
Joint Witness Statement Groundwater & Stormwater Management – Additional Items

Ashbourne [FTAA-2507-1087]
16 December 2025

Facilitated by: Brendon Verhoeff and Dean Morris (Maven)
Recorded by: Steph Wilson (Barker & Associates)

Attendance

The list of participants for this expert conferencing is included in the schedule at the end of this Statement.

Basis of Attendance and Environment Court Practice Note 2023

All participants agree to the following:

- (a) The Environment Court Practice Note 2023 provides relevant guidance and protocols for the expert conferencing session;
- (b) They will comply with the relevant provisions of the Environment Court Practice Note 2023.

Matters Considered at Conferencing – Agenda and Outcomes

Stormwater / Erosion and Sediment Control

- b. *Advise provided on behalf of MPDC advised that while the sediment control plans and associated reports provide general information regarding water quality and construction management, there is a lack of specific detail concerning the interaction between erosion and sediment control measures and the high ground water table at the site. To address these gaps, it is essential that further investigations are undertaken and that site-specific hydrogeological guidance is incorporated into the design and implementation of sediment control measures. This will help ensure effective management of ground water and minimise any potential adverse impacts on water quality and site stability.*

The Panel requests that expert conferencing address the above and advise what additional investigations and reviews are considered necessary to address these concerns and/or whether the information provided by the Applicant to date is sufficient to allow the Panel to develop consent conditions that address the issues raised.

**Response from Megan Wood (MW), Bronwyn Rhynd (BR),
Brendon Verhoeff (BV), and Dean Morris (DM)**

This matter was discussed at joint caucusing on 15 December 2025 between the above parties. **MW / BR / BV / DM** agree that due to the flexibility and timing of Earthworks and construction phasing this matter could be adequately captured in conditions of consent.

Sediment ponds are utilised in the Earthworks season (typically Oct to April) when ground water levels are lower. Earthworks in winter months, where there has been sufficient rainfall to raise the water table, already precludes undertaking earthworks. Should the water table raise to the point the sediment ponds cannot discharge (dead storage level) then Earthworks will stop. This is standard industry practice.

No further additional investigation is required.

Groundwater

- d. *Advice to MPDC concludes (Memorandum 2) that “the information provided to date has not demonstrated that the abnormal groundwater conditions at the Ashbourne site have been adequately allowed for within the proposed design”.*

Experts are to address the following matters:

- *(Response provided in Hydrogeology Joint Witness Statement provided 11 December 2025).*
- *There may be an issue with having enough fill to achieve the finished ground levels that have been specified. Please advise on the likely need to provide fill and whether the quantum required can be provided by cut to fill on the site.*

**Response from Tony Cowbourne (TC), Dean Morris (DM) and
Brendon Verhoeff (BV):**

DM/ BV / TC agree that the finished ground level cannot be easily lowered within the residential and retirement villages from that which is specified in the Engineering Drawings. Should compaction bulking vary this could create a shortfall of material.

DM confirmed that local contractors had indicated a 1:1 compaction factor was appropriate for the region. **TC** reconfirmed his comments in Memorandum 2 page 6 that 1:3 was more typical.

DM prepared a technical memo giving an updated earthworks balance and consideration of risk and potential contingency options. Copy appended. The memo has also concluded that an additional 20,000 cu m allowance for importation of fill should be included within the consent to provide some additional risk management for

a variance in bulking factors.

TC has reviewed this memo and, while a detailed check was not possible, concluded that the changes appear to be in the right order of magnitude. **TC** understands that the risk is with Ashbourne should there come a need to import more fill material.

BV / DM agreed this risk sits with Ashbourne, should this happen options are available for a S127 (ie borrow areas in the solar farm, subject to appropriate assessment at the time). **BV** and **DM** do, however, consider the current risk profile of such a shortfall as being consistent with industry practice when consenting.

- *Whether the above uncertainties and adequate contingency/fallback measures have been identified by the Applicant and provided for in the design of the proposed stormwater system.*

Response from Tony Cowbourne (TC), Bronwyn Rhynd (BR), Megan Wood (MW), Dean Morris (DM) and Brendon Verhoeff (BV):

DM / BV / TC / BR / MW understand this point relates to all other bullet points under 9d ground water:

1. **DM / BV / TC** The above matter with respect to the potential for groundwater to be higher with climate change. (Response provided in Hydrogeology Joint Witness Statement provided 11 December 2025). This Joint Witness statement concluded that climate change effects can be accommodated within the design of a subsoil drainage network, subject to civil and hydrogeological aspects of the design. **TC** noted that aspects of the subsoil design were still to be agreed and the layout/spacing of the drains, as well as the drain details, should be considered to be preliminary.
2. Fill balance. **DM / BV / TC** agree that an allowance has been made and the risk sits with Ashbourne for anything above and beyond this.
3. **DM / BV / TC / BR / MW** Viability of subsoil drainage, as per *stormwater disposal will be contingent on groundwater behavior as per JWS dated 11th of December*
“Council experts sought further certainty around groundwater behaviour, potential interaction with construction-phase controls and the need for site-specific hydrogeological input. This has not been provided at the time of writing”.
“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 by MPDC and WRC.”

DM / BV / BR / MW 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

DM/BV 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 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.

Confirmed in person: 16/12/25

Expert's name and expertise	Party	Expert's confirmation
Dean Morris (DM)	Maven Waikato on behalf of Matamata Development Ltd	
Brendon Verhoeff (BV)	Maven Waiakto on behalf of Development Ltd	
Bronwyn Rhynd (BR)	CKL on behalf of Matamata-Piako District Council	
Tony Cowbourne (TC)	Terrane Consultants on behalf of Matamata-Piako District Council	
Megan Wood (MW)	Wainui Consulting on behalf of Waikato Regional Council	