. |
| Yield BBO Estimate | 474 dwellings |
| Appendix S1 anticipated yield | 420 dwellings |
| Adopted Yield for this assessment | 474 dwellings |
| Difference | +54 |

BBO has identified approximately 31.6 ha of potentially developable land. For the purposes of this high-level assessment, an allowance has been made for an interface treatment along the industrial boundary (i.e. a 20m buffer strip). The precise nature and width of any buffer would need to be confirmed through future structure planning and detailed effects assessment.

Applying the indicative MDR yield of 15 dwellings per developable hectare results in an estimated yield of approximately 474 dwellings, compared with the 420 dwellings anticipated in Appendix S1. The difference

reflects the generic yield assumptions adopted for this assessment and should not be read as a revised statutory capacity figure.

### 6.13.2 Suitability for a Senior Lifestyle Village

| Parameter | Condition Met | Commentary |
|---|---|---|
| 10 Ha Contiguous Block | Yes | T13 is of sufficient scale to accommodate the required development footprint. |
| Site shape between 1:1 ≤ 1:3 | Yes | |
| Connectivity and Security | Potentially | The site can provide an integrated development area, although the interface with adjoining industrial land would need careful treatment. |
| Minimal Natural Hazards | Yes | No material natural-hazard constraint has been identified at a level that would preclude development. |
| Suitable Topography and Serviceability | Yes | The site is generally suitable at a high level for development. |
| Practical delivery | Potentially | The site remains in racing-related use and the timing of any sale or release depends on Waikato Thoroughbred Racing's wider facilities programme and racing-industry requirements. |
| Conclusions | Potentially suitable | T13 is physically capable of accommodating a senior lifestyle village, subject to timing, interface treatment and more detailed planning. |

T13 is assessed as potentially suitable for a senior lifestyle village at a high level. It is of sufficient scale, has generally favourable topography and is not materially constrained by natural hazards.

The principal considerations relate to timing and land-use interface. The site remains subject to Waikato Thoroughbred Racing's wider facilities strategy, and the timing of any sale or release is linked to that programme. In addition, future development would need to address the interface with adjoining industrial land and activities.

These matters do not preclude T13 from accommodating the proposed form of development, but they mean it cannot presently be assumed to be an immediately deliverable equivalent alternative.

## 6.14 Growth Cell T14

The T14 Growth Cell is located on the north-eastern edge of Te Awamutu and comprises approximately **55 ha**. It is identified for development post-2035.

The growth cell is held in a small number of separate landholdings and is generally unconstrained by natural hazards at a high level. Some parts of the site are affected by steeper topography, particularly along the eastern edge, which would influence the detailed development layout.

Future development of T14 will also need to integrate with the wider transport network serving the eastern growth area, including the planned roundabout and connections toward T9 and T10. The timing and delivery of that infrastructure remains a relevant consideration for the development of T14.

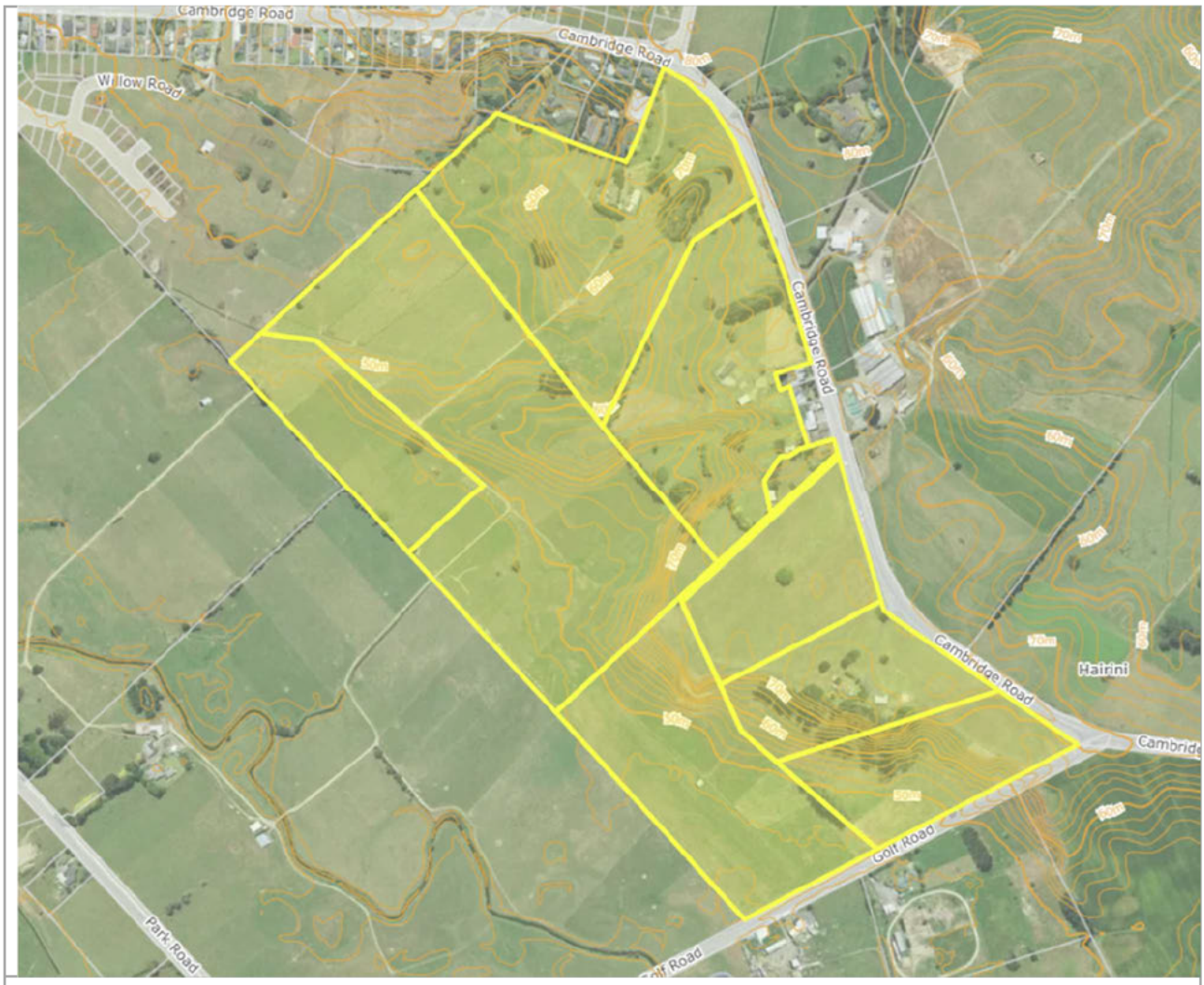



Figure No. 6.14. T14 Site Source: Grip

### 6.14.1 Expected Yield

As the development of this growth cell is expected to begin in over 10 years from now the yield is difficult to accurately predict, so a midpoint between BBO's estimate and Appendix S1 of the District Plan has been adopted.

| Growth Cell T14 | |
|---|---|
| Cell Size | 55 ha - Note area is based on structure plan in figure 6.11.2 above, growth cell areas have not been updated in the Council GIS portal |
| Developable Land - BBO Estimate | 48.5ha |
| Yield per developable hectare | Medium Density Residential Zone - 15 dwellings per ha |
| Yield BBO Estimate | 727 dwellings |
| Appendix S1 anticipated yield | 1452 dwellings |
| Difference | -725 dwellings |

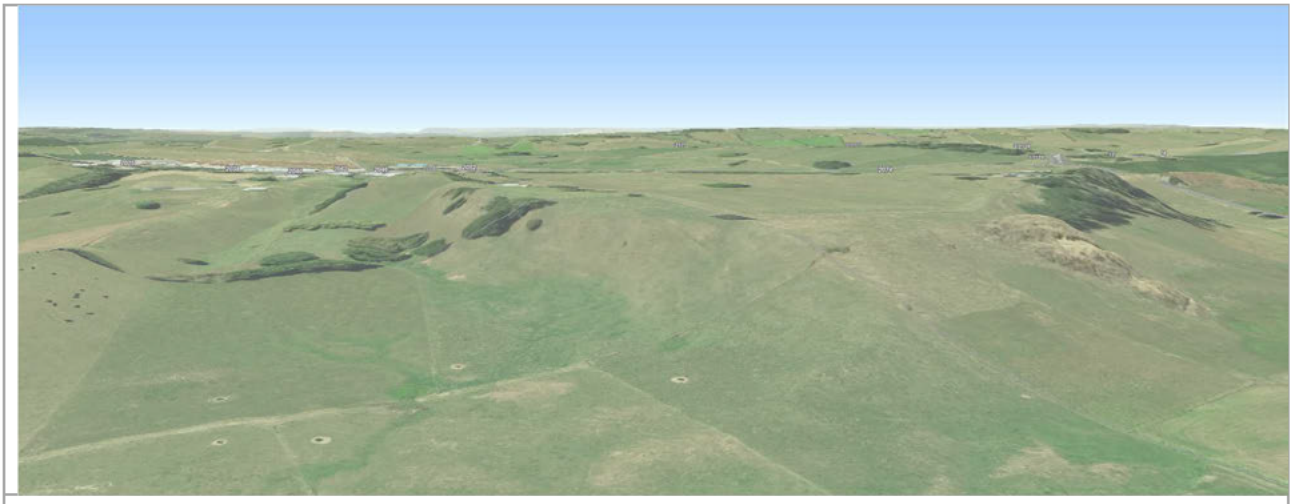


Figure No. 5.14.2 T14 Topography Source: LINZ Basemaps

### 6.14.2 Suitability for a Senior Lifestyle Village

| Parameter | Condition Met | Commentary |
|---|---|---|
| 10 Ha Contiguous Block | Yes | The growth cell is of sufficient overall scale to provide a contiguous area of the size required. |
| Site shape between 1:1 ≤ 1:3 | Yes | |
| Connectivity and Security | Potentially | Future access and internal layout will need to integrate with the eastern growth-area transport network. |
| Minimal Natural Hazards | Yes | No material natural-hazard constraint has been identified at a level that would preclude this form of development. |
| Suitable Topography and Serviceability | Generally yes | Some steeper areas would need to be avoided or addressed through detailed earthworks and design. |
| Practical delivery | Potentially | T14 is identified for post-2035 development and is dependent on future transport and infrastructure planning for the eastern growth area. |
| Conclusions | Site is generally suitable for development | T14 appears physically capable of accommodating an integrated senior lifestyle village, subject to future infrastructure, access and detailed site-planning requirements. |

T14 is assessed as potentially suitable for a senior lifestyle village at a high level. The growth cell is of sufficient scale, has generally favourable physical characteristics and is not materially constrained by natural hazards.

The principal considerations relate to timing and infrastructure. T14 is presently identified for post-2035 development and future development will need to integrate with the planned transport network serving the eastern growth area. Detailed access arrangements and the relationship with areas of steeper topography would also require further assessment.

## 6.15 Growth Cell T15

The T15 Growth Cell is located on the northern edge of Kihikihi adjacent to McGhie Road and comprises approximately 21.2 ha of Large Lot Residential and Deferred Large Lot Residential land.

A substantial part of the growth cell is subject to subdivision and land use consents SP/0017/21 and LU/0081/21, granted by Waipā District Council on 11 June 2021. Those consents authorise a staged subdivision creating 23 residential lots across approximately 12.57 ha, together with drainage reserves and a road to vest (See **Figure 6.15.2** for the approved layout).

The approved development is based on a Large Lot Residential form, with the consent requiring development within the deferred-zoned land to comply with the Large Lot Residential Zone provisions pending uplifting of the deferred zoning.

T15 is not intended to be fully serviced with urban three-waters infrastructure. The approved subdivision accordingly provides for on-site wastewater and, for relevant lots, on-site stormwater management and firefighting water supply. Some localised flooding is also present within the growth cell, although it is not considered to affect the entirety of the land.

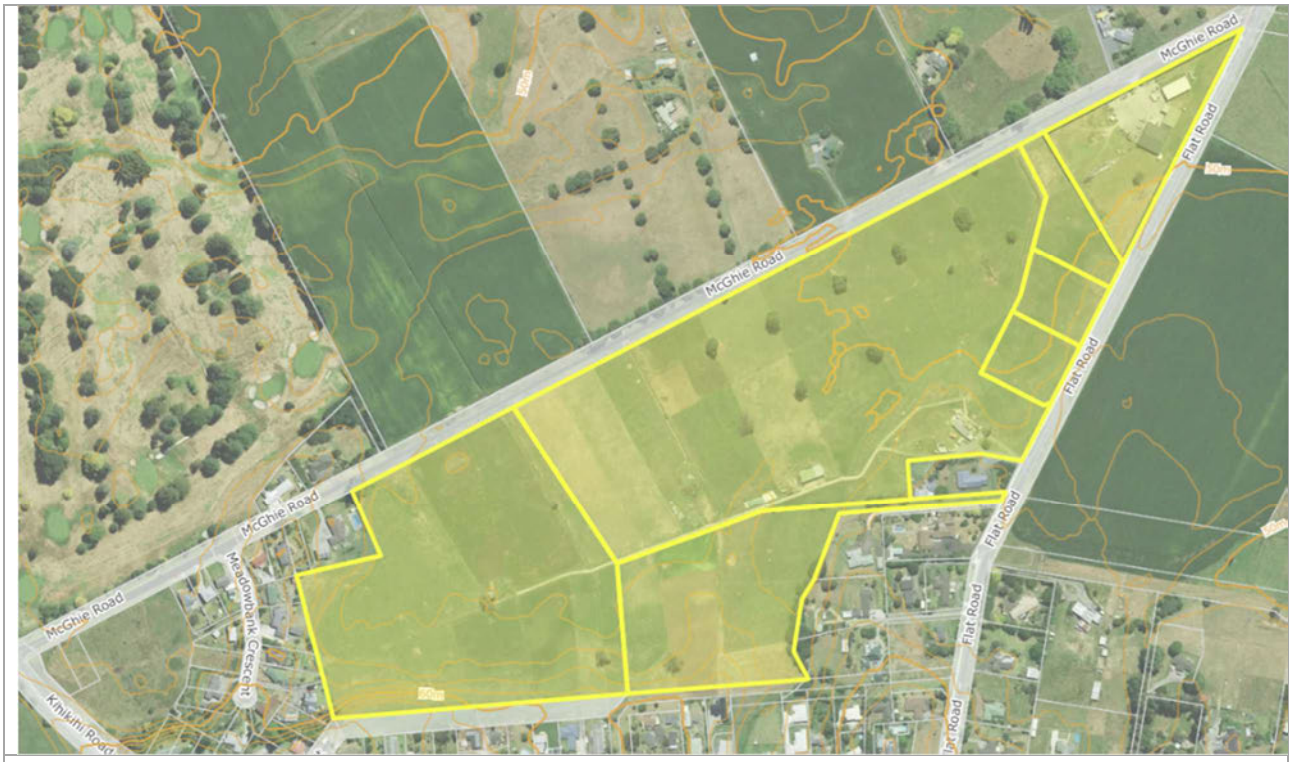



**Figure No. 6.15.1 T15 Topography Source: LINZ Basemaps**

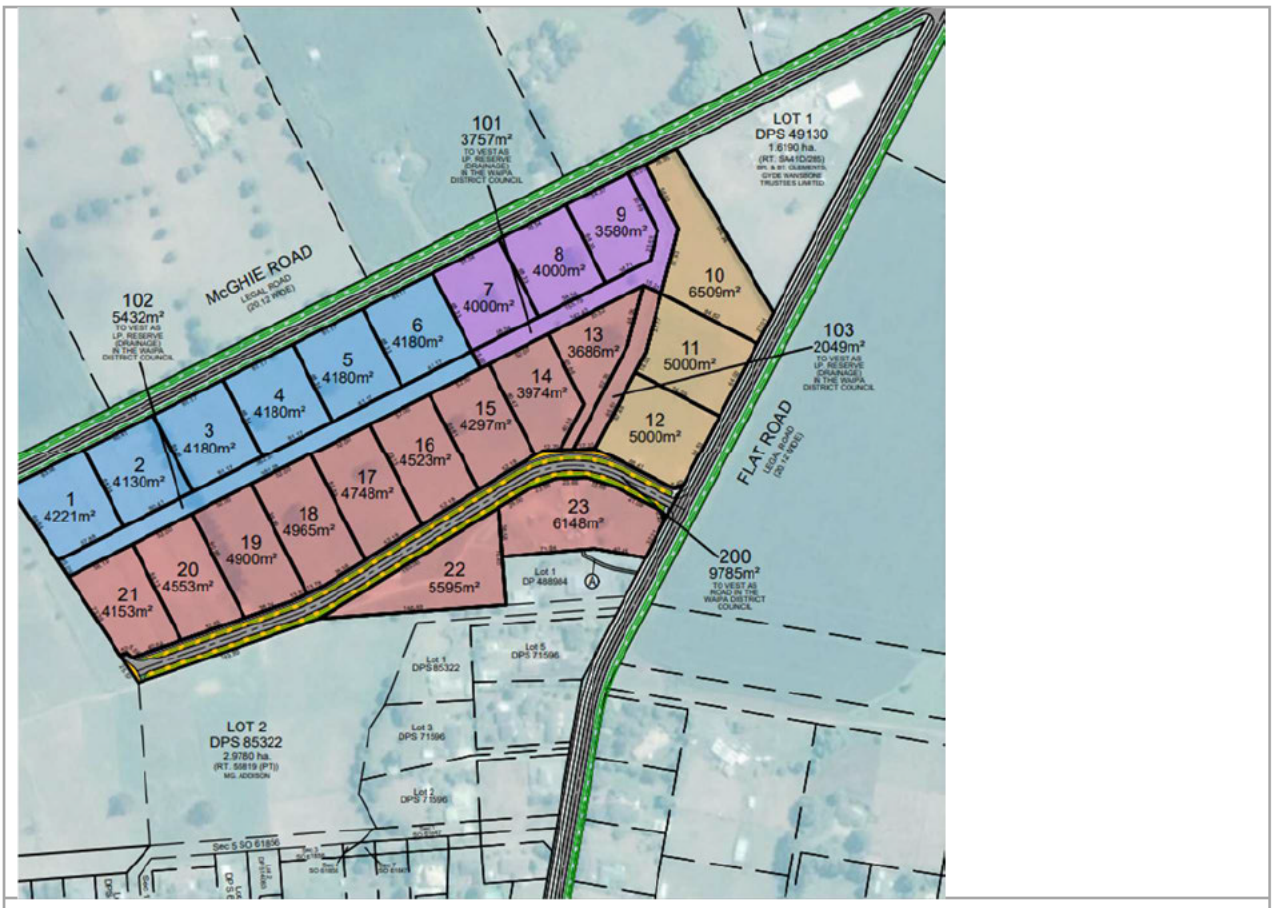



Figure No. 6.15.2 Approved Scheme Plan

### 6.15.1 Expected Yield

| Growth Cell T15 | |
|---|---|
| Cell Size | 21.2 ha |
| Developable land - BBO Estimate | 16.9 ha |
| Yield | Large Lot Residential Zone - 3 dwellings per ha |
| Yield BBO Estimate | 51 |
| Growth Cell Anticipated | 252[9] |
| Recommended Number of Lots | 51 |
| Difference | -201 |

BBO has identified approximately 16.9 ha of potentially developable land within T15. Applying the Large Lot Residential assumption of three dwellings per developable hectare results in an indicative whole-cell yield of approximately 51 dwellings.

The approved subdivision provides a more detailed indication of the development form being realised within part of the growth cell. SP/0017/21 authorises 23 residential lots across approximately 12.57 ha, with approved lot sizes generally in the order of approximately 3,500–6,500 m², together with road and drainage reserve areas.

[9] The Appendix S1 figure is not considered representative of the Large Lot Residential development form applying to T15 and has not been relied on for the comparative yield assessment.

This confirms that T15 is being developed as a comparatively low-density Large Lot Residential area rather than at conventional urban residential densities.

The 252-dwelling figure identified in Appendix S1 does not align with the Large Lot Residential zoning, the consented development form or the development outcome now established through SP/0017/21. It has therefore not been relied on as an appropriate indication of likely yield for T15.

An indicative yield of approximately 51 dwellings is retained for the purposes of this high-level whole-cell assessment.

### 6.15.2 Suitability for a Senior Lifestyle Village

| Parameter | Condition Met | Commentary |
|---|---|---|
| 10 Ha Contiguous Block | Constrained | While T15 is sufficiently large overall, approximately 12.57 ha is already subject to an approved staged Large Lot Residential subdivision for 23 lots. |
| Site shape between 1:1 ≤ 1:3 | Yes | |
| Connectivity and Security | Potentially | The approved Large Lot Residential subdivision establishes a development pattern materially different from the integrated senior living village proposed by TADL. |
| Minimal Natural Hazards | Potentially | Localised flooding is present and has been addressed through the consented stormwater framework. |
| Suitable Topography and Serviceability | Constrained | Topography is suitable provided flood risk is designed out. Site is not serviced for 3 waters and could be difficult to connect, particularly for potable water unless Waipa District Council provided access to the Trunk Main outside of site. |
| Practical delivery | No / materially constrained | A substantial part of T15 is already subject to an approved staged Large Lot Residential subdivision for 23 residential lots, together with road and drainage infrastructure. |
| Conclusions | No | The combination of committed Large Lot Residential development and the non-urban servicing framework materially constrains use of T15 for an alternative integrated senior living village. |

T15 is not considered suitable for the proposed integrated senior lifestyle village. Although the wider growth cell meets some of the high-level physical screening criteria, a substantial part of T15 is already subject to an approved staged subdivision for 23 Large Lot Residential lots, together with associated road and drainage infrastructure.

The approved development also confirms the intended development form and servicing approach for T15. The consent provides for Large Lot Residential development and relies, in part, on on-site wastewater, stormwater and firefighting water arrangements rather than a fully serviced urban residential framework.

## 6.16 TADL Development site

The TADL site at 2025 Ōhaupō Road is located on the northern edge of Te Awamutu and comprises approximately 25.7 ha. Unlike the existing growth cells assessed in Sections 6.2 to 6.15, the has been specifically master-planned to accommodate an integrated senior living and care development.

The proposed development has been designed as a coordinated community comprising approximately 414 dwellings/units, a 100-bed residential care facility, communal facilities, a neighbourhood centre, internal movement networks and supporting infrastructure. The suitability of the site therefore needs to be considered against the particular requirements of that integrated development form, rather than against conventional residential subdivision outcomes alone.

### 6.16.1 Expected Yield

BBO has identified approximately 19.9 ha of the 25.7 ha site as potentially developable at a high level, with the balance principally influenced by the site's gully and overland flow-path network.

Applying the generic assumptions in Section 4 would result in an indicative yield of approximately 398 retirement dwellings, or approximately 238 conventional residential dwellings if assessed at a reduced MDR-style density.

Those generic calculations are useful only as a broad comparison. They do not reflect the development form actually proposed for the site. For the purposes of this assessment, the current Harlow masterplan therefore provides the more appropriate indication of the development outcome capable of being accommodated on the site than the generic yield assumptions applied to the other growth cells.

| Proposed Growth Cell 2025 Ōhaupō Road | |
|---|---|
| Cell Size | 25.7 ha |
| Developable land - BBO Estimate | 19.9 ha |
| Yield | Retirement village - 20 dwellings per ha, Medium Density Residential Zone – 12 dwellings per ha (density reduced to developable land being split by flow paths |
| Yield BBO Estimate | 398 retirement dwellings or 238 residential dwellings |
| Client Harlow Village Proposal | 414 retirement units + a 100-bed aged care facility |
| Recommended Number of dwellings | 414 retirement units + a 100-bed aged care facility |
| Difference | N/A |

### 6.16.2 Suitability for a Senior Lifestyle Village

| Parameter | Condition Met | Commentary |
|---|---|---|
| 10 Ha Contiguous Block | Yes | The site comfortably exceeds the minimum contiguous area adopted for this assessment and is of sufficient scale to accommodate the residential, care, communal and infrastructure components as a coordinated development. |

| Parameter | Condition Met | Commentary |
|---|---|---|
| Site shape between 1:1 ≤ 1:3 | Yes | The site configuration is capable of supporting an integrated internal layout and relatively direct connections between residential areas and communal facilities. |
| Connectivity and Security | Yes | The site can be developed as a single integrated village with a controlled internal movement network rather than being bisected by an existing public road or committed conventional subdivision pattern. |
| Minimal Natural Hazards | Generally yes | Flooding is principally associated with the site's gully and overland flow-path system and can be avoided or incorporated into the masterplan rather than affecting the whole development footprint. See Figure 6.16.1. |
| Suitable Topography and Serviceability | Generally yes | Parts of the site contain gullies and steeper land, but the masterplan has been developed around those constraints and retains sufficient suitably configured land for the proposed integrated development. Detailed servicing is addressed through the substantive application. |
| Practicable delivery | Yes | he site is under the control of TADL and is the subject of the current substantive application and detailed masterplanning. Unlike the alternative growth-cell options, there is no existing subdivision pattern or committed conventional residential development that needs to be reconfigured to accommodate the proposed village. |
| Conclusions | Site is suitable for development | The site meets the high-level physical, configuration and delivery criteria adopted for an integrated senior lifestyle village. |

The TADL site is considered suitable for the proposed integrated senior lifestyle village. It is of sufficient scale, has a suitable overall configuration, and is not affected by natural-hazard constraints at a level that precludes development of the proposed form.

The site also differs from a number of the existing growth cells assessed in this report because it is not constrained by an approved conventional subdivision layout, existing structure-plan road network or committed development pattern that would first need to be reconfigured. It is already under the control of TADL and is the subject of the current substantive application.

At a high level, the site therefore provides a more direct fit with the specific land, configuration and integration requirements of the Harlow Lifestyle Village than the alternative growth cells identified as only potentially suitable.

The site is located on the northern edge of Te Awamutu adjoining the existing urban area. While a detailed infrastructure assessment is outside the scope of this report, servicing, access and infrastructure matters are addressed through the technical assessments supporting the substantive application.





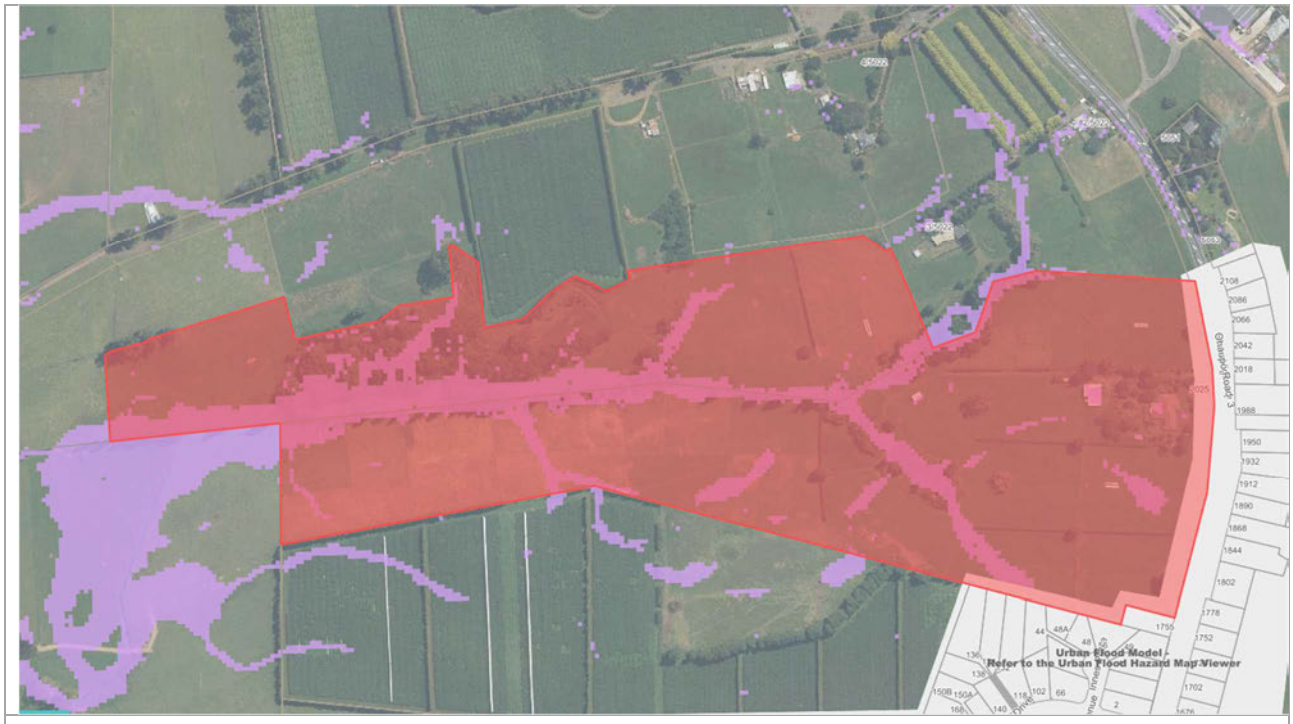



**Figure No. 5.16.1 2025 Ōhaupō Road Flood Risk**

# 7. Conclusions

The Te Awamutu growth-cell framework provides substantial residential development capacity. Council's June 2026 *Waipā District Housing Market Assessment* identifies sufficient reasonably expected to be realised residential capacity within the planned Te Awamutu growth cells to meet projected housing demand over the relevant assessment periods.

The assessment undertaken in this report therefore does not seek to establish an overall shortage of residential capacity. Rather, it considers the development characteristics of the individual growth cells and whether they contain land capable of accommodating the particular form of integrated senior living development proposed by TADL.

The assessment demonstrates that the strategic yields identified in Appendix S1 do not necessarily correspond directly with the development outcomes now expected within every growth cell. More detailed structure planning, approved subdivision, current development proposals, flooding, topography, stormwater requirements and infrastructure dependencies all influence the amount and form of development that may ultimately be achieved.

At a high level, T2, T4, T5, T10, T13 and T14 have been identified as containing land that is potentially capable of accommodating a senior lifestyle village of the general scale considered in this report. These findings were supported by Waipa District Council, when they reviewed V1 of this report.

Those growth cells are not, however, equivalent in terms of timing or delivery. T2, T4, T5 and T14 are presently associated with post-2035 development timing, although T4 may be brought forward through PC31. T10 is dependent on supporting transport infrastructure and potential amendment of the Picquet Hill Structure Plan. T13 is physically suitable but its timing is linked to the future release of the Waipā Racecourse site and future management of the interface with adjoining industrial activities.

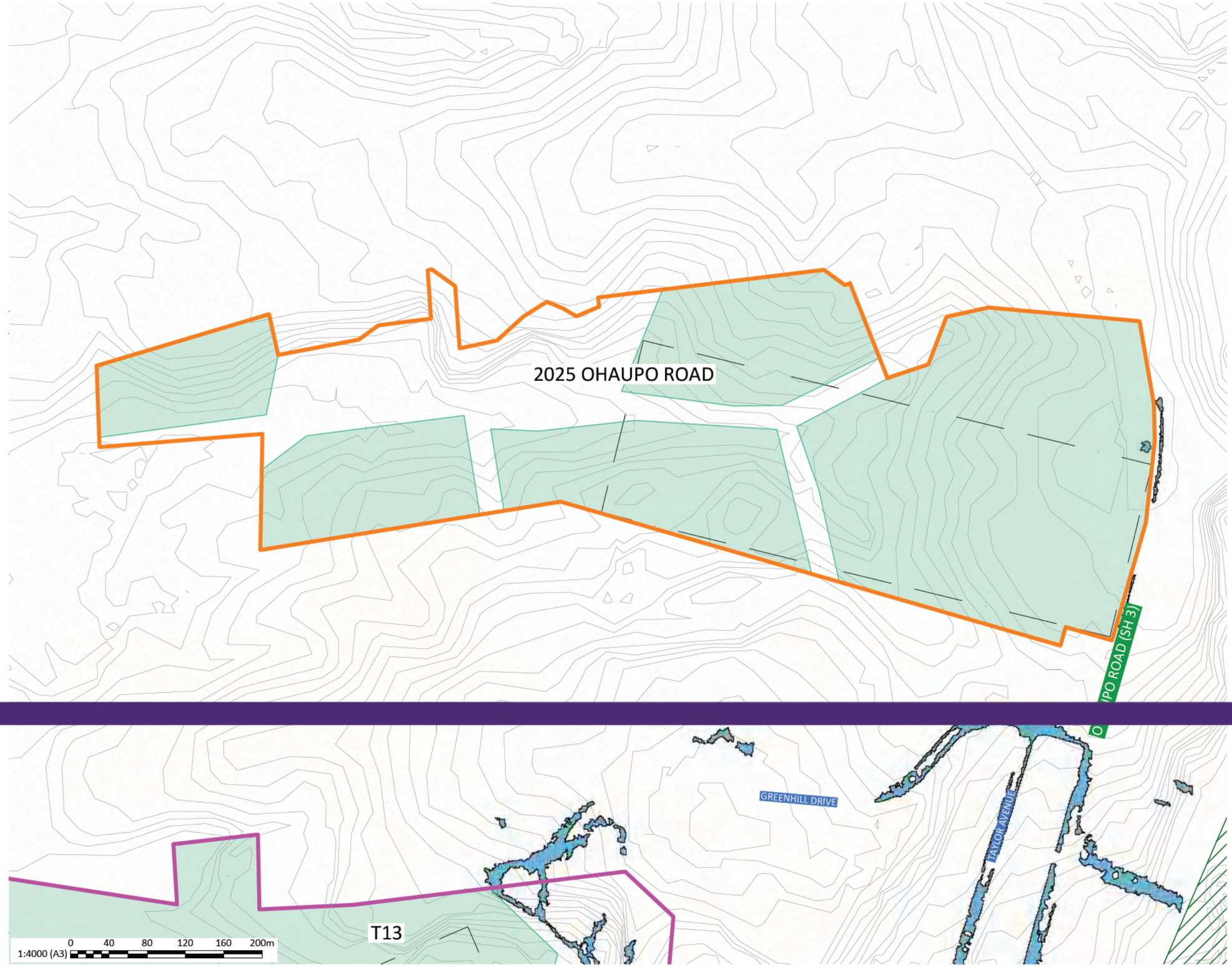
Other growth cells are more materially constrained by existing or approved development, flooding, topography, servicing, structure-plan requirements or site configuration. Those constraints affect their ability to accommodate a sufficiently large contiguous and integrated senior living site.

The proposed Harlow Lifestyle Village is different from conventional residential development. It requires a coordinated site capable of accommodating approximately 414 dwellings/units, a 100-bed residential care facility, communal facilities, internal movement networks and supporting infrastructure as an integrated development outcome.

WEBSTER Research's updated September 2026 economic assessment identifies a genuine demand foundation for the proposed development, with the strongest evidence relating to residential care and with the retirement-village component dependent on staged delivery, pricing and wider catchment demand.

Overall, the assessment confirms that while several Te Awamutu growth cells are potentially capable of accommodating a senior living village at a high level, each is subject to differing physical, planning, infrastructure and timing considerations. The existence of sufficient overall residential capacity does not, of itself, establish that an equivalent and immediately deliverable site exists within the current growth-cell framework.

# Appendix A – Drawings




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DRAWING ISSUE

DESIGNED PP
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CLIENT: TE AWAMUTU DEVELOPMENTS LIMITED

PROJECT: GROWTH CELL ANALYSIS

DRAWING: 2025 OHAUPO ROAD, TE AWAMUTU SHEET 1

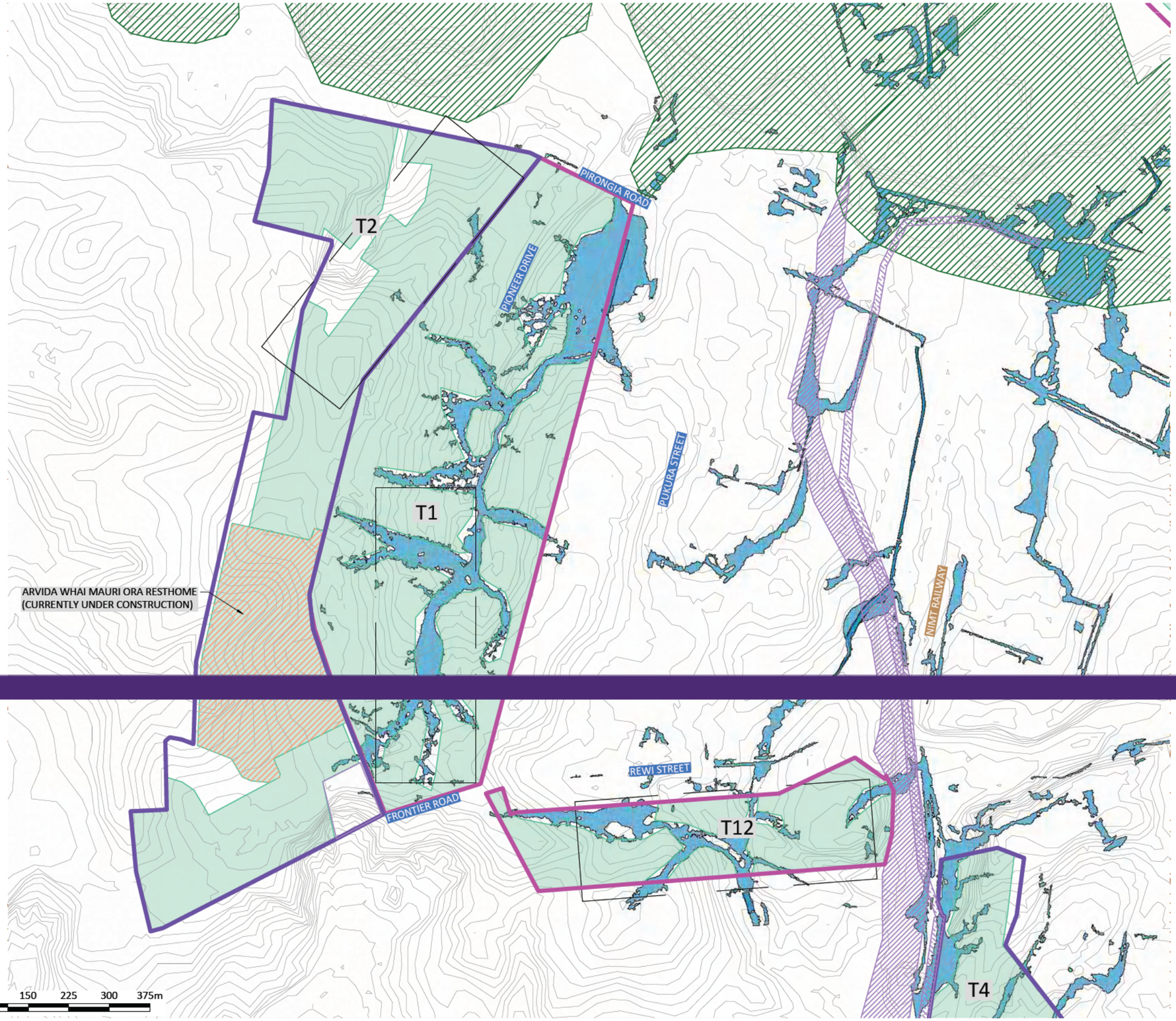
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CLIENT: TE AWAMUTU DEVELOPMENTS LIMITED

PROJECT: GROWTH CELL ANALYSIS

DRAWING: GROWTH CELL ANALYSIS T1, T2 & T12

STATUS: PRELIMINARY

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PROJECT: GROWTH CELL ANALYSIS

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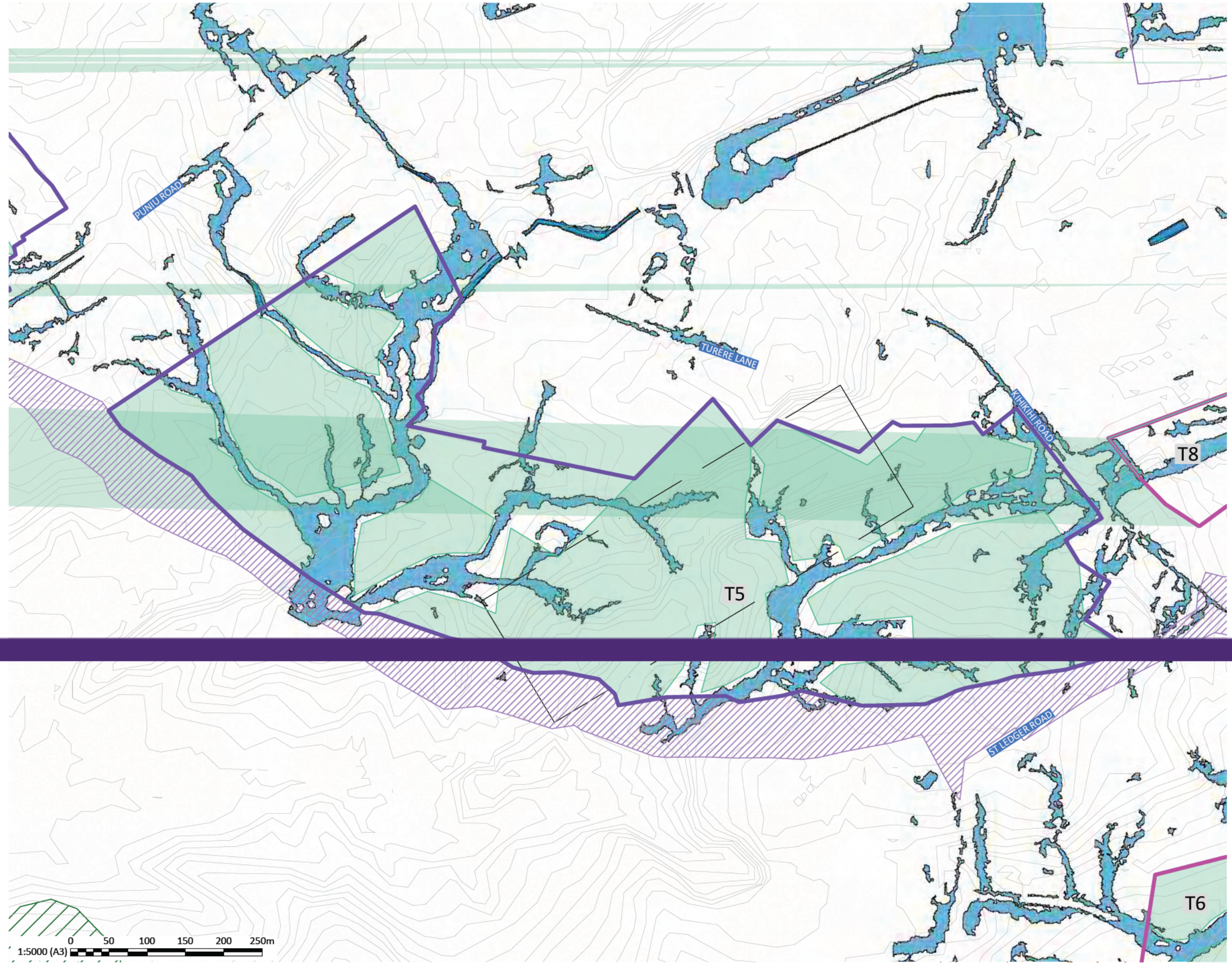
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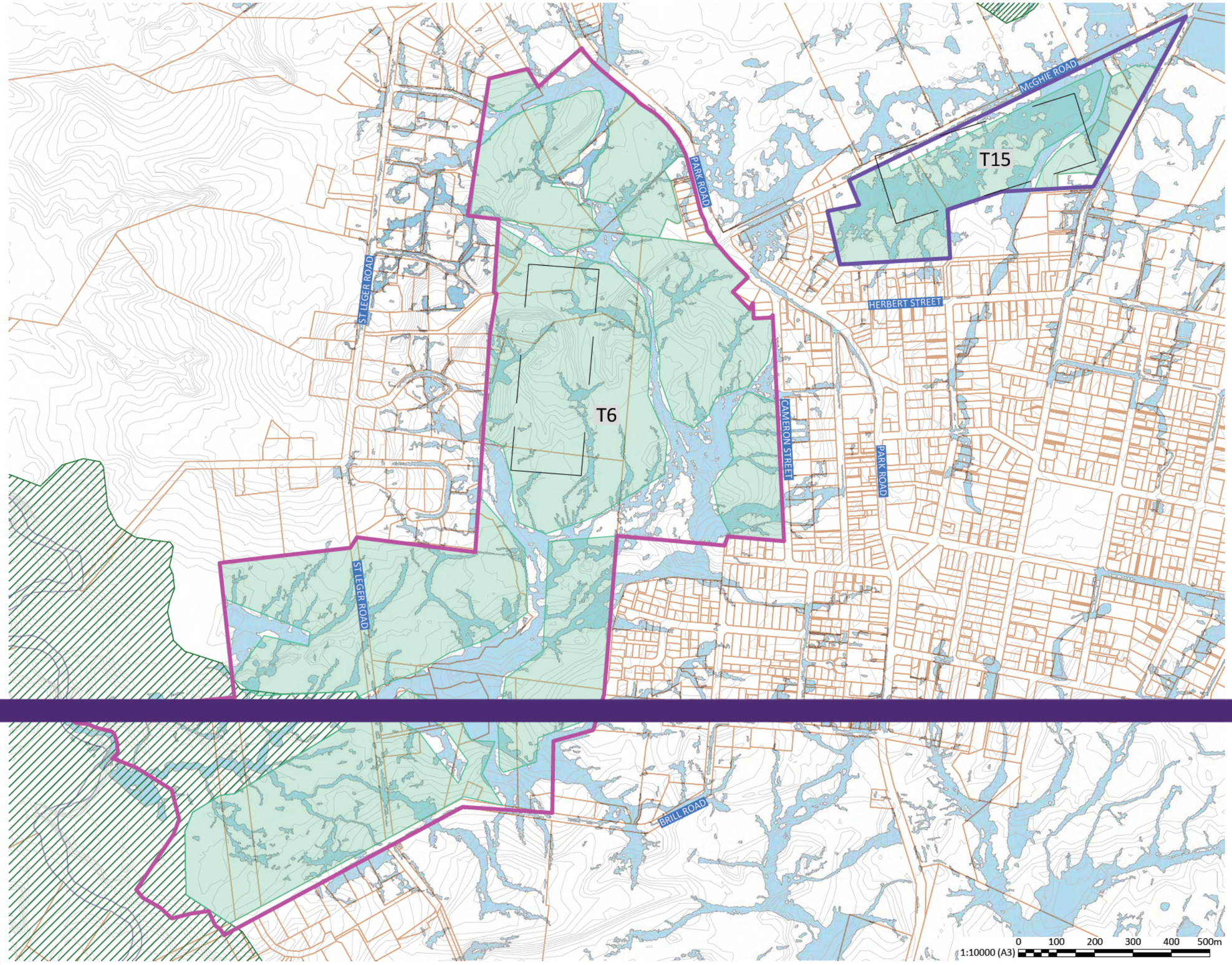
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- LEGAL BOUNDARIES
- 2025 OHAUPO ROAD
- PRE 2035 WAIPA GROWTH CELLS
- POST 2035 WAIPA GROWTH CELLS
- FLOOD WRC HAZARD AREA
- STORMWATER CLIMATE CHANGE 1% AEP RCP 6.0
- DEVELOPABLE AREA
- DEVELOPABLE AREA (SENIOR LIVING)
- SENIOR LIVING SHAPE FACTOR 185m x 547m (10 Ha)
- 2m CONTOURS

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CLIENT: TE AWAMUTU DEVELOPMENTS LIMITED

PROJECT: GROWTH CELL ANALYSIS

DRAWING: GROWTH CELL ANALYSIS T6 & T15

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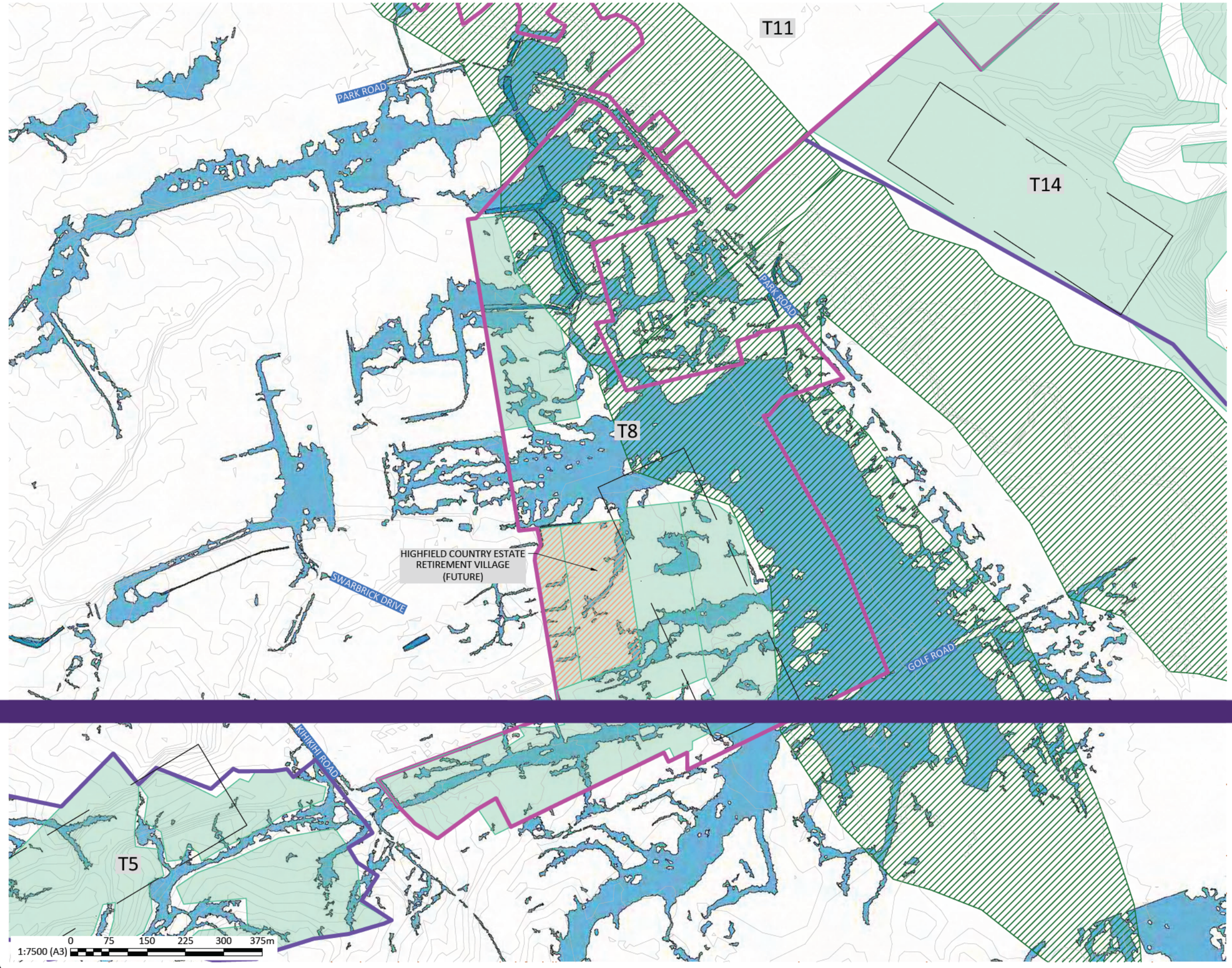
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PROJECT: GROWTH CELL ANALYSIS

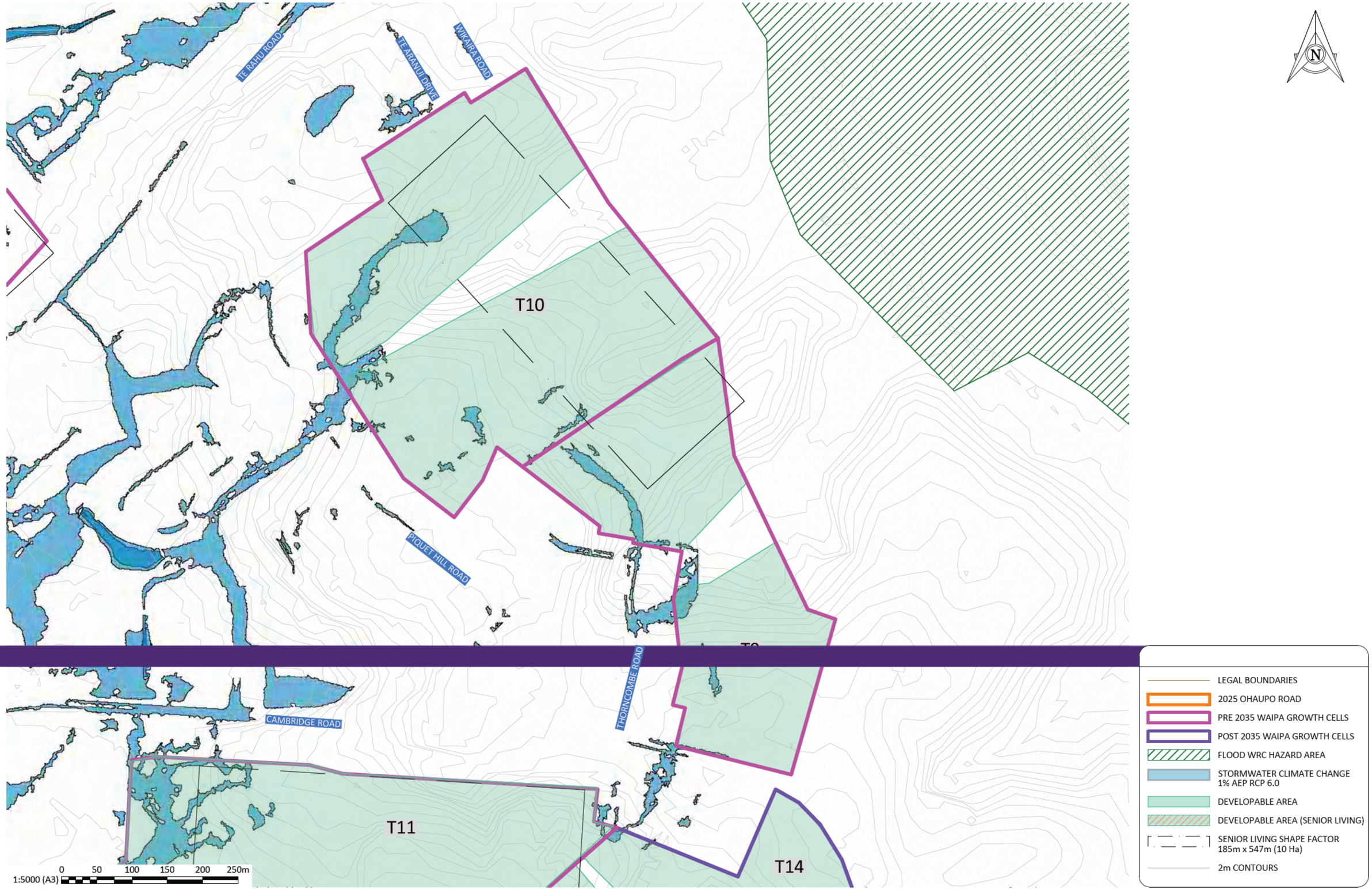
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PROJECT: GROWTH CELL ANALYSIS

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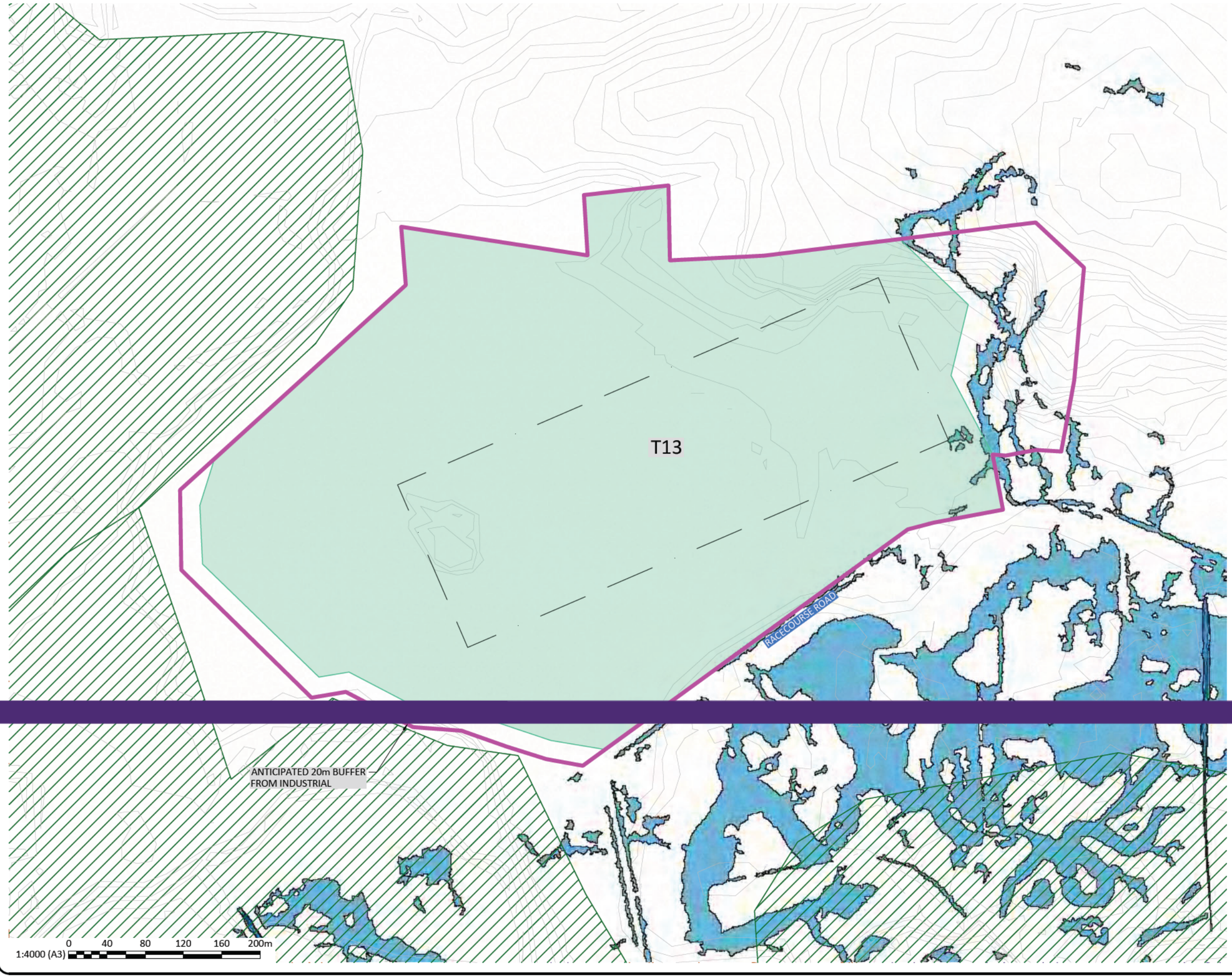
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