Waipā DISTRICT COUNCIL

# MEMO

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|---|---|
| **To:** | Wayne Allan, Group Manager District Growth & Regulatory Services |
| | Quentin Budd, Manager District Plan and Growth |
| **From:** | Alice Morris, Senior Policy Planner |
| **Date:** | 6 October 2025 |
| **Subject:** | **Acceptance and Notification of Proposed Private Plan Change 35 – Te Awamutu Large Format Retail Centre** |

## 1 PURPOSE – TAKE

The purpose of this report is to:

- Provide an overview of Proposed Private Plan Change 35 –Te Awamutu Large Format Retail Centre (PC35), lodged on Friday 8 August 2025 by Planning Focus Limited on behalf of the applicant, 638 Limited;
- Recommend that PC35 is accepted in accordance with Clause 25(2)(b) of Schedule 1 to the Resource Management Act 1991 (RMA) under delegated authority by the Group Manager District Growth and Regulatory Services; and
- Recommend that PC35 is publicly notified in accordance with Clause 26 of Schedule 1 of the RMA.

## 2 EXECUTIVE SUMMARY – WHAKARĀPOPOTOTANGA MATUA

The Private Plan Change request applies to land at 638 and 670 Cambridge Road in Te Awamutu.

638 Limited have lodged a private plan change request to rezone land at 638 Cambridge Road from the existing Medium Density Residential zone (T11 Residential Growth Cell) to Commercial Zone with the Te Awamutu Large Format Retail Centre (TALFRC) overlay.

The plan change request also seeks to amend the existing district plan provisions that apply to TALFRC at 670 Cambridge Road (Rule 6.4.2.22) and for these to also apply to 638 Cambridge Road.

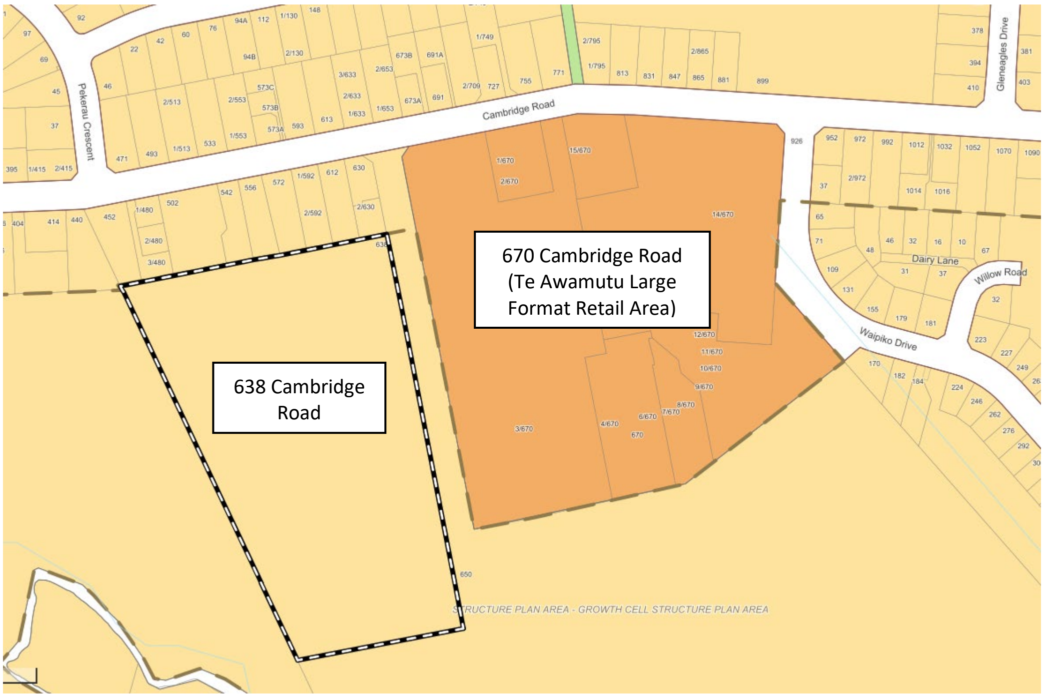


***Figure 1:*** *Planning Map, Waipa District Plan*

Proposed Private Plan Change 35 – Te Awamutu Large Format Retail Centre (PC35) seeks to:

- Rezone land at 638 Cambridge Road, Te Awamutu from Medium Density Residential to Commercial for the purpose of establishing a building improvement centre (the existing Mitre 10 is proposing to relocate to this land);
- Incorporate this area into the existing Te Awamutu Large Format Retail Centre at 670 Cambridge Road; and
- Enable the reuse of the existing Mitre 10 Building for retail purposes.

PC35 proposes amendments to the following parts of the Waipā District Plan:

- Section 6 – Commercial Zone;
- Appendix S1 – Te Awamutu Growth Map
- Appendix S6 – Te Awamutu Large Format Retail Site Plan;
- Appendix S26 – Te Awamutu T11Growth Cell Structure Plan; and
- Planning Maps.

It is recommended that the Group Manager District Growth and Regulatory Services, under delegated authority:

- Accepts PC35 (in whole) for processing pursuant to Clause 25(2)(b) of the First Schedule to the Resource Management Act 1991; and
- Instructs that PC35 be publicly notified in accordance with the requirements of Clause 26(1) of the First Schedule to the Resource Management Act 1991.

## 3 RECOMMENDATION – TŪTOHU Ā-KAIMAHI

*That the Group Manager District Growth & Regulatory Services, under delegated authority on behalf of Waipā District Council:*

a) ***Receives*** *the report of Alice Morris, Senior Policy Planner, titled "Acceptance and Notification of Proposed Private Plan Change 35 – Te Awamutu Lare Format Retail Centre" (ECM document reference 11510714); and*

b) ***Approves*** *to accept Proposed Private Plan Change 35 – Te Awamutu Large Format Retail Centre in accordance with Clause 25(2)(b) of Schedule 1 to the Resource Management Act 1991.*

c) ***Approves*** *to publicly notify Proposed Plan Change 35 – Te Awamutu Large Format Retail Centre in accordance with the requirements and timeframes set out in Clause 26 of Schedule 1 to the Resource Management Act 1991.*

## 4 BACKGROUND – KŌRERO WHAIMĀRAMA

The existing Te Awamutu Large Format Retail Centre (TALFRC) was established through a private plan change (PC53) to the previous Waipā District Plan in 2009. This plan change introduced a specific Te Awamutu Large Format Retail Concept Plan and associated provisions into the district plan. This plan and the provisions were transferred into the existing operative Waipa District Plan (WDP) as part of the 2012 district plan review.

The actual format and layout of the TALFRC was established through two resource consents for:

- Stage 1 – Pak'n Save in 2007 and
- Stage 2 Mitre 10 and the remaining development of the TALFRC site in 2010.

The TALFRC contains a mix of commercial activities, shared onsite carparking, with two large format retail activities, building improvement centre (Mitre 10) and a supermarket (Pak'n Save). The remaining activities on site are a mix of smaller retail tenancies, food and beverage outlets and commercial services and healthcare facilities:

| **Tenancies** | **GFA ($m^2$)** |
|---|---:|
| Pak n Save Fuel | 300 |
| Pak n Save Supermarket | 5350 |
| Mitre 10 | 5485 |
| Plumbing World | 700 |
| Guthrie Bowron | 500 |
| BNZ | 400 |
| Q Store | 700 |
| Mahoe Medical | 718 |
| Sanders Pharmacy | 207 |
| Focused Physiotherapy | 181 |
| Te Awamutu Birthing Centre | 463 |
| Pizza Hutt | 143 |
| Bakehouse Café | 200 |
| Oval Sports Bar | 195 |
| Big Barrel Liquor | 298 |
| **Total** | **15 840** |

The site is presently accessed from Cambridge Road via two vehicle entrances and a formed intersection onto a private ROW forming part of adjoining land. This right of way bisects 638 and 670 Cambridge Road. Both of these properties have legal rights to use the right of way.

The surrounding area is a mix of established residential housing and land identified for future urban development. The T11 growth cell, identified in the district plan, adjoins the southwestern, southern and southeastern boundaries of the TALRFC.

638 Cambridge Road is located within the T11 growth cell. T11 along with a number of future growth cells, was identified through the formulation of the 2009 Waipa 2050 Growth Strategy (Waipa 2050) around the existing urban extent of both Cambridge and Te Awamutu.

T11 was identified in the district plan as a growth cell through PC5 – Waipa 2050 Growth Strategy, live zoned (Residential Zone) through PC13 – Uplifting Deferred Zones and rezoned to Medium Density Residential Zone through Plan Change 26 – Residential Zone Intensification in 2024 (refer to Figure 2).

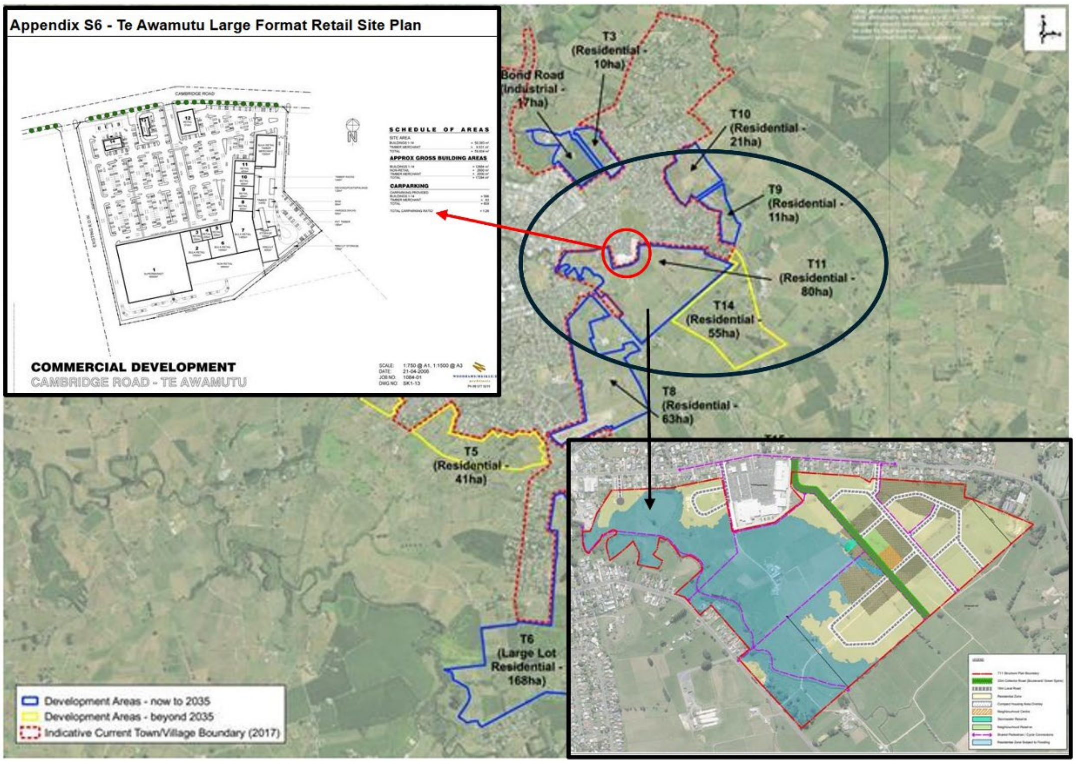


***Figure 2:*** *T11 and S6, Waipa District Plan*

## 5 PRIVATE PLAN CHANGE REQUEST

The request was lodged with Council on 8 August 2025 on behalf of 836 Limited by Planning Focus Limited. The private plan change request seeks to amend the WDP as follows:

- Rezone 638 Cambridge Road (Lot 1 DPS 10271) from Medium Density Residential Zone to Commercial Zone;

- Amend Appendix S1 – Te Awamutu Growth Map to remove 638 Cambridge Road from the T11 Residential cell;
- Replace the existing Appendix S6 – Te Awamutu Large Format Retail Site Plan with a revised Concept Plan (Figure 3)
- Remove 638 Cambridge Road from the Te Awamutu T11 Growth Cell Structure Plan in Appendix S26
- Amend performance standards and assessment criteria within:
    - Section 6 – Commercial Zone, Rules – Te Awamutu Large Format Retail (6.4.2.22 and 6.4.2.23)
    - Section 21 – Assessment Criteria and Information Requirements
- Amend the Planning Maps to rezone 638 Cambridge Road from Medium Density Residential to Commercial Zone, and remove the following overlays:
    - Infrastructure Constraint Qualifying Matter Overlay
    - River-Gully Proximity Overlay
    - Stormwater Constraint Qualifying Matter Overlay

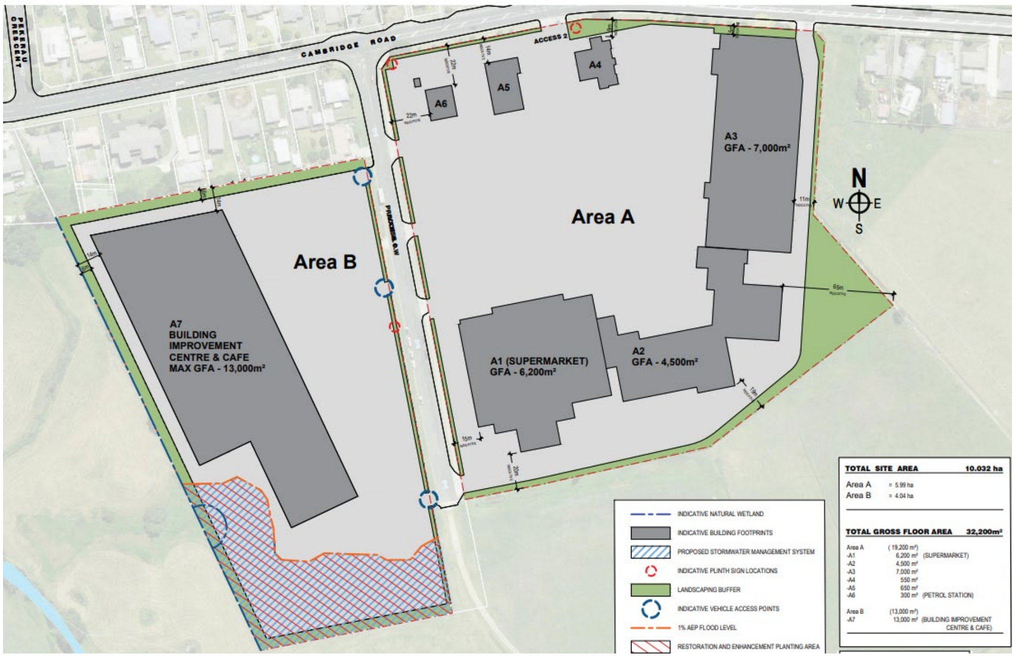


***Figure 3:*** *PC35 proposed changes (source PPC35 request: Assessment of Environmental Effects and Statutory Assessment, August 2025)*

The required deposit fee for PC35 was received on 12 August 2025. Following review of the submitted documentation, further information was requested on 29 August 2025, pursuant to Clause 23(1) of Schedule 1 to the Resource Management Act 1991. This requested information relating to:

- Evidence of engagement with Mana Whenua / Iwi
- Neighbouring landowner engagement
- Transportation
- Consistency of terminology applied

The further information requested was provided to Council on 19 September 2025. Council staff has reviewed the further information request and are satisfied that the request is now sufficient to enable processing of PC35 to continue. Accordingly, the processing clock for PC35 started on 22 September 2025.

## 6 RESOURCE MANAGEMENT ACT 1991 DECISION – ADOPT, ACCEPT OR REJECT

Section 73(2) of the RMA provides that any person may request that Council change the Waipā District Plan.

Part 2 of Schedule 1 to the RMA sets out the process to be followed for a private plan change request. It is under the following relevant clauses of this part that PC35 is to be processed.

### Form of Request (Clause 22)

The PC35 documentation that has been lodged is in writing, explains the purpose and reasons for the changes sought and contains a Section 32 evaluation report. The form of the plan change is in accordance with the requirements of Clause 22.

### Further Information (Clause 23)

Following the initial lodgement of PC35 a request for further information was made in terms of the requirements of Clause 23. The applicant has responded to this request, and it is considered that sufficient information has now been provided to enable Council to consider the private plan request.

### Consideration of Request (Clause 25)

Within 30 working days of receiving all required information (including payment of the required deposit fees) Council must decide how to deal with the request. Council must have particular regard to the evaluation report prepared for the plan change and may either:

- Adopt the request as if it were a plan change made by Council (Clause 25(2)(a)); or
- Accept the request, in whole or in part, and proceed to notify it under clause 26 (Clause 25(2)(b)); or
- Decide to deal with the request as if it were an application for resource consent (Clause 25(3)); or
- Reject the request (Clause 25(4)).

These four actions are discussed below.

The deposit fee for PC35 was paid in full on 12 August 2025, and all further information was provided on 19 September 2025. The 30-working day timeframe for making a decision under Clause 25 concludes on 3 November 2025.

**Option 1 – Adopt (Clause 25(2)(a))**

Council is prohibited from adopting private plan changes due to the Stop Plan requirements in Section 80P of the Resource Management Act.

**Option 2 – Accept (Clause 25(2)(b))**

Acceptance of a plan change request, enables the Schedule 1 process to occur with the applicant being responsible for meeting all the actual and reasonable costs incurred by Council up to the point where a decision on the plan change application is made.

Council is responsible for administering the statutory processes including notification, submissions, further submissions and hearing procedures and on charges costs back to the applicant.

PC35 as lodged (including the further information and evaluation report) provides sufficient information for people to understand what is proposed and to gauge any adverse effects the proposal may have on them.

**Option 3 – Treat as Resource Consent (Clause 25(3))**

The subject matter of PC35 and the changes to the district plan as proposed mean that it is not possible for PC35 be treated and processed as a resource consent.

**Option 4 – Reject (Clause 25(4))**

Council may reject PC 35, but only if one or more of the grounds set out in Clause 25(4)(a) – (e) of Schedule 1 of the Act apply.

Council staff are satisfied that the subject matter and substance of PC35:

(a) is not frivolous or vexatious;

(b) has not been considered and given effect to, or rejected by Council or the Environment Court in the last 2 years;

(c) is in accordance with sound resource management practice;

(d) will not make the Waipā District Plan (which has been operative for more than two years) inconsistent with Part 5 of the Act

As such Council Staff are satisfied that Clause 25(4)(a) – (e) do not give grounds for rejection of PC35.

**Adopt, accept, or reject decision summary**

Based on the discussion above it is recommended that PC35 be **accepted in whole** for processing by Council pursuant to Clause 25(2)(b) of the First Schedule to the Resource Management Act, and that staff proceed to notify the request under Clause 26.

## 7 RESOURCE MANAGEMENT ACT 1991 DECISION – NOTIFICATION

Clause 26(1)(b)(ii) of the First Schedule to the Act provides that PC35 must be notified within 4 months of it being accepted by Council under Clause 25(2)(b).

Clause 29(1) provides that Part 1 of the First Schedule applies to a plan change accepted under Clause 25(2)(b). As such the notification provisions of Clauses 5 (notification) and 5A (limited notification) apply.

Under Clause 5A Council may give limited notification of a plan change, but only if it is able to identify all the persons directly affected by PC35. In this instance staff are not comfortable that this requirement can be achieved to the point where all directly affected persons are identified. As PC35 concerns rezoning from Medium Density Residential Zone to Commercial Zone to allow for the extension of the existing large format retail centre in Te Awamutu, there is potential that others beyond immediate landowners could consider themselves directly affected. Because of this limited notification of PC 35 is not recommended.

**Notification recommendation: public notification**. It is recommended that PC35 be publicly notified in accordance with the requirements of Clause 5 to the First Schedule to the Act.

## 8 SIGNIFICANCE & ENGAGEMENT – KAUPAPA WHAI MANA ME NGĀ MATAPAKINGA

Staff have made an assessment of PC35 in relation to Council's Significance and Engagement Policy (refer Appendix A attached to this report) and consider that the matter(s) in this report are of a **low-medium** level of significance.

The higher risk matters assessed via the Significance and Engagement Policy include the likely impact of PC35 on:

- Māori values, including the relationship of Māori with their ancestral land, water, sites, waahi tapu, valued flora and fauna and other taonga;
- The catchment of the Waipā River and the associated objectives of Te Ture Whaimana;
- Environmental and cultural values; and
- Current and future community well-being and amenity values; and
- The safety and efficiency of Cambridge Road; and
- Potential for unbudgeted operating/capital expenditure relating to intersection improvements.

The low – medium significance is appropriate because:

- 638 Limited has provided evidence of engagement with Nga Iwi Topu o Waipa (NITOW).
- PC35 contains assessment relevant to the control, management, treatment and disposal of stormwater; and
- There are mechanisms that can be implemented through the decisions on this plan change to manage effects on infrastructure, including the transport network; and which would ensure cost neutrality to Council.
- PC35 will be publicly notified and any person will have the opportunity to lodge a submission on the proposal. Iwi partners and mana whenua have been informed of PC35 and will be served with direct notice in relation to it.

## 9 OTHER CONSIDERATIONS – HEI WHAIWHAKAARO

### Council's Vision and Strategic Priorities

Council's envisaged community outcomes and strategic priorities are set out in its 2025 – 2034 Long Term Plan, and include:

- Creating vibrant communities;
- Nurturing and respecting our unique culture and heritage;
- Responding to climate change;
- Caring for and valuing our environment now and in the future; and
- Effectively planning and providing for growing communities;

The recommendations of this report relate to a process under the RMA that includes consideration of the impacts of PC35 on the community, the growth and demand for residential land resource across the district and region, and other wider environmental, social, cultural, and economic effects. Council's priorities are not in conflict with the RMA.

### Legal and Policy Considerations – Whaiwhakaaro ā-Ture

The recommendations of this report are in accordance with Council's legal obligations under Schedule 1 of the RMA.

### Financial Considerations – Whaiwhakaaro ā-Pūtea

Acceptance of the plan change ensures that the applicant is responsible for meeting all of Council's actual and reasonable costs incurred in processing the application up to the point where a decision is made.

There always remains potential that any decision made by Council could be subject to appeal. This is the cost of democracy and is not a reason in itself that can be used to reject PC35.

### Risks - Tūraru

The recommendations of this report do not carry significant risk. The following potential (minor) risks have been identified:

- Community considers the effects of the proposed plan change are not able to be appropriately mitigated
- Community considers the reduction of medium density zoned land for residential development inappropriate;
- Impacts on the ecological and cultural values of the site/area;
- A large number of submissions are received;
- Processing takes longer than anticipated;
- The decision is appealed, and Environment Court proceedings are required.

While no plan change process is entirely without risk, the abovementioned risks are not considered to be significant enough to enhance, prevent, accelerate or delay the achievement of Council's business objectives.

### Iwi and Mana Whenua Considerations - Whaiwhakaaro ki ngā Iwi me ngā Mana Whenua

Mana whenua engagement has been initiated by the plan change applicant.

Staff have sent advice of receipt of the Plan Change to NITOW and Iwi partners. Direct notice of the plan change as part of public notification procedures will also be sent to these parties.

### Climate Change – Hurihanga Āhuarangi

The proposed plan change application includes consideration of climate change impacts by incorporating flood hazard management measures, and promoting integrated land use and transport modes. The conclusions from the information set out in the plan change request documentation concludes that the outcomes proposed through PC35 will align with the:

- Relevant iwi management plan (Te Rautaki Taiao Raukawa – Raukawa Environmental Management Plan 2015);
- Climate change resilience requirements under the 2022 Future Proof Strategy; and
- Resource Management Amendment Act 2020: National Adaptation Plan and Emissions Reduction Plan.

## 10 DELEGATIONS

The Waipā District Council delegations register provides the Group Manager District Growth and Regulatory Services with the following delegations:

- Clause 5, Schedule 1 RMA – Authority to decide whether to publicly notify proposal or give limited notification; and
- Clause 25, Schedule 1 RMA – Power to adopt, accept, reject or deal with a plan change request as set out in this section.

Because PC35 is expected to be uncontroversial it is recommended that decisions on adoption and notification of the plan change be made under delegated authority.

## 11 NEXT ACTIONS

| Action | Responsibility | By When |
|---|---|---|
| Notify Proposed Private Plan Change 35 – Te Awamutu Large Format Retail Centre | Staff | 16 October 2025 / As soon as possible |

## 12 APPENDIX

| No: | Appendix Title |
|---|---|
| 1 | Accept and Notify PC35 – Significance & Engagement Policy Assessment |

Prepared by: Alice Morris
**SENIOR POLICY PLANNER**

Reviewed by: Peter Skilton
**TEAM LEADER DISTRICT PLAN**

Approved by: Quentin Budd
**MANAGER DISTRICT PLAN AND GROWTH**

Approved by: Wayne Allan
**GROUP MANAGER DISTRICT GROWTH AND REGULATORY SERVICES**

# APPENDIX 1 – ACCEPT AND NOTIFY PC35: SIGNIFICANCE & ENGAGEMENT POLICY ASSESSMENT

| Name of proposal/decision: Accept and Notify Proposed Private Plan Change 35 – Te Awamutu Large Format Retail Centre | | |
|---|---|---|
| Date assessed: 26 September 2025 | By whom: | Alice Morris |
| **Significance and Engagement Policy considerations** | **Assessment of significance (high/med/low)** | **Notes/explanation of assessment** |
| What is the likely impact on the interests, values and aspirations of Māori in the district? | Medium | The most southeastern extent of the plan change area adjoins the Mangaohoi Stream, part of the Waipa River Catchment. Accordingly, it is subject to Te Ture Whaimana (Vision and Strategy for the Waikato River). The Waipa River catchment is highly significant to Māori. Through PC35 it is proposed to provide for wetland restoration planting and greater building setbacks to manage cumulative impacts on the well-being of the watercourse. Stormwater management through the provision of an enlarged planted wetland area to control stormwater runoff will assist in ensuring the ongoing viability of the existing wetland.<br><br>Given the measures proposed by the plan change application, and the ability for mana whenua to be further involved in PC35 through the RMA submission process, it is considered that likely impact of PC35 on the interests, values and aspirations of Māori in the district will be low – medium. |
| What is the likely impact on Māori values, including their relationship with their ancestral land, water, sites, waahi tapu, valued flora and fauna and other taonga? | Low | The application documents report that engagement has been initiated with mana whenua (NITOW).<br><br>PC35 includes proposed provisions that relate to the revegetation and protection of wetland areas within the subject site that are associated with the Mangaohoi Stream and, stormwater management devices.<br><br>Assessment of and the necessity for mitigation to protect identified fauna (bats, skinks/ lizards) is discussed through the request documents.<br><br>Given the measures proposed by the plan change application, and the ability for mana whenua to be further involved in PC35 as the RMA submission process, it is considered that likely impact of PC35 on cultural / Māori values are considered to be of low - medium significance. |
| Is there a legal requirement to engage with the community?* | Low | Primary responsibility for consultation with affected parties falls onto the applicant (638 Limited). Engagement is shown through the plan change documentation to have occurred.<br><br>There is a legal requirement for Council to engage with the community on PC35 through the notification |

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|---|---|---|
| Date assessed: 26 September 2025 | By whom: | Alice Morris |
| **Significance and Engagement Policy considerations** | **Assessment of significance (high/med/low)** | **Notes/explanation of assessment** |
| | | requirements of the First Schedule to the Resource Management Act 1991.<br><br>It is recommended that full public notification of PC35 occurs so that any person can lodge a submission. |
| What is the degree of likely impact on current and future community well-being? | Low | The plan change seeks to rezone existing Medium Density Residential Zone to Commercial which has not previously been anticipated. The proposed rezoning also reduces the available live greenfield zoned land for residential development.<br><br>The main points of contention are likely to relate to the:<br>▪ expansion of the Te Awamutu Large Format Retail Centre (TALFRC) in association with retail opportunities in general within Te Awamutu;<br>▪ reduction of live, but yet undeveloped, residentially zoned land;<br>▪ proposed mitigation to avoid adverse effects on the wider community infrastructure within Te Awamutu and the immediate transport network along Cambridge Road.<br>▪ Change in amenity values and generation of nuisance for occupiers of residential land in close proximity to 638 Cambridge Road<br><br>The degree of impact on the current / future community well-being is assessed as being of low risk. |
| What is the level of financial impact of the proposal or decision? | Medium | The proposed plan change provisions sets out the need for infrastructure and transportation management to be applied as part of any development or redevelopment of the TALFRC. Therefore, it is important that all costs associated with mitigation of adverse effects of the proposal fall on the applicant and developer. This is a focus of the submission process and the further information sought to date.<br><br>All costs associated with processing the plan change application up to the point of a decision are to be borne by the applicant. There is a risk that any decision made could be appealed. If this occurs Council will meet the associated costs of this in defending the decision.<br><br>Because of this, the issue of financial impact is considered to be of medium significance. However, this is part and parcel of the adversarial process set by the Resource Management Act and is a necessary cost of democracy. |

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| **Significance and Engagement Policy considerations** | **Assessment of significance (high/med/low)** | **Notes/explanation of assessment** |
| | | The chances of the decision being appealed is assessed as being medium risk and restricted to disagreement over timing of land release. |
| Specifically, does the proposal or decision include unbudgeted operating expenditure greater than 7.5 per cent of total operating expenditure? OR; | Low | The processing of PC35 up to the point of a decision being made does not include any unbudgeted operating expenditure. |
| Does the proposal or decision include unbudgeted capital expenditure greater than 2.5 per cent of the total value of Council's assets? | Low | The processing of PC35 does not commit any unbudgeted capital expenditure. |
| Will the proposal or decision affect a large portion of the community? | Medium | There is the potential for the proposed changes as a result of PC35 to affect the wider Te Awamutu. In particular through the expansion of retail opportunities and the anticipated traffic increase within the immediate Cambridge Road transport network.<br><br>Economic advice provided by the applicant does not consider the growth of the TALFRC will negatively impact the existing retail areas of Te Awamutu.<br><br>The increased traffic movements to and from the TALFRC arising from PC35 are intended to be mitigated by the requirements for the upgrade of the existing ROW intersection with Cambridge Road. |
| What is the level of likely impact on present and future interests of the community? | Low | The likely level of impact on the interests of the community overall is considered to be positive. This is because the expansion of the existing TALFRC centre is considered to provide opportunity for other large format retail to establish in Te Awamutu, reducing existing retail leakage. |
| Does the proposal affect the level of service of a significant activity? | Medium | The expansion of the TALFRC is anticipated to affect the existing level of service of the immediate transport network. However, the proposed introduction of signals at the intersection with Cambridge Road and the private ROW will assist with the impacts of service related to transportation network. |
| What is the level of community interest? | Medium | There is expected to be medium level of interest due to the unanticipated increase of commercially zoned land |

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| **Significance and Engagement Policy considerations** | **Assessment of significance (high/med/low)** | **Notes/explanation of assessment** |
| | | outside of the town's business centre and increase in traffic volumes.<br>The level of community interest is expected to be mainly limited to the owners and occupiers of the immediately surrounding area. |
| Will the likely consequences be controversial? | Low | The consequences of rezoning this 13,000m$^2$ portion of T11 from Medium Density Residential to Commercial is not considered to be controversial. |
| To what extent are community views already known, including the community's preferences about the form of engagement? | Low | It is stated in the private plan change request that immediate local landowners' and mana whenua have been informed of the proposal and the intent of the plan change.<br>The form of engagement that Council is obliged to follow is prescribed through Schedule 1 to the Resource Management Act 1991. |
| What forms of engagement have been used in the past for similar proposals and decisions? | Low | The Schedule 1 process set out in the Resource Management Act is the primary form of engagement associated with private plan change proposals.<br>This mandatory process provides for public notification and for any person to be involved in the decision-making process through lodging a submission. People who lodge submissions also have opportunity to appeal decisions to the Environment Court. |
| **Overall assessment**:** | **Low-Medium** | |

**Note that this is the only policy consideration that will trigger a high significance assessment in isolation.*

***Note that the more policy considerations that are assessed and medium or high significance, the more likely it is that the overall significance will be high. One high in isolation does not necessarily mean the overall assessment will be high.*