Before the Expert Consenting Panel

In the matter	of an application for approvals under section 42 of of the Fast-track Approvals Act 2024 (**Act** or **FTAA**)
and	
In the matter	of Ashbourne **FTAA-2507-1087**, a referred project under section 21 of the FTAA

MEMORANDUM OF COUNSEL ON BEHALF OF MATAMATA DEVELOPMENT LIMITED

27 February 2026

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MAY IT PLEASE THE PANEL:

1. This memorandum is filed on behalf of the applicant, Matamata Development Limited (**MDL**).

Further extension of suspension

2. MDL appreciates the guidance provided by the Expert Consenting Panel (**Panel**) in relation to its understanding of the process following the issue of a draft decision. Having further considered the Panel's explanation of the limits that it considers there to be on the steps that MDL may take following the issue of a draft decision,[1] it respectfully requests that the suspension of the processing of the application is extended until 6 March 2026.

3. That suspension will allow the parties to proceed with stormwater and groundwater expert conferencing in accordance with the agenda that was attached to Minute 19, and for the Panel to consider the outcome of the conferencing.

4. Naturally, MDL agrees that the Panel, Matamata-Piako District Council (**MPDC**) and Waikato Regional Council (**WRC**) can continue to incur costs in relation to expert conferencing.

Expert conferencing

5. In paragraph 30 of Minute 19 the Panel directed that MDL "make available all information and clarifications, not otherwise available on the fast track website, to all parties in advance of any rescheduled conferencing". MDL's experts have prepared some initial comments in response to the concerns

1 Minute 20 at [4].

raised by Jon Williamson. Those responses are attached to this memorandum as follows:

(a) **Appendix A:** by Maven, regarding the assumptions used in the modelling undertaken by MDL;

(b) **Appendix B:** by Barker & Associates, regarding the consent conditions relevant to stormwater and groundwater.

6. MDL is also intending to file a further memorandum by WGA, regarding the groundwater and soakage rates used, which it will do in advance of expert conferencing.

7. MDL has been communicating with MPDC and WRC in order to ensure that all experts are suitably prepared for independently facilitated expert conferencing in the week of 2 March 2026.

DATED at Auckland this 27th day of February 2026

W S Loutit / P Lang
Counsel for Matamata Development Limited

APPENDIX A

Memorandum

To:	Expert Consenting Panel - Ashbourne
From:	Dean Morris (Maven Waikato Limited)
Subject:	Ashbourne, Matamata –Minute 16; Stormwater
Date:	27th February 2026

1 Introduction

The purpose of this memorandum is to provide relevant advice for the applicant's response Fast Track application Minute 16, and the comments provided by Mr Jon Williamson regarding the performance and capacity of the Stormwater Basin A and agenda items for conferencing on the proposed Ashbourne Development, Matamata.

This memorandum should be read in conjunction with the updated technical documents prepared in support of the application, including WGA Memorandum Ref. WGA241087-MM-HG-0013_A.

In responding to Minute 16 there are some relevant matters to consider from the past which Mr Williamson will likely not be aware of when preparing his memo. This may also assist the panel to understand the full extent of the work and wider context that has gone into the stormwater solution for the residential.

a) The applicant, Waikato Regional Council (WRC) and Matamata-Piako District Council (MPDC) have been consulting over the stormwater solution for the Ashbourne development for some 18 months.

   This resulted in WRC supporting the application at lodgment as being a simple straight forward application. Further discussions through the fast-track process resulted in MPDC also accepting and supporting the Stormwater solution subject to appropriate consent conditions as outlined in Decembers stormwater joint witness statement.

   The relevant sections of the JWS Stormwater 16th Dec 2025[1] pertaining to Basin A and also soakage and groundwater in general is as follows:

   Applicant (Maven) / BR (MPDC / MW (WRC) The applicant has provided outcomes of stormwater modelling which included no soakage, no onsite mitigation (soakage or tanks), which The Greenway, wetlands and dry basins provided storage to attenuate the larger design events. Further assessment is necessary to ensure confidence in the robustness of the evaluations, including the availability of adaptive management options if required. This is a standard industry practice and can be incorporated into the updated Stormwater Management Plan (SMP). This updated SMP should address groundwater variability and provide evidence that the stormwater management solution is both fit for purpose and robust. As with other aspects in the JWS an agreed pathway is that an updated Stormwater Management Plan (SMP) will be prepared as part of the consenting process and reviewed by MPDC and WRC. It is to be noted that the Expert Panel have the discretion of requiring this updated SMP prior to consenting or post granting i.e. condition

   Applicant (Maven): In preparing a fast-track application Maven has taken the view that it was important to be conservative in the sizing of mitigation and have redundancy in the stormwater design. Further refinement of the

[1] Ashbourne-JWS-Stormwater-management-FINAL.pdf

SMP, especially for multiple smaller events will take considerable time to produce and check without ever impacting on a approved consent. Therefore, in the context of a fast track this is best dealt with via consent conditions.

The relevant context here is that there have been requests from MPDC and to a lesser extend WRC post lodgment to consider various conservative scenarios to provide confidence that there is redundancy by considering events that exceed MPDC and WRC standards. An example of such a scenario mentioned above is no soakage and no onsite (on lot) mitigation which was modelled without any additional effects due to the oversizing of the Greenway and Basin A (the only soakage basin). Maven had reported these results back to all parties as part of minute 4; Appendix 5I; SMP-Rev B on 18th November before the Dec 15th caucusing.

Given the JWS thereafter MPDC's expert was satisfied that there was sufficient redundancy available as to affect the issue of a consent with detailed design still to occur in future. The additional commentary in the JWS from Maven about being conservative and having redundancy in the sizing of the mitigation touches on this. The requirement for an updated SMP as a Condition of Consent is a detailed design issue which we welcome to be specific in terms of the content of the condition that informs the detail of the SMP – as reviewed by WRC and MPDC and proposed in our latest set of conditions.

Additional assessment to inform the SMP will be around smaller more frequent events and refinement of mitigation to look at various detailed design options and adaptive management to further lessen the effects. For example, the no onsite mitigation modelling demonstrated that given the large greenway much of the mitigation can be removed without effects.

As a fast track with limited time to adapt, Maven's approach has been to ensure mitigation is oversized to ensure any complications can be addressed during processing. That is the case with Basin A.

The purpose of this memo is therefore to clarify:

- The required Storage volumes under the RITS Code of Practice (4.2.4.2)
- The confirmed design storage volume of Basin A and associated Redundancies therein
- The conservative assumptions for soakage
- Why the basin complies with the relevant stormwater volume control requirements

2 Volume Control Requirements

The RITS Code states '*A 24-hour nested design storm shall be used plus 2.1degrees Celsius (climate Change adjustment) for post development'* in accordance with RITS Section 4.2.4.4. See table below that outlines the requirements.

4.2.4.4 **Design Storm Detention**

In any greenfield development where detention storage is present or will be required, the stormwater design shall be based on hydraulic modelling or other methods in accordance with Table 4-7: Design Level of Service. A 24-hour nested design storm, as found in HIRDS, shall be used for pre-development flows (without climate change adjustment) and plus 2.1°C (with climate change adjustment) for post development. If the catchment has a very long response time, it may be necessary to deviate from the 24 hour storm.

Figure 1: Section 4.2.4.4 (RITS)

Table provided below shows summary of the incoming catchment volume into Basin A, highlighting the required Volume required.

Required Design (Target)		References
Post Development (100 year – 10 year)	9321.3m³	Modelled value from HEC-HMS
Existing Inflow (100 year)	3439.2m³	Modelled value from HEC-HMS
Total Volume required	12,760.5m³	

Table 1: Required Volume under RITs and Code for 100year Storm event CC

The required storage volume for Basin A for the contributing catchment is **12,760.5 m³**.

3 Basin A Design Parameters and Total Storage

- Basin A has been designed with a confirmed available storage volume of Provided Storage Volume = 9,734m³. Note this is considering a 300mm freeboard from top of pond. If volume is taken right at the top this volume will further increase.
- Basin A Soakage Capacity based on a conservative 36.03mm/hr will add more storage capacity by = 2,848.3m³.
- Soakage Devices under the Basin A will add more volume of 187.2m³ (2m (W) X 0.5m (H) X 234m (L) X 0.8 (Air Voids)).
- The total proposed storage capacity of Basin A is = 12,769.5m³.

Basin A Parameter	
Rainfall Event	100 Year
Time of Concentration	24 hrs
Depth	2.0m (Less Freeboard 300mm below top
Volume	9,734m³

Table 2: Basin A Parameter

Soakage Parameter	
Soakage Rate	0.865m/day (*36.03mm/hr*)
Base Area	3292.9m²
Soakage Volume	2848.3m³/day
Soakage Devices	187.2m³ (80% Voids ratio)
Total Volume	3,035.5m³

Table 3: Soakage Parameter

Based on table 2 and 3 the overall Basin A capacity is **12,769.5 m³** which is more than the required storage (Table 1). This exceeds the current RITS requirement of 2.1 deg by cpnsidering a higher level of Climate Changes (+3.8 degrees) and with potential further capacity of the pond as mentioned above. Critically, this compliance can be achieved with a very conservative soakage rate as outlined below. The full 24-hour design storm volume can be contained within the Basin A capacity with conservative soakage rates.

4 Soakage Assumptions (Conservative Sensitivity Only)

Section 2 of the Matamata-Piako District Council Soakage Guidelines identifies that the Matamata area is characterised mainly by sandy soils which sit at the top of the stormwater retention hierarchy within the district due to their favorable infiltration. The Guidelines recognise soakage basins and infiltration devices as a preferred stormwater management method in these soil types where appropriate separation to groundwater of 1m vertically is demonstrated which is the case for Basin A as per .WGA reporting (over 5m vertically)

The proposed design for Basin A aligns with this hierarchy. The soils tested onsite within the Southern Catchment are consistent with the sandy soils as described in the Guidelines and are similar to those successfully utilised in the Peakedale and Maea Fields developments, both of which has soakage basin systems.

Conservative soakage has been incorporated into modelling as an additional storage capacity for Basin A.

A soakage rate of 36.03mm/hour (Maven SMP; Table 7; Page 20) has been adopted for design modelling. This value is well below the:

- Soakage rates identified through geotechnical falling head testing of 178-345 mm/hr (Maven SMP; Table 5, page 18)
- Significantly lower than rates permitted or referenced under RITS for similar soil conditions (Maven SMP; Table 5; page 18)
- Intentionally conservative to reflect a worst-case performance scenario.

MPDC Guidelines	**Value**
Soakage Rate Adopted (Conservative WGA;3-day)	36.03mm/hr
Tested Soakage Rate Onsite (CMW)	178-345 mm/hr
Required Design Rate based on MPDC Guidelines	261.5 mm/hr (Average)
Required Design Rate (after 0.5 Factor of Safety)	130.75 mm/hr
Minimum Soakage Rate as per MPDC Guidelines	30mm/hr (0.5l/min/m²)
Conservative Allowance Relative to RITS Default Rate	Yes – significantly lower adopted rate
Soakage rate redundancy	130.75 – 36.03mm/hr = 94.72mm/hr

Table 4: Soakage Rate Redundancy

If we used tested soakage rates with MPDC recommended FoS incorporated it would infiltrate approximately 10,333.1 m³/day.

Even if soakage were reduced substantially below 36.03 mm/hr there is still ability of Basin A to still meet the required 24-hour storage volume with minor amendments to basin footprint or diverting existing catchments elsewhere via minor detailed design amendments.

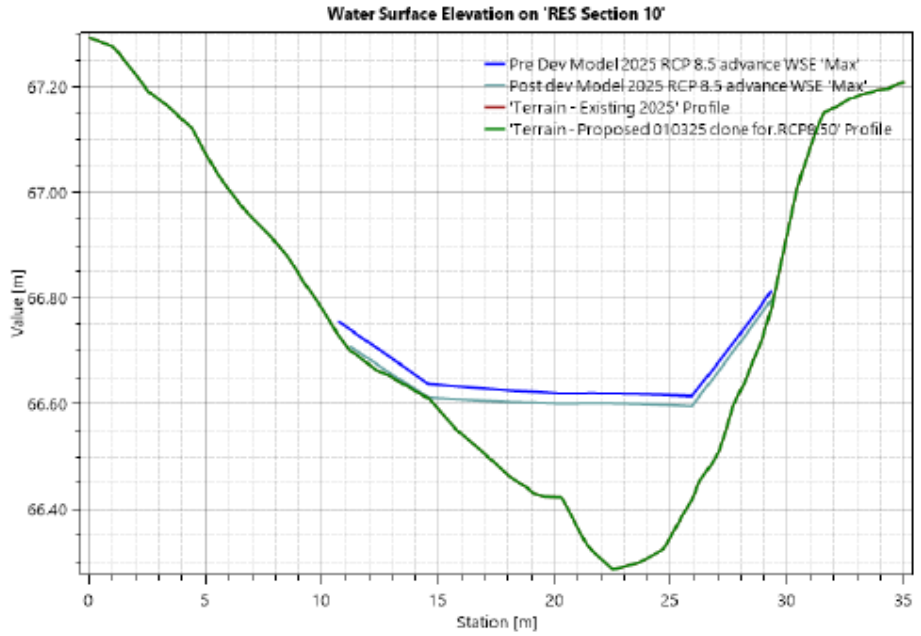
5 Receiving Environment Basin A Model No Soakage

As part of the sensitivity checking process that's required through the Stormwater management modelling it was found that we are improving flooding within the Eldonwood Precinct. This modelling is scenario based on full blockage of the Primary Reticulation Network and no allowances for Soakage within Basin A. This is an unrealistic and highly conservative scenario that exceeds relevant standards but is effectively what has been asked for by Mr Williamson.

In such a scenario Basin A will fill and has an overflow / tipping point flowing to the north as a small overland flow. Basin A was specifically located in this location as this overland flow already exists in the predevelopment state. The predevelopment flow in the absence of basin A is some 800l/s. Post development with the storage available the flow is reduced to some 700l/s.

Essentially, from this sensitivity model the results show that the level through RES Section10 was reduced (as per screenshot below). This concludes the basin has a positive impact even with zero soakage verses the existing scenario storm event of 100-year RCP 8.5 ie it not only reduces the flow to the north but also mitigates the effects of climate change on properties to the north. See below screenshots as shown in SMP.

Figure 2: Post Development Flood Overview



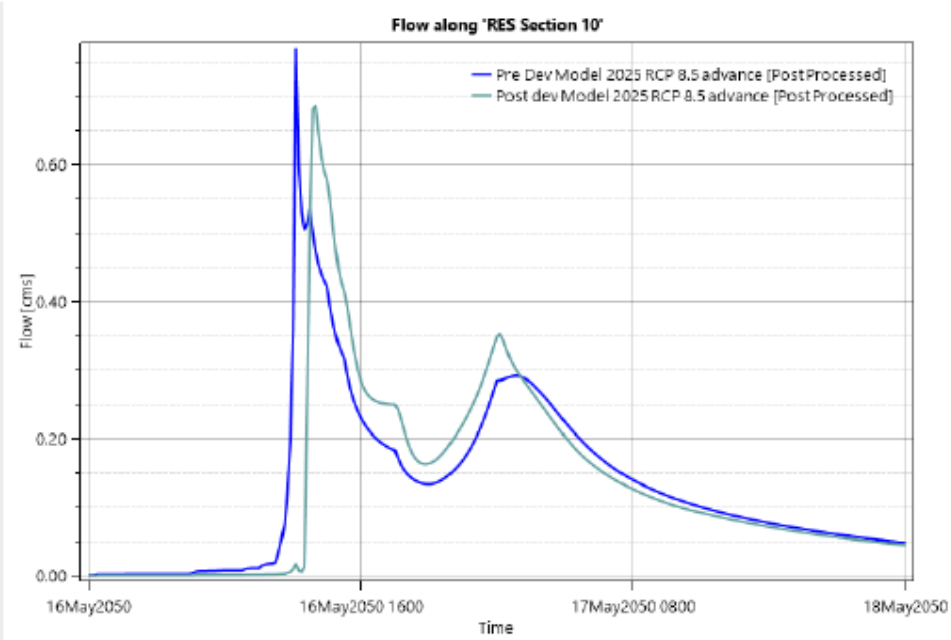


Figure 3: Post Development Cross Section and Flow

6 Response to Capacity Concern

The commentary suggesting "little confidence" in the basin capacity appears to rely on a comparison between modelled soakage volumes and a theoretical target volume. However:

- The RITS requirement is in terms of storage volume, not daily infiltration capacity.
- Basin A meets the required storage volume for 100-year storm event RCP 8.5 with climate changes of
  +3.8 degrees with conservative infiltration.
- The design under both low and high groundwater sensitivity scenarios meets requirements and further redundancies are within the soakage component of the basin.

As stormwater engineers our design assessment of compliance is based on hydraulic storage performance under the required design storm criteria. From this perspective Basin A achieves the required 24-hour event volume and therefore satisfies Clause 4.2.4.4 of the RITS. Groundwater mounding assessments are relevant to long-term infiltration, but they do not affect the basin's volume storage compliance with the relevant codes is so far as identifying effects. There are an infinite number of scenarios that can be considered for sensitivity and redundancy but these are not relevant to demonstrating compliance.

7 Conclusion

This memorandum has clarified the applicable volume control requirements under Section 4.2.4.4 of the RITS Code of Practice, Matamata-Piako District Council Soakage Design Procedures & Guidelines and demonstrated, through updated modelling and confirmed design parameters, that Basin A satisfies the required 24-hour nested design storm storage criteria inclusive of climate change allowances.

The required design storage volume for the 100-year, 24-hour nested storm event (including climate change adjustments) has been determined as set out in Table 1. The confirmed available storage within Basin A, including volume and associated freeboard allowance (refer Tables 2, 3 and 4), provides sufficient capacity to contain the full design event volume.

The infiltration component has been modelled using a deliberately conservative rate of 36.03mm/hr, substantially lower than site-tested values, and is therefore treated as additional redundancy rather than a prerequisite for compliance. Even under materially reduced infiltration assumptions, the basin retains sufficient hydraulic storage capacity to meet the RITS requirements.

Based on the assessment outlined in this memo, Basin A clearly meets the storage requirements based on Clause 4.2.4.4 of the RITS code of practice and well exceeds the minimum MPDC Soakage Rate requirements outlined in the Guidelines.

Both WRC and MPDC accepted and supported the Stormwater solution proposed, as per the JWS. All experts agreed that the stormwater solution was appropriate for the site, even in conservative scenarios exceeding the relevant MPDC and WRC standards. Consent conditions are an appropriate mechanism to confirm the finer details of the design.

Appended:

1. C401 Catchment areas with / without soakage

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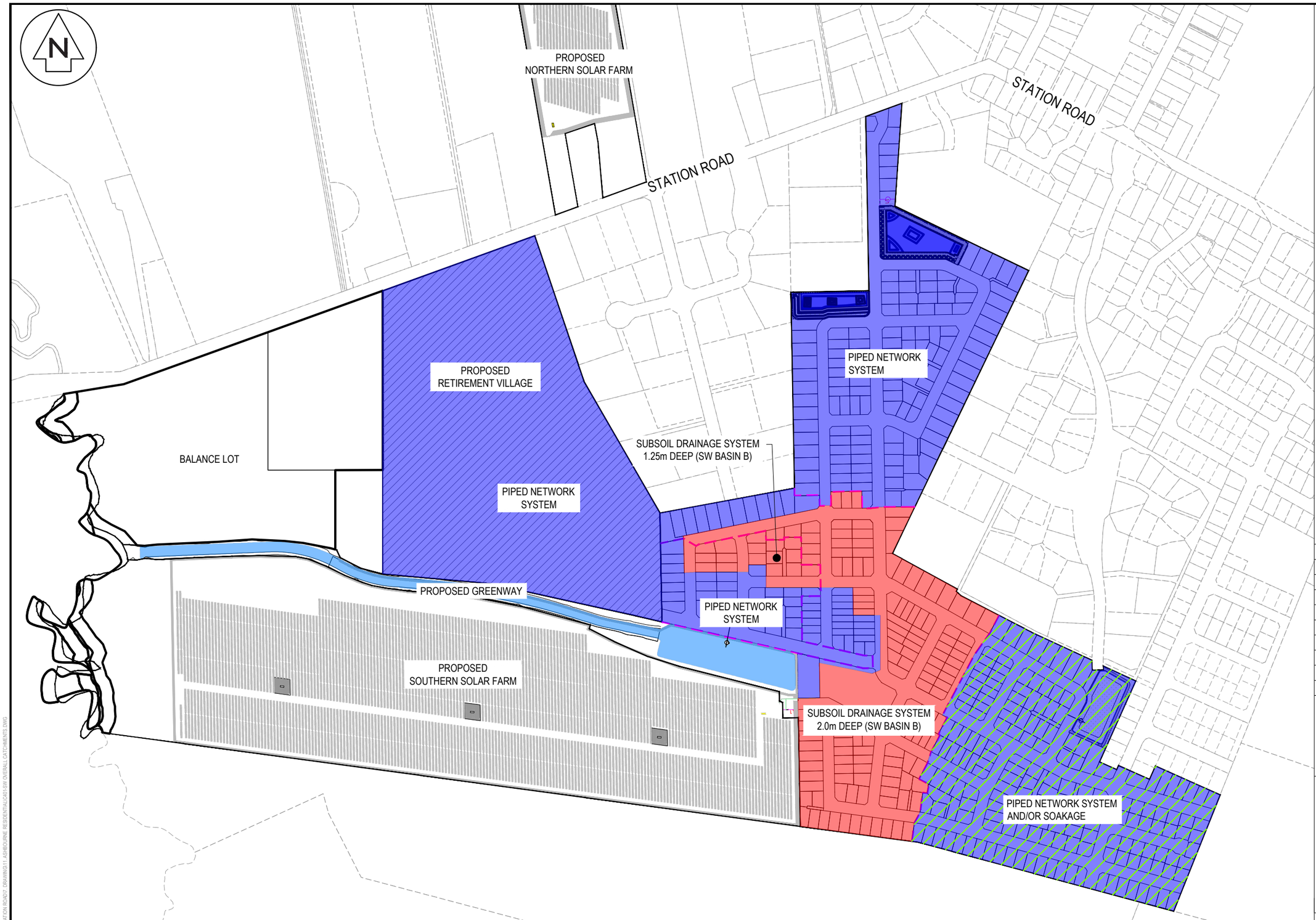

Notes

1. All works to be in accordance with Waikato Regional Infrastructure Technical Specifications.
2. Co-ordinates in terms of NZ Geodetic Datum Mount Eden 2000.
3. Levels in terms of the New Zealand Vertical Datum 2016.
4. It is the contractors responsibility to locate all services that may be affected by his operations.
5. Approved hardfill is to be used in backfilling of all stormwater lines within the road reserve.
6. All catchpit leads shall be laid at 1% unless otherwise specified.
7. All lines to be abandoned shall be sealed at each end. Timing of all sealing to be coordinated with council staff.

Legend

- EX BOUNDARY
- CATCHMENT BDY
- PROP LOT BOUNDARY
- PRIMARY SUBSOIL DRAINAGE SYSTEM
- PRIMARY PIPED NETWORK SYSTEM
- PIPED NETWORK SYSTEM AND/OR SOAKAGE

Rev	Description	By	Date
B	FAST TRACK APP	MKS	02/2026
A	FAST TRACK APP	MKS	12/2025

	By	Date
Survey	MAVEN	05/2024
Design	MKS	12/2025
Drawn	MKS	12/2025
Checked	DJM	12/2025

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Project

ASHBOURNE RESIDENTIAL FOR MATAMATA DEVELOPMENTS LTD

Title

PROPOSED SW OVERALL CATCHMENT PLAN

Project no.	289001		
Scale	1:6000 @ A3		
Cad file	C401-SW OVERALL CATCHMENTS.DWG		
Drawing no.	C401	Rev	B

RESOURCE CONSENT

APPENDIX B

Memorandum

B&A Urban & Environmental

To: Expert Consenting Panel – Ashbourne

From: Fraser McNutt / Steph Wilson – Barker & Associates Limited

Date: 27 February 2026

Re: Planning response to WWLA memorandum in relation to consent conditions

In response to the memorandum prepared by Jon Williamson of WWLA dated 18/02/2026, we refer the Panel to conditions proposed that were provided in the response to Minute 15 dated 12/02/2026. These specifically addressed the agreed JWS recommendations. We note the conditions queried by Mr Williamson were provided in full or part within the following documents as further set out in **Table 1** below:

- *"LUC_Residential and Commercial_MPDC_Ashbourne"*
- *"WRC_Stormwater Discharge_Resi-Greenway-Commercial_Ashbourne"*
- *"LUC_Retirement Village_MPDC_Ashbourne"*
- *"WRC_Retirement Village_Stormwater Discharge"*

We have no objection in replicating the entirety of these conditions within the Stormwater Discharge Consents and any other decision issued by the Panel on our proposed land use activities should it satisfy the Panel.

For clarity, we propose that it be confirmed through the scheduled stormwater experts' conference the suitability of incorporating these conditions in association with the various land use consents.

In response to Section 3 of the WLLA memo, the following is noted:

Table 1: Location of relevant conditions within proposed conditions documents

	Conditions noted in WLLA memo	Document / Section	Condition Number and Wording Proposed to MPDC / WRC
1	3A, Bullet 1: *"Additional groundwater level monitoring sites equipped with datalogger pressure sensors to be*		This was provided for on the MPDC Land Use Consent for the Residential portion as noted below. For clarity, this was not included on the WRC Discharge Consent, as it was already provided for. The Applicant has no objection to duplicating this condition on the Discharge Consents or any other decision issued by the Panel on proposed land use activities should it satisfy the Panel.

	constructed on site including two nested piezometers in the deepest part of the basin"	MPDC Land Use Consent – Residential: • Section 1.6.3 – Groundwater	*(63) At least twenty (20) working days prior to the commencement of earthworks, the Consent Holder shall construct and install five additional groundwater level monitoring sites equipped with datalogger pressure sensors on site as shown in Figure 1, including two nested piezometers in the deepest part of the basin.*
2	3A Bullet 2: *"Applicant to prepare a groundwater level synthetic hydrograph and peak recharge analysis (i.e. intensity and recurrence intervals for the site to inform detailed design"*	This was provided for on the MPDC Land Use Consent for the Residential portion as noted below. For clarity, this was not included on the WRC Discharge Consent, as it was already provided for. The Applicant has no objection to duplicating this condition on the Discharge Consents or any other decision issued by the Panel on proposed land use activities should it satisfy the Panel.	
		MPDC Land Use Consent – Residential: • Section 1.5 – Engineering Design and Approval	*(66) Prior to submission of EPA, the Consent Holder shall engage a hydrologist to prepare a groundwater level synthetic hydrograph using WRC data and relating it back to the site, and a peak recharge analysis using the Rushton method to inform the detailed design. This shall be submitted alongside the EPA for MPDC's Team Leader – Consents Engineer review.*
3	3A Bullet 3: *"Detailed design phase certification process involving expert hydrogeologist input with MPDC and WRC"*	For completeness, it is noted that the JWS stated "Detailed design phase certification process with MPDC and WRC" and did not explicitly mention hydrogeologist input in this. Notwithstanding, the applicant has no objection to updating the below conditions to incorporate this as required.	
		MPDC Land Use Consent – Residential: • Detailed Design Phase Certification – Section 1.5 • Stormwater Management Plan Certification – Section 1.4.4	Detailed design phase certification: *(64) That prior to commencing any construction of earthworks and/or civil infrastructure works for any Stage or Sub-Stage of the development, the Consent Holder shall submit EPA to MPDC's Team Leader – Consents Engineer. Engineering details and drawings shall be prepared by a Suitably Qualified and Experience Person, and shall include, but not be limited to, the following information:* *a. Earthworks, erosion and sediment control plans and details;*

		For clarity, Engineering Plan Approval was provided for under the MPDC LUC for the Retirement Village in Section 1.4, Condition 45, and certification of the SMP was provided for in Section 1.3.4, Condition 39.	b. *Details of the removal of any redundant buildings, structures and services in accordance with the Removal Plan (MAVEN Ref: XXX);* c. *Proposed road network, vehicle crossings, pavement formation, accessways and roads (including JOALs) and external roadworks (see Condition xx) including provisions for temporary turning heads where roads terminate;* d. *Provision of a 2.5m shared path within the berm of Road 1, with a 1.5m pedestrian path provided on the opposite berm of Road 1; and* e. *Proposed water, wastewater and stormwater connections/systems (see Conditions xx) and all relevant information including but not limited to long sections, cross sections, design specifications, calculations, and design certificates. The design plan shall show the location of the proposed wastewater, stormwater and water termination. The water main shall have a flushing valve or fire hydrant at the termination point, the wastewater main shall have a manhole at the termination point and the stormwater main shall have a manhole at the termination point.* f. *Proposed electricity and telecommunications reticulation and connections.* *If required, the Consent Holder shall supply MPDC's Team Leader – Consents Engineer with certification that the waters infrastructure as detailed on the engineering plans has been approved by Waikato Waters Limited.* Additionally, Stormwater Management Plan certification condition: *(56) In accordance with the timeframes set out in Table 1, the Consent Holder shall submit a Stormwater Management Plan (SMP) to MPDC's Team Leader – Consents Engineer for certification. The objective of the SMP is to demonstrate that the proposed stormwater management is the best practicable option,*

			taking into consideration the existing site features. The SMP must include but not be limited to the following information, in accordance with the Joint Witness Statement dated 16/12/2025: *a. An assessment of the Best Practical Option (BPO) approach adopted, accounting for elevated groundwater across the stormwater system, including Basin B* *b. Confirmation of attenuation requirements for the 2-, 10-, and 100-year ARI events (including extended detention, retention of initial abstraction volume, and water quality treatment), and include details on the optimisation of infrastructure sizing* *c. Demonstrate no adverse downstream flood or erosion effects for all relevant design events* *d. Provide detailed Greenway outlet design that manages energy dissipation and geotechnical constraints that are both constructable and empathetic to the landscape* *e. Assessment and management of effects of all discharges to receiving drains and open water bodies (including flood depth and duration, scour, and erosion effects)* *f. A flood risk assessment including a model build report.*
		WRC Stormwater Discharge Consent – Residential: • Section 1.2 – Stormwater Detailed Design For clarity, this is also provided for as a combined	*(57) The consent holder must retain suitably qualified and experienced practitioners to complete and finalise the detailed design of the stormwater network.* *The detailed design drawings and report must be to an acceptable standard and submitted to the Waikato Regional Council for technical certification prior to construction of the stormwater network.*

		condition on the WRC Stormwater Discharge Consent – Retirement Village at Section 1.2, Condition 11.	*Advice Note 1: Condition 1 requires that the consented stormwater network is constructed in general accordance with the application documentation, providing flexibility for minor stormwater network design changes subject to the consented design criteria still being achieved. Conditions 11 (detailed design) and 13 (as-builts) provide for regulatory oversight of minor design changes to the stormwater network. The purpose of this approach is to avoid an administrative Section 127 change of condition application for minor design changes which do not impact the consented design criteria.* For completeness, the Stormwater Management Plan is also intended to be certified by WRC, as required by the Stormwater JWS: *(12) At least twenty (20) working days prior to commencement of works, the Consent Holder shall submit a Stormwater Management Plan (SMP) to WRC for certification. No works shall commence until the SMP has been certified by WRC. The objective of the SMP is to demonstrate that the proposed stormwater management is the best practicable option, taking into consideration the existing site features. The SMP must include but not be limited to the following information:* *a. An assessment of the Best Practical Option (BPO) approach adopted, accounting for elevated groundwater across the stormwater system, including Basin B* *b. Confirmation of attenuation requirements for the 2-, 10-, and 100-year ARI events (including extended detention, retention of initial abstraction volume, and water quality treatment), and include details on the optimisation of infrastructure sizing* *c. Demonstrate no adverse downstream flood or erosion effects for all relevant design events*

			d. *Provide detailed Greenway outlet design that manages energy dissipation and geotechnical constraints that are both constructable and empathetic to the landscape* e. *Assessment and management of effects of all discharges to receiving drains and open water bodies (including flood depth and duration, scour, and erosion effects)* f. *A flood risk assessment including a model build report*
4	3A Bullet 4: *"A requirement for a stormwater management plan covering maintenance and operation of the drainage network including expert hydrogeologist input"*	For completeness, it is noted that the JWS referred to this being prepared as a separate management plan: "A requirement for a management plan covering maintenance and operation of the drainage network including hydrogeologist input". This is covered under the MPDC and WRC consents as per below.	
		MPDC Land Use Consent – Residential: • Section 1.4.4 – Stormwater Management Plans **For clarity, this was also provided for on the MPDC LUC for the Retirement Village at Section 1.3.4, Condition 40.**	*(57) An Operation and Maintenance Plan (OMM) must be provided to MPDC's Team Leader – Consents Engineer to address all public and private stormwater management systems within twenty (20) working days of completion of any stage of construction. The OMM must set out how the stormwater management system is to be operated and maintained to ensure that adverse environmental effects are minimised and include input from a hydrogeologist. The OMM must include:* a. *details of who will hold responsibility for long-term maintenance of the stormwater management system and the organisational structure which will support this process;* b. *a programme for regular maintenance and inspection of the stormwater management system;* c. *a programme for the collection and disposal of debris and sediment collected by the stormwater management devices;*

			d. *a programme for post storm inspection and maintenance;* e. *a programme for inspection and maintenance of the outfall;* f. *general inspection checklists for all aspects of the stormwater management system, including visual checks; and* g. *a programme for inspection and maintenance of any vegetation associated with the stormwater management devices.*
		WRC Stormwater Discharge Consent: • Section 1.7 – Stormwater Operation, Monitoring and Maintenance Management Plan (OMMP). **For clarity, this is also provided for on the WRC Stormwater Discharge Consent – Retirement Village at Section 1.7.1, Condition 29.**	*(24) The consent holder must retain suitably qualified and experienced practitioners to prepare an Operations, Monitoring and Maintenance Plan (OMMP) for the stormwater network. The main objectives of the OMMP are to:* • *Describe the operation, monitoring and maintenance procedures that the consent holder will routinely implement;* • *Ensure that the stormwater network is operated and maintained to function as designed; and* • *Meet the overall requirements of this resource consent.* *The OMMP must provide for all operation, monitoring and maintenance requirements and include, as a minimum, the following details:* a) *Design parameters of the stormwater network;* b) *Operation and maintenance procedures for the stormwater network, including the frequency of these procedures;* c) *Monitoring methods for the stormwater network and receiving environment downstream of the main discharge outlet, including the frequency of all monitoring procedures;* d) *Inspection checklists for all aspects and elements of the stormwater network;* e) *Inspection record keeping and processes to report **OMMP** activities to the **WRC**; and*

			*f) Details of who will be responsible for overseeing the **OMMP**.* *The OMMP must be prepared in consultation with the Matamata-Piako District Council and in general accordance with Waikato Regional Council's 'Waikato Stormwater Management Guideline' (WRC, TR20/07 or any subsequent updated version). It must also be to an acceptable standard and submitted to the Waikato Regional Council for technical certification at least 10 working days prior to the commencement of activities authorised by this resource consent.* ***Advice Note**: The consent holder is advised that a Draft OMMP may be submitted to WRC with the detailed design of the stormwater network, as per Condition 6 of this resource consent.*
5	Item 3B: *"they rely on a yet to be finalised Stormwater Management Plan, which does not include appropriate consideration of the hydrogeological aspects and a certification process involving hydrogeological experts prior to construction"*	The wording of the SMP condition was extracted from the agreed recommendations of the Stormwater JWS and is required to be submitted for certification as part of the EPA process to MPDC, and at least twenty working days prior to construction to WRC (with stipulation that no works shall commence until certified). For clarity, the Stormwater JWS dated 11/12/2025 included the following [emphasis added] in response to Item 9A of Minute 4: *"Following conferencing, the Applicant, WRC and MPDC met again and agreed that **the remaining matters can be appropriately resolved through outcome-oriented consent conditions**. The agreed pathway is that an updated Stormwater Management Plan (SMP) will be prepared as part of the consenting process and reviewed by MPDC and WRC.* *The updated SMP requires the following matters to be addressed, as identified by the experts:* *1. Ensuring the Best Practical Option (BPO) approach accounts for elevated groundwater across the stormwater system, including Basin B.* *2. Confirming attenuation requirements for the 2-, 10-, and 100-year ARI events (including extended detention, retention of initial abstraction volume, and water quality treatment). Including optimization of infrastructure sizing.* *3. Demonstrating no adverse downstream flood or erosion effects for all relevant design events.* *4. Providing detailed Greenway outlet design that manages energy dissipation and geotechnical constraints that are both constructable and empathetic to the landscape.*	

		5. *Assessing and managing effects of all discharges to receiving drains and open water bodies (flood depth/duration, scour, erosion).* 6. *Completing a flood risk assessment with a model build report."* The Applicant has no objection to incorporating additional matters relating to hydrogeology into the relevant conditions.