Appendix 26 – Objectives and Policies Assessment

Relevant Planning and Policy Documents

Relevant Planning and Policy Documents	
Category	**Relevant Planning Documents**
Treaty Settlements	• Te Ture Whaimana o te Awa o Waikato – Vision and Strategy for the Waikato River
National	• National Policy Statement for Urban Development 2020 • National Policy Statement for Highly Productive Land 2022 • National Policy Statement for Indigenous Biodiversity 2023 • National Policy Statement for Freshwater Management • National Policy Statement for Natural Hazards
Regional	• Waikato Regional Policy Statement - Te Tauākī Kaupapahere Te-Rohe O Waikato • Waikato Regional Plan
Local	• Waipa District Plan
Iwi Management Plans	• Waikato Tainui Environmental Plan

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

Te Ture Whaimana o te Awa o Waikato – Vision and Strategy for the Waikato River Objectives Assessment	
Objective or Policy Provision	**Comment**
Objectives	
Objective A *The restoration and protection of the health and wellbeing of the Waikato River*	The Project responds to this direction through an integrated stormwater management and ecological design that retains and enhances 12 natural wetlands, restores additional wetland habitat, provides riparian planting along the existing watercourse, and protects and enhances the kahikatea remnant. The proposed stormwater treatment train, including raingardens, constructed wetlands, attenuation and controlled discharge, will manage runoff and contaminants before water enters the Mangapiko Stream and subsequently the Waipā and Waikato Rivers. These measures are secured through the proposed management plans and conditions and are expected to improve freshwater habitat, biodiversity and water quality relative to the existing pastoral environment. Although the Project will modify parts of the existing freshwater environment, including the removal of a small 33 m² wetland, the broader restoration and enhancement programme will provide an overall improvement in wetland extent, quality and function. As such, the Project will contribute to the restoration and protection of the health and wellbeing of the Waikato River and is consistent with Objective
Objective B *The restoration and protection of the relationship of Waikato-Tainui with the Waikato River, including their economic, social, cultural, and spiritual relationships.*	The Project supports the relationship of Waikato-Tainui with the Waikato River through both its engagement approach and the environmental outcomes incorporated into the development. Engagement has been undertaken with Waikato-Tainui and mana whenua, while the Project itself provides for substantial wetland and riparian restoration, improved stormwater management and indigenous biodiversity enhancement. The recommendations of the Ngāti Apakura CVA are also proposed to be

	implemented through a CEMP, providing for cultural values and kaitiakitanga to inform the implementation of the Project.
Objective C *The restoration and protection of the relationship of Waikato River iwi according to their tikanga and kawa, with the Waikato River, including their economic, social, cultural and spiritual relationships.*	The Project recognises the relationship of Waikato River iwi with the Waikato River through engagement with Waikato-Tainui and relevant mana whenua groups, including opportunities for those groups to express their values and perspectives in accordance with their own tikanga and kawa. The Ngāti Apakura CVA has directly informed the Project's cultural and environmental response, particularly the proposed wetland enhancement, riparian restoration, biodiversity protection and long-term environmental stewardship measures. Its recommendations will be implemented through the proposed CEMP providing an ongoing mechanism for cultural values and kaitiakitanga to influence the Project's detailed design and implementation.
Objective D *The restoration and protection of the relationship of the Waikato region's communities with the Waikato River including their economic, social, cultural and spiritual relationships.*	Although the Project is not located directly beside the Waikato River, its environmental and community outcomes support the broader relationship recognised by Objective D. The Project will support the relationship of the Waikato region's communities with the Waikato River by improving freshwater and ecological outcomes within the wider river catchment. In particular, the proposed stormwater treatment system, wetland and riparian restoration, indigenous planting and removal of stock from the Site will improve the management of water and habitat relative to the existing pastoral environment. The Project will also provide social and economic benefits through additional retirement living and aged-care accommodation, allowing older residents to remain within their established community and social networks.
Objective E *The integrated, holistic and coordinated approach to management of the natural, physical, cultural and historic resources of the Waikato River.*	An integrated approach is evident in the way the Project has been designed around the Site's interconnected land, water, ecological, cultural and infrastructure systems. Stormwater management, freshwater restoration, earthworks, groundwater, transport, landscape treatment and ecological enhancement have been considered together rather than as isolated components. This approach is supported by the coordinated suite of technical assessments and management plans, including the stormwater, ecological, wetland, construction and cultural effects management frameworks. Engagement with mana whenua has also informed the proposed environmental and cultural outcomes.
Objective F *The adoption of a precautionary approach towards decisions that may result in significant adverse effects on the Waikato River, and in particular those effects*	The technical assessments do not identify the Project as presenting a risk of serious or irreversible damage to the Waikato River. Nevertheless, a precautionary approach is

that threaten serious or irreversible damage to the Waikato River.	reflected in the Project's design and management framework. Stormwater will pass through a treatment train incorporating raingardens, forebays, constructed wetlands, attenuation and controlled discharge, while construction-related risks will be managed through erosion and sediment controls, ecological hold points, monitoring and specialist management plans. The Project also retains 12 natural wetlands and protects the kahikatea remnant, with restoration and enhancement measures secured through proposed conditions.
Objective G *The recognition and avoidance of adverse cumulative effects, and potential cumulative effects, of activities undertaken both on the Waikato River and within its catchments on the health and wellbeing of the Waikato River*	The Project has considered its effects at a catchment level, including the potential for urban development to contribute cumulatively to increased runoff, contaminant loads, habitat degradation and downstream flooding. In response, the stormwater system has been designed to treat and attenuate runoff, maintain hydraulic connectivity and avoid increasing downstream peak flows and water levels. The retirement of pastoral land, exclusion of stock, restoration and enhancement of wetlands, riparian planting and indigenous habitat creation will also reduce existing pressures on freshwater and ecological values. While the Project will intensify land use on the Site, its integrated management measures mean that it is not expected to contribute to further cumulative degradation of the Waikato River system.
Objective H *The recognition that the Waikato River is degraded and should not be required to absorb further degradation as a result of human activities.*	The Project responds by treating and attenuating stormwater before it leaves the Site and by improving the condition and extent of freshwater habitat. Approximately 4,886 m^2 of existing wetland will be enhanced and approximately 6,468 m^2 restored, alongside riparian planting, terrestrial habitat restoration and the progressive removal of grazing from the Site. Although a small 33 m^2 wetland will be removed, the wider programme is expected to improve wetland quality, extent and function.
Objective I *The protection and enhancement of significant sites, fisheries, flora and fauna.*	The Project protects the Site's principal significant ecological features, including the kahikatea remnant, retained wetlands, watercourses and habitat used by long-tailed bats. It also provides for wetland and riparian restoration, terrestrial planting, fish passage and the recreation of open-water habitat within Stormwater Pond B. Potential effects on bats, birds, lizards and indigenous fish will be managed through the Ecological Management Plan, Lizard Management Plan and associated clearance, relocation, lighting and monitoring requirements. While some habitat modification will occur, including the removal of a small wetland and existing artificial ponds, the ecological

	assessment concludes that the overall restoration programme will improve biodiversity and habitat values across the Site.
Objective J *The recognition that the strategic importance of the Waikato River to New Zealand's social, cultural, environmental and economic wellbeing requires the restoration and protection of the health and wellbeing of the Waikato River.*	The Project recognises the strategic importance of the Waikato River by embedding freshwater protection and restoration into the development rather than treating those matters as secondary mitigation. The proposed stormwater treatment train, wetland enhancement, riparian restoration, indigenous planting and habitat protection will contribute to improved freshwater and ecological outcomes within the Mangapiko, Waipā and Waikato River catchment. These environmental measures sit alongside the Project's regional social and economic benefits, including increased retirement housing and aged-care capacity.
Objective K *The restoration of water quality within the Waikato River so that it is safe for people to swim in and take food from over its entire length.*	The Project cannot, by itself, restore water quality throughout the entire Waikato River. Its relevant contribution is to ensure that runoff and discharges from the Site do not further degrade downstream water quality and, where practicable, improve the quality of water leaving the Site. This will be achieved through raingardens, forebays, constructed wetlands, controlled discharge, erosion and sediment controls, stock exclusion, riparian planting and wetland restoration. The ecological and groundwater assessments also anticipate improved water-quality outcomes relative to the existing pastoral land use.
Objective L *The promotion of improved access to the Waikato River to better enable sporting, recreational, and cultural opportunities.*	The Site is not located beside the Waikato River, and the Project does not provide or restrict direct access to it. The proposed pedestrian network will improve access to wetlands, the watercourse, the kahikatea remnant and other natural areas within the development, but those measures do not relate to improved access to the Waikato River.
Objective M *The application to the above of both maatauranga Maaori and latest available scientific methods.*	Both mātauranga Māori and contemporary scientific methods have informed the Project. Cultural knowledge and values are represented through engagement with mana whenua and the Ngāti Apakura Cultural Values Assessment, including its recommendations concerning wai, wetlands, biodiversity, kaitiakitanga and long-term stewardship. These perspectives sit alongside technical investigations addressing ecology, groundwater, stormwater, flooding, geotechnical conditions and land-use capability. The resulting design combines cultural direction with technical modelling, monitoring, management plans and proposed consent conditions.

National Policy Statement for Urban Development

National Policy Statement for Urban Development – Objectives and Policies Assessment	
Objective or Policy Provision	**Comment**
Objectives	
Objective 1: *New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.*	The Project supports a well-functioning urban environment by responding to identified demand for retirement living and aged care in Te Awamutu. It provides a range of housing and care options that enable an ageing population to remain within their established community and social networks.
Objective 2: *Planning decisions improve housing affordability by supporting competitive land and development markets.*	The Project will introduce substantial additional retirement housing capacity and greater choice in housing typology, tenure and price point. This will increase competition within a retirement living market identified as currently having limited local supply and choice.
Objective 4: *New Zealand's urban environments, including their amenity values, develop and change over time in response to the diverse and changing needs of people, communities, and future generations.*	The Project responds to Te Awamutu's changing demographic needs by providing additional retirement living and aged-care options. While it will change the character and amenity of the Site, this change provides for the evolving needs of the community and future generations.
Objective 5: *Planning decisions relating to urban environments, and FDSs, take into account the principles of the Treaty of Waitangi (Te Tiriti o Waitangi).*	Engagement has been undertaken with Waikato-Tainui and relevant mana whenua groups, with cultural values and recommendations incorporated into the Project through its environmental restoration measures and proposed CEMP.
Objective 8: *New Zealand's urban environments:* *a. support reductions in greenhouse gas emissions; and* *b. are resilient to the current and future effects of climate change.*	The Project incorporates climate-change-adjusted stormwater and flood management and is designed to remain resilient to future climate-related rainfall and flooding. The SAR provides stronger support for the resilience limb of Objective 8 than for the greenhouse-gas reduction aspect.
Policies	
Policy 1: *Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum:* *a. have or enable a variety of homes that:* *i. meet the needs, in terms of type, price, and location, of different households; and*	The Project contributes to a well-functioning urban environment by increasing retirement housing and care choice, providing walking, cycling and public transport connections, and integrating housing with open space and natural areas. Climate resilience is also incorporated into the stormwater and infrastructure design.

ii. enable Māori to express their cultural traditions and norms; and b. have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and c. have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and d. support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and e. support reductions in greenhouse gas emissions; and f. are resilient to the likely current and future effects of climate change.	
Policy 2: *Tier 1, 2, and 3 local authorities, at all times, provide at least sufficient development capacity to meet expected demand for housing and for business land over the short term, medium term, and long term.*	The Project provides significant additional retirement living capacity through approximately 414 units and a 100-bed care facility, responding directly to identified current and future demand within Te Awamutu and the wider region.
Policy 6: *When making planning decisions that affect urban environments, decision-makers have particular regard to the following matters:* a. the planned urban built form anticipated by those RMA planning documents that have given effect to this National Policy Statement b. that the planned urban built form in those RMA planning documents may involve significant changes to an area, and those changes: i. may detract from amenity values appreciated by some people but improve amenity values appreciated by other people, communities, and future generations, including by providing increased and varied housing densities and types; and ii. are not, of themselves, an adverse effect c. the benefits of urban development that are consistent with well-functioning urban environments (as described in Policy 1) d. any relevant contribution that will be made to meeting the requirements of this National Policy Statement to provide or realise development capacity e. the likely current and future effects of climate change.	Although the Project is outside the planned urban growth boundary and will change the Site's existing rural amenity, it provides substantial development capacity and responds to an identified need for retirement housing and care. Its landscape, infrastructure and climate-related effects have also been addressed through the Project design.
Policy 8: *Local authority decisions affecting urban environments are responsive to plan changes that would add significantly to development capacity and contribute to well functioning urban environments, even if the development capacity is:* a. unanticipated by RMA planning documents; or b. out-of-sequence with planned land release.	The Project provides significant additional development capacity despite being outside the growth areas anticipated by the existing planning framework. It responds to an identified demand for retirement living and aged care that the existing Te Awamutu growth cells are not readily able to accommodate.

National Policy Statement for Freshwater Management

National Policy Statement for Freshwater Management – Objective and Policies Assessment	
Objective or Policy Provision	**Comment**
Objective	
Objective 1 *The objective of this National Policy Statement is to ensure that natural and physical resources are managed in a way that prioritises:* *a. first, the health and well-being of water bodies and freshwater ecosystems* *b. second, the health needs of people (such as drinking water)* *c. third, the ability of people and communities to provide for their social, economic, and cultural well-being, now and in the future.*	The Project prioritises freshwater health through the retention and enhancement of wetlands, riparian restoration, stock exclusion and an integrated stormwater treatment system. These measures sit alongside the social and economic benefits of providing retirement living and aged-care accommodation.
Policies	
Policy 1: *Freshwater is managed in a way that gives effect to Te Mana o te Wai.*	The Project gives effect to Te Mana o te Wai through its emphasis on freshwater restoration, improved stormwater management and enhancement of wetland and aquatic habitats.
Policy 2: *Tangata whenua are actively involved in freshwater management (including decision making processes), and Māori freshwater values are identified and provided for.*	Engagement with mana whenua has informed the Project, including through the Ngāti Apakura CVA and its recommendations relating to wai, wetlands, biodiversity and kaitiakitanga. These recommendations are proposed to be implemented through the CEMP condition.
Policy 3: *Freshwater is managed in an integrated way that considers the effects of the use and development of land on a whole-of-catchment basis, including the effects on receiving environments.*	Freshwater has been considered on an integrated catchment basis, including the relationship between land development, stormwater, groundwater, wetlands, the Site's watercourse and the downstream Mangapiko, Waipā and Waikato River systems.
Policy 4: *Freshwater is managed as part of New Zealand's integrated response to climate change.*	Climate-change-adjusted rainfall and flooding have been incorporated into the stormwater and hydraulic assessments, with the system designed to manage future rainfall and flood risk.
Policy 5: *Freshwater is managed (including through a National Objectives Framework) to ensure that the health and well-being of degraded water bodies and freshwater*	The existing wetlands and watercourse have been modified by historic farming activities. The proposed wetland restoration, riparian planting, stock exclusion and stormwater treatment will improve freshwater habitat and ecological values across the Site.

ecosystems is improved, and the health and well-being of all other water bodies and freshwater ecosystems is maintained and (if communities choose) improved.	
Policy 6: *There is no further loss of extent of natural inland wetlands, their values are protected, and their restoration is promoted.*	There is a direct tension with Policy 6 because the Project will remove approximately 33 m² of natural inland wetland. However, approximately 4,886 m² of existing wetland will be enhanced and 6,468 m² restored, resulting in an overall improvement in wetland extent, quality and function. On this basis, when viewed in the direction of the NES-FW, the project is consistent with the policy's overall direction.
Policy 7: *The loss of river extent and values is avoided to the extent practicable.*	The Project retains the existing watercourse and provides approximately 860 m of riparian habitat restoration, while culverts maintain hydraulic connectivity and fish passage through the Site.
Policy 9: *The habitats of indigenous freshwater species are protected.*	Indigenous freshwater habitat will be protected and enhanced through fish management measures, fish passage, wetland and riparian restoration and the creation of replacement aquatic habitat within Stormwater Pond B.
Policy 13: *The condition of water bodies and freshwater ecosystems is systematically monitored over time, and action is taken where freshwater is degraded, and to reverse deteriorating trends.*	The Project includes management and monitoring requirements associated with its ecological restoration and freshwater measures. These provide mechanisms for ensuring the intended freshwater and ecological outcomes are established and maintained.
Policy 15: *Communities are enabled to provide for their social, economic, and cultural wellbeing in a way that is consistent with this National Policy Statement.*	The Project enables substantial social and economic benefits through retirement accommodation and aged-care provision while incorporating measures to protect and improve freshwater values.

National Policy Statement for Highly Productive Land

National Policy Statement for Highly Productive Land – Objective and Policies Assessment	
Objective or Policy Provision	**Comment**
Objective	
Objective *Highly productive land is protected for use in land-based primary production, both now and for future generations*	The Project will result in the permanent conversion of approximately 7.1 ha of highly productive land to retirement village and aged-care development. To that extent, there is an inherent tension with the objective of protecting HPL for land-based primary production both now and for future generations. However, the NPS-HPL expressly provides circumstances in which HPL may be used or developed for other purposes through clause 3.10. The HPL Report concludes that the Site is subject to permanent and long-term constraints that materially limit its productive potential and that no reasonably practicable alternative land-based primary production use would overcome those constraints. The assessment also concludes that the Project satisfies the requirements of clause 3.10, including in relation to productive capacity, fragmentation, reverse sensitivity and the balance of environmental, social, cultural and economic costs and benefits. Accordingly, while the loss of HPL creates tension with the objective when considered in isolation, the Project is **generally consistent** with the objective when read within the wider NPS-HPL framework and the specific pathway provided by clause 3.10
Policies	
Policy 1: *Highly productive land is recognised as a resource with finite characteristics and longterm values for land-based primary production.*	The finite characteristics and long-term productive value of HPL have been expressly recognised through the site-specific soil and land-use capability assessment and the HPL Report. These assessments identify approximately 7.1 ha of HPL within the Site, but also identify that this land occurs in smaller, isolated pockets and is affected by fragmentation, variable topography, drainage characteristics, surrounding development and the Site's proximity to the existing urban edge. The HPL Report has considered a range of alternative productive uses and concludes that these constraints materially limit the ability of the Site to support economically viable primary production over the long term. Accordingly, the Project has appropriately recognised the finite nature and

	productive value of the resource before determining that its development is justified under clause 3.10. On this basis, the Project is consistent with Policy 1.
Policy 2: *The identification and management of highly productive land is undertaken in an integrated way that considers the interactions with freshwater management and urban development.*	The management of HPL has been considered alongside the freshwater, ecological and urban development considerations affecting the Site. The Project will remove HPL from primary production but will also restore and enhance wetlands, provide riparian and terrestrial habitat restoration and establish integrated stormwater management, while delivering retirement living and aged-care development in response to identified demand. The assessment therefore does not consider HPL in isolation, but evaluates its productive value and constraints alongside freshwater management and the wider implications of developing land at the edge of Te Awamutu. This integrated approach is **consistent** with the direction of Policy 2.
Policy 4: *The use of highly productive land for land-based primary production is prioritised and supported.*	There is a clear degree of tension with Policy 4 because the Project does not retain the Site's 7.1 ha of HPL for land-based primary production. However, the significance of that tension is moderated by the findings of the HPL Report, which concludes that the Site is subject to permanent and long-term constraints and that the productive use of the HPL is not economically viable over the relevant 30-year period. A range of potential uses, including dairy support, sheep and beef grazing, arable cropping, intensive vegetable production and kiwifruit, were considered without identifying an economically viable land-based primary production use for the Site. Importantly, clause 3.10 expressly provides a pathway for the development of HPL in these circumstances. While the Project does not directly implement the direction to prioritise HPL for primary production, this tension needs to be considered within the wider NPS-HPL framework and the Project's satisfaction of clause 3.10. As such, when viewed in the that context, the Project is **generally consistent** with the overall direction of the policy.
Policy 7: *The subdivision of highly productive land is avoided, except as provided in this National Policy Statement.*	The subdivision gives effect to the land use consent. As such, the Project's assessment is addressed by Policy 8.
Policy 8: *Highly productive land is protected from inappropriate use and development.*	The Project will permanently develop HPL for a non-primary-production activity, meaning the key question under Policy 8 is whether that development is inappropriate in the context of the NPS-HPL. The clause 3.10 assessment is particularly relevant to this judgement. The HPL Report identifies permanent constraints affecting the Site, concludes that reasonably practicable alternatives would not retain economically viable

	productive capacity, and identifies that the 7.1 ha of HPL occurs as fragmented pockets on the edge of the wider HPL resource. The SAR also records that the loss represents approximately 0.01% of the district's HPL resource and that the Project will not materially fragment or isolate the remaining HPL resource to the west. Against those costs, the clause 3.10 assessment identifies the Project's environmental, social, cultural and economic benefits and concludes that they outweigh the long-term costs associated with the loss of productive land. On that basis, while the Project involves development of HPL, it falls within the circumstances contemplated by clause 3.10 and is not considered inappropriate development for the purposes of Policy 8
Policy 9: *Reverse sensitivity effects are managed so as not to constrain land-based primary production activities on highly productive land.*	The establishment of residential activities adjoining existing rural production creates the potential for reverse sensitivity effects, particularly in relation to the established kiwifruit orchards to the north and south of the Site. These effects have been specifically assessed in the HPL Report. The Project incorporates physical separation, building setbacks, landscape buffers and, at the northern interface, differences in elevation and existing shelterbelt planting. For the southern orchard interface at 420 Greenhill Drive, the Project also proposes a 5 m landscape buffer and a no-complaints mechanism relating to lawful farming activities. The HPL Report concludes that these measures appropriately manage potential reverse sensitivity effects, while the SAR recognises that future residents will be establishing within a rural-fringe environment where a reasonable level of rural activity should be expected. On that basis, the Project is not expected to constrain the continued lawful operation of adjoining primary production activities and is consistent with Policy 9

National Policy Statement for Indigenous Biodiversity

National Policy Statement for Indigenous Biodiversity – Objective and Policies Assessment	
Objective or Policy Provision	**Comment**
Objective	
The objective of this National Policy Statement is: *a. to maintain indigenous biodiversity across Aotearoa New Zealand so that there is at least no overall loss in indigenous biodiversity after the commencement date; and* *b. to achieve this:* *i. through recognising the mana of tangata whenua as kaitiaki of indigenous biodiversity; and* *ii. by recognising people and communities, including landowners, as stewards of indigenous biodiversity; and* *iii. by protecting and restoring indigenous biodiversity as necessary to achieve the overall maintenance of indigenous biodiversity; and* *iv. while providing for the social, economic, and cultural wellbeing of people and communities now and in the future.*	The Project protects the existing SNA and provides substantial wetland, riparian and terrestrial habitat restoration. The EcAR concludes that the proposed management and restoration measures will enhance overall biodiversity values across the Site, while the Project also provides significant social and economic benefits.
Policies	
Policy 1: *Indigenous biodiversity is managed in a way that gives effect to the decision-making principles and takes into account the principles of the Treaty of Waitangi.*	Indigenous biodiversity has been considered through ecological assessment alongside engagement with mana whenua and the cultural values identified through the Ngāti Apakura CVA. The Project provides for protection and enhancement of indigenous biodiversity through its design and management measures.
Policy 2: *Tangata whenua exercise kaitiakitanga for indigenous biodiversity in their rohe, including through:* *a. managing indigenous biodiversity on their land; and* *b. identifying and protecting indigenous species, populations and ecosystems that are taonga; and* ***c.*** *actively participating in other decision-making about indigenous biodiversity.*	Mana whenua have been engaged throughout development of the Project, with the Ngāti Apakura CVA identifying biodiversity protection and kaitiakitanga as important outcomes. Its recommendations are proposed to be implemented through the CEMP.

Policy 3: *A precautionary approach is adopted when considering adverse effects on indigenous biodiversity.*	A precautionary approach is reflected through ecological management measures addressing bats, birds, lizards and indigenous fish, including pre-clearance checks, habitat protection, lighting controls and monitoring requirements.
Policy 4: *Indigenous biodiversity is managed to promote resilience to the effects of climate change.*	The Project will retain and enhance existing ecological features and establish additional wetland, riparian and terrestrial habitat. These measures will strengthen the extent and quality of indigenous habitat across the Site.
Policy 5: *Indigenous biodiversity is managed in an integrated way, within and across administrative boundaries.*	Indigenous biodiversity has been considered as part of the wider Site and catchment environment, including the relationships between wetlands, the watercourse, SNA, fauna habitat, stormwater and surrounding ecological features.
Policy 7: *SNAs are protected by avoiding or managing adverse effects from new subdivision, use and development.*	The Project protects SNA WP312 through a covenant. Further, the Project proposes enhancement planting within and around it. Units will also be located at least 25 m from the SNA, with lighting and ecological management controls applying to surrounding development.
Policy 8: *The importance of maintaining indigenous biodiversity outside SNAs is recognised and provided for.*	Biodiversity outside the SNA is recognised through the retention and enhancement of wetlands and watercourses, habitat restoration and management of fauna throughout the wider Site.
Policy 10: *Activities that contribute to New Zealand's social, economic, cultural, and environmental wellbeing are recognised and provided for as set out in this National Policy Statement.*	The Project provides significant social and economic benefits through retirement living and aged-care provision while also delivering environmental benefits through restoration and enhancement of indigenous biodiversity
Policy 13: *Restoration of indigenous biodiversity is promoted and provided for.*	The Project provides extensive restoration and enhancement, including approximately 6,468 m² of wetland restoration, 6,000 m² of terrestrial habitat restoration and riparian restoration along approximately 860 m of watercourse.
Policy 14: *Increased indigenous vegetation cover is promoted in both urban and nonurban environments.*	Extensive indigenous restoration planting is proposed across wetland, riparian and terrestrial habitat areas, increasing vegetation cover compared with the existing predominantly grazed pasture environment.
Policy 15: *Areas outside SNAs that support specified highly mobile fauna are identified and managed to maintain their populations across their natural range, and information and awareness of highly mobile fauna is improved.*	Long-tailed bats are present across the Site and their habitat has specifically informed the Project design. Habitat enhancement, planting, lighting controls and bat management measures are proposed to maintain and improve habitat values for this highly mobile fauna species.

Policy 17: *There is improved information and regular monitoring of indigenous biodiversity.*	Ecological monitoring and reporting requirements are incorporated into the proposed management framework, including measures relating to fauna and the establishment and maintenance of restoration areas.

National Policy Statement for Natural Hazards

National Policy Statement for Natural Hazards – Objective and Policies Assessment	
Objective or Policy Provision	**Comment**
Objective	
2.1 Objective *(1) Natural hazard risk to people and property associated with subdivision, use and development is managed using a risk-based proportionate approach.*	Natural hazard risks have been specifically assessed through the geotechnical and stormwater investigations, with engineering and management measures incorporated proportionate to the identified risks.
Policies	
Policy 1: *When considering natural hazard risk associated with subdivision, use or development, the risk level must be assessed using the risk matrix.*	The GAR assesses the relevant natural hazards against the NPS-NH risk matrix, including for the low hills and alluvial plain areas of the Site.
Policy 2: *Natural hazard risk associated with subdivision, use and development must be managed using an approach that is proportionate to the level of natural hazard risk.*	The identified geotechnical, liquefaction, settlement, slope and flooding risks are addressed through earthworks, foundation design, drainage and stormwater measures proportionate to the assessed risks.
Policy 3: *Where subdivision, use or development is assessed as having very high natural hazard risk, that risk must be avoided.*	The technical assessments do not identify very high natural hazard risk requiring development to be avoided.
Policy 4: *Where subdivision, use or development, including any associated mitigation measures, will create or increase significant natural hazard risk on other sites, that risk must be avoided or mitigated using an approach that is proportionate to the level of natural hazard risk.*	Hydraulic modelling demonstrates that the proposed stormwater system can manage post-development flows without increasing off-site flood effects, while geotechnical measures address potential effects arising from ground conditions.
Policy 5: *Natural hazard risk assessment and decisions must be based on the best available information and must be made even when that information is uncertain or incomplete.*	Natural hazard risks have been assessed through the GAR, GWR, SMP and supporting infrastructure investigations, which have informed the Project's design and mitigation measures.
Policy 6: *The potential impacts of climate change to at least 100 years into the future must be considered.*	Climate change has been incorporated into the stormwater and flood assessment, including climate-change-adjusted rainfall used in the hydraulic modelling and design of the stormwater system.

Waikato Regional Policy Statement

Waikato Regional Policy Statement – Objectives and Policies Assessment	
Objective or Policy Provision	**Comment**
Integrated Management - Objectives	
IM-O1 – Integrated management *Natural and physical resources are managed in a way that recognises:* 1. *the inter-relationships within and values of water body catchments, riparian areas and wetlands, the coastal environment, the Hauraki Gulf and the Waikato River;* 2. *natural processes that inherently occur without human management or interference;* 3. *the complex interactions between air, water, land and all living things;* 4. *the needs of current and future generations;* 5. *the relationships between environmental, social, economic and cultural wellbeing;* 6. *the need to work with agencies, landowners, resource users and communities; and* 7. *the interrelationship of natural resources with the built environment.*	The Project is an integrated development addressing land use development, freshwater, groundwater, stormwater, flooding, ecology, infrastructure and cultural values. The stormwater framework and SMP is developed at the scale of the catchment and considers the downstream receiving environment through improving the quality from the site. The specialist reports and SAR demonstrate the Project's design and implementation includes ecological restoration, flood management, infrastructure, and cultural outcomes. The Project recognises the environmental and infrastructure systems affected by the Project though undertaking engagement and consultation with Waipa District Council, Waikato Regional Council, the Department of Conservation, NZTA, tangata whenua, adjoining landowners. The SAR and Engagement and Consultation document summarises and contains record of key discussions and inputs provided by the key stakeholders and tangata whenua. The Project is, therefore, **consistent** with the integrated management direction of Objective IM-O1 and Policy IM-P1.
IM-O2 – Resource use and development	The Project creates 414 retirement village units with a 100-bed care facility partly adjoining the urban growth boundary. The EA and EME confirm the Project is meeting an

Recognise and provide for the rule of sustainable resource use and development and its benefits in enabling people and communities to provide for their economic, social and cultural wellbeing, including by maintaining and where appropriate enhancing: 1. *access to natural and physical resources to provide for regionally significant industry and primary production activities that support such industry;* 2. *the life supporting capacity of soils, water and ecosystems to support primary production activities;* 3. *the availability of energy resources for electricity generation and for electricity generation activities to locate where the energy resource exists;* 4. *access to the significant mineral resources of the region; and* 5. *the availability of water for municipal and domestic supply to people and communities.*	identified shortfall in retirement village living and residential care within the primary catchment. The Project has regionally significant economic benefits through the construction and operation of the retirement village, qualitative economic and social benefits through providing an integrated retirement village development, and cultural benefits through providing for enabling tangata whenua participation through the restoration and enhancement proposed through the development. On this basis, the Project is considered **consistent** with Objective IM-O2.
IM-O3 – Decision making *Resource management decision making is holistic and consistent and:* 1. *is aligned across legislation and national and regional strategies;* 2. *takes an integrated approach to managing resources that cross regional and functional boundaries;* 3. *adopts an appropriate planning timeframe;* 4. *adopts a precautionary approach, including the use of adaptive management, where appropriate, towards any proposed activity whose effects may be significant or irreversible but are as yet uncertain, unknown or little understood;* 5. *is transparent;* 6. *has regard to the potential for cumulative effects from activities;* 7. *is based on the best available information, including mātauranga Māori;* 8. *allows for flexible solutions for local variations;* 9. *recognises that time may be needed for change to occur;* 10. *includes working with tangata whenua;* 11. *includes working with key stakeholders;* 12. *considers a mix of methods to achieve objectives; and* 13. *results in solutions which include processes to minimise conflicts.*	The Project has been informed by a substantial body of site-specific technical information, including transport assessment, hydraulic modelling, ecological investigations, geotechnical and hydrogeological assessment, landscape and visual assessment, infrastructure design and the CVA. The Project has also been developed through engagement with WDC, WRC, Waikato Waters, NZTA, tangata whenua and other relevant stakeholders. That engagement has informed the development outcome, infrastructure staging, consent conditions and management plans. Potential cumulative effects have been considered, including catchment-wide stormwater and flooding effects, freshwater effects, infrastructure capacity and the relationship of the Project with existing and planned urban development. Where detailed design or residual uncertainty remains, this is addressed through conditions, monitoring, and management plans. Those matters do not prevent the effects and suitability of the Project being assessed on the information presently available.

	The Project therefore responds appropriately to the holistic, precautionary and evidence-based decision-making direction of Objective IM-O3 and is **consistent** with this objective.
IM-O4 – Health and wellbeing of the Waikato River *The health and wellbeing of the Waikato River is restored and protected, and Te Ture Whaimana o Te Awa o Waikato (the Vision and Strategy of the Waikato River) is achieved.*	The Project site lies within the wider Waipa River catchment and will modify parts of the existing freshwater environment. It nevertheless incorporates a significant programme of stormwater treatment, stream restoration, riparian enhancement, habitat creation and the ability for fish passage. Importantly, the Project does not rely on the existing degraded condition of the Mangapiko tributary and existing farm drainage network as justification for further degradation. Rather, the freshwater and stormwater framework seeks to improve the health, ecological function and resilience of those environments over time. The Project has also been developed through active engagement with mana whenua groups and provides for ongoing mana whenua involvement during the Project's implementation. The Project is therefore considered generally **consistent** with Objective IM-O4 and the direction of Te Ture Whaimana.
IM-O5 – Climate Change *Land use is managed to:* *1. avoid the potential adverse effects of climate change induced weather variability and sea level rise on:* *a. amenity* *b. the built environment, including infrastructure* *c. indigenous biodiversity* *d. natural character* *e. public health and safety and* *f. public access* *2. Support reductions in greenhouse gas emissions within urban environments and ensure urban environments are resilient to the current and future effects of climate change.*	Climate change has been incorporated into the Project's stormwater, flood-management and infrastructure framework. Climate-adjusted rainfall has been adopted for the design and assessment of the stormwater network, attenuation wetlands, overland flow paths and flood-management system. The Project also incorporates restoration of the wetlands, riparian planting and ecological enhancement measures that support the resilience of freshwater and biodiversity values. Accordingly, the Project is **consistent** with Objective IM-O5.

IM-06 – Ecosystem services *The range of ecosystem services associated with natural resources are recognised and maintained or enhanced to enable their ongoing contribution to regional wellbeing.*	The Project recognises and incorporates a range of ecosystem services associated with the Site's freshwater environments, wetlands, indigenous vegetation, and open space networks. In particular, the proposed restoration and enhancement of stream corridors, wetlands, and indigenous habitat will support water quality improvement, flood attenuation, ecological connectivity, habitat provision, and cultural values. While development will modify the existing environment, the integrated stormwater and ecological enhancement measures are expected to maintain and enhance the contribution of these ecosystem services to the wellbeing of the wider area. Accordingly, the Project is considered generally **consistent** with Objective IM-06.
IM-O7 – Relationship of tangata whenua with the environment *The relationship of tangata whenua with the environment is recognised and provided for, including:* *1. The use and enjoyment of natural and physical resources in accordance with tikanga Māori, including mātauranga Māori; and* *2. The role on tangata whenua as kaitiaki*	The Project has been informed by ongoing engagement with mana whenua and the findings of the CVA. The Project incorporates measures to protect and enhance freshwater, wetland, ecological, and cultural values, including restoration and enhancement of aquatic habitats, protection of significant ecological features, and the application of water-sensitive design principles. The proposed Mana Whenua Management Plan, secured through conditions and ongoing mana whenua involvement in implementation will support the exercise of kaitiakitanga throughout the life of the development. As such, the Project is considered generally **consistent** with Objective IM-O7.
IM-O8 – Sustainable and efficient use of resources *Use and development of natural and physical resources, excluding minerals, occurs in a way and at a rate that is sustainable, and where the use and development of all natural and physical resources is efficient and minimises the generation of waste.*	The Project provides for the efficient use and development of land and infrastructure through an integrated retirement village that can be serviced efficiently and supported by upgraded infrastructure networks. The proposal also incorporates ecological restoration, wetland enhancement, and water-sensitive stormwater design, contributing to the sustainable management of natural and physical resources. As such, the Project is generally **consistent** with Objective IM-O8.
IM-O9 – Amenity *1. The qualities and characteristics of areas and features, valued for their contribution to amenity, are maintained or enhanced; and* *2. Where intensification occurs in urban environment, built development results in attractive, healthy, safe and high-quality urban form which response positively*	The Project will alter the existing rural character and amenity of the Site through the introduction of a retirement village. However, it has been designed as a logical extension of the existing urban area and comprises a comprehensively planned development incorporating extensive landscaping, open space, wetland and ecological enhancement, internal connectivity, and high-quality residential and care environments. The proposal

to local context whilst recognising that amenity values change over time in response to the changing needs of people, communities and future generations, and such changes are not, of themselves, an adverse effect.	will provide an attractive, safe, and functional environment for future residents while maintaining and enhancing amenity values through its integrated design and landscape framework. While the amenity of the Site will change from its existing rural form, such change is a consequence of planned retirement village is not an unacceptable adverse effect. Accordingly, the Project is considered generally **consistent** with Objective IM-O9.
IM-O10 – Public access *Public access to and along the coastal marine area, lakes and rivers is maintained and enhanced.*	The Project does not affect existing public access to the Waikato River or other major public freshwater environments.
Integrated Management - Policies	
IM-P1 – Integrated approach *An integrated approach to resource management will be adopted that:* *1. recognises the inter-connected nature of natural and physical resources (including spatially and temporally) and the benefits of* *2. maximises the benefits and efficiencies of working together;* *3. recognises the multiple values of natural and physical resources including ecosystem services;* *4. responds to the nature and values of the resource and the diversity of effects (including cumulative effects) that can occur;* *5. maximises opportunities to achieve multiple objectives;* *6. takes a long-term strategic approach which recognises the changing environment and changing resource use pressures and trends;* *7. applies consistent and best practice standards and processes to decision making; and* *8. establishes, where appropriate, a planning framework which sets clear limits and thresholds for resource use.*	As detailed in the assessment against Objective IM-O1 the Project adopts an integrated approach to retirement village development transport, three waters, freshwater, ecology, natural hazards, landscape and cultural values. The development outcome, infrastructure staging, consent conditions and management plans provide a coordinated framework for managing environmental effects while enabling the social and economic benefits of the Project. The Project also provides opportunities for tangata whenua participation, ecological restoration and enhancement, and improved water quality for the downstream catchment. The Project is therefore **consistent** with Policy-P1.
IM-P2 – Collaborative approach *Waikato Regional Council will:* *1. recognise and provide for the unique role that territorial authorities have in the implementation of the provisions of the Waikato Regional Policy Statement; and* *2. encourage collaboration, participation and information sharing between resource management agencies, tangata whenua and relevant stakeholders,*	As detailed, the design of the Project has been development through an extensive engagement and programme as detailed in **Appendix 24 – Record of Engagement**. The Project therefore is **consistent** with the collaborative and coordinated approach sought by Policy IM-P2.

particularly where there are shared or overlapping responsibilities or functions for issues or resources, and including when resources or issues cross boundaries.	
IM-P3 – Tangata whenua *Tangata whenua are provided appropriate opportunities to express, maintain and enhance the relationship with their rohe through resource management and other local authority processes.*	Tangata whenua has been provided, and continue to be provided, with opportunities to participate in the development of the Project. Ngāti Apakura prepared a Cultural Values Assessment and supported the Project in principle, subject to the implementation of measures that enhance their ongoing involvement throughout the development process. While the remaining tangata whenua groups did not provide CVAs engagement will continue beyond lodgement of the application and opportunities remain available for those groups to express and maintain their relationship with the Site and contribute to the Project's ongoing development and implementation. On this basis, the Project is **consistent** with Policy IM-P3.
Land and Freshwater - Objectives	
LF-O1 – Mauri and values of fresh water bodies *Maintain or enhance the mauri and identified values of fresh water bodies including by:* *1. maintaining or enhancing the overall quality of freshwater within the region;* *2. safeguarding ecosystem processes and indigenous species habitats;* *3. safeguarding the outstanding values of identified outstanding freshwater bodies and the significant values of wetlands;* *4. safeguarding and improving the life supporting capacity of freshwater bodies where they have been degraded as a result of human activities, with demonstrable progress made by 2030;* *5. establishing objectives, limits and targets, for freshwater bodies that will determine how they will be managed;* *6. enabling people to provide for their social, economic and cultural wellbeing and for their health and safety;* *7. recognising that there will be variable management responses required for different catchments of the region; and* *8. recognising the interrelationship between land use, water quality and water quantity.*	Freshwater values have been an important consideration in the design of the Project. Existing wetlands, watercourses and the Significant Natural Area have been incorporated into the development framework and will be protected and enhanced through ecological restoration, indigenous planting, wetland enhancement, and long-term management measures. The Project adopts an integrated approach to freshwater and stormwater management using water-sensitive design principles, stormwater treatment devices, attenuation measures, and ecological enhancement initiatives. These measures are intended to protect and improve water quality, manage stormwater effects, and support the ecological functioning of the receiving environment. The Project will result in some modification of the site's existing hydrological regime, including the removal of the artificial pond located in the southern part of the Site. However, those effects are proposed to be appropriately managed through the implementation of the SMP, the provision of Open Water Stormwater Pond B, wetland

	enhancement works, ecological restoration measures, and the protection and enhancement of freshwater values across the Site. Overall, the Project is considered generally **consistent** with Objective LF-O1.
LF-O2 – Allocation and use of fresh water *The allocation and use of fresh water is managed to achieve freshwater objectives (derived from identified values) by:* 1. *avoiding any new over-allocation of ground and surface waters;* 2. *seeking to phase out any existing over-allocation of ground and surface water bodies by 31 December 2030;* 3. *increasing efficiency in the allocation and use of water; and* 4. *recognising the social, economic and cultural benefits of water takes and uses.*	In terms of its operation, the Project will be serviced by reticulated water infrastructure and will not rely on large-scale abstraction of groundwater or freshwater resources. During construction, if a suitable connection to Council's water supply is unavailable, the Project may require groundwater abstraction from the existing bore on site for dust suppression purposes. The GWR confirms that the volume of water required for dust suppression will result in less than minor effects. The Project will provide social and economic benefits through the provision of retirement living and aged-care accommodation, while ensuring the allocation and use of freshwater is appropriately managed through the proposed conditions of consent. Accordingly, the Project is considered generally **consistent** with Objective LF-O2.
LF-O3 – Riparian areas and wetlands *Riparian areas (including coastal dunes) and wetlands are managed to:* 1. *maintain and enhance:* a. *public access; and* b. *amenity values.* 2. *maintain or enhance:* a. *water quality;* b. *indigenous biodiversity;* c. *natural hazard risk reduction;* d. *cultural values;* e. *riparian habitat quality and extent; and* f. *wetland quality and extent.*	The Project includes a comprehensive programme of wetland restoration and enhancement comprising approximately 10,983 m² of restored and enhanced wetland habitat, sexceeding the 33 m² of wetland proposed to be removed. Riparian vegetation will be enhanced along approximately 860 m of watercourses, and approximately 6,000 m² of terrestrial habitat restoration is proposed. The Project also retains and protects the Site's SNA and the key long-tailed bat movement corridor extending to the northern artificial pond, thereby maintaining and enhancing indigenous biodiversity, riparian habitat quality, and wetland extent. In addition, the integrated stormwater management system is designed to improve water quality and appropriately manage on-site and downstream flood risk. The Project has also been developed in consultation with mana whenua and incorporates ecological

	restoration and freshwater management measures that recognise and respond to cultural values associated with the Site. On that basis, the Project is considered **consistent** with Objective LF-O3.
LF-O4 – Values of soil *The soil resource is managed to safeguard its life supporting capacity, for the existing and foreseeable range of uses.*	The Project will involve the modification of existing soils to facilitate development. However, it has been designed to retain and enhance the life-supporting capacity of the soil resource through the establishment of approximately 6,000 m² of terrestrial habitat restoration, extensive wetland and riparian enhancement, and the implementation of erosion, sediment, and stormwater management measures. These measures will support the ongoing ecological functioning of the Site and ensure the soil resource continues to contribute to a range of environmental values and uses. Accordingly, the Project is considered **consistent** with Objective LF-O4.
LF-O5 – High class soils *The value of high class soils for primary production is recognised and high class soils are protected from inappropriate subdivision, use or development.*	The Project will result in the permanent conversion of the site's high-class soils identified as being 5.7 ha (Regional Mapping and HPL Definition) or 7.1 ha (Site-specific Mapping and HPL Definition) of the 25 ha site. Therefore, it does not directly align with the protection direction provided by Objective LF-O5. The tension is informed by the value or the productive characteristics of the high-class soils on the site. Based on the SLUC mapping and the HPL Report, the Site is subject to a range of long-term constraints that limit the productive value of the high class soils. These constraints include the fragmentation of surrounding rural land, the fragmented distribution of high class soils across the Site, variable topography and soil characteristics, proximity to the urban boundary, the market value of the land, and the relatively small scale of the operation. Collectively, these factors significantly constrain the productive potential of the Site and limit its ability to support economically viable primary production activities, even when considering a range of alternative land-use options.

	The Project also responds to a demonstrated demand for retirement village living and aged-care accommodation in a location directly adjoining and opposite land used established residential land and a strategic road network. The tension with Objective LF-O5 is therefore acknowledged and must be considered as part of the overall statutory assessment alongside the productive characteristics of the Site and the strategic, economic and retirement living benefits of the Project.
Land and Freshwater – Policies	
LF-O1 – Mauri and values of fresh water bodies *Maintain or enhance the mauri and identified values of fresh water bodies including by:* 1. *maintaining or enhancing the overall quality of freshwater within the region;* 2. *safeguarding ecosystem processes and indigenous species habitats;* 3. *safeguarding the outstanding values of identified outstanding freshwater bodies and the significant values of wetlands;* 4. *safeguarding and improving the life supporting capacity of freshwater bodies where they have been degraded as a result of human activities, with demonstrable progress made by 2030;* 5. *establishing objectives, limits and targets, for freshwater bodies that will determine how they will be managed;* 6. *enabling people to provide for their social, economic and cultural wellbeing and for their health and safety;* 7. *recognising that there will be variable management responses required for different catchments of the region; and* 8. *recognising the interrelationship between land use, water quality and water quantity.*	Freshwater values have been an important consideration in the design of the Project. Existing wetlands, watercourses and the Significant Natural Area have been incorporated into the development framework and will be protected and enhanced through ecological restoration, indigenous planting, wetland enhancement, and long-term management measures. The Project adopts an integrated approach to freshwater and stormwater management using water-sensitive design principles, stormwater treatment devices, attenuation measures, and ecological enhancement initiatives. These measures are intended to protect and improve water quality, manage stormwater effects, and support the ecological functioning of the receiving environment. The Project will result in some modification of the site's existing hydrological regime, including the removal of the artificial pond located in the southern part of the Site. However, those effects are proposed to be appropriately managed through the implementation of the Stormwater Management Plan, the provision of Open Water Stormwater Pond B, wetland enhancement works, ecological restoration measures, and the protection and enhancement of freshwater values across the Site. Overall, the Project is considered generally **consistent** with Objective LF-O1.
LF-P1 – Approach to identifying fresh water body values and managing fresh water bodies	The Project has been informed by an integrated assessment of freshwater values within the downstream catchment of the site which flows from to the Mangapiko Stream, Waipa River and the Waikato River.

Waikato Regional Council will facilitate a process that will involve regional communities, to identify values and establish subsequent fresh water objectives, limits and targets for fresh water bodies. The value setting process will: *a. provide for variability in catchment management response;* *b. assist in ensuring that adverse effects of activities on the identified values of water bodies are managed in an integrated manner;* *c. determine any outstanding fresh water bodies and significant values of wetlands; and* *d. recognise that where a freshwater body is currently used for the purposes of renewable electricity generation or domestic or municipal supply, those uses are recognised as being values associated with that water body.*	Freshwater values have informed the development outcome, stormwater design, stream restoration, riparian enhancement, flood management and ecological management measures. As such, the Project is **consistent** with the integrated freshwater-management direction reflected in Policy LF-P1.
LF-P3 – All fresh water bodies *Manage the effects of activities to maintain or enhance the identified values of fresh water bodies and coastal water including by:* *1. reducing:* *a. sediment in fresh water bodies and coastal water (including bank instability) that is derived from human based activities;* *b. accelerated sedimentation of estuaries;* *c. microbial and nutrient contamination;* *d. other identified contaminants; and* *2. Where appropriate, protection and enhancement of:* *a. riparian and wetland habitat;* *b. instream habitat diversity;* *c. indigenous biodiversity; and* *3. providing for migratory patterns of indigenous freshwater species up and down rivers and streams and to the coastal marine area where practicable; and* *4. avoiding:* *a. physical modification of fresh water bodies where practicable; and* *b. inappropriate development in flood plains; and* *5. managing:* *a. groundwater and surface water flow/level regimes, including flow regime variability;* *b. linkages between groundwater and surface water; and* *c. pest and weed species where they contribute to fresh water body and coastal water degradation.*	The Project will implement a Construction Management Plan (CMP) that will manage erosion and sediment control during construction and an integrated SMP to manage operational sediment discharges. In addition, the Project undertakes restoration and enhancement of wetlands, terrestrial habitats and the riparian areas within the site. Further, the proposed development wetland enhancement and the creation of involves the removal of Stormwater Pond B (33 m^2) and the artificial pond to the south which provides for Stormwater Pond B as an open water habitat will mitigate the loss of the existing 33 m^2 wetland by increasing the overall extent and quality of wetland habitat on the Site, justifying the physical modification of these freshwater bodies. The GWR confirms the groundwater, and surface water flows within the site will be managed to an acceptable level. On this basis, the Project is **consistent** with Policy LF-P3.

LF-P5 – Waikato River catchment *Recognise Te Ture Whaimana o Te Awa o Waikato – the Vision and Strategy for the Waikato River – as the primary direction-setting document for the Waikato River and develop an integrated, holistic and co-ordinated approach to implementation.*	Te Ture Whaimana is recognised as the primary direction-setting document for the Waikato River catchment. The Project has been developed using an integrated approach to freshwater management that recognises the relationship between the Mangapiko tributary, the Waipā River and the wider Waikato River system. The Project incorporates stormwater treatment, stream restoration, riparian enhancement, habitat creation, fish-passage improvement and ecological restoration intended to improve freshwater outcomes over time. The Project has also been informed by engagement with tangata whenua and the CVA, including consideration of cultural values associated with freshwater and the wider Waikato River catchment. The Project is therefore considered generally **consistent** with Policy LF-P5 and the direction of Te Ture Whaimana.
LF-P11 – High class soils *Avoid a decline in the availability of high class soils for primary production due to inappropriate subdivision, use or development.*	The Project will result in the permanent loss of highly productive land from primary production and, to that extent, will contribute to a decline in the availability of high-class soils. However, the HPL Report identifies that the area of highly productive land affected by the Project represents less than 0.01% of the District's highly productive land resource. As such, while there will be a loss at the site level, the reduction in the availability of high-class soils at the District scale is not considered material. This is supported by the conclusions of the HPL Report that identify the HPL within the site is fragmented and have permanent long-term constrains for commercially viable primary production activities. On this basis, the Project is not considered to result in a material decline in the overall availability of high-class soils for primary production within the District and is therefore generally consistent with the intent of the policy.
Ecosystem and Indigenous Biodiversity - Objectives and Policies	

ECO-O1 – Ecological integrity and indigenous biodiversity *The full range of ecosystem types, their extent and the indigenous biodiversity that those ecosystems can support exist in a healthy and functional state.* ***ECO-P1 – Maintain or enhance indigenous biodiversity*** *Promote positive indigenous biodiversity outcomes to maintain the full range of ecosystem types and maintain or enhance their spatial extent as necessary to achieve healthy ecological functioning of ecosystems, with a particular focus on:* 1. *working towards achieving no net loss of indigenous biodiversity at a regional scale;* 2. *the continued functioning of ecological processes;* 3. *the re-creation and restoration of habitats and connectivity between habitats;* 4. *supporting (buffering and/or linking) ecosystems, habitats and areas identified as significant indigenous vegetation and significant habitats of indigenous fauna;* 5. *providing ecosystem services;* 6. *the health and wellbeing of the Waikato River and its catchment;* 7. *contribution to natural character and amenity values;* 8. *tangata whenua relationships with indigenous biodiversity including their holistic view of ecosystems and the environment;* 9. *managing the density, range and viability of indigenous flora and fauna; and* 10. *the consideration and application of biodiversity offsets.* ***ECO-P2 – Protect significant indigenous vegetation and significant habitats of indigenous fauna*** *Significant indigenous vegetation and the significant habitats of indigenous fauna shall be protected by ensuring the characteristics that contribute to its significance are not adversely affected to the extent that the significance of the vegetation or habitat is reduced.* ***ECO-P3 – Collaborative management*** *Maintaining and enhancing indigenous biodiversity shall be promoted in an integrated and efficient manner including by working collaboratively with landowners, resource managers, tangata whenua and other stakeholders.*	The EAR concludes that the Project will result in an overall positive ecological outcome through a comprehensive package of restoration, enhancement, and mitigation measures. The assessment below demonstrate the Project aligns with Policies P1-P3 and therefore, the Project will support the health and functioning of the Site's ecosystems and is therefore **consistent** with Objective ECO-O1. The EAR confirms the Project incorporates a comprehensive package of restoration, enhancement, and mitigation measures that will result in an overall positive ecological outcome. Collectively, implementing the EMP, LMP, and WMEP will maintain and enhance indigenous biodiversity, support ecological processes and habitat connectivity, increase the extent and quality of indigenous habitats, and provide ecosystem services consistent with Policy ECO-P1. The Project retains the characteristics that contribute to the significance of the Site's Significant Natural Area and significant habitats of indigenous fauna, thereby aligning with Policy ECO-P2. In addition, the ecological restoration and enhancement programme has been informed by engagement with mana whenua and ecological specialists, reflecting the collaborative approach anticipated by Policy ECO-P3.

Energy, infrastructure and transport - Objectives and Policies	
EIT-O1 – Energy *Energy use is managed, and electricity generation and transmission is operated, maintained, developed and upgraded, in a way that:* 1. *increases efficiency;* 2. *recognises any increasing demand for energy;* 3. *seeks opportunities to minimise demand for energy;* 4. *recognises and provides for the national significance of electricity transmission and renewable electricity generation activities;* 5. *recognises and provides for the national, regional and local benefits of electricity transmission and renewable electricity generation;* 6. *reduces reliance on fossil fuels over time;* 7. *addresses adverse effects on natural and physical resources;* 8. *recognises the technical and operational constraints of the electricity transmission network and electricity generation activities; and* 9. *recognises the contribution of existing and future electricity transmission and electricity generation activities to regional and national energy needs and security of supply.* ***EIT-P1 – Significant infrastructure and energy resources*** *Management of the built environment ensures particular regard is given to:* 1. *that the effectiveness and efficiency of existing and planned regionally significant infrastructure is protected;* 2. *the benefits that can be gained from the development and use of regionally significant infrastructure and energy resources, recognising and providing for the particular benefits of renewable electricity generation, electricity transmission, and municipal water supply; and* 3. *the locational and technical practicalities associated with renewable electricity generation and the technical and operational requirements of the electricity transmission network.*	EIT-O1 and Policy EIT-P1 are primarily directed towards energy generation and transmission infrastructure. However, Policy EIT-P1 also seeks to ensure particular regard is given to the effectiveness and efficiency of regionally significant infrastructure, which includes State Highway 3 adjoining the Site. As detailed in the ITA, the Project's traffic demands can be accommodated by the State Highway network and, through the provision of a new roundabout access, will not result in adverse effects that would compromise the effectiveness or efficiency of this regionally significant transport corridor. On this basis, the Project is **consistent** with the direction provided by EIT-O1 and EIT-P1 insofar as those provisions relate to transportation matters.
Hazards and Risks - Objectives and Policies	
HAZ-O1 – Natural hazards *The effects of natural hazards on people, property and the environment are managed by:* 1. *increasing community resilience to hazard risks;*	The assessments below demonstrate the Project is consistent with the HAZ-P1-3 which set specific outcomes for achieving HAZ-O1. On this basis, the Project is consistent with

2. *reducing the risks from hazards to acceptable or tolerable levels; and* 3. *enabling the effective and efficient response and recovery from natural hazard events.* ***HAZ-P1 – Natural hazard risk management approach*** *Natural hazard risks are managed using an integrated and holistic approach that:* 1. *ensures the risk from natural hazards does not exceed an acceptable level;* 2. *protects health and safety;* 3. *avoids the creation of new intolerable risk;* 4. *Reduces intolerable risk to tolerable or acceptable levels;* 5. *enhances community resilience;* 6. *is aligned with civil defence approaches;* 7. *prefers the use of natural features over man-made structures as defences against natural hazards;* 8. *recognises natural systems and takes a 'whole of system' approach; and* 9. *seeks to use the best available information/best practice.* ***HAZ-P2 – Manage activities to reduce the risks from natural hazards*** *Subdivision, use and development are managed to reduce the risks from natural hazards to an acceptable or tolerable level including by:* 1. *ensuring risk is assessed for proposed activities on land subject to natural hazards;* 2. *reducing the risks associated with existing use and development where these risks are intolerable;* 3. *avoiding intolerable risk in any new use or development in areas subject to natural hazards;* 4. *minimising any increase in vulnerability due to residual risk;* 5. *avoiding the need or demand for new structural protection works; and* 6. *discouraging hard protection structures and promoting the use of alternatives to them, including natural defences in the coastal environment.* ***HAZ-P3 – High impact, low probability natural hazard events*** *The risks associated with high impact, low probability natural hazard events such as tsunami, volcanic eruptions, earthquakes and debris flows are considered, having particular regard to:* 1. *personal health and safety;*	the direction set by the objectives and policies as it relates to the Project and not community-wide natural hazard planning. The Project adopts an integrated and risk-based approach to natural hazard management, informed by site-specific geotechnical, hydrogeological and hydraulic investigations. Geotechnical risks associated with liquefaction, lateral spreading, settlement, bearing capacity and slope instability are proposed to be managed through earthworks design, ground improvement where required, retaining and slope-stability measures, settlement monitoring and future site-specific building and foundation design. Flood risk is addressed through attenuation wetlands, conveyance channels, overland flowpaths, finished platform levels and reconstruction of the drainage corridor. Flood-management framework also incorporates climate-change-adjusted rainfall and considers effects on adjoining and downstream land. The Project therefore manages natural hazard risk using an integrated and proportionate approach based on the best available information and is considered **consistent** with Policy HAZ-P1. In terms of HAZ-P2, the Project has been designed to avoid creating intolerable natural hazard risk and to reduce identified risks to acceptable or tolerable levels. The GAR identifies the residual geotechnical risk following implementation of the proposed engineering controls. Where further site-specific design is required, including for retaining walls, slope stability, settlement and future building foundations, the available investigations establish that feasible engineering solutions are available. Flood modelling has informed the development outcome so that future development platforms are located outside the principal flood-conveyance areas and flood flows are managed through the public road, stormwater and existing drainage corridors. The

2. *damage and/or disruption to essential community services;* 3. *the ability of a community to respond and recover; and* 4. *civil defence readiness, response and recovery planning.*	proposed stormwater system attenuates post-development peak flows and is designed to avoid a material increase in flood risk on adjoining or downstream properties. The Project is therefore considered **consistent** with Policy HAZ-P2. In terms of HAZ-P3 recognises it is practically impossible to completely avoid or even manage the risks associated with high impact, low probability natural hazard events such as tsunami, volcanic eruptions, earthquakes and debris flows. As such, the policy is primarily directed at civil defence planning and awareness of hazards through non-statutory measures.
Historical and Cultural Values - Objectives and Policies	
HCV-O1 – Historic and cultural heritage *Sites, structures, landscapes, areas or places of historic and cultural heritage are protected, maintained or enhanced in order to retain the identity and integrity of the Waikato region's and New Zealand's history and culture.* ***HCV-P1 – Managing historic and cultural heritage*** *Provide for the collaborative, consistent and integrated management of historic and cultural heritage resources. Improve understanding, information sharing and cooperative planning to manage or protect heritage resources across the region.* ***HCV-P2 – Relationship of Māori to taonga*** *Recognise and provide for the relationship of tangata whenua and their culture and traditions with their ancestral lands, water, sites, wāhi tapu and other taonga.* ***HCV-P3 – Effects of development on historic and cultural heritage*** *Manage subdivision, use and development to give recognition to historic and cultural heritage and to integrate it with development where appropriate.*	The Project has been developed in a manner that recognises the relationship of tangata whenua with their ancestral lands, water, and other taonga, consistent with Policy HCV-P2. The engagement undertaken with mana whenua and technical specialists also reflects the collaborative and integrated approach anticipated by Policy HCV-P1. Furthermore, the Project has been designed to integrate these cultural and environmental values into the development through the retention and enhancement of significant ecological and freshwater features, consistent with Policy HCV-P3. Accordingly, the Project is considered **consistent** with Objective HCV-O1 and Policies HCV-P1 to HCV-P3.
Natural Character - Objectives and Policies	
NATC-O1 – Natural character	NATC-O1 takes an effects-based approach to ensure natural character is protected. Section 6. of the SAR concludes the effects on the natural character of wetlands and the existing watercourses are less than minor and therefore acceptable.

The natural character of the coastal environment, wetlands, and lakes and rivers and their margins are protected from the adverse effects of inappropriate subdivision, use and development. ***NATC-P1 – Preserve natural character*** *Ensure that activities within the coastal environment, wetlands, and lakes and rivers and their margins are appropriate in relation to the level of natural character and:* 1. *where natural character is pristine or outstanding, activities should avoid adverse effects on natural character;* 2. *where natural elements/influences are dominant, activities should avoid significant adverse effects and avoid, remedy or mitigate other adverse effects on natural character;* 3. *where man-made elements/influences are dominant, it may be appropriate that activities result in further adverse effects on natural character, though opportunities to remedy or mitigate adverse effects should still be considered;* 4. *promote the enhancement, restoration, and rehabilitation of the natural character of the coastal environment, wetlands and lakes and rivers and their margins; and* 5. *regard is given to the functional necessity of activities being located in or near the coastal environment, wetlands, lakes, or rivers and their margins where no reasonably practicable alternative locations exist.*	This is in the context that these areas are highly modified and human influenced. The restoration and enhancement programme for the wetlands and riparian areas results in a net positive effect. On this basis, the Project is **consistent** with the direction provided by NATC-O1 and NATC-P1.
Urban Form and Development	
UFD-O1 – Built environment *Development of the built environment (including transport and other infrastructure) and associated land use occurs in an integrated, sustainable and planned manner which enables positive environmental, social, cultural and economic outcomes, including by:* 1. *promoting positive indigenous biodiversity outcomes;* 2. *preserving and protecting natural character, and protecting outstanding natural features and landscapes from inappropriate subdivision, use, and development;* 3. *integrating land use and infrastructure planning, including by ensuring that development of the built environment does not compromise the safe, efficient and effective operation of infrastructure corridors;*	The Project meets an unmet demand for retirement village living and residential care within Te Awamutu. The Project has been comprehensively masterplanned and is supported by an integrated and staged infrastructure framework addressing transport, stormwater, water supply, wastewater and utilities. Infrastructure delivery is linked to development staging and capacity. The development outcome also integrates freshwater restoration, ecological enhancement, landscape and open-space outcomes, natural-hazard management and tangata whenua values. Further, the Project is contributes to a well-functioning urban environment through improving housing choice, quality and affordability for elderly people within the primary catchment, provides development

4. *integrating land use and water planning, including to ensure that sufficient water is available to support future planned growth;* 5. *recognising and protecting the value and long-term benefits of regionally significant infrastructure;* 6. *protecting access to identified significant mineral resources;* 7. *minimising land use conflicts, including minimising potential for reverse sensitivity;* 8. *anticipating and responding to changing land use pressures outside the Waikato region which may impact on the built environment within the region;* 9. *providing for the development, operation, maintenance and upgrading of new and existing electricity transmission, distribution and renewable electricity generation activities including small and community scale generation;* 10. *promoting a viable and vibrant central business district in Hamilton city, with a supporting network of sub-regional and town centres;* 11. *providing for a range of commercial development to support the social and economic wellbeing of the region; and* 12. *strategically planning for growth and development to create responsive and well-functioning urban environments, that:* a. *support reductions in greenhouse gas emissions and are resilient to the current and future effects of climate change;* b. *improve housing choice, quality, and affordability;* c. *enable a variety of homes that enable Māori to express their cultural traditions and norms;* d. *ensure sufficient development capacity, supported by integrated infrastructure provision, including additional infrastructure for community, and identified housing and business needs in the short, medium and long term;* e. *improves connectivity within urban areas, particularly by active transport and public transport;* f. *take into account the values and aspirations of hapū and iwi for urban development.* ***UFD-P1 – Planned and co-ordinated subdivision, use and development*** *Subdivision, use and development of the built environment, including transport, occurs in a planned and co-ordinated manner which:* 1. *has regard to the principles in APP11;*	capacity to meet the unmet need for retirement village and residential care facilities, provides multi-modal (bus, vehicle, cycle, and pedestrian) that improve the connectivity to Te Awamutu and the wider region while considering the values of hapu and iwi through engagement and implementation of cultural recommendations. The Project is a strategically located and integrated development that is **consistent** with Objective UFD-O1. The development outcome reflects the relevant APP11 principles, including coordinated infrastructure provision, management of natural hazards, enhancement of indigenous biodiversity and freshwater values, recognition of tangata whenua values, climate resilience and management of interfaces with surrounding land. The Project is therefore considered **consistent** with Policy UFD-P1. The Project is supported by an integrated and staged servicing framework addressing transport, stormwater, water supply, wastewater and utilities. The technical assessments establish that the development is serviceable, with infrastructure delivery linked to development staging, network capacity and identified infrastructure triggers. The Project has also been developed through coordinated engagement with WDC, WRC, DOC and NZTA to address interfaces with existing and planned infrastructure. That engagement has informed the transport connections, three-waters servicing strategy, infrastructure staging and proposed conditions. Development is therefore coordinated with the infrastructure necessary to service it, while maintaining the operational effectiveness of existing and planned infrastructure. The Project is considered **consistent** with Policy UFD-P2. Regarding Policy UFD-P11, the Project is located north of the urban growth boundary and is not identified for residential or retirement village development within the Future Proof land use pattern. As such, the Project is not directly consistent with the mapped land-use pattern anticipated by Policy UFD-P11.

2. *recognises and addresses potential cumulative effects of subdivision, use and development;* 3. *is based on sufficient information to allow assessment of the potential long-term effects of subdivision, use and development; and* 4. *has regard to the existing and planned built environment.* ***UFD-P2 – Co-ordinating growth and infrastructure*** *Management of the built environment ensures:* 1. *the nature, timing and sequencing of new development is co-ordinated with the development, funding, implementation and operation of transport and other infrastructure, including additional infrastructure in order to:* a. *optimise the efficient and affordable provision of both the development and the infrastructure;* b. *maintain or enhance the operational effectiveness, viability and safety of existing and planned infrastructure;* c. *protect investment in existing infrastructure; and* d. *ensure new development does not occur until provision for appropriate infrastructure necessary to service the development is in place;* 2. *the spatial pattern of land use development, as it is likely to develop over at least a 30-year period, is understood sufficiently to inform reviews of the Regional Land Transport Plan. As a minimum, this will require the development and maintenance of growth strategies where strong population growth is anticipated or as required for tier 3 local authorities as set out in UFD-P18 and its associated methods;* 3. *the efficient and effective functioning of infrastructure, including transport corridors, is maintained, and the ability to maintain and upgrade that infrastructure is retained; and* 4. *a co-ordinated and integrated approach across regional and district boundaries and between agencies; and* 5. *that where new infrastructure is provided by the private sector, it does not compromise the function of existing, or the planned provision of, infrastructure provided by central, regional and local government agencies.* ***UFD-P11 – Adopting Future Proof land use pattern*** *Within the Future Proof area:*	However, the broader strategic context provided by Objective UFD-O1 is also relevant. The Site is suitable for development, particularly when considered in the context of the limited availability of greenfield land within the existing growth cell network. In addition to the size and configuration of the Site, part of the Site adjoins the urban growth boundary, can be serviced by Council infrastructure, and is well positioned to access a range of transport modes. The EA and EME confirm that the Project responds to a genuine demand for retirement village living and residential care facilities within this part of the region, where retirement village supply is concentrated in Cambridge and Tamahere and generally provided at higher price points. The WRPS and Future Proof framework contemplate the coordinated consideration of alternative or unanticipated urban development where the relevant strategic, infrastructure, and environmental considerations are appropriately addressed. In that context, the Project responds positively to the broader direction for coordinated and infrastructure-supported growth. This assessment recognises that there is a tension between the mapped Future Proof land-use pattern and the Project. However, that tension must be considered alongside the Project's strategic location, integration with existing and planned infrastructure, and contribution towards meeting demand for retirement village living and residential care accommodation. Accordingly, the Project is considered to respond generally to the strategic direction underlying Policy UFD-P11 and the broader direction provided by UFD-O1, while not directly implementing the mapped Future Proof land-use pattern.

1. *new urban development shall occur within the Urban and Village Enablement Areas indicated on Map 43 and outlined in Table 341;* 2. *new residential (including rural-residential) development shall be managed in accordance with the timing indicated on Map 43 or in accordance with the timing provided for within an operative Future Development Strategy for the Future Proof sub-region in accordance with the National Policy Statement on Urban Development 2020);* 3. *new residential (including rural-residential) development and sensitive activities shall not be located in a strategic industrial node on land either zoned for industrial uses, or deferred industrial uses or identified as a future industrial growth area;* 4. *new industrial development should predominantly be located in the strategic industrial nodes in Table 34 (APP12) and Map 43 and in accordance with the indicative timings in that table except as set out in clause (8) below;* 5. *other industrial development should only occur within the Urban Enablement Areas indicated on Map 43, unless there is a need for the industry to locate in the rural area in close proximity to the primary product source. Industrial development in urban areas other than the strategic industrial nodes indicated by Table 34 (APP12) and Map 43 shall be provided for as appropriate in district plans;* 6. *new industrial development outside the strategic industrial nodes or outside the allocation limits set out in Table 34 and Map 43 shall not be of a scale or location where the development undermines the role of any strategic industrial node as set out in Table 34 and Map 43;* 7. *new industrial development outside the strategic industrial nodes must avoid, remedy or mitigate adverse effects on the transport system, and on other infrastructure;* 8. *where alternative urban land release patterns are promoted, either out-of-sequence or unanticipated on Map 43 or in Table 34, including proposals outside of the urban or village enablement areas indicated on Map 43, through district plan and development area processes, justification shall be provided to demonstrate consistency with the principles of the Future Proof land use pattern and particular regard shall be had to the proposed development capacity only where the local authority determines that the urban development proposal is significant, by assessing the proposal for consistency with the*	

operative Future Development Strategy for the Future Proof sub-region and responsive planning criteria in APP13; and 9. *where land is required for activities that require direct access to Hamilton Airport runways and where these activities cannot be accommodated within the industrial land allocation in Table 34, such activities may be provided for within other land adjacent to the runways, providing adverse effects on the transport network and other infrastructure are avoided, remedied or mitigated.*	
Relevant Appendices	
General development principles *The general development principles for new development are:* a. *support existing urban areas in preference to creating new ones;* b. *occur in a manner that provides clear delineation between urban areas and rural areas;* c. *make use of opportunities for urban intensification and redevelopment, particularly within urban centres and along future rapid transit routes, to minimise the need for urban development in greenfield areas;* d. *not compromise the safe, efficient and effective operation and use of existing and planned infrastructure, including transport infrastructure, and should allow for future infrastructure needs, including maintenance and upgrading, where these can be anticipated;* e. *connect well with existing and planned development and infrastructure;* f. *identify water requirements necessary to support development and ensure the availability of the volumes required;* g. *be planned and designed to achieve the efficient use of water;* h. *be directed away from identified significant mineral resources and their access routes, natural hazard areas, energy and transmission corridors, locations identified as likely renewable energy generation sites and their associated energy resources, regionally significant industry, highly productive land, and primary production activities on highly productive land except in accordance with the National Policy Statement for Highly Productive Land 2022;* i. *promote compact urban form, design and location to:* i. *minimise energy and carbon use;* ii. *minimise the need for private motor vehicle use;*	The SAR and supporting technical assessments confirm the Project has been developed in a manner that is generally consistent with the General Development Principles and, where relevant, the principles for rural-residential development. While the Project is not a rural-residential development, the Site is located within a peri-urban area in the Rural Zone and therefore the underlying principles remain relevant to an extent. The Project represents a logical extension of the existing urban environment into a peri-urban area, with established residential development located immediately to the southwest and on the opposite side of State Highway 3. Although the Project will extend beyond the identified Future Proof urban growth boundary and result in the loss of highly productive land, it comprises an integrated retirement village that requires a greenfield site of sufficient size, configuration, topography, and availability to accommodate the full range of retirement living and care facilities. The GCA confirms that sites with these characteristics are not readily available within the existing urban area. Through its design and the proposed infrastructure upgrades, the Project provides strong multi-modal connections to Te Awamutu and the wider transport network, while maintaining the safe and efficient operation of existing infrastructure. The development is supported by a comprehensive and staged servicing strategy addressing transport, stormwater, water supply, wastewater, and utilities. It also incorporates significant freshwater restoration, ecological enhancement, landscape treatment, open-space provision, natural hazard management, and recognition of tangata whenua values.

iii. *maximise opportunities to support and take advantage of public transport in particular by encouraging employment activities in locations that are or can in the future be served efficiently by public transport;* iv. *encourage walking, cycling and multi-modal transport connections; and* v. *maximise opportunities for people to live, work and play within their local area;* *j. maintain or enhance landscape values and provide for the protection of historic and cultural heritage;* *k. promote positive indigenous biodiversity outcomes and protect significant indigenous vegetation and significant habitats of indigenous fauna. Development which can enhance ecological integrity, such as by improving the maintenance, enhancement or development of ecological corridors, should be encouraged;* *l. maintain and enhance public access to and along the coastal marine area, lakes, and rivers;* *m. avoid as far as practicable adverse effects on natural hydrological characteristics and processes (including aquifer recharge and flooding patterns), soil stability, water quality and aquatic ecosystems including through methods such as low impact urban design and development (LIUDD);* *n. adopt sustainable design technologies, such as the incorporation of energy-efficient (including passive solar) design, low-energy street lighting, rain gardens, renewable energy technologies, rainwater harvesting and grey water recycling techniques where appropriate;* *o. not result in incompatible adjacent land uses (including those that may result in reverse sensitivity effects), such as industry, rural activities and existing or planned infrastructure;* *p. be appropriate with respect to current and projected future effects of climate change and be designed to allow adaptation to these changes and to support reductions in greenhouse gas emissions within urban environments;* *q. consider effects on the unique tangata whenua relationships, values, aspirations, roles and responsibilities with respect to an area. Where appropriate, opportunities to visually recognise tangata whenua connections within an area should be considered;*	The Project promotes positive indigenous biodiversity outcomes, enhances ecosystem services, supports the Vision and Strategy for the Waikato River, and includes measures to avoid, remedy, or mitigate effects on hydrology, water quality, and ecological values. Furthermore, reverse sensitivity effects on surrounding rural activities are appropriately managed through setbacks, landscaping, design measures, and legal mechanisms. The principles specific to rural-residential development are of limited direct relevance; however, the Project achieves a consolidated development form, avoids ribbon development, can be fully serviced by reticulated infrastructure, integrates with the existing urban area, and provides substantial ecological and freshwater enhancement outcomes. Accordingly, the Project is considered generally **consistent** with the relevant General Development Principles in APP11.

r. *support the Vision and Strategy for the Waikato River in the Waikato River catchment;* s. *encourage waste minimisation and efficient use of resources (such as through resource-efficient design and construction methods); and* t. *recognise and maintain or enhance ecosystem services.* ***Principles specific to rural-residential development*** *As well as being subject to the general development principles, principles for new rural-residential development are:* a. *be more strongly controlled where demand is high;* b. *not conflict with foreseeable long-term needs for expansion of existing urban centres;* c. *avoid open landscapes largely free of urban and rural-residential development;* d. *avoid ribbon development and, where practicable, the need for additional access points and upgrades, along significant transport corridors and other arterial routes;* e. *recognise the advantages of reducing fuel consumption by locating near employment centres or near current or likely future public transport routes;* f. *minimise visual effects and effects on rural character such as through locating development within appropriate topography and through landscaping;* g. *be capable of being serviced by onsite water and wastewater services unless services are to be reticulated; and* h. *be recognised as a potential method for protecting sensitive areas such as small water bodies, gully-systems and areas of indigenous biodiversity.*	
APP13 – Responsive Planning Criteria – Out-of-sequence and Unanticipated Developments (Future Proof local authorities)	Future Proof has developed two sets of criteria within APP13 to assist local authorities when considering district plan or development area plan proposals that are either out-of-sequence or unanticipated by the Future Proof settlement pattern. Development proposals are only considered "significant" where they meet the significance criteria contained in APP13, and particular regard is given to the proposed development capacity only where a proposal is determined to be significant. While APP13 is directed towards plan-making processes and therefore does not directly apply to resource consent applications, it remains a useful framework for understanding how Future Proof anticipates alternative or unanticipated urban development should be assessed. As the Project represents an unanticipated form of urban development, these considerations

	provide useful guidance when assessing the extent to which the Project aligns with the broader strategic intent of the Future Proof framework.
Criteria A *a. That the development would add significantly to meeting a demonstrated need or shortfall for housing or business floor space, as identified in a Housing and Business Development Capacity Assessment or in council monitoring.*	**Generally met.** The EME confirms that the Project responds to a demonstrated shortfall in residential care facilities and, more broadly, retirement village living within the primary Te Awamutu catchment. The Waipā Housing Capacity Assessment is directed towards housing supply and capacity and does not specifically assess demand for, or capacity within, the retirement village sector. In the absence of that information, the EME provides an appropriate evidence base for assessing the demonstrated need for retirement village and residential care accommodation, despite not constituting a Housing and Business Development Capacity Assessment. Accordingly, the EME is considered a relevant source of evidence for establishing the demand addressed by the Project and how the Project meets that unmet demand.
b. That the development contributes to a well-functioning urban environment. Proposals are considered to contribute to a well-functioning urban environment if they: ***i.*** *have or enable a variety of homes that: meet the needs, in terms of type, price, and location, of different households; and/or enable Māori to express their cultural traditions and norms; and/or have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and* *ii. support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets.*	**Met**. The EA and EME confirm that the Project contributes to a well-functioning urban environment by providing a range of retirement living options and a positive effect on competitive land markets. Further, the Project will also contribute to the diversity of retirement stock available within the region by providing retirement living opportunities outside of areas such as Cambridge where supply is concentrated and at higher price points. This is further supported through a range of typologies, tenure options, and price points that respond to the varying needs of future residents. Through its staged delivery, the Project will provide additional retirement village and residential care capacity within the primary Te Awamutu catchment, helping address a demonstrated shortfall in retirement accommodation and care facilities. In terms of land markets, the EA concludes that the Project will strengthen competition in the local retirement living market by introducing a substantial and differentiated supply of retirement village and residential care accommodation. Through increasing

	housing choice, expanding deliverable capacity, and introducing an additional operator into the market, the Project will improve market responsiveness and support the competitive operation of land and development markets.
c. That the development is consistent with the Future Proof Strategy guiding principles, and growth management directives (as set out in Sections B2, B3, B5, B6, B7, B8, B9, B10 and B11 of the strategy).	**Generally met**. The Project is not identified within the mapped Future Proof urban land-use pattern and therefore does not directly implement that pattern. However, it responds positively to the broader strategic direction of the Future Proof framework through its location adjacent to the existing urban area, integrated and staged infrastructure delivery, provision of multi-modal transport connections, freshwater restoration and ecological enhancement, and recognition of tangata whenua values through engagement and the implementation of cultural recommendations.
d. That the development has good accessibility for all people between housing, jobs, educational facilities, community services, natural spaces, and open spaces, including by way of public or active transport.	**Met.** The Project has good accessibility to housing, community services, open space, and transport networks. The retirement village incorporates an internal neighbourhood centre, communal facilities, and an extensive open-space network, enabling many day-to-day needs to be met on site. The Project also provides multi-modal transport connections, including pedestrian, cycle, vehicle, and public transport access, connecting residents to Te Awamutu's employment, commercial, community, health, and recreational facilities.
e. In cases where development is being brought forward, whether it can be demonstrated that there is commitment to and capacity available for delivering the development within the advanced timeframe.	**Met**. The Project is being advanced through a substantive Fast-track application and is supported by a comprehensive suite of technical assessments, a detailed master plan, infrastructure design, staging controls, management plans, and proposed conditions. The integrated and staged infrastructure framework identifies the transport, stormwater, water supply, wastewater, and utility services required to support each stage of development and provides a clear pathway for implementation.
f. In cases where the development is proposing to replace a planned land use with an unanticipated land us, whether it can be demonstrated that the proposal will not result in a shortfall in residential, commercial or industrial land, with robust data and evidence underpinning this analysis.	**Not directly met**. The Site is currently zoned General Rural and is not identified within the Future Proof framework for residential, commercial, or industrial urban development. Accordingly, the Project does not displace any planned urban development capacity. However, the Project will result in the permanent conversion of rural production land, including areas

	of high class and highly productive land. These matters are separately assessed against the relevant Waikato Regional Policy Statement and NPS-HPL provisions.
g. That the development protects and provides for human health.	**Met**. Potential effects relevant to human health have been assessed as acceptable through the SAR and technical assessments.
h. That the development would contribute to the affordable housing stock within the sub-region, with robust data and evidence underpinning this analysis.	**Met.** The EME identifies the relative affluence of households within the Te Awamutu catchment and compares the anticipated price points of the proposed units with existing retirement village offerings in Cambridge. On that basis, the EME concludes that the Project will provide a more affordable retirement living option that is accessible to the local market.
i. That the development does not compromise the efficiency, affordability or benefits of existing and/or proposed infrastructure, including additional infrastructure, in the sub-region.	**Met.** The ITA and IR reports identify subject to the implementation of key upgrades undertaken at the Applicant's expense, the Project does not compromise the efficiency, affordability of existing or planned infrastructure.
j. That the development can be serviced without undermining committed infrastructure investments made by network utility operators, local authorities or central government (including NZ Transport Agency). Development must be shown to be adequately serviced without undermining committed infrastructure investments made by network utility operators, local authorities or central government to support other growth areas.	**Met.** The assessment under (i) is applicable.
k. That the development demonstrates efficient use of local authority and central government financial resources, including prudent local authority debt management. This includes demonstration of the extent to which cost neutrality for public finances can be achieved.	**Generally met, subject to final funding arrangements.** The Project is privately initiated, and the infrastructure required to support the development is proposed to be delivered through the Project and associated infrastructure and funding arrangements. The application includes a comprehensive suite of technical assessments, infrastructure designs, staging controls, management plans, and proposed conditions that identify the upgrades and servicing requirements necessary to support each stage of development.
l. The compatibility of any proposed land use with adjacent land uses including planned land uses.	**Generally met.** Part of the Project immediately adjoins the established residential area to the south west. The site's interfaces with adjoining rural land are managed through landscape

	buffers, stormwater and ecological corridors, setbacks, and controls to mitigate any potential reverse sensitivity effects to an acceptable level.
m. That the development would contribute to mode-shift that supports the medium and long-term transport vision for the sub-region being the creation of a rapid and frequent multi-modal transport network and active mode network.	**Met.** The Project incorporates a multi-modal transport network that provides for vehicle, pedestrian, cycle, and public transport connections. The ITA confirms that the Site will be well connected to Te Awamutu through walking and cycling routes, bus services, and the wider road network, enabling access to community facilities, services, employment opportunities, and open spaces.
n. That the development would support reductions in greenhouse gas emissions and would be resilient to the likely current and future effects of climate change, with robust evidence underpinning this assessment.	**Generally met.** The Project incorporates climate-change allowances into the design of the stormwater management system, including attenuation and treatment devices, overland flow paths, flood management measures, and wetland restoration. The Project also provides for multi-modal transport connections, including pedestrian, cycle, vehicle, and bus access, to support connectivity with Te Awamutu and reduce reliance on private vehicle travel.
o. That the development provides for the values that make the area wāhi toitū and can avoid or mitigate any adverse effects arising in respect of those values as a result of the proposed development.	**Not applicable.** No part of the site has been mapped as waahi toituu, this criterion is not directly applicable.
p. During a review of the Future Proof strategy (including the development of a Future Development Strategy under the National Policy Statement on Urban Development 2020 and its subsequent 3-yearly review), or a comprehensive district plan review, consideration may be given to urban development on areas identified as wāhi toitū. A strong precautionary approach will be taken such that if the land is not needed to fill an identified shortfall of development capacity in the short-medium term, it should not be considered for urban development. Preference will be given to urban development proposals which are not located on areas identified as wāhi toitū.	**Not applicable.** No part of the site has been mapped as waahi toituu, this criterion is not directly applicable.
q. That a precautionary approach be taken when considering development on areas identified as wāhi toiora, such that if the land is not needed in the short-medium term it should not be considered for urban development.	**Not applicable.** No part of the site has been mapped as waahi toituu, this criterion is not directly applicable.
Criteria B	**Met.**

a. *That the development demonstrates that it would not affect the feasibility, affordability and deliverability of planned growth within urban enablement areas and/or village enablement areas over the short, medium and long term. In the interest of clarity, proposals in areas currently identified for development beyond long term on Map 43 and which are proposed to be brought forward into an earlier timeframe must demonstrate that they do not affect the feasibility, affordability and deliverability of planned growth in the earlier time periods.*	The Project introduces approximately 414 retirement units and a 100-bed care facility. While the Project is located outside the Future Proof urban enablement areas, the EA does not indicate that it would affect the feasibility, affordability, or deliverability of planned growth within those areas. Rather, the EA concludes that additional and deliverable capacity provided by willing and capable developers improves market outcomes by increasing competition and housing choice, regardless of whether existing growth areas contain sufficient theoretical capacity. The EA further notes that none of the identified growth cells specifically provides for the scale and mix of retirement village and residential care accommodation proposed by the Project. Accordingly, the Project is not expected to result in any effects on the feasibility, affordability, or deliverability of planned growth.
b. *That the development demonstrates that value capture can be implemented and that cost neutrality for public finance can be achieved.*	**Generally met.** The Project is privately initiated and the infrastructure required to service the development will be delivered through the Project and associated funding and servicing arrangements. The application is supported by a comprehensive suite of technical assessments that identify the transport, stormwater, water supply, wastewater, and utility infrastructure required to support each stage of development. Infrastructure delivery is linked to development staging, network capacity, and identified servicing triggers.
c. *That the proposed development would not adversely affect the function and vitality of existing rural settlements and/or urban areas.*	**Met.** The EA also concludes that the Project will support the vitality of Te Awamutu by introducing additional residents, employment opportunities, and spending within the local economy. While the development includes an on-site neighbourhood centre and communal facilities, the EME notes that most resident, visitor, and staff expenditure is expected to continue to support existing businesses and services within Te Awamutu.
d. *That the development would address an identified housing type/tenure/price point need.*	**Met.** The EA and EME conclude that the Project directly addresses that a retirement living and residential shortfall through the provision of approximately 414 retirement living units and a 100-bed care facility.

	Further, the EME concludes that the Project will provide a differentiated retirement living offering within the Te Awamutu catchment through a range of housing typologies, tenure arrangements, and price points that are not currently available in the local market and region.

Waikato Regional Plan

Waikato Regional Plan – Objectives and Policies Assessment	
Objective or Policy Provision	**Comment**
Water Module: National direction in accordance with the National Policy Statement for Freshwater Management 2020	
Objective 3.A.1: Fish Passage The passage of fish is maintained, or is improved, by instream structures, except where it is desirable to prevent the passage of some fish species in order to protect desired fish species, their life stages, or their habitats. **Policy 3.A.2: Natural inland wetlands** a. The loss of extent of natural inland wetlands is avoided, their values are protected, and their restoration is promoted, except where: i. the loss of extent or values arises from any of the following: the customary harvest of food or resources undertaken in accordance with tikanga Māori ii. wetland maintenance, restoration, or biosecurity (as defined in the National Policy Statement for Freshwater Management) iii. scientific research iv. the sustainable harvest of sphagnum moss v. the construction or maintenance of wetland utility structures (as defined in the Resource Management (National Environmental Standards for Freshwater) Regulations 2020) vi. the maintenance or operation of specified infrastructure, or other infrastructure (as defined in the Resource Management (National Environmental Standards for Freshwater) Regulations 2020 vii. natural hazard works (as defined in the Resource Management (National Environmental Standards for Freshwater) Regulations 2020); or b. the regional council is satisfied that:	The IR and SMP confirm the replacement culverts in the bed of the water course will maintain and improve fish passage. As such, the Project is **consistent** with the direction provided by Objective 3.A.1. Policy 3A.2 relates to the loss of natural inland wetlands. While none of the criteria in 3A.2 are directly applicable to the Project, (c) is the most relevant. The Project contributes to a well-functioning urban environment through the provision of retirement village living and residential care accommodation in response to a demonstrated and growing shortfall within the Te Awamutu catchment. The Site contains 12 natural inland wetlands. The Project will result in the removal of the smallest wetland (33 m²) to enable the construction of Stormwater Pond B, which forms a functionally necessary component of the integrated stormwater management system and contributes to the broader ecological enhancement of the Site. The location of Stormwater Pond B has been informed by the physical constraints and servicing requirements of the Site, and the extent of wetland loss has been minimised through the design process. The effects of this loss have informed the restoration and enhancement measures that will be implemented through the Wetland Management and Enhancement programme. The Project also includes approximately 10,983 m² of wetland restoration and enhancement. Overall, the EAR confirms the Project adequately address the effects associated with the loss of the wetland. Accordingly, the Project demonstrates that the wetland loss is associated with urban development that contributes to a well-functioning urban environment, provides significant district and regional benefits, and applies the effects management hierarchy through avoidance, minimisation, restoration, enhancement, and ongoing management measures. However, the Project does not occur on land identified for urban development in an operative district plan and the Site remains zoned General Rural. As such, criteria (3) and (4) are not met.

i. the activity is necessary for the purpose of the construction or upgrade of specified infrastructure; and ii. the specified infrastructure will provide significant national or regional benefits; and iii. there is a functional need for the specified infrastructure in that location; and iv. the effects of the activity are managed through applying the effects management hierarchy; or c. the regional council is satisfied that: i. the activity is necessary for the purpose of urban development that contributes to a well-functioning urban environment (as defined in the National Policy Statement on Urban Development); and ii. the urban development will provide significant national, regional or district benefits; and iii. the activity occurs on land identified for urban development in operative provisions of a regional or district plan; and iv. the activity does not occur on land that is zoned in a district plan as general rural, rural production, or rural lifestyle; and v. there is either no practicable alternative location for the activity within the area of the development, or every other practicable location in the area of the development would have equal or greater adverse effects on a natural inland wetland; and vi. the effects of the activity will be managed through applying the effects management hierarchy; or d. the regional council is satisfied that: i. the activity is necessary for the purpose of quarrying activities; and ii. the extraction of the aggregate will provide significant national or regional benefits; and iii. there is a functional need or operational need for the activity to be done in that location; and iv. the effects of the activity will be managed through applying the effects management hierarchy; or e. the regional council is satisfied that:	However, as demonstrated above the proposed mitigation measures ensure inconsistency with this policy does not result in an unacceptable adverse effect.

i. the activity is necessary for the purpose of the extraction of minerals and ancillary activities; and ii. the extraction of the mineral will provide significant national or regional benefits; and iii. there is a functional need or operational need for the activity to be done in that location; and iv. the effects of the activity will be managed through applying the effects management hierarchy; or f. the regional council is satisfied that: i. the activity is necessary for the purpose of constructing or operating a new or existing landfill or cleanfill area; and ii. the landfill or cleanfill area: (A) will provide significant national or regional benefits; or (B) is required to support urban development as referred to in paragraph (c); or (C) is required to support the extraction of aggregates as referred to in paragraph (d); or (D) is required to support the extraction of minerals as referred to in paragraph (e); and i. there is either no practicable alternative location in the region, or every other practicable alternative location in the region would have equal or greater adverse effects on a natural inland wetland; and ii. the effects of the activity will be managed through applying the effects management hierarchy.	
Water Module: 3.1 Water Resources	
3.1.2 Objective *The management of water bodies in a way which ensures:* *a. that people are able to take and use water for their social, economic and cultural wellbeing* *b. net improvement of water quality across the Region* *c. the avoidance of significant adverse effects on aquatic ecosystems*	The Project provides for the social and economic wellbeing of the community through the delivery of retirement village living and residential care accommodation while ensuring water-related effects are appropriately managed The Project also provides for a substantial increase in the extent and quality of wetland habitat through approximately 10,983 m² of wetland restoration and enhancement, together with extensive riparian restoration and ecological enhancement works. The restoration programme is

d. the characteristics of flow regimes are enhanced where practicable and justified by the ecological benefits *e. the range of uses of water reliant on the characteristics of flow regimes are maintained or enhanced* *f. the range of reasonably foreseeable uses of ground water and surface water are protected* *g. inefficient use of the available ground surface water resources is minimised* *h. an increase in the extent and quality of the Region's wetlands* *i. that significant adverse effects on the relationship tangata whenua as Kaitiaki have with water and their identified taonga such as waahi tapu, and native flora and fauna that have customary and traditional uses in or on the margins of water bodies, are remedied or mitigated* *j. the cumulative adverse effects on the relationship tangata whenua as Kaitiaki have with water their identified taonga such as waahi tapu, and native flora and fauna that have customary and traditional uses that are in or on the margins of water bodies are remedied or mitigated* *k. the management of non-point source discharges of nutrients, faecal coliforms and sediment to levels that are consistent with the identified purpose and values for which the water body is being managed* *l. the natural character of the coastal environment, wetlands and lakes and rivers and their margins (including caves), is preserved and protected from inappropriate use and development* *m. ground water quality is maintained or enhanced and ground water takes managed to ensure sustainable yield* *n. shallow ground water takes do not adversely affect values for which any potentially affected surface water body is managed* *o. concentrations of contaminants leaching from land use activities and non-point source discharges to shallow ground water and surface waters do not reach levels that present significant risks to human health or aquatic ecosystems* *p. that the positive effects of water resource use activities and associated existing lawfully established infrastructure are recognised, whilst avoiding, remedying or mitigating adverse effects on the environment.* *q. Refer to Objective 3.A.1.*	intended to improve wetland function, biodiversity values, riparian habitat quality, and water quality outcomes across the Site The groundwater assessment concludes that groundwater resources will continue to be available for existing and reasonably foreseeable uses and that the Project will not materially alter groundwater flows or affect neighbouring groundwater users. The assessment also concludes that the land-use change and introduction of stormwater wetlands is expected to reduce nutrient inputs to groundwater and downstream receiving environments over time relative to the existing rural baseline. Together with the proposed ecological restoration, fish passage provisions, freshwater enhancement measures, and ongoing engagement with tangata whenua, the Project aligns with the objective's direction to improve water quality, enhance wetland extent and quality, protect freshwater values, provide for community wellbeing, and recognise the relationship of tangata whenua with water. Therefore, the Project is considered generally **consistent** with the direction provided by Objective 3.1.2 and the relevant policies.

Policy 3.2.3

Policy 1: Management of Water Bodies

Manage all water bodies to enable a range of water use activities, whilst ensuring that a net improvement in water quality across the Region is achieved over time through:

a. *Classifying and mapping water bodies based on the characteristics for which they are valued and implementing the classification through a mixture of regulatory and non-regulatory methods.*
b. *Maintaining overall water quality in areas where it is high, and in other water bodies, avoiding, remedying or mitigating cumulative degradation of water quality from the effects of resource use activities.*
c. *Enhancing the quality of degraded waterbodies.*
d. *Providing for the mitigation and remediation of adverse effects in accordance with Section 1.3.3 of the Waikato Regional Policy Statement.*
e. *Recognising the positive benefits to people and communities arising from use or development of water resources and by taking account of existing uses of water and the associated lawfully established infrastructure.*

Policy 2: Managing Degraded Water Bodies

Enhance the quality of degraded water through improved management of activities that affect water bodies so that::

a. *For activities controlled by rules in the Plan:*
    i. *discharges to water will not further degrade water quality with respect to those parameters of the relevant class(es) for that water body that are not currently met*
    ii. *land-based treatment systems will be promoted where soil type and drainage will allow, and where adverse effects are less than the adverse effects of direct discharges into water*
    iii. *water allocation takes into account the additional adverse effect of reduced flow in degraded waters on aquatic ecosystems and human uses and values.*
b. *For activities covered by non-regulatory methods in the Plan, promote:*
    i. *land management methods that reduce non-point source discharges*

ii. riparian management that mitigates the effect of non-point source discharges on water bodies. ***Policy 3: Natural Character*** *Recognise, and where relevant provide for, the following characteristics when considering the preservation of the natural character of lakes and rivers and their margins and the protection of them from inappropriate use and development:* *a. Diversity and composition of aquatic and riparian habitat.* *b. Topography and physical composition of river and lake beds and the course of the river.* *c. The natural flow characteristics and hydraulic processes (such as sediment transport) of rivers and streams or the pattern and range of water level fluctuations that occur naturally in rivers and lakes.* *d. Any significant natural features of the lakes and rivers and their margins.* ***Policy 4: Waikato Region Surface Water Class*** *Enable the use of all surface water bodies in the Region, provided that:* *a. Any significant adverse effects on existing aquatic ecosystems are avoided, remedied or mitigated.* *b. Intake structures are designed to minimise fish entrapment.* *c. Any conspicuous change in visual colour or clarity is avoided, remedied or mitigated.* *d. The water body is not tainted or contaminated to the extent that it is unpalatable or unsuitable for consumption by humans after treatment (equivalent to coagulation, filtration and disinfection).* *e. The water body is not tainted or contaminated to the extent that it is unsuitable for irrigation or stock watering.*	
Water Module: 3.3 Water Takes	
3.3.2 Objective a. Giving effect to the overarching purpose of the Vision and Strategy to restore and protect the health and wellbeing of the Waikato River for present and future generations.	The Project requires temporary groundwater and or surface water dewatering associated with the constriction the Project. The construction activities include, the stormwater wetlands, wastewater infrastructure, earthworks, retaining walls, building platforms and abstraction for dust suppression.

b. The availability of water to meet the existing and the reasonably justified and foreseeable future domestic or municipal supply requirements of individuals and communities and the reasonable needs for an individual's animal drinking water requirements. c. The recognition of the significant community benefits that derive from domestic or municipal supply takes. d. The efficient allocation and the efficient use of water. e. No further allocation of water that exceeds the primary allocation in Table 3-5 that reduces the generation of electricity from renewable energy sources. f. The recognition that existing water takes contribute to social and economic wellbeing and in some cases significant investment relies on the continuation of those takes, including rural-based activities such as agriculture, perishable food processing and industry. g. The continued availability of water for cooling of the Huntly Power Station. h. Sufficient water is retained instream to safeguard the life supporting capacity of freshwater, including its ecosystem processes and indigenous species and their associated ecosystems. i. That decisions regarding the allocation and use of water take account of the need to avoid the further degradation of water quality, having regard to the contaminant assimilative capacity of water bodies. j. Subject to Objectives a) to h) above, the availability of water to meet other future social, economic and cultural needs of individuals and communities (including rural-based activities such as agriculture, perishable food processing and industry). k. Refer to Objective 3.A.1. **Policy 4: Establish Sustainable Yields from Groundwater** Establish, set and review sustainable yields from groundwater resources which are to be used when assessing authorised water takes and resource consent applications from aquifers while having particular regard to the following matters: a. Giving effect to the overarching purpose of the Vision and Strategy to restore and protect the health and wellbeing of the Waikato River for present and future generations.	The GWR confirms the temporary and localised nature of the take, together with the proposed management framework, is intended to ensure that groundwater dewatering does not result in effects on resource availability or connected freshwater values. The Applicant seeks flexibility to undertake groundwater, or surface takes for the purpose of construction dewatering. The proposed takes are classified in accordance with Policy 9 and Policy 10. Based on the above, the Project is **consistent** with the direction provided by Objective 3.3.2 and the relevant policies.

b. The recognition of the relationship between tangata whenua with groundwater resources and providing for tangata whenua input in determining their values and interests, and reviewing the sustainable yields for those groundwater resources. c. The protection of groundwater resource from salt intrusion d. The need to ensure that any groundwater discharges into surface waters are not reduced such that there is a resultant significant adverse effect on in-stream uses and values (including wetlands and karst systems) and on other allocated use e. The need to ensure groundwater depletion or dewatering of aquifers does not result in significant adverse effects on resource availability f. The maintenance of groundwater quality in accordance with the policies in Chapter 3.2 of this Plan g. The benefits derived from the take and consumptive use of groundwater for people's social, economic and cultural wellbeing h. The loss of benefits derived from the generation of electricity that can result from groundwater takes above Karapiro i. The benefits to be derived from the efficient take and use of groundwater for reasonably foreseeable future consumptive uses, and in particular for domestic or municipal supply and the reasonable needs for an individual's animals drinking water j. The maintenance of security of existing, efficient take and use of water and the associated lawfully established infrastructure k. Maintenance of tangata whenua uses and values l. The effects of climate change on groundwater resources m. The avoidance of a reduction in recharge groundwater flows to Geothermal Systems. **Policy 9: How Surface Water Takes for Domestic or Municipal Supply Will Be Classified** The Waikato Regional Council will manage water allocation in catchments to ensure the availability of water to meet the existing and reasonably justified and foreseeable domestic or municipal supply requirements of individuals and communities by:	

a. Classifying applications for takes for domestic or municipal supply to replace resource consents as controlled activities provided that:
    i. At the time of application the take was an authorised water take; and
    ii. There is no increase in the nature, rate and volume of the take from that previously authorised; and
    iii. A water management plan which meets the requirements of Method 8.1.2.2 has been provided.
b. Classifying as a controlled activity applications for takes not previously authorised for domestic or municipal supply when the net take, assessed in combination with all other existing authorised water takes within the same catchment, is for a rate less than or equal to 70 percent of the primary allocable flow identified in Table 3-5.
c. Classifying as a restricted discretionary activity applications for takes not previously authorised for domestic or municipal supply when the net take, assessed in combination with all other existing authorised water takes within the same catchment, is for a rate exceeding 70 percent and up to and including 100 percent of the primary allocable flow identified in Table 3-5.
d. Classifying as a discretionary activity applications for takes not previously authorised for domestic or municipal supply which exceed 100 percent of the primary allocable flow identified in Table 3-5 or exceed 100% of the combined primary and secondary allocable flows identified in Table 3-5.
e. Classifying all applications for takes for domestic or municipal supply as a non-complying activity where a water management plan which meets the requirements of Method 8.1.2.2 has not been provided.

Policy 10: How Groundwater Takes will be Classified

The Waikato Regional Council shall manage the taking of groundwater resources in a manner that meets the criteria for establishing Sustainable Yields from groundwater resources listed in Policy 4 by:

a. Classifying takes as being authorised without the need for resource consent if such takes:

i. re allowed by s14(3)(b) RMA purposes, except as restricted in part c) of this policy and in any associated rules, or ii. Do not exceed 15 cubic metres per day except as provided for in part d) of this policy and in any associated rules, or iii. Are temporary takes up to 150 cubic metres per day except as provided for in part d) of this policy and in any associated rules; or iv. Are takes for well and aquifer testing up to 2500 cubic metres per day and a pumping duration of less than three days b. Classifying as a controlled activity any take existing at 15 October 2008 that was for the purposes of milk cooling or dairy shed wash down provided the effects of the take are avoided, remedied or mitigated. c. Classifying as a non-qualifying s14(3)(b) take and a discretionary activity any take which was not existing prior to 15 October 2008 and would otherwise be allowed under s14(3)(b) of the RMA except that when assessed in combination with all other existing authorised water takes within the same aquifer it exceeds the Sustainable Yield in Table 3-6 d. Classifying as a discretionary activity any supplementary take or temporary take which might otherwise be a permitted activity when the take, assessed in combination with all other existing authorised water takes within the same aquifer, is for a rate greater than 100 percent of the Sustainable Yield identified in Table 3-6. e. Using Management Levels to indicate when there is increasing demand from an aquifer. f. Classifying as a discretionary activity all applications for domestic or municipal supply takes for groundwater where a water management plan which meets the requirements of Method 8.1.2.2 has been provided. g. Classifying all other applications for takes of groundwater in the following manner: i. As a discretionary activity, or ii. As a non-complying activity if a relevant Sustainable Yield is provided in Table 3-6 and the rate of take in combination with all other existing authorised water takes within the same aquifer is greater than the relevant Sustainable Yield value.	

h. Classifying all new and existing resource consent holders a priority level(s) for the whole or part of the consent to apply when water shortage restrictions occur. i. Notwithstanding Policies a) to h), assessing the nature of hydraulic connection (if any) between groundwater takes and surface water bodies and, if there is such a connection as defined by Policy 12w), having regard to relevant parts of Policy 11 and Policy 12 when making decisions on groundwater takes. j. Including Sustainable Yields by way of a Plan Change when sufficient information is available and when needed to address significant adverse effects of groundwater takes. k. Classifying all applications for groundwater takes for domestic or municipal supply as a non-complying activity where a water management plan which meets the requirements of Method 8.1.2.2 has not been provided.	
Water Module: 3.5 Discharges	
3.5.2 Objective Discharges of contaminants to water undertaken in a manner that: a. does not have adverse effects that are inconsistent with the water management objectives in Section 3.1.2 b. does not have adverse effects that are inconsistent with the discharges onto or into land objectives in Section 5.2.2 **c.** Ensures that decisions regarding the discharge of contaminants to water do not reduce the contaminant assimilative capacity of the water body to the extent that allocable flows as provided for in Chapter 3.3 are unable to be utilised for out of stream uses.	The Project is demonstrated to be consistent with the direction provided in 3.1.2, 5.2.2, and 3.3. Based on this and the consistency with the relevant policies identified below, the Project is **consistent** with the direction provided by 3.5.2.
Policy 3: Alternatives to Direct Discharge to Water Land-based treatment systems will be promoted where soil type and drainage will allow and where adverse effects are minor or are less than those from a direct discharge to water. If the economic burden of adopting land treatment is unacceptable, provision will be made for a phased introduction of land treatment over an agreed period of time.	The operational stormwater discharges have been assessed through the SWMP and hydraulic modelling and will be managed through a comprehensive treatment, attenuation and conveyance system. The proposed stormwater system is intended to avoid effects on receiving-water quality, flooding, erosion and downstream siltation. Post-development peak flows are attenuated through constructed stormwater wetlands and associated storage, while conveyance channels, overland flow paths and the reconstructed water course for and open water pond for safe conveyance of larger events. Therefore, the Project is consistent with Policy 3.

Policy 5: Ground Water Minimise the adverse effects of discharges onto or into land on ground water quality by ensuring that they: a. do not compromise existing or reasonably foreseeable uses of ground water b. avoid adverse effects on surface water bodies that are inconsistent with the policies in Section 3.2.3 of this Plan as far as practicable and otherwise, remedy or mitigate those effects **c.** are not inconsistent with the policies in Section 3.8.3 that manage the effects of drilling and discharges associated with drilling on ground water quality.	The groundwater assessment also concludes that groundwater resources will remain available for existing and reasonably foreseeable uses and that the Project is not expected to materially affect neighbouring groundwater users. Reticulated water and wastewater services will be provided to the Site, and any temporary groundwater abstraction for construction purposes is assessed as having less than minor implications for surrounding groundwater users. As such, the Project is **consistent** with Policy 5.
Policy 6: Tangata Whenua Uses and Values Ensure that the relationship of tangata whenua as Kaitiaki with water is recognised and provided for to avoid significant adverse effects and remedy or mitigate cumulative adverse effects on: a. the mauri of water b. waahi tapu sites c. other identified taonga.	The relationship of tangata whenua with freshwater has been recognised through engagement undertaken with mana whenua and the preparation of a Cultural Values Assessment (CVA) by Ngāti Apakura. The CVA identifies cultural values associated with the Site's wetlands, watercourses, and the wider freshwater environment. These values have informed the design of the Project, including the stormwater management system, wetland restoration programme, stream and riparian enhancement measures, and broader ecological framework. The Project also provides for ongoing tangata whenua involvement through the implementation of cultural and environmental management measures, including opportunities for input into restoration, enhancement, and environmental management activities. In this way, the Project recognises the role of tangata whenua as kaitiaki and incorporates measures intended to uphold and enhance the relationship between tangata whenua and freshwater resources. Accordingly, the Project is considered generally **consistent** with Policy 6.
Policy 7: Stormwater Discharges Encourage at-source management and treatment of stormwater discharges to reduce water quality and water quantity effects of discharges on receiving waters.	The Project adopts an at-source and treatment-train approach to stormwater management through a combination of raingardens, conveyance systems, and stormwater wetlands prior to discharge. The system also addresses stormwater quantity through attenuation storage, dedicated conveyance corridors and overland flow paths, with hydraulic modelling used to assess downstream flood and erosion effects. The stormwater framework therefore responds directly to Policy 7 by managing both water-quality and water-quantity effects at source and prior to discharge to receiving waters.
Water Module: 3.6 Damming and Diverting	

3.6.2 Objective Damming and/or diverting of water undertaken in a manner that: a. Does not have adverse effects that are inconsistent with the water management objectives in Section 3.1.2. b. Does not have adverse effects that are inconsistent with the river and lake bed structures objectives in Section 4.2.2. c. Does not obstruct fish passage where it would otherwise occur in the absence of unnatural barriers, so that trout or indigenous fish can complete their lifecycle. d. Results in no increase in the adverse effects of flooding or land instability hazards. e. Results in no loss of existing aquatic habitats as a consequence of channelisation of rivers. f. Increases the use of off-stream dams for water supply purposes as an alternative to dams in perennial streams. g. ensures that decisions regarding the damming and diverting of water take account of the consequent loss of water quality and any associated reduction in contaminant assimilative capacity, minimum flows and allocable flows for out of stream uses as provided by Section 3.3.3 Policy 1 and Table 3-5 of Chapter 3.3. h. Refer to Objective 3.A.1.	Based on the effects assessment in the SAR and assessments of 3.1.2 and 4.2.2, and the policies below, the Project is **consistent** with the direction of Objective 3.6.2.
Policy 2: Damming and Diverting of Water in Perennial Water Bodies Manage the damming and diverting of water in perennial water bodies in a manner that ensures: a. Adverse effects on surface water bodies that are inconsistent with the policies in Section 3.2.3 of this Plan are avoided as far as practicable and otherwise remedied or mitigated. b. Adverse effects of the use, erection, reconstruction, placement, alteration or extension of structures on the beds of lakes or rivers associated with the activity that are inconsistent with the policies in Section 4.2.3 are avoided as far as practicable and otherwise remedied or mitigated. c. That the activity will not obstruct fish passage of trout and/or indigenous fish to complete their lifecycle where it would otherwise occur in the absence of unnatural barriers.	The Project involves the infilling of an artificial pond located within the southern part of the Site. The EAR identifies that any direct effects on fish associated with pond dewatering and infilling will be managed through the EMP, which requires the capture and relocation of indigenous fish prior to pond dewatering and construction works commencing. The EAR also notes that the loss of the artificial pond habitat will be addressed through open-water habitat re-creation within Stormwater Pond B, together with wetland restoration and riparian enhancement across the Site. The groundwater assessment confirms that intercepted groundwater and diverted flows will be returned to the local drainage network and watercourse system, with the proposed groundwater diversions representing a redistribution of flows within the Site catchment rather than a net loss of water resources. The assessment concludes that groundwater effects associated with the Project are minimal and can be appropriately managed.

d. The adverse effects of flooding or erosion on neighbouring properties are avoided, remedied or mitigated. e. Changes in the catchment and sediment transport processes have no significant adverse effects on water quality, habitat and flow regimes in perennial streams. f. Any significant adverse effect on cave systems are avoided or mitigated. g. Any adverse effects on wetlands that are areas of significant indigenous vegetation and/or significant habitats of indigenous fauna are avoided, remedied or mitigated in accordance with Policies 1 and 2 of Chapter 3.7.	On this basis, the permanent pond infilling and groundwater diversion activities associated with the Project are considered **consistent** with Policy 2.
Policy 3: Tangata Whenua* Uses and Values Ensure that the relationship of tangata whenua as Kaitiaki with water is recognised and provided for, to avoid significant adverse effects and remedy or mitigate cumulative adverse effects on: a. the mauri of water, b. waahi tapu sites, c. other identified taonga.	As detailed in Part Four of the SAR, tangata whenua values have been recognised through engagement and the development of the Project.
Water Module: 4.2 River and Lake Bed Structures	
4.2.2 Objective The use, erection, reconstruction, placement, alteration, extension, removal or demolition of structures in, on, under or over the beds of rivers and lakes managed in a manner that: a. produces a net reduction in the adverse effects of the destabilisation of river and lake beds b. does not have adverse effects on water quality, flow regimes, aquatic ecosystems and wetlands that are inconsistent with Water Management Objective 3.1.2 c. does not obstruct fish passage for trout and indigenous fish to complete their life cycle d. preserves the natural character of river and lake beds and their margins and protects them from inappropriate use and development e. there is no increase in the adverse effects of flooding f. provides for navigation of water bodies where appropriate	The IR confirms the proposed culverts and stormwater outlet structures have been designed to maintain and provide for fish passage. On this basis, the installation of the culverts is **consistent** with Objective 4.2.2 and Policy 2, 5, and 6.

g. remedies or mitigates adverse effects of existing structures on the relationship tangata whenua as kaitiaki have with identified taonga, such as waahi tapu, native flora and fauna and access to their customary fisheries h. avoids significant adverse effects of new structures on the relationship tangata whenua as kaitiaki have with identified taonga, such as waahi tapu, native flora and fauna and access to their customary fisheries i. remedies or mitigates cumulative adverse effects on the relationship tangata whenua as kaitiaki have with their identified taonga, such as waahi tapu, native flora and fauna and access to their customary fisheries j. maintains existing legal public access to and along river and lake beds and their margins. k. Refer to Objective 3.A.1.	
Water Module: 5.1 Accelerated Erosion	
5.1.2 Objective **A net reduction of accelerated erosion across the Region so that:** a. soil productivity, versatility and capability is maintained b. there are no adverse effects on water quality, aquatic ecosystems and wetlands that are inconsistent with Water Management Objective 3.1.2 c. there is no increase in the adverse effects of flooding or land instability hazards d. accelerated infilling of lakes, estuaries, rivers, wetlands and cave systems is avoided and the rate of infilling of artificial watercourses, excluding structures designed to trap sediment, is minimised e. significant adverse effects on the relationship tangata whenua as Kaitiaki have with their identified ancestral taonga such as ancestral lands, water and waahi tapu are avoided f. cumulative adverse effects on the relationship tangata whenua as Kaitiaki have with their identified taonga such as ancestral lands, water, waahi tapu are remedied or mitigated. g. significant adverse effects on natural character and ecological values associated with land and the coastal environment including dune systems is avoided	The Project incorporates erosion and sediment control measures, integrated stormwater management, fish management protocols, wetland restoration, riparian enhancement, and ecological restoration measures that are intended to support water quality, aquatic ecosystem health, and the management of freshwater resources to manage the potential effects of earthworks on freshwater. The EWMP and SMP also provide for the management of surface water flows so that soil disturbance does not increase flooding or land instability, or cause damage to adjoining property and infrastructure. Particular attention has been provided where earthworks occur adjacent to streams and drainage channels, as accelerated erosion has the potential to affect water quality, aquatic habitat, bank stability, and downstream sedimentation. Freshwater ecological and cultural values will be recognised and managed through the stream works, fish management measures, erosion and sediment control framework, and mana whenua engagement and management processes. While the Project will involve disturbance of the existing soil resource during construction, the proposed management measures are intended to minimise accelerated erosion and associated off-site effects.

h. there are no adverse effects on air quality that are inconsistent with Air Quality Objective 6.1.2, Objectives 2 and 3 i. damage to property and infrastructure is avoided in particular in High Risk Erosion Areas together with: a. Catchments of estuaries that are areas of significant conservation value on the Coromandel Peninsula b. Karst and cave systems.	Accordingly, the Project is considered generally **consistent** with the direction provided in Objective 5.1.2 and Policy 1.
5.1.3 Policies **Policy 1: Managing Activities that Cause or Have the Potential to Cause Accelerated Erosion and Encouraging Appropriate Land Management Practices** Through permitted activities and non-regulatory methods manage activities that cause or have the potential to cause accelerated erosion, with particular regard to: a. the potential for the activity to adversely affect the purpose of the water management classes as identified in the policies in Section 3.2.2, and the coastal marine area b. the risk of downstream sedimentation leading to accelerated infilling of lakes, estuaries, artificial watercourses, rivers, wetlands and caves c. the erosion potential of soil when it is disturbed or vegetation is cleared d. the potential to increase the adverse effects of flooding e. the potential to adversely affect waahi tapu and archaeological sites or other identified sites of importance to tangata whenua as Kaitiaki f. the potential to adversely affect natural character of the coastal environment and the margins of rivers, lakes and wetlands and areas of significant indigenous vegetation and significant habitats of indigenous fauna28 g. the potential to compromise air quality objectives as identified in Module 6 Air h. the potential to damage property and infrastructure.	
Water Module: 5.1 Accelerated Erosion	
5.2.2 Objective Discharges of wastes and hazardous substances onto or into land undertaken in a manner that:	The IR identifies limited volumes of clean fill and roading materials may be imported where required to facilitate earthworks. Construction will be undertaken in accordance with the relevant EWMP and CMP, which provide for the management of earthworks-related discharges to land.

a. does not contaminate soil to levels that present significant risks to human health or the wider environment b. does not have adverse effects on aquatic habitats, surface water quality or ground water quality that are inconsistent with the Water Management objectives in Section 3.1.2 c. does not have adverse effects related to particulate matter, odour or hazardous substances that are inconsistent with the Air Quality objectives in Section 6.1.2 d. is not inconsistent with the objectives in Section 5.1.2 e. avoids significant adverse effects on the relationship that tangata whenua as Kaitiaki have with their taonga such as ancestral lands, water and waahi tapu **f.** remedies or mitigates cumulative adverse effects on the relationship that tangata whenua as Kaitiaki have with their identified taonga such as ancestral lands, water and waahi tapu.	The EWMP and CMP are designed to minimise sediment generation and migration during construction, and the supporting technical assessments conclude that any resulting discharges to land will have less than minor effects on the receiving environment. Accordingly, the Project is considered **consistent** with the direction of Objective 5.2.2 and Policy 2.
Policy 2: Other Discharges Onto or Into Land Manage discharges of contaminants onto or into land not enabled by Policy 1, in a manner that avoids, where practicable, the following adverse effects and remedies or mitigates those effects that cannot be avoided: a. contamination of soils with hazardous substances or pathogens to levels that present a significant risk to human health or the wider environment b. the discharge is not inconsistent with policies in Section 5.1.3 c. any effect on water quality or aquatic ecosystems that is inconsistent with the purpose of the Water Management Classes as identified by the policies in Section 3.2.3 d. the adverse effects outlined in the policies and rules for air quality in Chapters 6.1 and 6.2, particularly for odour and particulate deposition **e.** damage to archaeological sites, waahi tapu or other identified sites of importance to tangata whenua as Kaitiaki.	

Waipa District Plan – Objectives and Policies

Part C – Section 1 – Strategic Policy Framework

Waipa District Plan Rule Assessment	
Reference	**Comments**
Section 1.3.1 – Implementation of Te Ture Whaimana Objective and Policies	
Objective - Implementation of Te Ture Whaimana ***1.3.1*** *The health and well-being of the Waikato River is restored and protected and Te Ture Whaimana is realised.*	Objective 1.3.1 seeks the restoration and protection of the health and wellbeing of the Waikato River and the realisation of Te Ture Whaimana. As detailed in Part Seven of the SAR and this appendix, the Project restores and protects the health and wellbeing of the Waikato River through improved stormwater treatment and attenuation, wetland restoration and enhancement, riparian restoration and naturalisation of the existing drain, and the inclusion of the cultural recommendations identified by Ngati Apakura.
Policy - Health and well-being of the Waikato and Waipā Rivers ***1.3.1.1*** *a. To achieve the Objectives and Strategies of Te Ture Whaimana within the catchment area identified on the Planning Maps by District Plan provisions relating to:* *b. Building setbacks and earthworks; and* *c. Activities on the surface of water; and* *d. Peat lake catchments; and* *e. Esplanade reserves; and* *f. Landscapes; and* *g. Environmental Benefit Lot provisions for significant natural areas and in some circumstances riparian areas; and* *h. Significant natural areas and indigenous biodiversity generally; and* *i. Intensive farming activities; and* *j. Public access; and* *k. Customary activities; and* *l. Marae and papakāinga; and* *m. Cultural sites and cultural landscapes.*	The Project responds to this policy through a comprehensive package of freshwater, ecological and cultural enhancements. These include the retention and enhancement of twelve natural inland wetlands, restoration of approximately 6,468 m² of new wetland habitat, enhancement of existing wetlands, protection and enhancement of the kahikatea remnant (SNA WP312), naturalisation and riparian planting of the existing farm drain, extensive indigenous planting, stock exclusion from sensitive habitats, and long-term pest and weed management. Collectively, these measures will improve ecological function, biodiversity values and freshwater outcomes compared with the existing pastoral land use The Project's stormwater management framework has also been specifically designed to improve the quality and management of runoff through treatment wetlands, attenuation ponds, bioretention devices and controlled discharge mechanisms. These measures are intended to reduce contaminant and sediment inputs to downstream receiving environments and support the long-term health of the Mangapiko, Waipā and Waikato river systems.

	The Project has been informed by engagement with mana whenua and incorporates ecological restoration, wetland enhancement and long-term environmental stewardship outcomes supported through the Ngāti Apakura Cultural Values Assessment. These outcomes are directly aligned with the aspirations of Te Ture Whaimana and the restoration of the wider catchment. While the Project involves earthworks, infrastructure works and the removal of a small 33 m² natural inland wetland, those effects are addressed through substantial restoration and enhancement measures resulting in a significant net gain in wetland habitat and overall ecological improvement across the site. On this basis, the Project is considered to support the restoration and protection of the health and wellbeing of the Waikato and Waipā River catchment and is therefore **consistent** with Policy 1.3.1.1.
Section 1.3.2 – Settlement Pattern Objective and Policies	
Objective - Settlement pattern ***1.3.2*** *To achieve a consolidated settlement pattern that:* *a. Is focused in and around the existing settlements of the District; and* *b. Supports the continued operation, maintenance, upgrading and development of regionally important sites and regionally significant infrastructure and nationally significant infrastructure and provides for on-going access to mineral resources.*	The Site is not identified for urban growth within either strategy and is located outside the current urban limits of Te Awamutu. Accordingly, the Project is not fully consistent with the specific settlement pattern anticipated by those strategic planning documents. However, the degree of inconsistency is tempered by several site-specific factors. The Site adjoins the existing urban edge of Te Awamutu, is immediately adjacent to established residential development, and can be efficiently serviced by transport and three-waters infrastructure. The Project is not a conventional greenfield residential development but a purpose-built retirement village and aged-care facility responding to an identified shortfall in retirement living and residential care accommodation within Te Awamutu and the wider catchment. The evidence also demonstrates that opportunities to accommodate a retirement village of a similar scale and nature within the existing growth cell framework are constrained. In addition, the Project will deliver substantial social, economic and infrastructure benefits, including expanded retirement living choice, increased residential care

	capacity, upgrades to State Highway 3, and improved walking, cycling and public transport connections. Accordingly, while the Project does not strictly align with the anticipated settlement pattern identified by the Future Proof Growth Strategy and District Growth Strategy, the proposal is adjacent to the existing urban area and responds to a demonstrated and site-specific need. On balance, there is a tension with the policy's settlement pattern direction. However, the Project is focused on existing residential land to the southeast and on the opposite side of State Highway 3 which forms a logical extension of Te Awamutu; and is therefore consistent with the general direction provided by Objective 1.3.2.
Policy - Settlement pattern ***1.3.2.1*** *To ensure that all future development and subdivision in the District contributes towards achieving the anticipated settlement pattern in the Future Proof Growth Strategy and Implementation Plan 2022 and the District Growth Strategy (or any subsequent replacement).*	The Project will provide a compact urban form, efficient infrastructure utilisation, and a significant contribution to housing supply, it is located outside the planned urban growth area and therefore departs from the settlement pattern anticipated through the District's strategic growth management framework. The proposal is better characterised as an unanticipated expansion of the urban area rather than development occurring in the locations identified for growth. Accordingly, the proposal is not fully aligned with the anticipated settlement pattern envisaged by the Future Proof Growth Strategy and District Growth Strategy, although its adjacency to the existing urban area and contribution to housing outcomes provide some support for the policy's broader growth and urban development objectives. However, this is contemplated and addressed in the RPS, where the Project has been demonstrated to met the key requirements for unplanned growth. As such, there is a tension with the Project and Policy 1.3.2.1. However, when viewed in the context of the RPS and the general direction of the WDP, the Project is generally **consistent** with Policy 1.3.2.1. Further, the as identified in **Part Six** of the SAR, the tension with this policy has not resulted in an adverse impact that weighs against the Project.
Policy - Towns ***1.3.2.2***	While the Site is located outside the current urban limits of Te Awamutu and the Project is therefore not fully aligned with the general direction of the policy, the policy expressly

To provide for a consolidated settlement pattern by ensuring that new urban activities are focused within the urban limits of the towns of the District and in particular: *a. Residential developments and subdivision being located within the residential zones of Cambridge, Te Awamutu and Kihikihi, and also above ground floor level within the Commercial Zone; provided that this policy does not limit further development within the Residential Zone at Karāpiro identified on Planning Map 31.* *b. To provide for medium density residential development in relevant residential zones located within the urban environs of Cambridge, Kihikihi and Te Awamutu, except where qualifying matters require modification of the medium density residential standards.* *c. A range of accommodation facilities and services to support the long term accommodation and care requirements for the existing and future elderly population, some of which may need to occur on the periphery of towns outside of the current urban limits as well as within the Residential Zone and Medium Density Residential Zone.* *d. Retail activities, offices and commercial services being located within the Commercial Zones of the District, in a manner that ensures the vitality of the identified pedestrian frontage areas, and maintains Cambridge and Te Awamutu as the primary commercial centres of the District.* *e. To recognise the potential for the following new areas of commercial zoning:* *i. The deferred Commercial Zone in Carter's Flat, Cambridge will be considered for rezoning to once a new Industrial Zone at Hautapu is in place, and the Cambridge bypass is complete; and* *ii. A possible motorway service centre at Hautapu; and* *iii. Local and neighbourhood centres within Deferred Zones and future growth areas.* *f. Industrial Zoned land being maintained for industrial activities and new Industrial Zoned land being provided for within the urban limits at Hautapu (96ha gross), Bond Road (21ha gross) and Paterangi Road (8.5ha).* *g. Developments within the Commercial Zone and Industrial Zone that increase the type and range of employment opportunities within the District and reduce the level of commuting traffic into Hamilton will be supported.*	recognises that a range of accommodation facilities and services required to support the long-term accommodation and care requirements of the existing and future elderly population may need to occur on the periphery of towns outside the current urban limits. The Project directly responds to this aspect of the policy. The Project comprises a comprehensive retirement village and 100-bed care facility designed to address an identified shortfall in retirement living and residential care accommodation within Te Awamutu and the wider catchment. The EME identifies limited retirement living diversity within Te Awamutu, a shortage of contemporary care-integrated retirement accommodation, and increasing demand associated with an ageing population. The Project's location immediately adjoining the existing urban edge of Te Awamutu, adjacent to established residential development, enables the village to function as an extension of the existing settlement while remaining accessible to services, community facilities, public transport, walking and cycling connections. The Project will also provide a range of accommodation typologies, tenure arrangements and care options specifically tailored to the needs of older residents, including independent living units, apartments, serviced apartments and residential care accommodation. While the Project is not located within an identified residential zone or growth cell, Policy 1.3.2.2 expressly contemplates that retirement and aged-care facilities may be located on the periphery of towns (outside of current urban limits) where necessary to meet the long-term needs of the elderly population. Given the nature of the Project, and its location to the existing urban area, and the demonstrated need for retirement living and care accommodation, the Project is **consistent** with the direction and intent of Policy 1.3.2.2 overall.
Policy - Subdivision and development within the Rural Zone 1.3.2.5	Policy 1.3.2.5 seeks to ensure that the natural resources of the Rural Zone, including high class soils continue to be used for rural activities through subclauses a-g.

To ensure that the natural resources of the Rural Zone, including high class soils, continue to be used for rural activities by: *a. Avoiding residential developments and dwellings that are at a density greater than that anticipated by the Rural Zone; and* *b. Avoiding commercial activities and industrial activities, except for rural based industries and nature tourism; and* *c. Ensuring that development and subdivision activities within the Rural Zone do not reduce the area of land available for farming activities in the District; and* *d. Rural based industries not being of a size or location where they undermine the role of a strategic industrial node identified in the Proposed Waikato Regional Policy Statement, or have an adverse effect on the strategic road network or other infrastructure. Rural based industries shall have a functional and compelling needs to locate in the Rural Zone; and* *e. Managing actual or potential adverse effects on the health and well-being of water bodies; and* *f. Avoiding sensitive subdivision, use and development that could result in reverse sensitivity effects on rural activities or existing lawfully established rural based industries.* *g. Managing the effects of development on on-going access to mineral resources.*	The Project is inconsistent with clause (a) as it proposes a comprehensive retirement village and aged care facility at a density substantially greater than anticipated by the Rural Zone. However, the significance of that inconsistency is moderated by the fact that the Project is a specialised form of accommodation responding to the long-term accommodation and care needs of the elderly population, a land use specifically recognised elsewhere within the District Plan as one that may appropriately occur on the periphery of towns outside the current urban limits. The Project is not consistent with clause (c) as it will permanently remove the Site from primary production and therefore reduce the area of land available for farming activities. However, the HPL Assessment concludes the Site contains only 7.1 ha of fragmented highly productive land within a 25.78 ha holding and is subject to permanent and long-term constraints that limit its ability to sustain economically viable land-based primary production. The assessment further concludes these constraints cannot be overcome through reasonably practicable alternatives. In that context, while farming land is lost, the reduction in productive capacity is limited and does not materially undermine the wider rural production resource of the District. In relation to clause (e), the Project incorporates significant freshwater and ecological enhancement measures. These include the retention and enhancement of twelve natural inland wetlands, restoration of wetland habitat, naturalisation and riparian enhancement of the existing watercourse, comprehensive indigenous planting, and a stormwater management system designed to improve water quality and manage runoff. For clause (f), the assessment demonstrates that reverse sensitivity effects on surrounding rural activities can be appropriately managed through setbacks, landscaping, planting buffers, design responses and no-complaints mechanisms. The Project has also been informed by consultation with adjoining kiwifruit operators, and the resulting design is intended to avoid unreasonable constraints on ongoing rural production activities.

	Overall, there is a tension with clauses (a) and (c) because it introduces an urban-scale residential activity within the Rural Zone and permanently removes land from rural production. However, the significance of that tension is reduced by the Site's limited and fragmented highly productive land resource, the identified constraints on long-term productive use, and the Project's role in addressing an identified demand for retirement living and aged care accommodation. The Project is strongly consistent with clauses (e) and (f) through the enhancement of freshwater and ecological values and the management of reverse sensitivity effects. On balance, while the Project is an identified tension with Policy 1.3.2.5, it does not materially undermine the broader outcomes sought by the policy. Further, the as identified in Part Six of the SAR, the tension with this policy has not resulted in an adverse impact that weighs against the Project.
Policy - Regionally significant and nationally significant infrastructure 1.3.2.8 *To ensure that new development does not adversely affect the ongoing operation maintenance, upgrading and development of existing and planned regionally significant infrastructure and nationally significant infrastructure.*	In the context of the Project, the most relevant item of regionally significant infrastructure is State Highway 3, which adjoins the eastern boundary of the site and forms part of the strategic transport network. The Project has been specifically designed to integrate with and support the ongoing operation of State Highway 3. The ITA (**Appendix 16**) concludes that the surrounding network can accommodate the traffic generated by the Project without materially affecting its operation, efficiency or safety. Access to the site will be provided via a new roundabout on State Highway 3, which has been developed in consultation with NZ Transport Agency Waka Kotahi and is intended to maintain the safe and efficient function of the corridor while accommodating future traffic growth. The Project also incorporates design measures to avoid reverse sensitivity effects on the state highway corridor. Future residential units located in proximity to State Highway 3 will be required to comply with the relevant acoustic requirements, ensuring the ongoing operation, maintenance and future upgrading of the state highway is not constrained by the introduction of a sensitive activity.

	As such, the Project will not adversely affect the ongoing operation, maintenance, upgrading or future development of State Highway 3; therefore, is considered to be **consistent** with Policy 1.3.2.8.
Section 1.3.3 – Planned and Integrated Development Objective and Policies	
Objective - Planned and integrated development ***1.3.3*** *To ensure that development and subdivision happens in a way and at a rate that is consistent with the anticipated settlement pattern, maximises the efficient use of zoned and serviced land, and is co-ordinated with cost-effective infrastructure provision.*	Objective 1.3.3 is implemented through Policies 1.3.3.1 to 1.3.3.9 and seeks three outcomes: development that is generally consistent with the anticipated settlement pattern, efficient use of serviced land, and development that is coordinated with cost-effective infrastructure provision. There is a degree of tension between the Project and the settlement pattern component of the objective. As discussed in relation to Policy 1.3.3.1, the Site is located outside the identified urban limits and future growth areas identified through the Future Proof Growth Strategy and District Growth Strategy. Accordingly, the Project is not fully consistent with the anticipated settlement pattern. However, that inconsistency is moderated by the wider strategic framework. Policy 1.3.2.2 expressly recognises that accommodation facilities and services for the existing and future elderly population may appropriately occur on the periphery of towns outside current urban limits. The Project directly gives effect to that direction and responds to an identified retirement living and aged care need. The remaining policies within Section 1.3.3 provide strong support for the Project. The Growth Cell Assessment demonstrates that accommodating a retirement village of a similar scale and nature within the identified growth cell framework is constrained, the

	Project can be independently serviced through developer-funded infrastructure upgrades, it provides significant development capacity, does not compromise future growth areas, and has been designed to integrate with surrounding infrastructure and future development. Accordingly, while the Project is not fully consistent with the settlement pattern aspects of Objective 1.3.3, it is generally **consistent** with the broader objective as a whole. The Project provides a planned, integrated and infrastructure-supported response to an identified retirement living and aged care need, and aligns strongly with the objective's direction relating to efficient land use, infrastructure coordination and long-term development outcomes.
Policy - Implement Waikato Regional Policy Statement: Te Tauākī Kaupapahere Te-Rohe O Waikato, Future Proof and Waipā District Growth Strategy ***1.3.3.1*** *To allow subdivision and development that will give effect to the settlement pattern and directions of the Waikato Regional Policy Statement and that is consistent with the settlement pattern and directions in the Future Proof Growth Strategy and the District Growth Strategy (or any subsequent replacement), and avoid unplanned developments which are inconsistent with these directions.*	Policy 1.3.3.1 gives effect to the settlement pattern directions contained within the Waikato Regional Policy Statement, Future Proof Growth Strategy and District Growth Strategy by seeking to avoid unplanned development that is inconsistent with those directions. There is an inherent tension between this policy and the Project, as the Site is located outside the existing urban limits of Te Awamutu and is not identified as a future growth area within the relevant strategic growth documents. To that extent, the Project is not fully consistent with the anticipated settlement pattern. However, that tension must be considered alongside the broader strategic framework, including Policy 1.3.2.2, which expressly recognises that accommodation facilities and services required to support the long-term accommodation and care needs of the existing and future elderly population may appropriately occur on the periphery of towns outside current urban limits. The Project directly responds to that anticipated outcome. In addition, the Site immediately adjoins the existing urban edge of Te Awamutu, is capable of being independently serviced through developer-funded infrastructure upgrades, and responds to a demonstrated need for retirement living and aged care accommodation that the Growth Cell Assessment identifies as difficult to accommodate within the existing growth cell framework. The Project has been comprehensively

	planned, is supported by detailed technical assessments, and does not represent ad hoc or sporadic rural residential development. Accordingly, there is a tension with the specific settlement pattern identified in the Future Proof Growth Strategy and District Growth Strategy and therefore Policy 1.3.3.1. However, when viewed in the context of the broader strategic framework, including the District Plan's explicit recognition that retirement living and aged care facilities may appropriately establish on the periphery of towns, the Project is therefore generally **consistent** with the overall direction of this policy.
Policy – Out of sequence and out of zone plan changes ***1.3.3.2*** *To have regard to potential plan changes that are otherwise not enabled or not in sequence with the planned release of land where that plan change would:* *a. Contribute to a well-functioning urban environment; and* *b. Provide the necessary infrastructure required for the proposed development; and* *c. Be well connected to public transport and transport corridors; and* *d. Provide significant development capacity.*	Policy 1.3.3.2 is directed toward plan changes that are otherwise out-of-sequence or not anticipated by the planned release of land. While the Project does not involve a plan change and is therefore not the type of proposal specifically contemplated by this policy, the criteria identified in the policy provide a useful indication of the circumstances in which development outside the anticipated growth sequence may nevertheless be appropriate. In that regard, the Project exhibits many of the characteristics identified by the policy. The EME concludes the Project will contribute to a well-functioning urban environment through the provision of retirement living and aged care accommodation responding to an identified need. The Project is capable of being serviced through a coordinated package of developer-funded transport, water, wastewater and stormwater infrastructure upgrades. The Site is also well connected to strategic transport corridors and public transport through its frontage to State Highway 3 and the inclusion of new bus stops, walking and cycling connections. Finally, the Project provides significant development capacity through approximately 414 retirement living units and a 100-bed care facility. While the policy is not directly applicable because the Project is not a plan change, the Project is **consistent** with the outcomes and considerations that the policy identifies as relevant when assessing out-of-sequence growth proposals.

Policy - Sequencing and Staging: accommodation for the aging population ***1.3.3.4*** *A range of accommodation facilities and services for the long term accommodation and care requirements of the existing and future elderly population may be considered in future growth areas where it can be shown that:* *a. Sufficient zoned and serviced land is not available for the specific nature of the development; and* *b. The development can be adequately serviced at the cost of those parties undertaking the development and does not undermine committed infrastructure investments made by Council to support other growth areas; and* *c. The development provides heritage, archaeological, recreational or ecological features (preferably within the site) which benefit the wider community and are protected in perpetuity for public use and/or access.*	Policy 1.3.3.4 recognises that accommodation facilities and services for the long-term accommodation and care requirements of the existing and future elderly population within identified future urban growth areas. The GCA concludes that opportunities to accommodate a retirement village of a similar scale and nature within the identified growth cell framework are constrained by ownership, timing, infrastructure, physical characteristics and deliverability factors. The assessment therefore concludes that sufficient zoned and serviced land is not readily available to accommodate the specific form of retirement village and aged care development proposed. In relation to clause (b), the Project can be adequately serviced through a coordinated package of developer-funded infrastructure upgrades, including transport, water, wastewater and stormwater infrastructure. The Project provides both recreational benefits that extend beyond the development itself. The proposal includes a new walking and cycling connection linking the Site to the existing transport network within Te Awamutu, improving active mode accessibility and supporting a recreational outcome identified as desirable by both Council and transport planning documents. Accordingly, while the Project is not located within a future growth area, it is **consistent** with the underlying intent of the sequencing and staging for retirement village development.
Policy - Efficient use of zoned and serviced land ***1.3.3.5*** *Maximise the efficient use of existing physical resources by requiring all new serviced residential greenfield development and subdivisions to have a range of lot sizes that achieve an overall target density of 12 to 15 dwellings per ha of gross developable area.*	Policy 1.3.3.5 seeks to maximise the efficient use of serviced land by promoting greenfield residential development that achieves an efficient development yield. While the Project is not a conventional residential subdivision, it delivers a comparatively intensive form of residential development through approximately 414 retirement living units together with a 100-bed care facility, communal facilities and supporting infrastructure on a 25.78 ha site.

	While directed at greenfield residential subdivision, the Project is **consistent** with the direction provided by Policy 1.3.3.5.
Policy - Avoid development and subdivision that compromises the development of Deferred Zones and future growth areas ***1.3.3.6*** *To ensure that development and subdivision within Deferred Zones and future growth areas does not compromise anticipated future uses.*	Policy 1.3.3.6 seeks to ensure that development and subdivision within Deferred Zones and future growth areas does not compromise their anticipated future development. While the Site is not located within a Deferred Zone or identified future growth area, the policy remains relevant insofar as the Project should not prejudice the future development of identified growth areas. The Growth Cell Assessment concludes that the Project does not undermine the ability of identified growth cells to develop in accordance with their intended purpose. Rather, the Project provides a specialised retirement village and aged care development that has been identified as difficult to accommodate within the current growth cell framework due to ownership, physical, infrastructure and deliverability constraints. The Project is capable of being independently serviced through a coordinated package of developer-funded transport, water, wastewater and stormwater infrastructure upgrades and therefore does not rely on infrastructure intended to service future growth areas. Nor does the Project constrain, sterilise or otherwise reduce the future development potential of those areas. Importantly, the Project has been designed to facilitate future integration with adjoining land. The internal road, pedestrian and servicing layout provides the opportunity for future connections to adjoining landholdings, including potential links to land to the south and west should those areas develop in the future. Accordingly, the Project does not impede the anticipated development of surrounding land and instead provides a framework capable of integrating with future growth. On this basis, the Project will not compromise the anticipated future development of Deferred Zones or future growth areas. The Project is therefore **consistent** with the direction provided by Policy 1.3.3.6 despite it not being located within a deferred zone or future growth zone.

Policy - Co-ordination between subdivision and development and infrastructure 1.3.3.7 *To manage the increased demand on infrastructure from development and subdivision by requiring all subdivision and development to be co-ordinated with the provision of infrastructure including utility services, and integrated with the transport network and the District's road hierarchy. If subdivision and development is likely to occur in areas currently supplied, or intended to be supplied by municipal services, but in advance of the provision of municipal services, then the provision of infrastructure by developers shall be to a design and standard that will enable integration with public service provision. The provision of infrastructure by developers must take into account the available or planned network capacity.*	Policy 1.3.3.7 seeks to ensure development is coordinated with the provision of infrastructure and integrated with the District's transport network and road hierarchy. The Project is strongly consistent with this policy. Detailed transport, water, wastewater and stormwater assessments confirm the Site can be adequately serviced through a coordinated package of developer-funded infrastructure upgrades delivered alongside the staged development. The Project also integrates with the District's transport network through the proposed State Highway 3 roundabout, public transport connections, walking and cycling infrastructure, and future connections to adjoining land. Accordingly, the Project is coordinated with infrastructure provision and does not exceed available or planned network capacity. On this basis, the Project is **consistent** with Policy 1.3.3.7.
Policy - Uneconomic expansion of existing infrastructure 1.3.3.9 *Subdivision and development which results in the uneconomic expansion of existing infrastructure shall be avoided.*	The Project is consistent with this policy. The supporting transport, water, wastewater and stormwater assessments confirm that the Site can be serviced through a coordinated package of developer-funded infrastructure upgrades delivered alongside the staged development. Infrastructure upgrades required to service the Project, including the State Highway 3 roundabout, water supply improvements, wastewater infrastructure and stormwater management systems, will be provided by the Applicant rather than requiring uneconomic expansion of existing public infrastructure. Accordingly, the Project will not result in the uneconomic expansion of existing infrastructure and is **consistent** with Policy 1.3.3.9.
Section 1.3.4 – Tangata Whenua Objective and Policies	
Objective - Tāngata whenua 1.3.4 *To uphold, and assist tāngata whenua to uphold, the partnership principles inherent within Te Tiriti o Waitangi, by assisting tāngata whenua to maintain and enhance their culture, traditions, economy and society, in order that their well-being (mauri) and health (hauora) is maintained.*	The Project has been informed by engagement with mana whenua, including Cultural Values Assessment – Ngāti Apakura, which supports the Project in principle subject to the implementation of its recommendations. While some iwi groups have not provided input prior to lodgement, engagement will be maintained throughout the FTAA process. In terms of the design, the Project incorporates ecological restoration, wetland enhancement, protection and enhancement of the kahikatea remnant, improved

	freshwater management, and long-term environmental stewardship outcomes that respond directly to values identified by mana whenua. The restoration and enhancement of wetlands, indigenous biodiversity and freshwater systems supports the ongoing exercise of kaitiakitanga and contributes to the protection and enhancement of the mauri of the site and wider catchment. The Project also provides for ongoing engagement with mana whenua and the implementation of cultural management measures through conditions and management plans. As such, the Project is considered to be **consistent** with Objective 1.3.4.
Policy - Cultural and historic relationship ***1.3.4.1*** *To recognise and promote the cultural and historic relationships tāngata whenua have with the District.*	The Project recognises the cultural and historical relationship mana whenua have with the Site and wider Waipā catchment through engagement with Ngāti Apakura, Ngāti Mahanga and Maniapoto ki Te Raki. he Ngāti Apakura Cultural Values Assessment identifies the cultural significance of the wider landscape, wetlands, waterways and ecological systems and supports the Project in principle subject to implementation of its recommendations. The Project incorporates a range of measures that respond directly to those values, including the protection and enhancement of the kahikatea remnant (SNA WP312), restoration and enhancement of wetlands, naturalisation of the existing watercourse, indigenous planting and long-term environmental stewardship measures. These initiatives recognise and reinforce the cultural relationship mana whenua have with the whenua and wai and support the exercise of kaitiakitanga. Accordingly, the Project is considered to be **consistent** with Policy 1.3.4.1 as it recognises and promotes the cultural and historic relationship tāngata whenua have with the Site and wider District.
Section 1.3.5 – Environmental and heritage protection and recreation values Objective and Policies	
Objective - Environmental and heritage protection and recreation values ***1.3.5***	As detailed in the policy assessment below, the Project is **consistent** with this objective as it delivers a net environmental gain through significant ecological restoration and

To ensure that development and subdivision activities maintain and where possible enhance the environmental, heritage and recreational values of the District.	enhancement measures while also improving recreational opportunities through new walking and cycling connections and on-site walking tracks.
Policy - Management of adverse effects ***1.3.5.1*** *To ensure that development and subdivision is undertaken in a manner that:* *a. Does not result in a net loss of indigenous biodiversity; and* *b. Protects areas of outstanding landscape; and* *c. Maintains cultural landscapes and other identified landscape areas and features of high amenity; and* *d. Protects listed heritage items; and* *e. Retains and where possible enhances recreation values.*	The Ecological Assessment concludes the proposal will result in no net loss of indigenous biodiversity through the protection and enhancement of the kahikatea remnant (SNA WP312), retention and enhancement of twelve natural inland wetlands, restoration of new wetland habitat, naturalisation of the existing watercourse, and extensive indigenous planting. The Project will also retain and enhance recreational values through the provision of an on-site walking track network providing access to the restored wetlands, watercourse and ecological restoration areas. Therefore, the Project is **consistent** with the intent of this policy.
Policy - Environmental, recreational and heritage protection ***1.3.5.2*** *To consider additional development and subdivision opportunities in circumstances where:* *a. Significant natural areas, located within the indigenous forest corridors, are permanently protected; or* *b. Significant heritage sites and places are permanently protected; or* *c. Land provided for the Te Awa cycleway or an Incentivised Cycleway is permanently protected.* *d. Provided that the anticipated settlement pattern is not compromised, reverse sensitivity effects are avoided and that any other adverse effects on the environment are appropriately mitigated.*	The proposal provides for the long-term protection and enhancement of the existing kahikatea remnant (SNA WP312), retention and enhancement of twelve natural inland wetlands, restoration of additional wetland habitat, naturalisation of the existing watercourse and extensive indigenous planting. These ecological features will be protected and managed in perpetuity through the proposed management framework and consent conditions. Therefore, the Project is **consistent** with the intent of this policy.
Policy - Promoting new recreation experiences ***1.3.5.4*** *To promote new recreation experiences in the District, in particular the Te Awa Cycleway and Incentivised Cycleways, and activities located on existing reserves, where adverse effects are appropriately managed.*	The proposal includes a new walking and cycling connection linking the Site with the wider Te Awamutu active transport network, together with an on-site walking track network that provides access to the restored wetlands, enhanced watercourse and ecological restoration areas. Accordingly, the Project promotes new recreation experiences and is **consistent** with Policy 1.3.5.4.
Policy - Enhancing existing recreation and conservation values ***1.3.5.5***	The proposal provides a net environmental gain through the protection and enhancement of the kahikatea remnant (SNA WP312), retention and enhancement of

To enhance the recreation and ecological values of the District, by improving the function and access to existing reserves whilst ensuring areas of historic and ecological importance are protected and the development or subdivision results in net environmental gains. *Advice Note: Refer also to the environmental benefit lot provisions in Section 15 - Infrastructure, Hazards, Development and Subdivision.*	twelve natural inland wetlands, restoration of additional wetland habitat, naturalisation of the existing watercourse, and extensive indigenous planting. Together, these measures will improve biodiversity, freshwater health and ecological connectivity across the site. Accordingly, the Project delivers both recreational and ecological benefits and results in an overall net environmental gain, **consisten**t with Policy 1.3.5.5.

Part D – Section 4 - Rural Zone

Waipa District Plan Rule Assessment	
Objective / Policy Reference	**Comments**
Section 4 – Rural Zone	
Objective - Rural resources ***4.3.1*** *To maintain or enhance the inherent life supporting capacity, health and well-being of rural land, ecosystems, soil and water resources.*	
Policy - Health and well-being of the Waikato and Waipā Rivers ***4.3.1.1*** *To give effect to the directions and outcomes in Te Ture Whaimana o Te Awa o Waikato – The Vision and Strategy for the Waikato River and the Waipā Accord through District Plan provisions relating to building setbacks, earthworks, farming activities, non-farming activities, intensive farming, rural based industries and solid and liquid waste.*	The proposal will replace an existing pastoral farming activity with a comprehensively planned retirement village development incorporating significant ecological restoration and freshwater enhancement measures. These include the retention and enhancement of twelve natural inland wetlands, restoration of additional wetland habitat, protection and enhancement of the kahikatea remnant (SNA WP312), naturalisation of the existing farm drain, extensive indigenous planting and a stormwater management system designed to improve the quality of water discharged from the site.
Policy - Avoid adverse effects on aquatic and riparian ecosystems (including lakes) ***4.3.1.3*** *To avoid, remedy or mitigate adverse effects of development, subdivision and activities on the quality of the District's ground and surface water resource, and promote the enhancement of their ecological and cultural values by:* *Maintaining or enhancing the ability to use aquatic ecosystems as mahinga kai (a food source); and* *a. Maintaining or enhancing the life supporting capacity of water bodies; and* *b. Where appropriate, maintaining or enhancing the availability of water bodies for recreation; and* *c. Enhancing ecological corridors and riparian margins.* *Advice Note: See also the objectives, policies and rules of the Waikato Regional Plan.*	The proposal will result in the retention and enhancement of twelve natural inland wetlands, restoration of additional wetland habitat, naturalisation of the existing farm drain, extensive riparian planting, and protection and enhancement of the kahikatea remnant. Together, these measures will improve aquatic habitat, ecological connectivity, riparian margins and the life-supporting capacity of water bodies across the Site.
Policy - Protect the rural soil resource ***4.3.1.4*** *The versatility and life supporting capacity of the District's rural land and soil resource, particularly high class soils and peat soils, are protected from development, subdivision*	The Project will permanently remove approximately 7.1 ha of highly productive land from future primary production and is therefore not fully aligned with the first limb of the policy. However, the HPL Assessment concludes that the highly productive land resource is limited in extent, fragmented in nature, and subject to permanent and long-term constraints that materially limit its ability to sustain economically viable land-based

or activities that would prevent its future use for primary production, or its ability to maintain the District's ecological/biodiversity values.	primary production. While the policy does not distinguish between primary production and economically viable primary production, the findings remain relevant when considering the significance of the land resource affected. Conversely, the EAR demonstrates that the Project will maintain and enhance the District's ecological and biodiversity values through the protection and enhancement of the kahikatea remnant (SNA WP312), retention and enhancement of twelve natural inland wetlands, restoration of additional wetland habitat, naturalisation of the existing watercourse, and extensive indigenous planting. These measures are anticipated to result in a net gain in biodiversity and ecological function relative to the existing pastoral environment. As such, while there is tension with Policy 4.3.1.4 arising from the permanent loss of the soil resource, the significance of this loss in terms of preventing future primary production is limited, given the permanent and long-term constraints affecting the land and its limited ability to support economically viable primary production. Conversely, the Project will maintain and enhance the ecological and biodiversity values of the site. As such, the Project is consistent with the general direction provided by Policy 4.3.1.4.
Policy - Solid and liquid waste management ***4.3.1.5*** *The storage and disposal of solid and liquid waste is undertaken in a manner that remedies or mitigates effects on the environment and adjacent properties that cannot be avoided.*	Although directed at on-site wastewater solid and liquid waste management, the IR Report confirms the Project can adequality wastewater flows from the site on the environment and adjacent properties. As such, the Project is **consistent** with Policy 4.3.1.5.
Policy – Earthworks ***4.3.1.6*** *To ensure that earthworks are carried out in a manner that avoids adverse effects on infrastructure, between properties and on water bodies.*	**Part Six** of the SAR confirms any actual or potential effects associated with earthworks are less than minor and therefore acceptable. Accordingly, the Project's earthworks are **consistent** with Policy 4.3.1.6.
Objective - Rural activities: farming ***4.3.2*** *The capacity of rural areas and rural resources to support farming activities and lawfully established rural based activities is maintained.*	There is an inherent tension between the Project and this objective, as the proposal will permanently convert the Site from pastoral farming to retirement village and aged care activities. To that extent, the Project reduces the capacity of the Site itself to support future farming activities.

	The significance of that tension is moderated by the characteristics of the Site and the conclusions of the HPL Assessment. The assessment concludes that the highly productive land resource is limited in extent, fragmented in nature, and subject to permanent and long-term constraints that materially limit its ability to sustain economically viable primary production. In addition, the Project has been designed to avoid materially constraining the continued operation of surrounding rural activities through setbacks, planting, landscaping and other reverse sensitivity mitigation measures. The Project will reduce the capacity of the Site itself to support farming activities, the significance of that loss is moderated by the existing constraints on its future productive use. Importantly, the Project will not materially constrain the continued operation of farming or other lawfully established rural-based activities on surrounding land. On balance, while there is some tension with Objective 4.3.2, the Project is **generally consistent** with its broader direction.
Policy - Management of rural resources ***4.3.2.1*** *Manage rural resources so that farming activities can continue to establish and operate.*	The Project gives rise to some tension with Policy 4.3.2.1, as the development will permanently remove the Site from future farming activities. However, the significance of this tension is moderated by the permanent and long-term constraints affecting the Site's future productive use, as identified in the HPL Assessment. Further, the Project incorporates setbacks, planting, landscaping and other reverse sensitivity measures to ensure that surrounding farming activities are not materially constrained in their ability to continue to establish and operate. While there is some tension with Policy 4.3.2.1 arising from the loss of the Site for future farming activities, the Project does not materially undermine the ability of farming activities to establish and operate within the surrounding rural environment. On balance, the Project is considered **generally consistent** with the overall direction of Policy 4.3.2.1.
Policy - Rural environment ***4.3.2.2***	The Project gives rise to some tension with Policy 4.3.2.2, as the Site will no longer form part of the pastoral working environment of the Rural Zone. However, the Project has been designed to recognise and protect the continued operation of surrounding rural

Recognise and protect the continued operation of the Rural Zone as a pastoral working environment.	activities. The reverse sensitivity assessment concludes that adjoining farming and horticultural activities can continue to operate through the use of setbacks, landscaping, planting buffers, topographical separation and no-complaints mechanisms. Accordingly, the Project will not materially constrain the ongoing operation of the wider Rural Zone as a pastoral working environment. The Project recognises and protects the continued operation of the surrounding Rural Zone as a pastoral working environment. On balance, the Project is **generally consistent** with the overall direction of Policy 4.3.2.2.
Policy - Farming activities to avoid adverse effects ***4.3.2.3*** *Manage farming activities so that they do not result in adverse effects on the environment or adjacent sites by ensuring:* *a. Buildings are located appropriately; and* *b. Adverse effects, are avoided, remedied or mitigated.*	Policy 4.3.2.3 is not relevant to the Project. However, it identifies there is an expectation within the Rural Zone for adverse effects to be avoided, remedied or mitigated.
Policy - Farm buildings and activities to internalise adverse effects ***4.3.2.4*** *Farm buildings and activities shall be located and scaled to minimise adverse effects on rural character and amenity.*	Policy 4.3.2.4 is not relevant to the Project. However, it provides a general direction that rural character and amenity is maintained through internalising adverse effects on neighbouring properties.
Objective - Rural activity: shelterbelts, woodlots, and commercial forestry ***4.3.3*** *To ensure commercial forestry and/or woodlot forestry and shelterbelts do not have an adverse effect on the environment, the amenity of adjacent properties, or on infrastructure such as roads, railway lines, electricity transmission and distribution lines, and boundary fence lines.*	Objective 4.3.3 is implemented through Policies 4.3.3.1 – 4.3.3.5. Generally, the Project does not propose and shelterbelts, woodlots, and commercial forestry. Therefore, the Project is **consistent** with the direction provided by Objective 4.3.3
Objective - Rural based industry ***4.3.4*** *To enable appropriate rural based industry to locate and operate within the Rural Zone.* ***Policy - Adverse effects*** ***4.3.4.1*** *To ensure that rural based industry activities are designed and located to internalise adverse effects on the environment as far as practicable.*	Objective 4.3.4 and Policies 4.3.4.1-2 are not directly relevant to the Project. However, these objectives and policies identify that rural based industry is provided for in the Rural Zone provided the adverse effects can be internalised.

Policy - Scale and location of rural based industry ***4.3.4.2*** *The scale and location of rural based industry shall:* *a. Be consistent with the capacity, design and function of the road hierarchy; and* *b. Not adversely affect rural character; and* *c. Take potential reverse sensitivity issues into account.*	
Objective - Rural character ***4.3.7*** *Rural character and amenity is maintained.*	The Project gives rise to tension with Objective 4.3.7 as it will permanently change the Site from an open pastoral landscape to a retirement village with an urban character, resulting in a reduction in the Site's existing rural character and amenity. The LUDA assesses the resulting landscape effects as Moderate (more than minor) due to this permanent change. However, the significance of this change is moderated by the Site's existing context and the Project's design response. The Site is located at the northern urban fringe of Te Awamutu, where existing residential development and SH3 already influence its perceived rural character. The LUDA also identifies that the existing urban pattern does not provide a strong or defensible urban edge in the vicinity of the Site. The Project responds to this context through predominantly low-rise built form, extensive landscape treatments, boundary planting and retention and enhancement of key natural features. While these measures will not retain the Site's existing pastoral openness, they will soften and integrate the development and contribute to a high-quality landscape outcome. The LUDA also identifies positive landscape effects associated with enhancement of the kahikatea SNA, restoration of wetlands, riparian margins and terrestrial vegetation, and establishment of a clearer urban-rural edge at the northern entrance to Te Awamutu. On this basis, while the permanent change from pastoral land to an urban retirement village gives rise to tension with Objective 4.3.7, the Project incorporates measures that respond to and moderate the resulting changes in rural character and amenity, while providing positive landscape outcomes and a clearer transition between Te Awamutu and the wider rural environment.

	On balance, the Project is considered **partially inconsistent** with Objective 4.3.7. Further, Part Six of the SAR identifies the moderate landscape effect is acceptable and will not result in an adverse impact that will weight against the Project.
Policies - Rural character ***4.3.7.1*** *Land use activities should be at a density, scale, intensity and location to maintain rural character.* ***4.3.7.2*** *Rural character and associated amenity values shall be maintained by ensuring rural land uses predominate in the Rural Zone, and buildings are of an appropriate scale and location.* ***4.3.7.3*** *Ribbon development or residential cluster development shall be avoided.*	The Project gives rise to tension with Policies 4.3.7.1–4.3.7.3. The proposed retirement village represents a density, scale and intensity of development that is not characteristic of the Rural Zone and will permanently change the Site from an open pastoral landscape to one with a more urban character. In particular, the LUDA identifies that the Project will reduce the Site's pastoral openness and rural character and introduce a density and pattern of development not anticipated within the Rural Zone. The significance of this tension is moderated by the location of the Site at the existing urban fringe of Te Awamutu, where surrounding residential development and the State Highway corridor already influence its rural character. Importantly, the Project does not extend into an otherwise wholly rural setting but establishes a clearer and more legible urban-rural edge, enabling the rural character and amenity of the wider Rural Zone beyond the Site to be maintained. The Project also incorporates a design response intended to moderate this change in character. Development is predominantly low-rise, incorporates familiar gabled building forms and materials, and is integrated with extensive landscape treatments and retained natural features. The LUDA identifies that these measures will provide a high-quality development and establish a clearer and more legible transition between Te Awamutu and the wider rural environment. While the density, scale and intensity of the Project and the resulting loss of pastoral openness give rise to tension with Policies 4.3.7.1–4.3.7.3, the significance and extent of that tension are moderated by the Site's urban-fringe location, existing peri-urban influences and the Project's comprehensive landscape and design response. Although the Project will result in a permanent change from rural to urban character at the Site, its location and design response contain that change and maintain the rural character of the wider environment beyond the Site.

	On balance, there is a tension with these policies. However, when viewed overall the Project is **generally consistent** with the direction provided with the WDP and does not give rise to unacceptable effects and impacts that weigh against the Project (**Part Six** of the SAR).
Policies - Rural character of entrance roads ***4.3.7.5*** *To preserve the rural character of entrance roads to towns and villages and maintain a distinct delineation between urban and rural areas by avoiding aggregations of buildings and non-farming uses.*	The Project gives rise to tension with Policy 4.3.7.5 as it will introduce an aggregation of buildings and non-farming activities along Ōhaupō Road and permanently change the rural character of the Site and its road frontage. However, the Site is located at the existing northern urban fringe of Te Awamutu, where residential development, urban infrastructure and the State Highway already contribute to a peri-urban character. The LUDA identifies that the existing development pattern does not provide a strong or defensible urban edge in this location. The Project responds to this context by extending the built edge alongside the existing residential development on the eastern side of Ōhaupō Road, broadly aligning with its northern extent. The predominantly low-rise built form, extensive boundary and streetscape planting, and proposed roundabout will establish a clearer and more legible northern entrance to Te Awamutu and provide a more distinct delineation between the urban area and the rural environment beyond the Site. Further, the LUDA identifies the visual element of this change will be low-moderate to low transitioning to very low once the landscaping on site has been established. The Project's location at the existing urban fringe limits the extent of that change into the wider rural environment. The Project will establish a clearer and more defensible urban-rural edge, enabling the rural character of Ōhaupō Road beyond the Site to remain distinct from the urban area. On balance, the Project is **generally consistent** with Policy 4.3.7.5.
Policies - Rural dwellings ***4.3.7.6***	Policy 4.3.7.6 seeks to maintain the rural character and meet the anticipated future settlement pattern through limiting the number of dwellings in the Rural Zone. The rural

To maintain the rural character and to meet the anticipated future settlement pattern in the Rural Zone by limiting the number of dwellings in the Rural Zone.	zone limits the number of dwellings per site to 1 dwellings. The Project of414 units and 100-bed care facility exceeds this limit. However, as detailed the anticipated future settlement pattern of the in the rural zone provides for accommodation facilities and services for the existing and future elderly population may appropriately occur on the periphery of towns. The Project also responds to a demonstrated retirement living and aged care need and has been comprehensively planned and serviced. Accordingly, while the Project is inconsistent with the specific mechanism used by Policy 4.3.7.6 to achieve its outcome, it is **broadly consistent** with the wider settlement pattern outcomes that the policy seeks to achieve.
Policy - Relocated buildings ***4.3.7.13*** *Relocated buildings shall not detract from the amenity of the area they are located within by ensuring that exterior maintenance and painting is undertaken.*	Any relocated buildings associated with the Project will be appropriately maintained, upgraded and painted to ensure they do not detract from the amenity of the surrounding area. Accordingly, the Project is **consistent** with Policy 4.3.7.13.
Objective - Rural amenity: setbacks ***4.3.8*** *To maintain rural character and amenity and avoid reverse sensitivity effects.*	The Project gives rise to some tension with Objective 4.3.8 as a number of buildings are located within the Rural Zone setback standards. However, as detailed in Part Six of the SAR, the effects of the reduced setbacks are moderated through landscaping, differences in elevation between the Site and adjoining properties, and the proposed no-complaints covenant for 420 Greenhill Drive. These measures maintain an appropriate level of rural character and amenity at the Site boundaries and avoid material reverse sensitivity effects on surrounding rural activities. Accordingly, while there is some tension arising from the reduced setbacks, the Project is generally consistent with Objective 4.3.8.
Policy - Transport network boundaries ***4.3.8.1*** *Buildings and activities are set back from road boundaries and railway tracks to maintain safety, rural character and amenity, and to avoid reverse sensitivity effects.*	While the Project includes units within the road boundary setback, the design maintains safe sightlines for road users and manages reverse sensitivity effects through acoustic treatments and building design measures. Given the associated urbanisation of this section of State Highway 3 through the proposed roundabout and transport upgrades, the purpose of the policy is achieved. As such, the Project is **consistent** with Policy 4.3.8.1.

Policy - Internal boundaries ***4.3.8.2*** *Buildings and activities are set back from rear boundaries and side boundaries to maintain rural character and amenity and avoid reverse sensitivity effects.*	See assessment for Objective 4.3.8.
Objective - Rural amenity: signs ***4.3.9*** *To ensure that signs do not have an adverse impact on the amenity values of the Rural Zone, landscape values, heritage values, or public safety.* ***Policy - Signs to reflect local character and transport environment*** ***4.3.9.1*** *Ensure that signs reflect the rural character and amenity values of the surrounding environment, including any identified landscapes, significant natural areas, viewshafts, and the nature of the adjacent transport environment, by restricting the location, size, number, and content of signs.* ***Policy - Location of signs*** ***4.3.9.2*** *Avoid the establishment of signs in the Rural Zone which are not related to the site on which they are located.* ***Policy - Signs to avoid adverse effects*** ***4.3.9.3*** *Avoid signs that are illuminated, moving, or flashing, or which are likely to create a visual hazard or interfere with the safe and efficient use of roads, railways, airports, or water bodies.* ***Policy - Temporary signs*** ***4.3.9.4*** *Manage the location, size, number, and type of temporary signs to minimise short-term impact, and to avoid adverse effects on local amenity values and public safety.*	The proposed signs will not comply with the permitted activity requirements. All signage is integrated with the overall development and has been designed and located to serve a clear wayfinding and identification function. Given the scale, design and placement of the signs, no effects are anticipated beyond the site boundaries. The primary sign located adjacent to the road frontage will provide site identification and assist visitors in locating and accessing the retirement village and aged care facilities in a safe and efficient manner. Any temporary signs associated with the construction of the site will comply with the District Plan permitted activity rules. On this basis, the proposed signs are **consistent** with the direction provided by Objective 4.3.9 and Policies 4.3.9.2-5.

Policy - Traffic safety ***4.3.9.5*** *The design, location and content of signs shall not adversely affect the safe functioning of roads.*	
Objective - Rural amenity: noise and vibration ***4.3.10*** *To maintain rural amenity while enabling the operation of noise and vibration generating farming activities within the Rural Zone.* ***Policy - Noise: rural farming activities*** ***4.3.10.1*** *Enable the generation of noise and vibration arising from legitimate farming activities, while mitigating adverse effects as far as practicable.* ***Policy - Noise: rural activities*** ***4.3.10.2*** *To ensure that the adverse effects of noise generated by rural activities are avoided, remedied or mitigated.* ***Policy - Noise: frost fans*** ***4.3.10.3*** *Frost fans shall be located and operated to minimise adverse effects on adjacent properties.* ***Policy - Noise: reverse sensitivity: strategic roads and railways*** ***4.3.10.4*** *Dwellings and associated residential development located adjacent to strategic roads and/or railways shall provide sufficient acoustic treatment to protect the level of amenity anticipated in the Rural Zone.*	The objectives and policies seek to maintain rural amenity while providing for noise and vibration generating activities within the rural zone. The objectives and policies expect that although in a rural zone, noise generating activities from farming activities must be managed to minimise effects on adjacent properties. As detailed in Part Six of the SAR, the Project incorporates setbacks, landscaping, non-complaints covenants, and physical separation distances to manage potential noise and reverse sensitivity effects on future residents. These measures recognise that the site is located within a peri-rural environment where existing and ongoing farming activities are a characteristic feature of the surrounding area. As a result, future owners and occupiers will be appropriately protected from noise effects while maintaining the ability of neighbouring rural activities to generate noise lawfully and as expected by the District Plan. Further, the Project will result in units being located within near State Highway 3. A condition will require these units comply with the noise insulation requirements of Rule 4.4.2.26. Noise insulation requirements do not change depending on the zone. Therefore, compliance with 4.4.2.26 is considered appropriate in the context of the proposed retirement village development. On this basis, the Project is **consistent** with the direction provided by Objective 4.3.10 and Policies 4.3.10.1-4.

Objective - Non-farming activities ***4.3.12*** *Only non-farming activities that have a functional and compelling requirement to locate in the Rural Zone should be enabled to locate in the Rural Zone.* ***Policies - Non-farming activities*** ***4.3.12.1*** *To limit non-farming activities in rural areas except for activities that:* *a. Have a functional and compelling reason to establish in a rural area; and* *b. Do not result in any further loss of land from primary production purposes; and* *c. Maintain rural character.* *Activities that do not meet these criteria should be accommodated in urban areas.* ***4.3.12.2*** *The introduction of non-farming activities in rural areas shall not prevent or constrain intensive farming activities from operating.* ***4.3.12.3 Policy - Reverse sensitivity*** *Non-farming activities in rural areas shall internalise adverse effects and should not cause adverse effects that would result in farming activities being prevented or constrained from operating.*	Objective 4.3.12 seeks to ensure that non-farming activities are only enabled within the Rural Zone where there is a functional and compelling requirement for them to locate there. Policy 4.3.12.1 provides further direction as to when such activities are appropriate, including avoiding further loss of land from primary production and maintaining rural character. Policies 4.3.12.2 and 4.3.12.3 further seek to ensure that non-farming activities do not prevent or constrain the continued operation of farming activities. The assessment above demonstrates that the Project has a functional and compelling requirement to establish on the Site, having regard to the identified demand for retirement living and aged-care accommodation and the inability to suitably accommodate the Project within the existing growth cell network. To this extent, the Project responds directly to the principal direction of Objective 4.3.12 and Policy 4.3.12.1(a). There is a tension with Policy 4.3.12.1(b) and (c). The Project will permanently remove the Site from primary production and will change its existing rural character through the introduction of an urban retirement village. The significance of these tensions is moderated by the constraints affecting the Site's future productive use and its location at the existing urban fringe of Te Awamutu. While rural character will change at the Site itself, the Project's location and landscape and design response limit the extent of that change and maintain the rural character of the wider environment beyond the Site. The LUDA similarly identifies that the development will establish a clearer and more legible transition between Te Awamutu and the wider rural environment. Further, the Project will not prevent or materially constrain the continued operation of farming activities on surrounding properties. The reverse sensitivity measures incorporated into the Project address the interfaces with adjoining rural activities and support their continued operation. Accordingly, the Project is consistent with Policies 4.3.12.2 and 4.3.12.3 in this respect.

	On balance, while the Project does not satisfy every component of Policy 4.3.12.1 and there is acknowledged tension arising from the loss of land from primary production and the change in rural character at the Site, these matters do not undermine the overall planning judgement that there is a functional and compelling basis for the Project to establish in this location. Having regard to the policy framework as a whole, including the protection afforded to surrounding rural activities, the Project is considered **broadly consistent** with the direction of Objective 4.3.12 and Policies 4.3.12.1–4.3.12.3.

Part E – Section 15 - Infrastructure, Hazards, Development, and Subdivision

Waipa District Plan Rule Assessment	
Objective / Policy Reference	**Comments**
Section 15 – Infrastructure, Hazards, Development, and Subdivision	
Objective - Integrated development: site design and layout ***15.3.1*** *To achieve integrated development within the District, that contributes to creating sustainable communities and enhances key elements of character and amenity.* ***Policy - Understanding the constraints and opportunities of a site by undertaking a site and surrounding area analysis*** ***15.3.1.1*** *Development and subdivision should integrate with and acknowledge the constraints and opportunities of the site and surrounding area.* ***Policy - Sustainable design and layout development principles*** ***15.3.1.2*** *Development and subdivision within the urban limits and the Large Lot Residential Zones, should occur in accordance with the principles of sustainable design, and enable energy efficiency.* ***Policy - Low impact design*** ***15.3.1.3*** *The design and layout of development and subdivision, should recognise the landform and processes of the natural environment of the site and surrounding land, and avoid or minimise alterations to the landform and ecosystems.* ***Policy - All zones: ensuring boundary adjustments and boundary relocations do not compromise amenity*** ***15.3.1.4*** *Boundary adjustments and boundary relocations shall not create or increase any non compliance with rules for new lots in the zone within which the subdivision is taking place.*	Objective 15.3.1 seeks to achieve integrated development through meeting the outcomes sought by the identified policies. As detailed in the GCA, the site is identified as suitable for providing for a retirement village. The Project has identified key on-site constraints being the topography, existing wetlands, the SNA and the productive land located within the site. The design of the development has considered these constraints and ensures they are managed to an acceptable level an in instances for water quality and bio-diversity values results in a net positive effect. In terms of the surrounding area, the Project represents a logical and feasible extension of the existing township to enable the development. Located in a peri-rural area, consideration has been provided to adjoining land uses and the context within which the site is located within. The design of the site and the proposed landscaping and boundary treatments ensure any effect on the surrounding area are internalised while providing key multi-modal connections to Te Awamutu and the wider region. The Project works with the landform to enhance and restore the site's hydrology and provide for an integrated stormwater system based on water sensitive design which uses raingardens, wetlands, and water courses to improve stormwater discharge into the downstream catchment. Overall, the assessment above and in the SAR confirm the design and layout of the Project achieves an integrated development as envisioned by the objectives and policies and is therefore **consistent** with Objective 15.3.1 and the identified policies.

Objective - Integrated development: natural hazards and site suitability ***15.3.2*** *To ensure that sites proposed as part of a development or subdivision will be capable of accommodating activities anticipated within the applicable zone.* ***Policy - Land to be suitable for use*** ***15.3.2.1*** *Land to be developed or subdivided must be physically suitable to accommodate the permitted land use activities for that zone in accordance with the rules of this Plan.* ***Policy - Consideration of natural hazards*** ***15.3.2.2*** *Development and subdivision design should avoid natural hazards, or provide for the mitigation of the hazard within the development or subdivision design.* ***Policy - Consideration of climate change*** ***15.3.2.3*** *Development and subdivision design should avoid areas that may be subject to the known effects of climate change, or provide for the mitigation of the effects of climate change within the development or subdivision design.* ***Policy - Consideration of reverse sensitivity*** ***15.3.2.4*** *Development and subdivision design should not result in reverse sensitivity effects on adjacent sites, adjacent activities, or the wider receiving environment.*	Objective 15.3.2 focuses on natural hazards and site suitability specifically. As detailed in Part Six of the SAR, the geotechnical, flooding, stormwater and servicing assessments demonstrate that the site is physically suitable for development through the proposed design and implementation of conditions. In terms of natural hazards and with respect to climate change, the SMP confirms the on-site and downstream flooding hazard is addressed through the stormwater management system and building location and design. The earthworks and geotechnical recommendations ensure there are no residual geotechnical risks associated with the development. As detailed above and in Section Six of the SAR, the Project does not result in reverse sensitivity effects that are not able to be mitigated to an acceptable level in the context of the adjacent site and wider environment.
Objective - Integrated development: efficient servicing *15.3.3* *Achieving the efficient and cost effective servicing of land by ensuring that servicing is provided to areas proposed to be developed.* ***15.3.3.1*** *All proposed urban development and subdivision shall be serviced to a level that will provide for the anticipated activities approved in a structure plan, or otherwise anticipated within the zone. Servicing requirements shall include:* *Reserves for community, active and passive recreation; and*	The Project is for retirement village living development as such, the rural zone provisions are not considered relevant in determining is the level of service is acceptable. As detailed above, the geotechnical, flooding, stormwater and servicing assessments demonstrate that the site is physically suitable for development through the proposed design and implementation of conditions. These assessments have been informed by the servicing requirements for residential activities and therefore suitable for the nature of the Project.

a. *Pedestrian and cycle connections; and* b. *Roads; and* c. *Public transport infrastructure, e.g. bus stops; and* d. *Telecommunications; and* e. *Electricity; and* f. *Stormwater collection, treatment and disposal; and* g. *Wastewater treatment and reticulation, water provision for domestic and fire fighting purposes; and* h. *Anticipating and providing for connections to identified adjacent future growth areas.* *Advice Note: There are significant servicing constraints in some areas of the District. Early discussion on the serviceability of a site is recommended.*	
Policy - Co-ordination between servicing and development and subdivision ***15.3.3.2*** *Development and subdivisions shall:* a. *Be located in areas where infrastructural capacity has been planned and funded; and* b. *In areas subject to an approved structure plan, provide sufficient infrastructural capacity to meet the demand identified in the structure plan; and* c. *Achieve the lot yield anticipated in an approved structure plan; and* d. *Include infrastructure provision for both the strategic infrastructure network and local infrastructure connections.* ***Policies - Roading infrastructure*** ***15.3.3.3*** *The design, location, alignment, and dimensions of new roads shall ensure that safe vehicle, pedestrian, and cycling access and manoeuvring can be provided to every site/lot.* ***15.3.3.4*** *The roading pattern shall ensure connectivity to adjacent land identified as Deferred Zones or future growth areas, and the provision of public transport infrastructure, such as bus stops.* ***Policy - Standard of infrastructure***	The Project demonstrates a coordinated approach to development and infrastructure provision. The IR confirms that upgrades to the existing water and wastewater networks will ensure sufficient capacity to service the development, and that the Project will not connect to Council's potable water supply until adequate capacity is available. In addition, the internal infrastructure has been designed in accordance with the RITS standards, ensuring it is appropriately sized and configured to meet the operational requirements of the Project. In terms of the internal roads, the ITA confirms that the design, location and dimensions of the proposed roads, footpaths and cycle facilities will not result in unsafe transport outcomes. The internal roading network has been designed to safely accommodate vehicular, pedestrian and cyclist movements while supporting the efficient operation of the wider transport network. The site provides vehicular, pedestrian, cycling and public transport connections to Te Awamutu and the surrounding residential areas. While the Project does not adjoin land identified for future growth, it has been designed to enable future transport and movement connections to adjoining land to the south-west, west and north should they be required in the future. In addition, new bus stops are proposed as part of the

15.3.3.5 *Infrastructure services shall be provided to a standard that will allow the service to be extended to Deferred Zones or future growth areas.*	roundabout upgrade on State Highway 3, improving public transport accessibility to and from the site. As detailed above and in the SAR, the Project provides infrastructure to the RITS standards. Based on the assessment above, the Project is **consistent** with the direction provided by Objective 15.3.3 and the relevant policies.
Objective - Urban consolidation ***15.3.4*** *To ensure urban consolidation will be achieved within the District, while also contributing to character and amenity outcomes.* ***Policy - Achieving density, design and character*** ***15.3.4.1*** *The minimum and maximum lot size and dimension of vacant lots have been established so that they achieve the character and density outcomes of each zone.* ***Policy - Achieving sufficient development density to support the provision of infrastructure services*** ***15.3.4.2*** *Within the urban limits, where there is no structure plan, the maximum lot size for the zone shall be achieved in order provide a development yield to support infrastructure provision. For some developments where there are proven geotechnical constraints the maximum net lot area may be exceeded.* ***Policy - Rural Zones: ensuring the productive potential of rural land*** ***15.3.4.6*** *The minimum rural lot size requirement has been established to ensure the productive potential of rural land is retained for a range of farming activities.* ***Policy - Rural Zones: maintaining amenity and rural character*** ***15.3.4.7***	Objective 15.3.4 and the identified policies describe what urban consolidation looks like within the context of character and amenity outcomes sought by each zone. The Project is a planned, integrated retirement village located in the Rural Zone directly to the north of the identified urban growth boundary for Te Awamutu. Although the Project exceeds the rural zone's density expectations, it still achieves and maintains the character of the surrounding environment being a peri-urban area. As detailed above, the GAR and IR reports confirm the Project is of a suitable density to support infrastructure services. The HPL Report confirms that, due to site constraints, the Site's productive potential for a range of reasonable farming activities is not economically viable. Further, the WDP identifies a minimum allotment size of 40 ha, providing an indication of the scale of land generally considered necessary to support productive rural activities. Taken together, this evidence indicates that the Site has limited potential to contribute meaningfully to ongoing primary production and that its development for retirement village and aged care purposes would not result in the loss of a viable or economically productive farming unit. Policy 15.3.4.7 is directed at unplanned, incremental rural residential growth, whereas Harlow is a planned, integrated retirement village responding to an identified need for integrated retirement village living. Further, the LVA Report confirms visual and environmental values of the area are maintained and the restoration and enhancement

To ensure that development does not compromise the predominant character and amenity of the Rural Zone, subdivision design and layout shall: a. *Avoid de facto settlements such as ribbon, or residential cluster development; and* b. *Maintain the visual and environmental values of the area, including but not limited to, maintaining the integrity of landscape areas and viewshafts; and* ***c.*** *Not compromise the ecological functioning of significant natural areas, e.g. peat lakes and biodiversity (indigenous forest) corridors, as defined on the Planning Maps; and other areas of biodiversity value.* ***Policy - Rural Zones: infrastructure*** ***15.3.4.8*** *To ensure that development does not give rise to demand or potential demand for the uneconomical and unplanned expansion of infrastructure services, or the upgrade of existing infrastructure, by avoiding residential cluster, ad hoc and ribbon development.* ***Policy - Avoiding reverse sensitivity on adjacent zones and infrastructure*** ***15.3.4.11*** *Development and subdivision shall not compromise the function of adjacent zones, existing nationally or regionally significant infrastructure, or the provision of infrastructure and services.*	as implemented through the management plans results in a net positive bio-diversity value for the Project. As detailed in Section 6.11 of the SAR and in the IR, the Project's upgrades to the water and wastewater infrastructure, the internal infrastructure of the Project undertaken by the Applicant does not give rise to the uneconomic or unplanned expansion of infrastructure. As discussed, potential reverse sensitivity effects have been mitigated to an acceptable level, such that the Project will not unreasonably constrain the lawful operation of farming activities on adjoining rural properties. Further, the Project manages the reverse sensitivity effects on the State Highway through the proposed condition which requires noise insulation to be undertaken where retirement units are located along the State Highway. The Project is not expected to affect the use and development of adjoining residentially zoned land. Cross-boundary effects are minimal, ensuring both the Project and neighbouring properties can continue to function for their intended residential purposes. The Project does not reflect the low-density development pattern typically anticipated within the Rural Zone. However, the development is comprehensively planned and achieves a consolidated urban form, consistent with the broader intent of the urban consolidation policies to avoid dispersed or ad hoc development patterns. When considered in the context of the wider policy framework, the Project is therefore broadly **consistent** with the direction of Objective 15.3.4 and the urban consolidation policies.
Objective - Integrated development: reduce the fragmentation of rural land and retain rural land for production ***15.3.5*** *To ensure that the primary productive potential of the rural land resource is retained and enhanced.*	Objective 15.3.5 describes how the WDP seeks to retain and enhance the productive potential of rural land. While the Project does not achieve the preferred 40 ha allotment outcome, Policy 15.3.5.1 recognises that smaller lots may be appropriate where their location and effects

Policy - Maintaining productive potential of the rural land ***15.3.5.1*** *To ensure the productive potential of the Rural Zone is retained by:* *a. Maintaining a minimum rural lot size of 40ha; and* *b. Limiting and controlling the location of smaller lots.* ***Policy - Ensuring boundary relocations and amalgamations maximise the productive potential of the zone and do not fragment rural land*** ***15.3.5.2*** *Boundary relocations and amalgamations, shall not:* *a. Increase the number of dwellings (excluding farm workers dwellings) on the holding beyond one dwelling per 40ha; and* *b. Create a lot layout that reduces the productivity of the land; and* *c. Create ad-hoc, ribbon development or residential cluster development; and* *d. Create a demand for public infrastructure; and* *e. Result in reverse sensitivity effects on adjacent rural activities.* ***Policy - High class soils*** ***15.3.5.3*** *To protect high class soils from fragmentation by:* *a. Ensuring that rural lot sizes can accommodate a range of farming activities; and* *b. Allowing limited adjustment or relocation of title boundaries within a holding or between holdings, that result in more efficient use of high class soils; and* *c. Ensuring that subdivision rights transfer to non-sensitive locations as specified in this Plan; and* *d. Restricting the use of high class soils for activities other than primary production; and* *e. Restricting the level of impermeable surfaces on high class soils; and* *f. Facilitating and encouraging the amalgamation of small titles.*	are appropriately managed. In this case, the proposal is a comprehensively planned retirement village development rather than ad hoc rural-residential subdivision. Furthermore, the HPL Report concludes that the Site's productive potential is constrained and that a range of reasonable farming activities would not be economically viable. Accordingly, while the Project is not fully aligned with the minimum allotment size component of the policy, it does not materially undermine the outcome sought by the policy, being the retention of productive potential, given the site's existing constraints. Policy 15.3.5.2 is primarily directed at boundary relocations and amalgamations. While it is not directly relevant to the Project, the matters it seeks to address have been considered throughout the assessment of objectives and policies and within the SAR. Similarly, the objectives and policies relating to high-class soils have been comprehensively addressed through the Rural Zone assessment. The Project will permanently convert an area of high-class soils to retirement village and aged care activities. However, the evidence demonstrates that the productive capacity of the Site is constrained and not economically viable, while reverse sensitivity effects have been appropriately managed to ensure the lawful operation of surrounding rural activities is not undermined. On this basis, the Project represents an integrated extension of the existing urban growth boundary and does not materially undermine the productive potential of either the Site or surrounding rural properties. While not fully consistent with the minimum allotment size outcome sought by Policy 15.3.5.1, the Project is considered **broadly consistent** with the direction and outcomes sought by Objective 15.3.5 and Policies 15.3.5.1-15.3.5.3.

Objective – Subdivision in areas that are not serviced ***15.3.6*** *Avoid significant adverse effects on people, property, infrastructure and the environment arising from any subdivision in areas that are not serviced by Council infrastructure.* ***Policy – Health and safety on rural properties*** ***15.3.6.1*** *Health and safety for residents in areas that are not serviced by Council infrastructure should be provided through appropriate design and mitigation measures.*	The IR confirms with the upgrades and design, the Project can connect to Council's water supply and wastewater infrastructure. There are no health and safety issues expected to arise from the proposal. On this basis, the Project is **consistent** with Objective 15.3.6 and Policy 15.3.6.1.
Objective - Integrated development: environmental enhancement ***15.3.7*** *Maintain and enhance the District's natural environment, including the natural functioning of the environment, natural features and landscapes, and significant natural areas.* ***Policy - Minimise impacts on the natural environment: low impact design methods*** ***15.3.7.1*** *To maintain and enhance the natural environment, the existing land forms, vegetation, and water bodies, through the use of low impact design methods at the time of development and subdivision.* ***Policies - Achieving the permanent protection of the natural environment*** ***15.3.7.4*** *To achieve the permanent protection of identified significant natural areas, Maungatautari Ecological Island, ecological features, lakes and water bodies, the Te Awa Cycleway route and any Incentivised Cycleway, through the incentive of an environmental benefit lot.* ***15.3.7.5*** *Incentivised Cycleways may be created by Council resolution once Council is satisfied that granting environmental benefit lot eligibility for that cycleway is consistent with the District Plan, Regional Policy Statement and any Council, regional, or sub-regional, growth strategy.*	The Project maintains and enhances the District's natural environment through the measures below and described in the SAR: • The Project restores and enhances the existing wetland, water course and significant natural area network as well as providing an integrated stormwater management network. • The Project proposes to establish covenant over the SNA. • The ITA confirms the proposed shared pathway is identified in the WDC Transport Strategy which identifies part of the proposed route, along Racecourse Road as forming part of Te Awamutu's urban mobility network. • The IR and SMP confirm the stormwater discharged from the development will have an improved water quality and not result in any downstream effects on sensitive water bodies. • The EAR confirms the proposal maintains the key ecological corridor used by the long-tailed bats as well as the proposed lighting conditions to manage light spill effects to an acceptable level. On this basis, the Project is **consistent** with the direction provided by Objective 15.3.7 and the relevant policies.

Policy - Managing the future effects of development and subdivision on lakes and water bodies ***15.3.7.6*** *To ensure that the layout and design of subdivision and subsequent development and any development on a site acknowledges and avoids adverse effects on the sensitive environment of the water bodies.* ***Policy - Additional subdivision opportunities in limited circumstances to permanently protect important areas of biodiversity value*** ***15.3.7.8*** *Consider additional subdivision opportunities where significant biodiversity gains can be achieved in the following priority areas or locations:* *a. Peat lakes and rivers: by permanently providing significant buffer areas around peat lakes and rivers; or* *b. Wetlands, kahikatea stands, riparian margins and bush stands on the low lands, by providing permanent protection; or* *c. Significant natural areas on the forested lower slopes of the western hills of Pirongia, the Kapamahunga Range, Maungatautari, Kakepuku, Maungakawa, Te Miro, and Te Tapui being permanently protected; or* *d. Significant natural areas being aggregated to form one large more ecologically sustainable area and being permanently protected; or* *e. Biodiversity corridors: by the permanent protection of significant areas of indigenous forest within biodiversity (indigenous forest) corridors; or* *f. Biodiversity corridors: by permanently protecting significant riparian or wetland areas within the identified biodiversity (river or stream) corridors.*	
Objective - Maintaining cultural landscapes ***15.3.8*** *To maintain the District's cultural landscapes, identified in this Plan.* ***Policy - Manage adverse effects on the values of the cultural landscape*** ***15.3.8.1*** *To maintain the values of the cultural landscapes identified in this Plan, the layout and design of development and subdivision should not result in buildings, earthworks and wastewater systems adversely affecting the cultural values of the landscape.*	The WDP does not identify the site as containing an identified cultural landscape. Further, the CVA prepared by Ngati Apakura does not identify any area within the site rather that it forms part of a wider and broader cultural landscape. Through which Ngati Apakura recognise the Project will change the existing cultural landscape but consider the, social, ecological, and cultural benefits to result in a positive outcome. that can be modified in response to the implementation measures being included. On this basis, the Project is **consistent** in maintaining the WDC's cultural landscapes.

Objective - Provision of reserves ***15.3.11*** *To ensure the ongoing provision of reserves through the subdivision process, including opportunities to add land to existing reserves or land owned by Council, to enhance or provide for public recreation, conservation and amenity needs. Local purpose reserves may also need to be provided at the time of subdivision.* ***Policy - Ensuring each greenfield subdivision provides reserve areas*** ***15.3.11.1*** *To ensure that subdivision processes to create new lots, contribute to the provision of reserves within the District.* ***Policies - Reserve location and design*** ***15.3.11.2*** *All urban neighbourhood reserves and sports reserves shall be designed and located to ensure that they are of shape, size, and contour to provide for the anticipated recreational demands of the community and District, and can be accessed by both pedestrians and vehicles.* ***15.3.11.3*** *All conservation reserves shall recognise an existing natural feature, or contribute to the protection or access to the natural feature.* ***15.3.11.4*** *In the instances where a reserve serves a dual function, for example a local purpose reserve, this shall be recognised within the layout and design of the subdivision.* ***Policy - Securing land adjoining or adjacent to existing reserves*** ***15.3.11.5*** *Subdivisions in an area that either adjoin or are adjacent to an identified significant recreation or conservation reserve as identified in Appendix O5, shall contribute to the improved functioning and use of that reserve, including access to the reserve, ecological enhancement within the reserve, or improved passive surveillance through the addition of residential activity adjoining the reserve.*	The Project provides a range of on-site recreational amenities for future residents, supported by an interconnected pedestrian network that enables safe and convenient access throughout the village. The provision of these areas has been designed to accommodate the demand created by future residents. Although the provision of a public reserve is not appropriate in the context of a retirement village, the Project provides the shared pathway which enhances public recreation near the site and toward Te Awamutu. On this basis, the Project is consistent with the overall **direction** of Objective 15.3.11.

Objective - Giving effect to Te Ture Whaimana ***15.3.13*** *To ensure that Te Ture Whaimana is given effect to by all development and subdivision.* ***Policy - Maintaining the health and well-being of land and water bodies*** ***15.3.13.1*** *To give effect to the directions and outcomes in Te Ture Whaimana and the Waipā River Accord, by ensuring that all development and subdivision shall include the following elements:* *a. Low impact design for stormwater, drainage and earthworks; and* *b. Building setbacks from lakes and water bodies; and* *c. Access to water bodies where appropriate; and* *d. Provision for the Te Awa Cycleway, where relevant; and* *e. Minimal indigenous vegetation removal and requirements for restoration and enhancement of indigenous vegetation and natural character; and* *f. Restricting locations of earthworks, building and wastewater systems within cultural landscapes.*	As detailed in the SAR and this document, the Project has been designed to give effect to Te Ture Whaimana. In particular: • The proposed stormwater management system incorporates water sensitive design principles and will improve the stormwater discharge to the Mangapiko catchment. • Stormwater discharge from buildings will also be managed through the stormwater system. • The Project involves minimal vegetation clearance of key ecological area of restoration and enhancement around the existing wetlands and the water course. Collectively, these measures demonstrate the Project gives effect to Te Ture Whaimana in the context of the district council land use and subdivision consent and is therefore, **consistent** with Objective 15.3.13.

Part E – Section 16 – Transportation

Waipa District Plan Rule Assessment	
Objective / Policy Reference	**Comments**
Section 16 – Transportation	
Objective - Ensuring sustainable, integrated, safe, efficient and affordable multi-modal land transport systems ***16.3.1*** *All new development, subdivision and transport infrastructure shall be designed and developed to contribute to a sustainable, safe, integrated, efficient (including energy efficient network design), accessible and affordable multi-modal land transport system.* ***Policy - Design elements*** ***16.3.1.1*** *Development, subdivision and transport infrastructure shall be designed and located to:* *a. Minimise energy consumption in construction, maintenance and operation of the network; and* *b. Accommodate and encourage alternative modes of transport; and* *c. Give effect to the road hierarchy; and* *d. Contribute to:* *i. Integrated transport and land use planning and a safe road system approach; and* *ii. Reducing deaths and serious injuries on roads; and* *iii. An effective and efficient road network; and* *iv. Efficient movement of freight; and* *v. Providing good accessibility for people.* ***Policy - Ensuring future connections*** ***16.3.1.2*** *Development, subdivision and transport infrastructure shall be designed and located to:* *a. Link to existing transport networks, including roads, walking, cycling and passenger transport; and* *b. Accommodate future transport network connections and walking, cycling and passenger transport options to Deferred Zones and future growth areas.*	Objective 16.3.1 seeks to ensure that development contributes to a safe, integrated, efficient, accessible and multi-modal transport system. This outcome is achieved through Policies 16.3.1.1-16.3.1.3, which focus on providing transport choice, integrating land use and transport infrastructure, maintaining the efficient operation of the network, and ensuring development is coordinated with existing and planned infrastructure. As detailed in the ITA, the Project incorporates a comprehensively planned internal transport network comprising roads, footpaths, shared pathways and public transport infrastructure. The Project provides opportunities for walking, cycling, public transport and private vehicle travel, thereby encouraging alternative transport modes and improving accessibility for residents, visitors and staff. A new roundabout on SH3 will provide safe and efficient access to the site, while the internal road network has been designed in accordance with the anticipated hierarchy and function of each road. The Project links directly to the existing transport network and includes a shared path connection to Te Awamutu via Greenhill Drive, Taylor Avenue and Racecourse Road, together with new bus stops located within the proposed SH3 roundabout infrastructure. The Project also provides for future connections to adjoining land to the south-west, west and north should those areas be developed in the future. The ITA confirms that the development can be accommodated within the existing transport network, with the proposed intersection and surrounding network continuing to operate safely and efficiently.

Policy - The timing and availability of planned funding for transport infrastructure ***16.3.1.3*** *The provision of transport infrastructure for any development or subdivision shall be managed in such a way that it takes into account the timing and availability of planned funding for transport infrastructure.*	Accordingly, the Project is **consistent** with Objective 16.3.1 and Policies 16.3.1.1-16.3.1.3.
Objective - Integrating land use and transport: ensuring a pattern of land uses and a land transport system which is safe, effective and compatible ***16.3.2*** *Land use and transport systems successfully interface with each other through attention to design, safety and amenity.* ***Policy - Integrating land use and transport*** ***16.3.2.1*** *Development, subdivision and transport infrastructure shall be located, designed and managed to:* *a. Minimise conflict on and across arterial routes and provide appropriate access; and* *b. Include access that is safe and appropriate for all road users, including those with restricted mobility; and* *c. Minimise the need for travel and transport where practicable; and* *d. Facilitate travel demand management opportunities where practicable.* ***Policy - Enhancing pedestrian safety*** ***16.3.2.2*** *To improve pedestrian safety in proximity to schools and other community facilities, and commercial areas including pedestrian frontage areas; the standard of pedestrian networks shall be enhanced to accommodate and encourage greater use.* ***Policy - Safe roads*** ***16.3.2.3*** *Development and subdivision design and construction shall contribute to a safe road environment, by:*	Objective 16.3.2 seeks the successful integration of land use and transport systems through appropriate design, safety and amenity outcomes. The supporting policies focus on safe access, minimising conflicts on arterial routes, accessibility for all users, travel choice, pedestrian safety, road safety and the management of amenity effects. The Project has been specifically designed to integrate with the surrounding transport network while maintaining the function of SH3. Access is provided via a new single-lane roundabout, which the ITA confirms will operate efficiently through all stages of development and into the 2045 assessment horizon. The ITA further concludes that the Project will not result in a material deterioration in the performance or safety of the Council's wider transport network. The internal road network incorporates footpaths, shared paths, traffic calming measures, pedestrian crossings, landscaping and low-speed street environments that support safe movement for vehicles, pedestrians and cyclists. Consideration has been given to accessibility, reflecting the needs of future retirement village residents, including those with restricted mobility. The Project also minimises the need for vehicle travel by providing on-site services and communal facilities within the retirement village, while supporting walking, cycling and public transport as practical alternatives to private vehicle use. Proposed pedestrian and cycle connections, together with new bus stop infrastructure on SH3, will improve access to Te Awamutu, Hamilton and surrounding destinations. In terms of amenity, the transport infrastructure is integrated into the overall development design and is not anticipated to give rise to unacceptable character,

a. *Providing safe and appropriate locations for vehicle entrances, driveways, pedestrian and cycle routes; and* b. *Designing and locating transport networks, lighting, street furniture and landscaping to minimise conflict, maintain visibility, and provide for maintenance activities.* ***Policy - Managing effects on character and amenity*** ***16.3.2.4*** *Development, subdivision and transport infrastructure shall be located, designed and managed to:* a. *Avoid, remedy, or mitigate adverse effects of transport on character and amenity; and* b. *Facilitate opportunities to enhance character and amenity; and* c. *Ensure that the outcomes sought in the Waipā Growth Strategy, Town Concept Plan 2010 Plans, and the Character Precinct statements in Section 6 – Commercial Zone of this Plan are achieved.* *Advice Note: The Character Descriptions in Appendix DG2 to DG6 contain a description of the existing character of each precinct area and a series of design statements. Section 21.2.6.1 contains the information requirements for a Site Analysis Statement: Precinct Areas.*	amenity or safety effects. The ITA concludes that transport effects are no more than minor and can be appropriately managed through the proposed infrastructure and conditions framework. Accordingly, the Project is **consistent** with the direction and outcomes sought by Objective 16.3.2 and Policies 16.3.2.1-16.3.2.4
Objective - Maintaining transport network efficiency ***16.3.3*** *To maintain the ability of the transport network to distribute people and goods safely, efficiently and effectively.* ***Policy - Effects of development or subdivision on the transport network*** ***16.3.3.1*** *Avoid, remedy or mitigate the adverse effects of development or subdivision on the operation and maintenance of the transport network, including from:* a. *Traffic generation, load type, or vehicle characteristics; and* b. *The collection and disposal of stormwater; and* c. *Reverse sensitivity effects where development or subdivision adjoins existing and planned roads.* ***Policy - Location of network utilities*** ***16.3.3.2***	Objective 16.3.3 seeks to maintain the efficiency, effectiveness and safety of the transport network. Policy 16.3.3.1 achieves this by requiring transport effects associated with development to be avoided, remedied or mitigated, including effects arising from traffic generation, stormwater management and reverse sensitivity. As detailed in the ITA, the Project is expected to generate approximately 162 vehicle trips in the AM peak hour and 176 vehicle trips in the PM peak hour at full development. The ITA concludes that these traffic demands can be accommodated within the surrounding transport network and that the proposed SH3 roundabout will operate efficiently throughout all stages of development and the 2045 assessment horizon. The wider transport assessment similarly concludes that the Project will not result in a material deterioration in the safety, efficiency or operation of the transport network.

When significant alterations to existing utilities occur in the road reserve, or new network utilities locate in the road reserve, the network utilities must avoid, remedy, or mitigate impacts on: *a. The operation, renewal and development of the transport network; and* *b. Existing and planned landscaping, tree planting, footpaths, lighting, bus bays, indented car parks, and any other amenity enhancements.*	Stormwater generated by roads, buildings and other impervious surfaces will be managed through the Project's integrated stormwater management system. As assessed elsewhere, the proposed stormwater infrastructure has been designed to ensure stormwater discharges are appropriately managed and do not adversely affect transport infrastructure or the receiving environment. In terms of reverse sensitivity, the Project has been designed to ensure future residents are appropriately separated from and protected from the operation of the adjoining state highway and surrounding transport activities through landscaping and the noise insulation of relevant units. Policy 16.3.3.2 relates to the installation and upgrading of network utilities within the road reserve. The Project includes infrastructure and utility works associated with servicing the development. Any works within the road reserve will be undertaken through detailed design and approvals processes to ensure the operation and future development of the transport network, together with associated landscaping, footpaths, bus stops and other transport infrastructure, are not adversely affected. On this basis, the Project will maintain the safe and efficient operation of the transport network and is **consistent** with Objective 16.3.3 and Policies 16.3.3.1 and 16.3.3.2.
Objective - Provision of vehicle entrances, parking, loading and manoeuvring areas 16.3.4 *The provision of adequate and well located vehicle entrances and parking, loading and manoeuvring areas that contribute to both the efficient functioning of the site and the adjacent transport network.* ***Policy - Location of vehicle entrances 16.3.4.1*** *To maintain the safe and efficient functioning of adjoining roads and railways, vehicle entrances to all activities shall be located and formed to achieve safe sight lines and entry and egress from the site. In some locations, adjoining rail lines, State Highways, and the District's Commercial Zones; vehicle entrances will be limited and will require assessment due to the complexity of the roading environment, or the importance of provision for pedestrians.*	Objective 16.3.4 seeks to ensure that vehicle entrances, parking, loading and manoeuvring areas are appropriately located and designed to support both the efficient functioning of the site and the wider transport network. Policy 16.3.4.1 requires vehicle entrances to be located and designed to achieve safe access and appropriate sight distances, particularly where access is taken from a State Highway. The ITA confirms that the roundabout has been designed to achieve the relevant sight distance requirements and will provide safe and efficient access for residents, visitors, staff and service vehicles while maintaining the function of the State Highway network. The ITA further concludes that the proposed intersection will continue to operate efficiently through all stages of development (to 2025).

Policies - Ensuring adequate parking, loading and manoeuvring areas on-site ***16.3.4.2*** *To maintain the efficient functioning of adjoining roads, all activities shall provide sufficient area on-site to accommodate the parking, loading and manoeuvring area requirements of the activity, except in the Residential Zone and Medium Density Residential Zone where the provision of on-site manoeuvring for dwellings is enabled within the setbacks.* ***16.3.4.3*** *Activities that operate at different times and have adjoining sites may be able to share the use of the same parking spaces.* ***16.3.4.4*** *Certain activities may be able to demonstrate through the provision of a travel plan, that staff or occupants of the activity can access the activity through alternative means of travel, thus reducing the necessity for car parks.* *Advice Note: Appendix T1 of this Plan outlines the loading space requirements for activities.* ***Policy - On-site vehicle manoeuvring areas in the Residential Zone and Medium Density Residential Zone*** ***16.3.4.5*** *The requirement for dwellings to provide an on-site manoeuvring area may be dispensed with in specific and limited circumstances, where any adverse effects on safety can be avoided, remedied or mitigated.*	Policies 16.3.4.2-16.3.4.4 seek to ensure sufficient on-site parking, loading and manoeuvring is provided so that activities do not adversely affect adjoining roads. The ITA confirms that parking is provided through a combination of garages, driveways, dedicated parking areas for the care facility, apartment buildings and community hub, together with on-street visitor parking throughout the development. The parking assessment concludes that the proposed supply exceeds relevant parking demand expectations and is sufficient to accommodate residents, visitors, staff and service vehicles. Loading, ambulance and accessible parking facilities are also provided within car parks for the care facility and the community centre. The Project also incorporates a comprehensive internal road network designed in accordance with the road hierarchy and RITS standards. Appropriate manoeuvring areas are provided throughout the development, and the ITA confirms that waste collection, emergency services, servicing vehicles and residents can safely access and manoeuvre within the site. Policy 16.3.4.5 is directed at circumstances where on-site manoeuvring requirements may be relaxed. Given the Project provides an integrated internal transport network and appropriate manoeuvring areas throughout the site, the safety concerns addressed by this policy are appropriately managed. On this basis, the Project provides safe and efficient access, adequate parking, loading and manoeuvring facilities, and will not adversely affect the operation of the adjoining transport network. Accordingly, the Project is **consistent** with Objective 16.3.4 and Policies 16.3.4.1-16.3.4.5.
Objective - Minimising adverse effects of the transport network ***16.3.5*** *The transport network can have effects on the adjacent environment that must be mitigated through design.* ***Policy - Natural environment*** ***16.3.5.1***	Objective 16.3.5 seeks to ensure that adverse effects arising from the transport network are appropriately mitigated through the design and location of transport infrastructure. Policies 16.3.5.1 and 16.3.5.2 focus on managing potential environmental, amenity and noise effects associated with transport infrastructure and transport corridors. As detailed in the ITA and supporting technical assessments, the Project incorporates an integrated transport network that has been designed alongside the site's ecological,

Transport infrastructure, including its layout within a development and subdivision, shall be designed and located to avoid, remedy or mitigate adverse effects on the adjacent environment, having regard to stormwater collection, treatment and disposal, earthworks, noise and the landscape areas identified within this Plan and on the Planning Maps. ***Policy - Noise and vibration*** ***16.3.5.2*** *Noise sensitive activities, adjacent to strategic roads, including State Highways, collector roads in the Rural Zone and Large Lot Residential Zones, and railway lines; will require acoustic attenuation to ensure the continuation of the ability to achieve acoustic privacy.*	hydrological and landscape features. Stormwater generated from roads, footpaths, parking areas and other transport infrastructure will be managed through the Project's stormwater management system and is at a depth and velocity for residential development. The Project introduces a noise-sensitive activity adjacent to SH3 and has therefore incorporated a range of design measures to manage transport-related noise effects. As assessed in the Acoustic Assessment, these measures include setbacks, building design controls, and acoustic treatment where appropriate. Collectively, these measures ensure future residents can achieve an appropriate level of acoustic amenity while avoiding constraints on the continued operation and future functioning of SH3. On this basis, the Project has been designed to appropriately manage the environmental and amenity effects associated with transport infrastructure and adjacent transport corridors. On this basis, the Project is **consistent** with Objective 16.3.5 and Policies 16.3.5.1 and 16.3.5.2.

Part F – Section 24 – Indigenous Biodiversity

Waipa District Plan Rule Assessment	
Objective / Policy Reference	**Comments**
Section 24 – Indigenous Biodiversity	
Objective - Managing effects on district wide indigenous biodiversity ***24.3.1*** *To maintain and enhance the existing level of biodiversity within the District.* ***Policy - Maintenance and enhancement of indigenous biodiversity*** ***24.3.1.1*** *To achieve the maintenance and enhancement of indigenous biodiversity values in the District by ensuring that removal of indigenous vegetation or disturbance of wetland areas only occurs where:* *a. Connectivity to link core habitats along biodiversity corridors is supported; and* *b. Sensitive sites remain buffered from intensive land use, development and subdivision; and* *c. Habitat is retained for at risk and threatened indigenous species; and* *d. Customary activities do not adversely affect at risk or threatened indigenous species; and* *e. Consideration has been given to opportunities that contribute to no net loss at a regional scale.* *….*	Objective 24.3.1 seeks to maintain and enhance indigenous biodiversity across the District. Policy 24.3.1.1 implements this objective by ensuring indigenous vegetation removal and wetland disturbance only occurs where ecological values, habitat connectivity, buffering, threatened species habitat and no-net-loss considerations have been appropriately addressed. As detailed in the EAR, the site is identified as having high ecological value due to the SNA together with the confirmed presence of long-tailed bats. The Project maintains and enhances ecological connectivity through the retention ad restoration of riparian corridors, wetlands and terrestrial habitat areas, with restoration planting proposed over approximately 16,000 m² and riparian restoration extending along approximately 860 m of the retained watercourse and pond system. Further, the restoration around the key areas of habitat buffers the development from these areas with the proposed lighting condition able to mitigate any potential light spill effects into the habitat. The EAR confirms the proposed restoration and enhancement result in net gain for bio-diversity values for the site. On this basis, the Project results in an overall improvement in ecological values and therefore the Project is **consistent** with Objective 24.3.1 and Policy 24.3.1.1.
Objective - Maintain and enhance indigenous biodiversity within the biodiversity corridors ***24.3.2*** *To maintain and enhance indigenous biodiversity, ecological processes and connectivity within the biodiversity corridors as identified on Planning Map 49.* ***Policy - Loss of indigenous biodiversity***	The Project does provide for the restoration and enhancement of the wetlands however; they are not located within an identified bio-diversity corridor. A portion of the site along its western boundary is located within the 500m biodiversity buffer. In this instance, this area of the site contains the existing dwelling, grazing paddocks and no naturally occurring (without human assistance) indigenous vegetation.

24.3.2.1 *The removal indigenous vegetation and habitat of indigenous species or the disturbance of wetland areas within the biodiversity corridors is discouraged.* ***Policy - Promote enhancement of indigenous biodiversity*** ***24.3.2.2*** *To recognise and promote the importance of maintaining and enhancing connectivity along biodiversity corridors, and indigenous vegetation and habitat of indigenous fauna within the biodiversity corridors.* ***Policy - Encouragement of permanent protection in the biodiversity corridors*** ***24.3.2.3*** *To encourage incentives that achieve permanent protection for the retention of features within the biodiversity corridors such as wetlands and kahikatea stands.* *Advice Note: Please refer to Environmental Benefit Lot Rules 15.4.2.50 to 15.4.2.55.*	Further, there is no logical connection between the site and the main area of the corridor as the site is separated by from the Mangapiko Stream by the State Highway and residential properties. As such, the Project does not result in the loss of indigenous biodiversity within these identified areas and is therefore **consistent** with Objective 24.3.2.
Objective - Significant natural areas and bush stands ***24.3.3*** *To protect the indigenous biodiversity values and the existing level of indigenous biodiversity within the significant natural areas listed in Appendix N5 and bush stands listed in Appendix N8.* ***Policy - Limiting indigenous vegetation removal and other activities within identified significant natural areas and bush stands.*** ***24.3.3.1*** *To protect the ecological sustainability, indigenous biodiversity values and characteristics of significant natural areas including wetlands, and bush stands by ensuring that:* *a. The removal of indigenous vegetation or habitat of indigenous species is discouraged and:* *i. Only occurs in sustainable quantities in significant natural areas of local significance; and* *ii. Only occurs in limited circumstances within internationally, nationally or regionally significant natural areas and bush stands.* *b. The health and functioning of significant natural areas including wetlands, and bush stands is maintained through appropriate land use practices.* *…*	Objective 24.3.3 seeks to protect the indigenous biodiversity values and ecological functioning of identified SNAs and bush stands. Policy 24.3.3.1 implements this objective by discouraging indigenous vegetation removal and ensuring the health and functioning of SNAs is maintained through appropriate land use and management practices. As detailed in the EAR, the Project has been designed to avoid direct effects on SNA WP312, being the kahikatea remnant located within the site. The SNA will be retained in its entirety and protected through setbacks, restoration planting, weed control, predator management and long-term ecological enhancement measures. The the provision of the walkways will not result in the loss of indigenous vegetation within the SNA. On this basis, the Project is **consistent** with Objective 24.3.3 and 24.3.3.1.

Part F – Section 26 – Lakes and Water Bodies

Waipa District Plan Rule Assessment	
Objective / Policy Reference	**Comments**
Section 24 – Indigenous Biodiversity	
Objective - Protecting the natural character of lakes and water bodies and their margins, from inappropriate use, and development ***26.3.1*** *Ensure that activities that occur on and adjacent to lakes and water bodies are managed to avoid, and where possible enhance, natural character and water quality.* ***Policy - Ensuring activities are setback from lakes and water bodies*** ***26.3.1.1*** *To ensure that adverse effects on public access to lakes and water bodies, and on the natural character and quality of the water in lakes and water bodies are avoided, through establishing setbacks for a range of activities that may cause adverse effects, except within the Karāpiro and Arapuni Hydro Power Zone.* ***Policy - Managing effects*** ***26.3.1.2*** *Buildings, paved areas and wastewater treatment systems shall be located to avoid, remedy or mitigate adverse effects on remnant areas of indigenous flora and fauna, including, significant natural areas, peat lakes, and wetlands.* ***Policy - Customary activities*** ***26.3.1.3*** *To enable customary activities to be undertaken within and adjacent to the lakes and water bodies of the District* ***Policy - Managing ecological effects*** ***26.3.1.4*** *To ensure that users undertaking activities on the surface of lakes and water bodies and within their margins do not adversely affect water quality, or significant natural areas, other indigenous vegetation, or habitats of significant indigenous fauna.*	The Project has been designed to respond directly to the outcomes sought by Section 26 through the retention of the site's primary watercourse, the protection of SNA WP312, the restoration and enhancement of approximately 10,983 m² of wetland habitat, and riparian restoration along approximately 860 m of watercourse margins. The Project also incorporates a water-sensitive stormwater management system and erosion and sediment controls to improve water quality outcomes and minimise effects on freshwater environments. Together, these measures maintain and enhance the natural character, ecological functioning and biodiversity values of the site's wetlands, ponds and watercourse margins. On this basis, the Project is **consistent** with Objective 26.3.1 and the relevant policies.

Policy - Recreational activities ***26.3.1.5*** *To enable recreation activities adjoining lakes and water bodies, and ensure that they do not have adverse effects on the health and well-being of lakes and water bodies.* ***Policy - Enhancing natural character*** ***26.3.1.6*** *Promote the restoration and enhancement of the natural character of lakes, water bodies and their margins.* ***Policy - Good practice: lakes, water bodies and wetlands*** ***26.3.1.7*** *To promote good land use practice adjoining lakes, water bodies and wetlands; including promoting the value of wetlands for both their biodiversity importance and the ecological services they provide (e.g. controlling sediment and nutrients runoff from intensively managed land).*	

Waikato Tainui Environmental Management Plan

Waipa District Plan Rule Assessment	
Reference	**Comments**
Section 1.3.1 – Implementation of Te Ture Whaimana Objective and Policies	
1.1.1 Overarching Purpose *Key strategic objectives include tribal identity and integrity, including "to grow our tribal estate and manage our natural resources." The Plan is designed to enhance Waikato-Tainui participation in resource and environmental management*	The overarching purpose of the WTEP is to increase Waikato-Tainui participation in resource and environmental management. The Project demonstrates this in two principal ways. First, through engagement and consultation undertaken with Waikato-Tainui and the relevant iwi and mana whenua groups throughout the development of the Project (**Appendix 24 – Consultation and Engagement Record**). Second, through a design response that has recognised and incorporated key themes and outcomes promoted by the WTEP, including wetland restoration and enhancement, improved freshwater outcomes, and opportunities for ongoing mana whenua involvement in ecological restoration initiatives. On this basis, the Project is **consistent** with the overarching purpose of the WTEP by facilitating participation in the resource management process and responding to the key environmental, cultural, and social outcomes sought by the plan.
Section 11 – Te Ture Whaimana o Te Awa o Waikato – The Vision and Strategy for the Waikato River	
11.7.1 Objective – Te Ture Whaimana prevails *Te Ture Whaimana prevails in any resource management, use and activity within the Waikato River catchment in the Waikato-Tainui rohe.*	The SAR and this appendix include a specific assessment of the Project against the VS. Further, the VS has been given effect to by the RPS, WRP, and WDP. Overall, the Project has considered the VS and is **consistent** with its direction.
11.7.1.1 Policy – Te Ture Whaimana prevails *To ensure that Te Ture Whaimana prevails in any resource management, use and activity within the Waikato River catchment in the Waikato-Tainui rohe.*	
Section 16 – Natural Heritage and Biosecurity	
15.3.1 Objective – indigenous biodiversity	

The full range of Waikato ecosystem types found throughout the Waikato-Tainui rohe are robust and support representative native flora and fauna.	The EAR identified a range of indigenous fauna associated with the Site, including pekapeka (long-tailed bat), tuna (shortfin eel), indigenous bird species, and the likely presence of copper skinks. The EAR includes a range of recommendations, implemented through the EMP and LMP, which provide management measures to avoid, remedy, or mitigate potential effects on identified and likely indigenous fauna. In combination with the WEMP, these measures provide for the protection, enhancement, and restoration of indigenous habitats across the Site. The EAR concludes that the Project will result in an overall positive ecological outcome, including the enhancement of indigenous biodiversity values through substantial wetland restoration, revegetation planting, habitat creation, and ongoing ecological management. Accordingly, the Project is **consistent** with the direction of the relevant objectives and policies in Section 16 of the WTEP.
15.3.1.1 Policy – Indigenous biodiversity *To ensure that the full range of Waikato ecosystem types found throughout the Waikato-Tainui rohe are robust and support representative native flora and fauna.*	
15.3.2 Objective - landscape planning and natural heritage *Cultural, spiritual and ecological features of the Waikato landscape that are significant to Waikato-Tainui are protected and enhanced to improve the mauri of the land.*	
Policy – landscape planning and natural heritage *15.3.2.1 To ensure that there is greater protection and enhancement of cultural, spiritual and ecological features of significance to Waikato-Tainui.*	
15.3.3.1 Policy – mitigation of biosecurity risks to culturally and/or spiritually significant species and habitats *To ensure that priority plant and animal pests are appropriately identified, managed, and/or controlled to a level where their effects are minor or, where possible, are eradicated.*	
Section 16 – Valuable Historical Items, Highly Prized Sites, Sites of Significance	
16.3.1 Objective – Site Management Protocols ***Site management protocols exist to ensure a precautionary approach to site works to manage the potential for waahi tapu and taonga tuku iho discovery.***	The CVA and AA did not identify any specific sites of cultural significance. Nevertheless, the Project will include a condition relating to accidental discovery. The inclusion of this condition is aligned with the CVA by Ngati Apakura. Overall, this condition ensures the Project and its implantation has a clear process for the accidental discovery of taonga and archaeological sites. On this basis, the Project is **consistent** with the direction provided by the relevant objectives and policies in Section 16 of the WTEP.
16.3.2 Site Management Protocols ***The Project Manager for a project or consented activities incorporates site management protocols and other protocols in this chapter into the site management plan so as to ensure a precautionary approach to site works to manage the potential discover of waahi tapu and taonga tuku iho.***	
16.3.4 Objective – discovery of taonga (including archaeological sites) ***Procedures are in place to manage the discovery of taonga and archaeological sites.***	
16.3.4.3 Policy – archaeological sites ***To ensure that the appropriate protocol for the accidental discovery of archaeological sites is followed.***	
16.3.5 Objective – areas and sites of significance	

The adverse effects of resource use and activity operation are managed so as to appropriately protect areas and sites of significance.	
Section 17 – Natural Hazards	
17.3.1 Objective – land use and structures *Land use and the construction of structures occurs in a way that does not increase the risk or magnitude of a naturalbhazard event, and that does not increase the risk or effects on human life or activity in the event that a natural hazard event occurs.*	The GAR identifies the key natural hazard risks affecting the Site and provides recommendations for earthworks and construction to ensure the development is implemented in a manner that achieves an acceptable level of risk. In relation to flooding, the SMP assesses both current and future flood scenarios, including allowances for climate change. The SMP confirms that the proposed stormwater management system, together with the design and location of the proposed villas, will not give rise to an unacceptable flood risk either on-site or within the downstream catchment. Accordingly, the Project appropriately manages natural hazard risks and is **consistent** with the relevant natural hazard objectives and policies.
17.3.1.1 Policy – land use and structures *To ensure that land use and structures do not increase the risk or magnitude of a natural hazard event, and does not increase the risk or effects on human life or activity in the event that a natural hazard event occurs.*	
17.3.2.1 Policy – risk management *To ensure that human, cultural, spiritual, or environmental wellbeing is appropriately considered when assessing natural hazard risks and/or the need for hazard protection structures.*	
17.3.3 Objective – climate change *The cause and effects of climate change are understood and prepared for within the Waikato-Tainui rohe.*	
17.3.3.1 Policy – understanding and managing adverse effects of climate change *To ensure that the causes and effects of climate change are understood and prepared for within the Waikato-Tainui rohe.*	
Section 19 – Freshwater	
19.4.1 Objective – The relationship between Waikato-Tainui and water *Waikato-Tainui engage and participate in the highest level of decision-making on matters that affect waters in the Waikato-Tainui rohe.*	The Project recognise the relationship between Waikato-Tainui and water within its rohe. These objectives broadly relate to partnership with Waikato-Tainui where activities potential affect its relationship with water. Broadly, these principles are given effect to through Te Ture Whaimana, the RPS, WRP, and the WDP on which the Project is **consistent** with through the restoration and
19.4.1.1 Policy – decision making *To ensure that Waikato-Tainui engage and participate in the highest level of decision-making on matters that affect waters in the Waikato-Tainui rohe.*	
19.4.3 Objective – Water quality (integrated catchment management) *An integrated and holistic approach to management of water is achieved.*	
19.4.3.1 Policy – integrated catchment management	

To ensure that there is an integrated and holistic approach to catchment management that is effective and informative and the scope of planning is broad.	enhancement of the wetlands and riparian areas; and the improvement of stormwater quantity and quality of discharge downstream to the Waipa and Waikato Rivers. In addition, further opportunities for engagement and decision making will arise through the post-lodgement FTAA process.
19.4.4 Objective – water quantity and allocation *Water allocation is consistent with restoring and protecting the health and wellbeing of water bodies within the rohe of Waikato-Tainui.*	
19.4.4.1 Policy – water quantity and allocation *Ensure that any water allocation framework operates under consistent principles, is equitable and efficient and restores and protects the health and wellbeing of Waikato-Tainui water bodies.*	
Section 20 – Wetlands	
20.3.1 Objective – Wetland mauri and condition, hauanga kai, habitat *Existing wetlands are protected and enhanced*	The Project protects, restores, and enhances 11 of the 12 wetlands on site. The smallest wetland of 33 m^2 is being replaced with Stormwater Pond B, which will be an open water stormwater pond that provides for stormwater attenuation and open water habitat. The EAR confirms through the implementation of the Wetland and Enhance Plan and the recommendations of the EAR, the Project does not impact the overall functions of the wetlands on-site. Further, the WEP includes riparian planting and the removal pest plants in riparian vegetation and pest animals within the SNA. Overall, through the implementation of the recommendations through the management plans, the Project will enhance overall bio-diversity overall values at the site. Further, the GWR Report confirms the hydrological functions of the retained wetlands will not be impacted. On this basis, the Project is **consistent** with the objectives and policies of Section 20 - Wetlands.
20.3.1.1 Policy – improvement to the condition of existing wetlands *To encourage improvements to local hydrology (where possible) to support healthy wetland function, and restoration of locally appropriate wetland biodiversity within local planning and land management practice.*	
20.3.1.2 Policy – land use planning and management adjacent to wetlands *To ensure that all land use practices that have the potential to impact on wetlands have efficient sediment, drainage, discharge, fertiliser application, and riparian buffer control practices in place to ensure that adverse impacts on wetlands are prevented.*	
20.3.1.3 Policy – pest animals and plants *Refer to Objective – biosecurity risks and Objective – control agents for relevant objectives and policies for effectively managing pest animals and plants.*	
21.3.1 Objective – effectively manage soil erosion *Activities that accelerate soil erosion are managed effectively, including through the reforestation and retirement of marginal lands from existing intensive and environmentally unsustainable land uses*	
21.3.1.1 Policy – retirement and restoration of marginal land *To encourage local authorities and landowners to retire highly erodible land from farming and to restore and protect highly erodible lands.*	
21.3.1.2 Policy – land development	

All major excavation works that have the potential to impact on waterways shall have sufficient erosion and sediment control measures in place to ensure that adverse effects on water bodies are managed.	
Section 21 – Land	
21.3.2 Objective –the life supporting capacity of land and soils *The life supporting capacity of land and soils effectively manages soil nutrient loss and water quality so there is minimal impact on nutrient loss to waterways.*	The matters identified in Section 21 have been given effect to in the objectives and policies in the RPS and WRP. The objectives and policies identified do not give rise to any addition consideration expect for the impact on the Waikato Tainui rohe. Based on consistency with the WRPS and the WRP, the Project is **consistent** with the relevant objectives and policies in the WTEP as it relates to land.
21.3.2.1 Policy – soil and land management practices *To promote the adoption of best practice land and soil management that minimises soil erosion, nutrient leaching, and sediment and nutrient runoff.*	
21.3.2.2 Policy – land management *Promote and encourage the development and adoption of land management practices that protects waterways from suspended sediments, nutrients and pollutants.*	
21.3.4 Objective – achieve integrated catchment management, including floodplain and drainage management *Integrated catchment management occurs across the entire rohe of Waikato-Tainui, including in catchments that impact on, or flow into the Waikato-Tainui rohe. Integrated catchment management includes the effective and sustainable management of floodplains and drainage areas to promote natural habitat enhancement.*	
21.3.4.1 Policy – integrated catchment management plans and land use *To promote the development and use of integrated catchment management plans that adequately considers land use, floodplain and drainage management and that promotes habitat restoration*	
Section 22 – Fisheries	
22.3.1 Objective – holistic and coordinated approach *An integrated, holistic, and coordinated approach to fisheries management is achieved and sustained.*	Although primarily directed at the fishery specific activities, the WTEP identified key objectives to manage taonga fish species including the shortfin eel (tuna). The EAR confirms the drain systems provide habitat for tuna. Recognising the Project has impacts on these native fish species, the Project implements an EMP and a IFMP. The
22.3.1.1 Policy – holistic and coordinated approach *To ensure that an integrated, holistic, and coordinated approach to fisheries management is achieved and sustained.*	
22.3.1.3 Policy – other factors	

To be aware and respond to other factors that potentially impact on fisheries or fisheries management.	IFMP will minimise direct effects on indigenous fish specifies through the capture and relocation of the fish prior to works occurring. As such, it demonstrates effects On this basis, the Project is **consistent** with the direction of provided by the objectives and policies for fisheries.
22.3.2 Objective – taonga species *Taonga species are protected, restored and managed, consistent with the tikanga, kawa, maatauranga, and mana whakahaere of Waikato-Tainui.*	
22.3.2.1 Policy – taonga species *To ensure that taonga species are protected, restored and managed, consistent with the tikanga, kawa, maatauranga, and mana whakahaere of Waikato-Tainui.*	
22.3.2.2 Policy – mana whakahaere *Taonga species are protected and enhanced to give effect to the exercise of mana whakahaere*	
Section 26 – Land Use Planning	
25.3.1 Objective – approach to land use and development *Development principles are applied to land use and development (urban and rural) and development in new growth cells, that enhance the environment.*	The Project's integrated approach aligns with the key development principles identified in the WTEP. In particular, the Project provides for the enhancement and restoration of approximately of wetland habitat, restoration planting within and adjoining the SNA, the maintenance of the site's hydrological regime, and improvements to the quality of stormwater discharged to the downstream catchment. In relation to the conversion of highly productive land, the WTEP recognises that such conversion may be appropriate where it is outweighed by greater environmental, cultural, spiritual, or social outcomes than the existing land use. The SAR and EAR demonstrate that the Project will deliver significant environmental benefits through improved water quality, wetland enhancement, and the restoration of highly modified wetland areas. The Project will also generate positive social outcomes by responding to an identified demand for retirement village living and residential care facilities within Te Awamutu, enabling residents within the primary catchment to age in place and remain connected to their community. In terms of cultural outcomes, the Project does not adversely affect any identified sites or areas of significance. The CVA identifies opportunities for the enhancement and restoration of wetland environments and for ongoing mana whenua involvement in the
25.3.1.1 Policy – approach to land use and development *To encourage development principles to be applied to land use and developments (urban and rural) and, in particular, development in new growth cells, that enhance the environment.*	
25.3.2 Objective – urban and rural development ***Urban and rural development is well planned and the environmental, cultural, spiritual, and social outcomes are positive.***	
25.3.2.1 Policy – urban development ***To ensure that urban development is well planned and the environmental, cultural, spiritual, and social outcomes are Positive***	
25.3.3 Objective – positive environmental and cultural effects ***Land use and development has positive environmental and cultural effects.***	
25.3.3.1 Policy – positive environmental and cultural effects ***To ensure that land use and development, particularly new land use and development, has positive environmental and cultural effects.***	

	implementation of those measures. While not expressed as the direct view of Waikato-Tainui, the Project has the potential to achieve positive cultural outcomes through these restoration initiatives and opportunities for participation by mana whenua. On this basis, while the Site is not located within an identified growth cell, the Project is **consistent** with the overall land-use approach promoted by Objective 25.3.1 and the relevant policies.
Section 26 – Infrastructure	
26.3.1 – Objective – Waikato-Tainui engagement *Infrastructure development, upgrade, and maintenance within the Waikato-Tainui rohe occurs in partnership with Waikato-Tainui.*	The Section 18 Report identifies Objectives 26.3.1 and 26.3.1.1 as being directly relevant to the Project. Within the WTEP, infrastructure is described as including three-waters infrastructure, transportation networks, waste-disposal facilities, and public infrastructure. The Project is not, however, an infrastructure project in the strict sense. Rather, it is an integrated retirement village development that incorporates associated infrastructure components. Accordingly, Objectives 26.3.1 and 26.3.1.1 are not directly applicable to the Project. Notwithstanding this, the concept of partnership is identified as a key strategic direction of the WTEP. The Engagement and Consultation Record demonstrates a partnership approach with Waikato-Tainui through the sharing of information, consideration of feedback, and the development of a Project that is consistent with the direction of Te Ture Whaimana. On this basis, the Project is generally **consistent** with the intent of partnership as identified in Objective 26.3.1 and Policy 26.3.1.1.
26.3.1.1 Policy – Waikato-Tainui engagement *To ensure that infrastructure development, upgrade and maintenance within the Waikato-Tainui rohe occurs in partnership with Waikato-Tainui.*	
26.3.4 – Objective – transportation *Transportation infrastructure is developed and managed in a manner that provides for social, cultural, spiritual, economic, and environmental needs.*	The Project includes a key transportation infrastructure to provide for safe and efficient access to the State Highway. In terms of providing for cultural and spiritual needs, the proposed development and upgrading of infrastructure is not identified to impact on sites of cultural or spiritual
26.3.4.1 – Policy – transportation	

To ensure that transportation infrastructure is developed and managed in a manner that provides for social, cultural, spiritual, economic, and environmental needs.	significance. On this basis, the Project is **consistent** with the direction of Objective of 26.3.4 and 26.3.4.1.