

13 February 2026

Document Ref: HAM2023-0124AU | Rev 1

Expert Consenting Panel - Ashbourne  
Private Bag 63002  
Wellington 6140

## **RE: FASTTRACK RFI RESPONSE MEMO** **ASHBOURNE DEVELOPMENT, MATAMATA**

### **INTRODUCTION**

The purpose of this letter report is to address the comments raised within the Expert Panel appointed Planz Consultants planning position report (comment and response table attached in Appendix A) on the 3<sup>rd</sup> of February 2026 regarding the Fast Track Substantive Application, ref. BRF-6105, for the proposed Ashbourne Development located along Station Road, Matamata.

### **MEMORANDUM RESPONSES**

Table 1 in Appendix A sets out a summarised record of position by Planz Consultants and details of our response on the panel review of the CMW document.

**For and on behalf of CMW Geosciences**

Prepared by:



Ben McKay  
Project Geotechnical Engineer  
MEngNZ

Reviewed and authorised by:



Dave Sullivan  
Principal Geotechnical Engineer  
CPEng, CMEngNZ

Distribution: 1 electronic copy to Expert Consenting Panel - Ashbourne via email  
Original held at CMW Geosciences

Appendices: Appendix A – RFI Response Table



# APPENDIX A: RESPONSE TABLE

Item No.	Respondent Reference/s	Respondents	Summary of Comment	Response to Position/Minutes
1	Active Fault Risk	Planz Consultants Ltd	<p>The outcome of the JWS suggests that the currently available information is wholly inadequate to determine the presence (or location) of an active fault risk (despite a clear understanding of what the mitigation response is if the risk was present). I consider this scenario differs to the flooding and liquefaction risks identified above, in that, while the mitigation method is clearly understood, the presence of the risk has not been identified (or more correctly, the site has not been determined to be free from risk). I consider the prudent approach would be to require the GNS report prior to granting consent so that the active faulting risk can be managed appropriately as anticipated by the NPS-NH."</p>	<p>The current active fault assessment exceeds typical industry standards for Resource Consent applications.</p> <p>The JWS agreed by the MPDC and applicant geotechnical expert representatives confirmed that that the geotechnical experts from both parties agreed that the Ashbourne site is "...not requiring any further assessment for active faulting..." for this stage of the FT application. MPDC and the applicant geotechnical experts agreed that a desktop screening should be a resource consent condition, and is to be carried out by a SQEP from Earth Science New Zealand before future detailed design of the development.</p> <p>Mitigation of fault hazards has been addressed in previous RFI responses in the CMW Fasttrack RFI Response Letter (ref. HAM2023-0124AQ Rev 0, dated 17 November 2025), under Table 1, Item 8, Note 2(1-4). This has been prepared in accordance with MfE guidance titled 'Planning for Development of Land on or Close to Active Faults', and the findings from recent research conducted by GNS/University of Waikato staff presented in a paper from 2025. This presents the following information:</p> <p>2. <i>Considering Table 11.2 in the MfE document, and given the average return interval of the Te Pūnanga Fault of 6,200yrs, and assuming there is a trace of an active fault even though the DEM study does not indicate a fault rupture through the site, the following points can be made:</i></p> <p>(1) IL1 structures are permitted within the fault avoidance zones established for any fault type,  (2) IL2 buildings may be permitted within the fault avoidance zones for distributed/uncertain fault types and permitted/controlled/discretionary for well defined faults,  (3) IL3 buildings are discretionary within the fault avoidance zones for distributed/uncertain fault types and non-complying for well defined faults, and  (4), building outside of the fault avoidance zones (if established) is allowable for IL1-IL3 structures (in relation to the fault rupture hazard).</p> <p>As outlined in the 2025 GNS paper, faults traces/fluvial features near the subject site are considered ambiguous and hard to define. When considering the reported fault ambiguity in relation to the MfE guidance document, faulting over the development area may be considered 'uncertain' at this stage of the assessment, with all IL1-IL2 buildings being permitted, and IL3 buildings being discretionary. The acceptance of a condition to undertake further investigations which may or may not provide more certainty on the location of a fault does not preclude development. As outlined above, moving the fault into the 'distributed' or 'well defined' category would allow reclassification of the activity status and fewer assessment criteria. Following Table 11.2 guidance from the MfE document, even in the case future fault studies indicate shorter return intervals over parts of the development site (up to 5,000 year intervals), all buildings up to IL3 may be permitted/discretionary for uncertain/distributed faults (refer Appendix B for excerpts taken from the MfE guidance document). In this scenario ground deformation due to faulting may be mitigated future buildings over future fault areas by designing foundations to take the calculated magnitude of movement into consideration. In addition to this, given foundations fall within TC2/TC3 hybrid category for liquefaction, there is already a base level of superstructure strengthening that will be required for future dwellings, which will help to mitigate the ambiguous risk that a diffuse/poorly defined fault system presents.</p> <p>When considering Policy 5 of the NPS-NH, incorporating scientific research published in 2025 and up to date planning guidance for developments in relation to faults, this can be considered the 'best available information' at the time of the assessment.</p> <p>In summary, the planning requirement of the referenced MfE guidance document for a fault avoidance area classified as 'uncertain' is permitted/discretionary for IL1-IL3 structures. In the event that further assessment results in changes to the classification (ie reduction in return period, and/or well-defined faults being identified), this will not preclude development of the site as proposed. Avoidance zones established 20m either side of a newly mapped active fault (if any) would be created. Alternatively, specifically designed foundations may be adopted for future structures. These may be similar to TC2/TC3 Hybrid foundations, which are already proposed to address liquefaction risk. The consent condition is therefore appropriate as the results of this study will follow through to our Geotechnical Completion Report (GCR) to ensure future structures are designed to match the assessment risk.</p>
2	WRPS	Planz Consultants Ltd	<p>With respect to the natural hazard objectives and policies, again, I do not consider that the active faulting risk has yet been adequately addressed.</p>	<p>Refer paragraph 2 of Item 1 of this table for reference to geotechnical expert JWS findings between MPDC and applicant teams that are not consistent with the reviewers stance: "The JWS agreed by the MPDC and applicant geotechnical expert representatives confirmed that that the geotechnical experts from both parties agreed that the Ashbourne site is "...not requiring any further assessment for active faulting..." for this stage of the FT application. MPDC and the applicant geotechnical experts agreed that a desktop screening should be a resource consent condition, and is to be carried out by a SQEP from Earth Science New Zealand before future detailed design of the development."</p>
3	RMA Part 2	Planz Consultants Ltd	<p>As the potential for active faulting has not been confirmed, I do not consider that the proposal has provided for the management of significant risks from natural hazards.</p>	<p>Refer paragraph 3 of Item 1 of this table for management of fault rupture risk, and paragraph 3 for mitigation options:</p> <p>"Mitigation of fault hazards has been addressed in previous RFI responses in the CMW Fasttrack RFI Response Letter (ref. HAM2023-0124AQ Rev 0, dated 17 November 2025), under Table 1, Item 8, Note 2(1-4). This has been prepared in accordance with MfE guidance on planning developments near active faults, and the findings from recent research conducted by GNS/University of Waikato staff presented in a paper from 2025. This presents the following information:</p> <p>2. <i>Considering Table 11.2 in the MfE document, and given the average return interval of the Te Pūnanga Fault of 6,200yrs, and assuming there is a trace of an active fault even though the DEM study does not indicate a fault rupture through the site, the following points can be made:</i></p> <p>(1) IL1 structures are permitted within the fault avoidance zones established for any fault type,  (2) IL2 buildings may be permitted within the fault avoidance zones for distributed/uncertain fault types and permitted/controlled/discretionary for well defined faults,  (3) IL3 buildings are discretionary within the fault avoidance zones for distributed/uncertain fault types and non-complying for well defined faults, and  (4), building outside of the fault avoidance zones (if established) is allowable for IL1-IL3 structures (in relation to the fault rupture hazard)."</p>
4	FTAA (1.)	Planz Consultants Ltd	<p>The active fault risk is unresolved and has not been addressed to the extent that it satisfies the NPS-NH, the WRPS or the MPDP, meaning that people could potentially be exposed to a very high (significant) natural hazard risk.</p>	<p>Refer paragraph 4 of Item 1 of this table for NPS-NZ applicability. The JWS recommends that future fault studies are carried out prior to detailed design in order to protect people using areas of the development in the intended land use when designed/completed. As outlined in the JWS, further fault study is not considered appropriate at this stage of the application by geotechnical experts on behalf of the FT respondents and the applicants teams. It is proposed to carry out the fault study before detailed design to ensure that the future development is designed appropriately to inform safe, compliant and effective mitigation techniques for the natural hazard risk presented by active faulting (if any).</p>

5	5.	Fast Track Expert Panel	<p>In addition, the Panel understands that the runoff to Basin A in a 3 day 100 year storm used for the mounding assessment excludes the disposal of stormwater by soakage devices other than Basin A. Please comment on how the infiltration of stormwater to ground from this mechanism might affect the mounding assessment for Basin A.</p>	<p>The depth from ground surface to mounding water levels is lower than previously assessed in our GIR (ref. HAM2023-0124AI Rev 3). This will result in less of the near-surface soil profile being subject to liquefaction-induced ground deformation, reducing overall liquefaction effects. This assessment of liquefaction local to stormwater pond mounding water levels during a 1-in-100yr storm event with a 3 day duration, along with with ULS seismic loadings (1-in-500yr seismic event), is considered a worst reasonable case scenario and addresses adequate sensitivity in design, in line with industry best practice.</p> <p>In regard to the latest WGA memo on groundwater (ref. WGA241087-MM-HG-0012_A, issued 10/02/2026), and in our expert opinion, the risk of liquefaction for the broader Ashbourne Development site is readily manageable using widely accepted design and construction mitigation techniques adopted in the industry as best practise for New Zealand sites.</p>
---	----	-------------------------	---	---

# APPENDIX B: MfE PLANNING GUIDANCE EXCERPTS

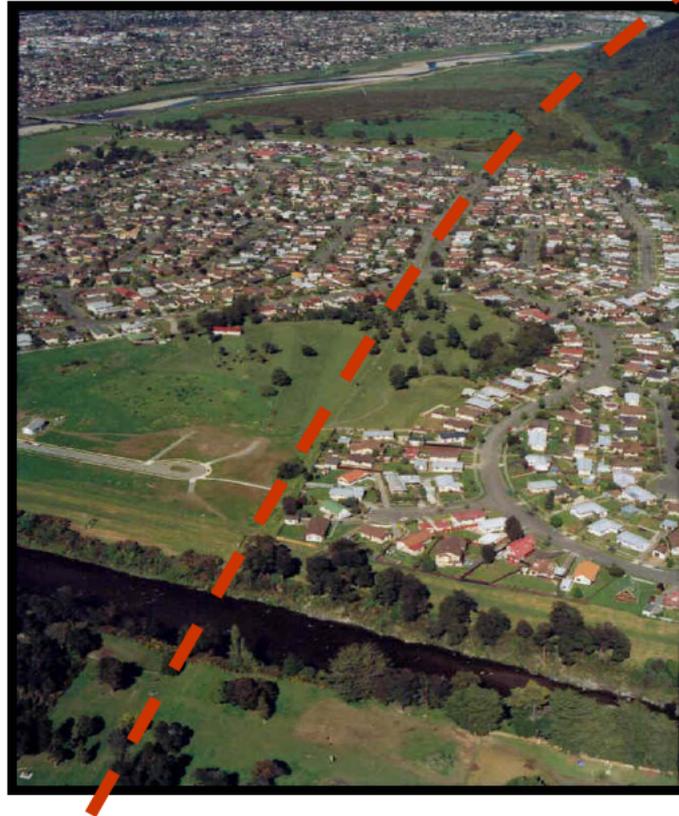


Ministry for the  
**Environment**  
*Manatū Mō Te Taiao*



*Institute of*  
**GEOLOGICAL  
& NUCLEAR  
SCIENCES**  
*Limited*

# Planning for Development of Land on or Close to Active Faults



**A guideline to assist resource management  
planners in New Zealand**

Report prepared for the Ministry for the Environment by  
Janine Kerr, Simon Nathan, Russ Van Dissen, Peter Webb,  
David Brunson and Andrew King

Published in July 2003 by the  
Ministry for the Environment  
Manatu Mo Te Taiao  
PO Box 10-362, Wellington, New Zealand

ISBN: 0-478-18901  
ME number: 483

Institute of Geological & Nuclear Sciences client report 2002/124  
Project Number: 440W3301

The data presented in this report are available to GNS for other use from May 2003.



***Titlepage photo: Totara Park suburb, Upper Hutt City.*** A “greenfield” development that has mitigated the fault rupture hazard of the Class 1 Active Wellington fault (The photo dates from the late 1970’s, before Totara Park was fully developed). The photo shows, in the distance, right of centre, the dual carriageway of California Drive leading into California Park, the large open space at centre. The Wellington fault underlies the median strip of California Drive, crosses California Park, through the centre of the photo, and continues to the lower left. It underlies a walkway between California Park and the Hutt River, just left of the leftmost group of houses nearest the camera, on the far bank of the Hutt River. The fault crosses into the river, at the leftmost of the trees aligned along the far riverbank. It continues to lower left, through Harcourt Park, another recreational reserve. Photo D.L. Homer, GNS CN18547/39

**Table 9.1: Building Importance Categories: a modified version of New Zealand Loading Standard classifications**

Building Importance Category (BIC)	Description	Examples
1	Structures presenting a low degree of hazard to life and other property	Structures with a total floor area of less than 30m <sup>2</sup> Farm buildings, isolated structures, towers in rural situations Fences, masts, walls, in-ground swimming pools
2a	Residential timber-framed construction	Timber framed single-story dwellings
2b	Normal structures and structures not in other categories	Timber framed houses of plan area of more than 300 m <sup>2</sup> Houses outside the scope of NZS 3604 "Timber Framed Buildings" Multi-occupancy residential, commercial (including shops), industrial, office and retailing buildings designed to accommodate less than 5000 people and also those less than 10,000 m <sup>2</sup> gross area. Public assembly buildings, theatres and cinemas of less than 1000 m <sup>2</sup> Car parking buildings
3	Structures that, <b>as a whole, may</b> contain people in crowds or contents of high value to the community or pose <b>risks to people in crowds</b>	Emergency medical and other emergency facilities not designated as post disaster facilities Buildings where more than 300 people can congregate in one area Buildings and facilities with primary school, secondary school or day care facilities with capacity greater than 250 Buildings and facilities with capacity greater than 500 for colleges or adult education facilities Health care facilities with a capacity of 50 or more residents but not having surgery or emergency treatment facilities Airport terminals, principal railway stations, with a capacity of more than 250 people Any occupancy with an occupancy load greater than 5000 Power generating facilities, water treatment and waste water treatment facilities and other public utilities not included in Importance Category 4 Buildings and facilities not included in Importance Category 4 containing hazardous materials capable of causing hazardous conditions that do not extend beyond the property boundaries
4	<b>Structures with special post disaster functions</b>	Buildings and facilities designated as essential facilities Buildings and facilities with special post-disaster function Medical emergency or surgical facilities Emergency service facilities such as fire, police stations and emergency vehicle garages Utilities required as backup for buildings and facilities of importance level 4 Designated emergency shelters Designated emergency centres and ancillary facilities Buildings and facilities containing hazardous materials capable of causing hazardous conditions that extend beyond the property boundaries.

Table 9.2 shows the relationship between the fault recurrence interval and Building Importance Category in previously subdivided or developed areas, and in greenfield sites.

It shows which Building Importance Categories are acceptable in a fault avoidance zone with a particular fault recurrence interval.

# 11 Taking a Risk-based Approach to Resource Consent

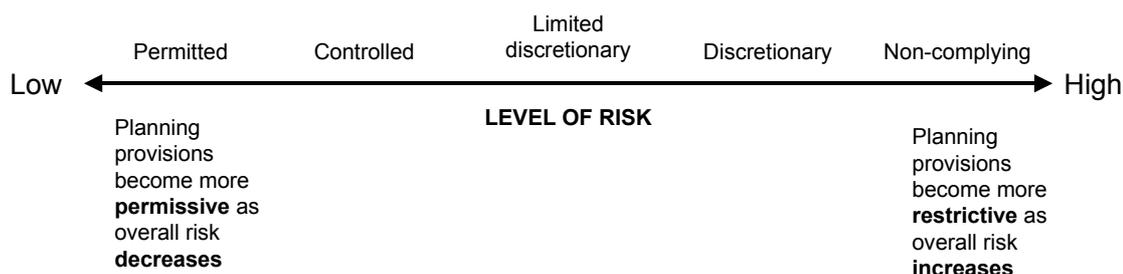
## 11.1 Determining consent categories

Determining consent categories for buildings within a fault avoidance zone involves evaluating the fault recurrence interval, fault complexity, and Building Importance Category alongside the risk the community is prepared to accept.

Differing types of buildings will be placed into different resource consent activity categories, based upon the risk. The council needs to be satisfied that the risk isn't significant, or that appropriate mitigation measures have been taken, before granting resource consent.

Clearly, as the risk increases, the consent category should become more restrictive, and the range of matters the council needs to consider will increase. The council needs to set requirements for the bulk, location and foundations of any structure, so it can impose the consent conditions that will avoid or mitigate the adverse effects of fault rupture.

**Figure 11.1: Scale of risk and relationship to planning provisions**



A rule may require resource consent for a new building, but with a requirement that a geotechnical report be included with the application (confirming that the building will be located at least 20 metres from an area subject to fault rupture, or that necessary engineering precautions have been taken).

For example:

*“For all structures and buildings, an engineering report will be required to confirm that the Wellington Fault is not within 20.0m of any proposed structure or building; or that the necessary engineering precautions have been taken”*  
(Standard 14H 2.1.1.2 to Rule 14H 2.1 of the Hutt Proposed District Plan)

Each council will want to apply the resource consent activity status categories that suits its own circumstances. *The key is to ensure that the council has the ability to address the fault rupture hazard risk properly when assessing a resource consent application.* The matters over which the council can reserve control or restrict its discretion include:

- the proposed use of the building
- site layout, including building setback and separation distance
- building height and design

- construction type (for resource management purposes)
- financial contributions (for example, reserves contributions).

Tables 11.1 and 11.2 show an example of resource consent activity status for proposed buildings within a fault hazard avoidance area. The activity status will depend on the Building Importance Category, the fault recurrence interval, and the fault complexity.

**Table 11.1: Resource consent activity status for greenfield sites**

Building importance category	1	2a	2b	3	4
Fault complexity	Activity status				
<b>Fault recurrence interval class I less than or equal to 2000 years</b>					
A – Well defined	Permitted	<i>Non-complying</i>	<i>Non-complying</i>	<i>Non-complying</i>	Prohibited
B – Distributed	Permitted	<i>Discretionary</i>	<i>Non-complying</i>	<i>Non-complying</i>	Non-complying
C – Uncertain <sup>†</sup>	Permitted	<i>Discretionary</i>	<i>Non-complying</i>	<i>Non-complying</i>	Non-complying
<b>Fault recurrence interval class II greater than 2000 but less than or equal to 3500 years</b>					
A – Well defined	Permitted	<i>Non-complying</i>	<i>Non-complying</i>	<i>Non-complying</i>	Prohibited
B – Distributed	Permitted	<i>Discretionary</i>	<i>Non-complying</i>	<i>Non-complying</i>	Non-complying
C – Uncertain <sup>†</sup>	Permitted	<i>Discretionary</i>	<i>Non-complying</i>	<i>Non-complying</i>	Non-complying
<b>Fault recurrence interval class III greater than 3500 to but less than or equal to 5000 years</b>					
A – Well defined	Permitted	Permitted*	<i>Non-complying</i>	<i>Non-complying</i>	Non-complying
B – Distributed	Permitted	Permitted	<i>Discretionary</i>	<i>Discretionary</i>	Non-complying
C – Uncertain <sup>†</sup>	Permitted	Permitted	<i>Discretionary</i>	<i>Discretionary</i>	Non-complying
<b>Fault recurrence interval class IV greater than 5000 but less than or equal to 10,000 years</b>					
A – Well defined	Permitted	Permitted*	Permitted*	<i>Non-complying</i>	Non-complying
B – Distributed	Permitted	Permitted	Permitted	<i>Discretionary</i>	Non-complying
C – Uncertain <sup>†</sup>	Permitted	Permitted	Permitted	<i>Discretionary</i>	Non-complying
<b>Fault recurrence interval class V greater than 10,000 but less than or equal to 20,000 years</b>					
A – Well defined	Permitted	Permitted*	Permitted*	Permitted*	Non-complying
B – Distributed	Permitted	Permitted	Permitted	Permitted	Non-complying
C – Uncertain <sup>†</sup>	Permitted	Permitted	Permitted	Permitted	Non-complying
<b>Fault recurrence interval class VI greater than 20,000 but less than or equal to 125,000 years</b>					
A – Well defined	Permitted	Permitted*	Permitted*	Permitted*	Permitted*
B – Distributed	Permitted	Permitted	Permitted	Permitted	Permitted**
C – Uncertain <sup>†</sup>	Permitted	Permitted	Permitted	Permitted	Permitted**

Note: Faults with a recurrence interval of greater than 125,000 years are not considered active.

\* The activity status is permitted, but could be controlled or discretionary because the fault location is well defined.

\*\* Although the activity status is permitted, care should be taken in locating BIC 4 structures on or near known active faults. Controlled or discretionary activity status may be more suitable.

† Where the fault trace is uncertain, specific fault studies may provide more certainty on the location of the fault. Moving the fault into the distributed or well defined category would allow a reclassification of the activity status and fewer assessment criteria.

*Italics* show that the activity status is more flexible. For example, where *discretionary* is indicated, controlled activity status may be considered more suitable.