

### Your comment on the Ashbourne project draft conditions

Please include all the contact details listed below with your comments and indicate whether you can receive further communications from us by email to [substantive@fasttrack.govt.nz](mailto:substantive@fasttrack.govt.nz).

1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
<b>Organisation name (if relevant)</b>			
<b>First name</b>	Roger		
<b>Last name</b>	Slattery		
<b>Postal address</b>	[REDACTED]		
<b>Home phone / Mobile phone</b>	[REDACTED]	<b>Work phone</b>	[REDACTED]
<b>Email (<i>a valid email address enables us to communicate efficiently with you</i>)</b>	[REDACTED]		

<input checked="" type="checkbox"/>	<b>I can receive emails and my email address is correct</b>	<input type="checkbox"/>	<b>I cannot receive emails and my postal address is correct</b>
-------------------------------------	---	--------------------------	---

Please provide your comments below, include additional pages as needed.

To the Expert Panel, Ashbourne Fast Track Application,

My name is Roger Slattery and I am a part owner of [REDACTED], Matamata. I have been invited to comment on the Ashbourne FTAA Project and now the decision under section 70 of the FTAA.

I understand that I am able to comment on the proposed conditions and not the draft decision itself.

## Draft Decision

If I may bring to your attention some anomalies in the draft decision that was published:

- In paragraph 190a, the name of the road should be Peakedale Drive – not Peake Road as is listed in that paragraph.

In Appendix A2 MPDC SUB Document

Please check and cross reference the document names on the Advice notes for stages 8A (paragraph 10 m), 8B (paragraph 10 n). The numbering for the referenced sheets does not match the Stages or residential lots.

Engineering Drawings for the Northern Solar Farm:

The document in question is called Proposed Subdivision Plan for Lots 8 and 9 C350.

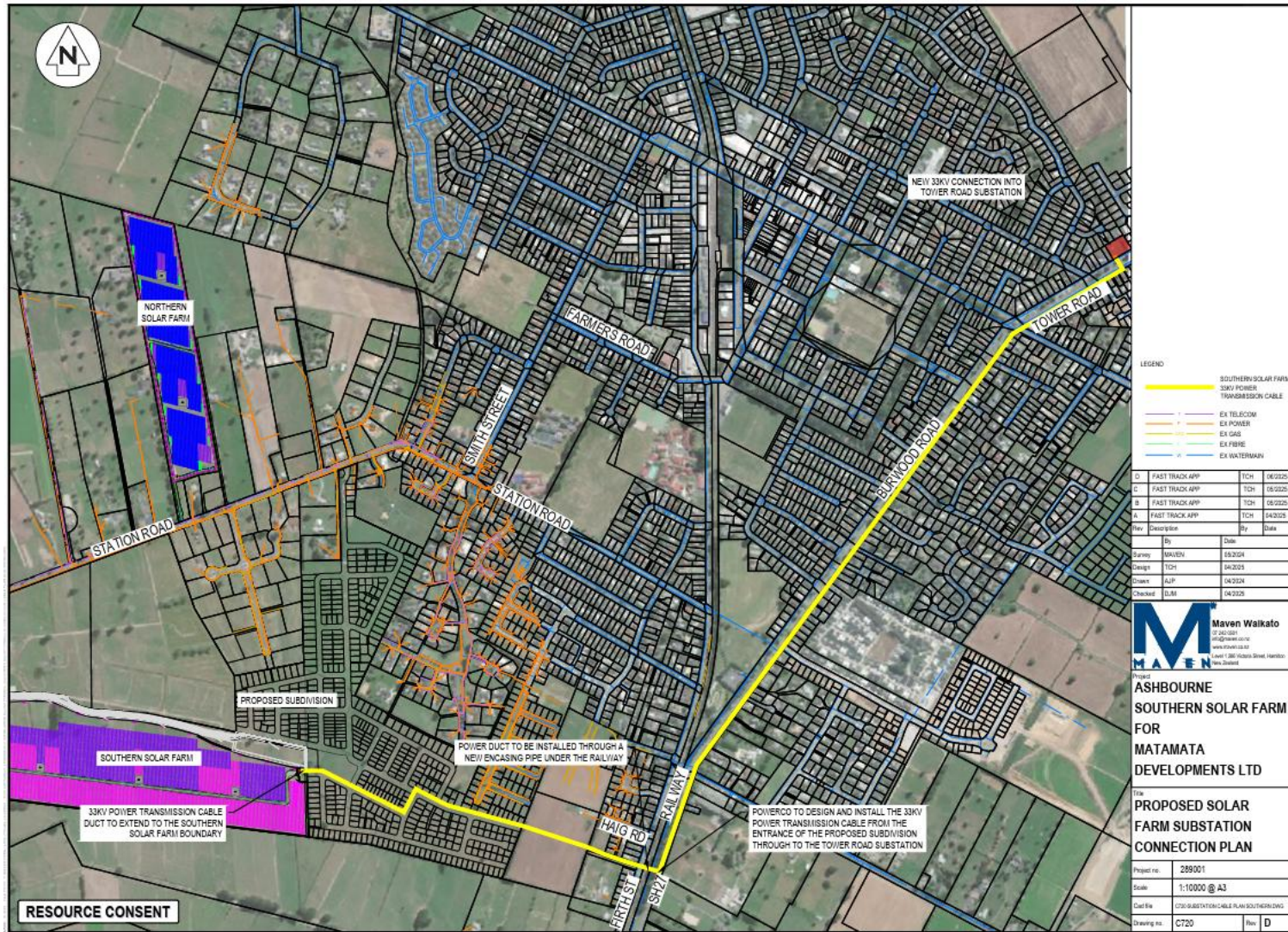
- In Appendix 0 of the Draft Decision– Document list the Northern Solar Farm Proposed subdivision plan for lots 8 and 9 does not have a Rev F.
- Lots 8 & 9 are no longer in the Ashbourne development plan, therefore the document and the table for the Memorandum of Easements, is no longer required.
- I am requesting that this document be removed from the Engineering Drawing for the Northern Solar farm that was uploaded in the correspondence to the Panel on the 13 Feb 2026

# Northern Solar farm

In paragraph 11 of A2 MPDC SUB which states that the northern solar farm must be operational before Stage 4 of the residential development commences. This includes the 33KV power transmission cable connection from the northern solar farm to the Tower Road Sub Station (confirmed with As Built plans). Can this please be checked as the Maven designs (*Maven Plan "Proposed [Northern] Solar Farm Connection Plan: (Ref: C720, Rev B, dated May 2025)*) state that the power is going via an 11 KV power transmission line to Brown Street. See below.



It is the southern Solar farm that is being taken through to the Tower Road Substation (Maven Plan "Proposed [Southern] Solar Farm Connection Plan: (Ref: C720, Rev D, dated May 2025)) see below



## The Draft Conditions:

I would like to thank the panel for their time and diligence to reviewing the copious documents submitted for assessment for this project.

For the conditions, I have broken my submission into four components: Stormwater & flooding, Groundwater, Wastewater, and other comments.

## Stormwater & flooding:

I understand that the draft conditions are extensive but I must highlight that many of them are based on frameworks and not on settled designs. This raises concerns for me, as well as others who were invited to comment on the draft conditions.

- Consent holder must prepare and get certified a **Stormwater Management Plan (SMP)**.
- From the information I have seen, there is direction from the Panel to produce a plan based on information produced by models. There has been a lot of conflict about stormwater at Ashbourne, but the proof should be in the pudding. Where is the empirical data, the study of all the seasons' effects on stormwater in the proposed site area and the irrefutable proof that there will be less stormwater leaving the post-developed site? Where is the baseline to calculating stormwater and potential erosion, rather than relying on assumptions?
- What protections do I have as a landowner and rate payer that the MPDC will not be left carrying the can if the models got it wrong? The risk to the MPDC and WRC is that the models' outputs do not match the weather to come, resulting in it being too high. If there is still no agreement from the experts on how the stormwater system is going to perform, there must be a call to gather data, to observe what actually happens on and in the ground, in preparation for a stormwater system that is able to cope with the task it has been designed for.
- Historical data and drain designs show that the intended area for the Ashbourne Subdivision has always had issues with stormwater. Over the years, it can be seen from the aerial photographs that drains have been filled, changed and improved. Those aerial photos also show that the town of Matamata has expanded, that housing density has increased, and the natural path of the water from that area has been diverted. Combining this with more impervious surfaces in previous developments which has increased stormwater runoff downstream from the proposed site and stormwater is a huge issue for this development. What is required is baseline data for the plan to work from, and that data is not yet available. There is still questions to be answered about water flow and movement from all the dry basins and wetlands that are proposed. If these questions are not answered before the project is started, how can the applicant design a well performing SMP to cope with seasonal weather variations going forward? More than one local resident has raised concerns about the high water table, the stormwater management and use of only modelling when it comes to the Station Road, Peakedale Drive and Highgrove area.

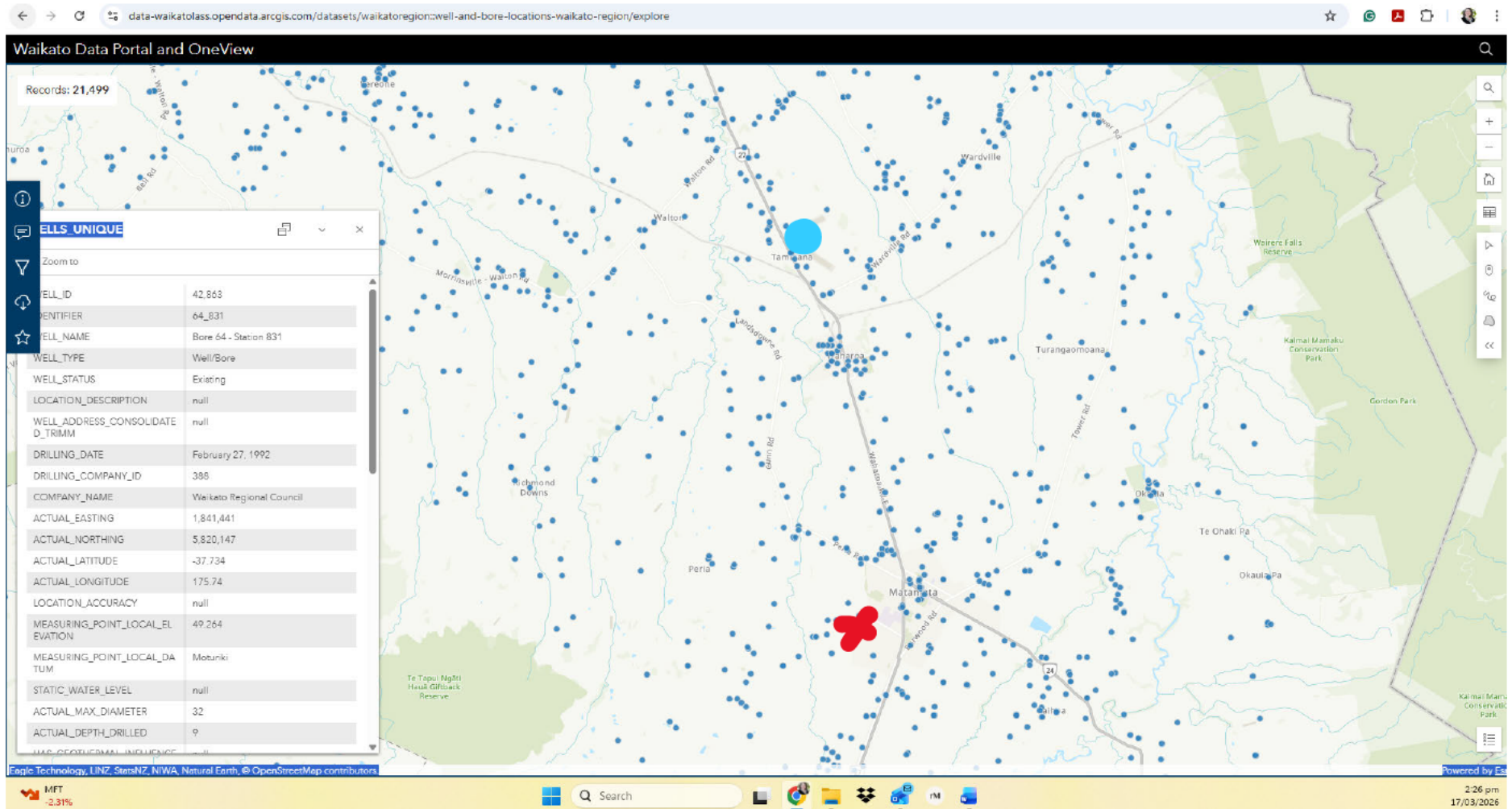
- From lived experience of drilling soak holes in the Matamata District for 50 years I can tell you that the area where the subdivision is proposed to be situated has a high water table at the best of times, and during the heavy isolated rains we have been receiving recently the water table level has been fluctuating to a very high level – in some cases to the depth required to dig a fence post hole in the ground! Please do not leave it for the MPDC and WRC to have to close the gate after the horse has bolted, leaving those councils up to the eyeballs in liability. Clear, firm conditions that are established from irrefutable data are what is required to ensure the SMP will be able to achieve the best outcomes.
- The Greenway is seen as a safe and effective discharge for stormwater – this has been modelled by the applicant, but what is the real effect of the increased water being added to the Waitoa Stream at that point? Where is the data from observation and study? It has been shown already in this application that models can have numbers inputted incorrectly. For the sake of the ecological environment of the river and downstream users of the water, please make the applicant get factual data.
- It was noted throughout the application and replies from councils and experts that stormwater is a contentious issue, it must be fully investigated, not just summarised by modelling.
- I am calling for the panel to ensure there are measures in place so the consent conditions rely on thorough empirical test data rather than theoretical models for the stormwater. The panel have made it very clear that they have issues with the data, the method, and the modelling used for stormwater in this application. And since we are not able to comment on a yet to be completed PDA agreement between the developer and MPDC, the baseline data is the only way to start analysis on what goes on under and over ground.

Requested Conditions:

- That modelling is not the sole method of information gathering for the development of the SMP, there must be investigations conducted that are specific to the site over an entire set of seasons (at least one year) before any earthworks are started. If the investigations show that soakage is not viable, the SMP has to outline specifications and costs for an alternative piped reticulation system before earthworks start.
- That no section 224(c) certificates are to be issued for any lot in the Basin A catchment until written confirmation has been received from WRC that the stormwater system is functioning as designed.
- That an investigation of the baseline of all outflows (Stormwater, Groundwater, Wastewater) from the site for a full seasonal cycle of at least 1 year occur, so that the SMP figures can start with actual data, not assumptions.
- That the SMP includes pre-development baseline monitoring of all outflows from the site for twelve months before development starts as well as post-development measuring of the same outflows for 10 years.
- That a report is produced annually for WRC to assess the captured data and possible adverse effects.
  - If adverse effects are found, the consent holder must fix the issue at its own cost, to the WRC's satisfaction.

## Groundwater:

I understand that the water level monitoring must come from a site that is monitored by a reliable source, WRC. I must point out that in this situation the water bore the applicant is relying on for water level analysis is situated 10 km away at the Matamata Airfield. As indicated on the picture below with the blue dot being the Bore identified as 64\_831 and the red cross being the approximate area of Ashbourne.



I know from previous experience drilling soak holes at both locations that the groundwater level in the area around the Matamata Airfield is much lower than that in holes I have drilled in the Proposed Ashbourne Subdivision area. I feel frustrated that the water level indicators for the JWS were based on data captured from a borehole located 10 km away from the site, with a different soil structure. I ask the panel to reinforce the conditions of the project so that factual data is used for calculations, rather than the computer modelling the applicant has presented.

In paragraph 47 of MPDC LUC, the question is asked, "If subsoil drains are used for limiting maximum groundwater levels for achieving stormwater disposal for soakage devices, then a GMP is required" When will the decision be made if the subsoil drains are to be used, and what triggers the requirement for a Groundwater Management Plan? What data will be gathered to define the plan's parameters so it does not rely on models? Subsoil drains are known to collapse over time, suffer from root intrusion and to silt up. Who will pay if this happens? Will it be left for the MPDC or residents to fend for themselves?

It makes sense to create a baseline using a local bore so that measurements are local, not regional. For the project to go ahead, starting plans to manage groundwater using baseline data from the same location as the subdivision is imperative, so that local variations in groundwater levels can be monitored during periods of recharge and dryness.

#### Requested Conditions:

- That there are 12 months of continuous data collected from the monitoring sites before the SMP is put forward for certification.
- That a closer bore site is used for monitoring of the groundwater levels so that data is factual and does not require manipulation to create a modelled baseline.
- That there is a financial bond to cover subsoil drain maintenance and repair for at least 15 years after the vesting of stormwater system to the council. The amount of the bond should be determined by an independent expert and the monetary value of the bond should cover replacement of the system.

## Wastewater

In the MPDC LUC attachment to the decision, paragraph 22, for example, the wastewater requires amended, beefed-up, and new infrastructure to meet the requirements of the Ashbourne development. What assurance does the council, and then I as a rate payer, have that this system upgrade will suit the modelled needs of the project? Who will fix the issues once the developer hands over the keys to the next guy?

I know that it is cheaper in the long run to do a job right the first time, and this project should be done right, especially when it comes to wastewater and additional connections that may affect other users in Matamata.

### Requested Condition:

- That the construction of infrastructure occurs before the built environment is constructed.
- No section 224(c) certificates issued until the MPDC confirms (in writing) that the wastewater network has the capacity to cope with what it was designed for, including all of the upgrades required.

### Other Comments:

For the Northern Solar farm, WRC, in a letter dated 27/11/2025, requested that access to the WRC-managed drain must be maintained – see below.

**WRC notes that the Panel has in its Minute at 27i) requested a response from the applicant in relation to a drain that is maintained by WRC's Integrated Catchment Services team. WRC considers that access to this drain must be maintained at all times as per rule 4.2.18.1 of the Waikato Regional Plan. Further, as WRC are the operators of the drain then the capacity of the drain must be maintained at or near to pre-development capacity should this proposal go ahead.**

From [https://www.fasttrack.govt.nz/\\_data/assets/pdf\\_file/0019/16381/WRC-Response-to-Minute-3-Ashbourne-FT\\_Redacted.pdf](https://www.fasttrack.govt.nz/_data/assets/pdf_file/0019/16381/WRC-Response-to-Minute-3-Ashbourne-FT_Redacted.pdf)

I raised this issue in my response to the Substantive application, knowing the requirements from WRC.

In Appendix A of Applicant's response to comments received from Affected Landowners

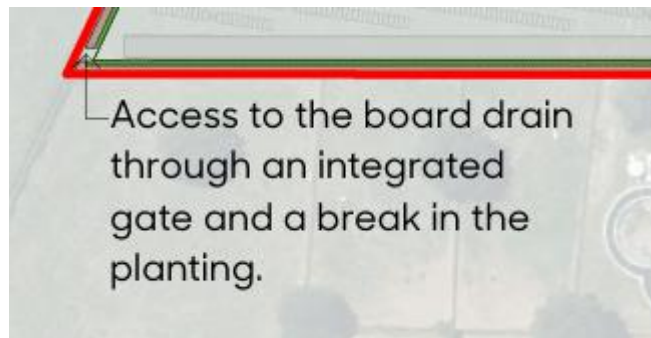
([https://www.fasttrack.govt.nz/\\_data/assets/pdf\\_file/0016/15217/Appendix-A\\_Tracking-Table-Response-to-Affected-Landowners\\_Redacted.pdf](https://www.fasttrack.govt.nz/_data/assets/pdf_file/0016/15217/Appendix-A_Tracking-Table-Response-to-Affected-Landowners_Redacted.pdf))

The applicant replied to my response about the WRC drain on the North boundary of the Northern Solar Farm on page 29, see below.

	Please refer to <b>Attachment 23</b> for further details.
Concern that the proposed buffer planting and boundary fence at the northern boundary of the proposed northern solar farm will prevent access to the existing board drain	The Landscape Plans have been updated to show access to Board drain – refer to <b>Attachment 23</b> for further details.
Identified a discrepancy in listed dates of issue of the	Comment received states: 'Pa 33 of SR the writer of the assessment mentions the site visits

The Applicant amended the Northern solar farm Landscape package to show on Page 1 of 10 an accessway to the WRC "board drain"

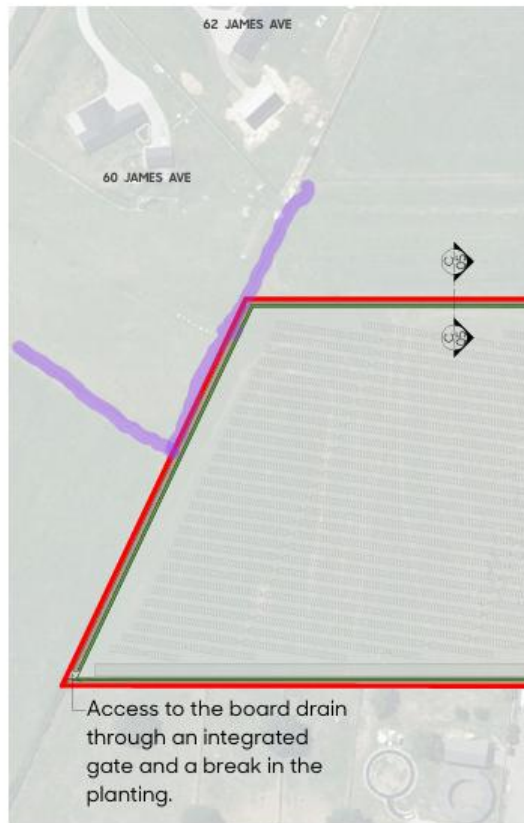
[https://www.fasttrack.govt.nz/\\_data/assets/pdf\\_file/0019/15274/Attachment-23B\\_Solar-Farms-Landscape-Package\\_S53\\_02-Appendix-3B.pdf](https://www.fasttrack.govt.nz/_data/assets/pdf_file/0019/15274/Attachment-23B_Solar-Farms-Landscape-Package_S53_02-Appendix-3B.pdf)



I emailed the panel on 26/11/25, indicating that the gateway and break in the planting are on the North Western corner of the property.

I indicated in my email the path of the drain by highlighting it in purple. See below.

Highlighted in Purple line where the Waikato Regional Council Board drain in question runs.



My email stated “This showed that there is still no access to the WRC drain due to the fence and planting.”

“The issue is that the WRC board drain is on the Northeastern side of the northern boundary and in the information from WRC about land drainage from Sept 2024, it states "Under the Waikato regional plan, landowners with drains on their property that are managed by WRC must ensure there is suitable access for maintenance machinery by - Keeping plants or structures more than 10 m away from the drain”

<https://www.waikatoregion.govt.nz/assets/WRC/LandDrainageInformationBrochure.pdf> (page 2 of document right-hand column, “Establishing trees and structures beside drains”)

Further down in that section of the publication, it says to see rule 4.2.18.1.

There is no allowance for the 10 m access to the drain that is required by the Waikato regional council, the plan clearly shows the boundary, then the planting area that is 3 m wide (depicted in Green) and they have planned for a 2.2 m high fence. The drain is prone to flooding and requires regular inspection and work to clean/clear it.

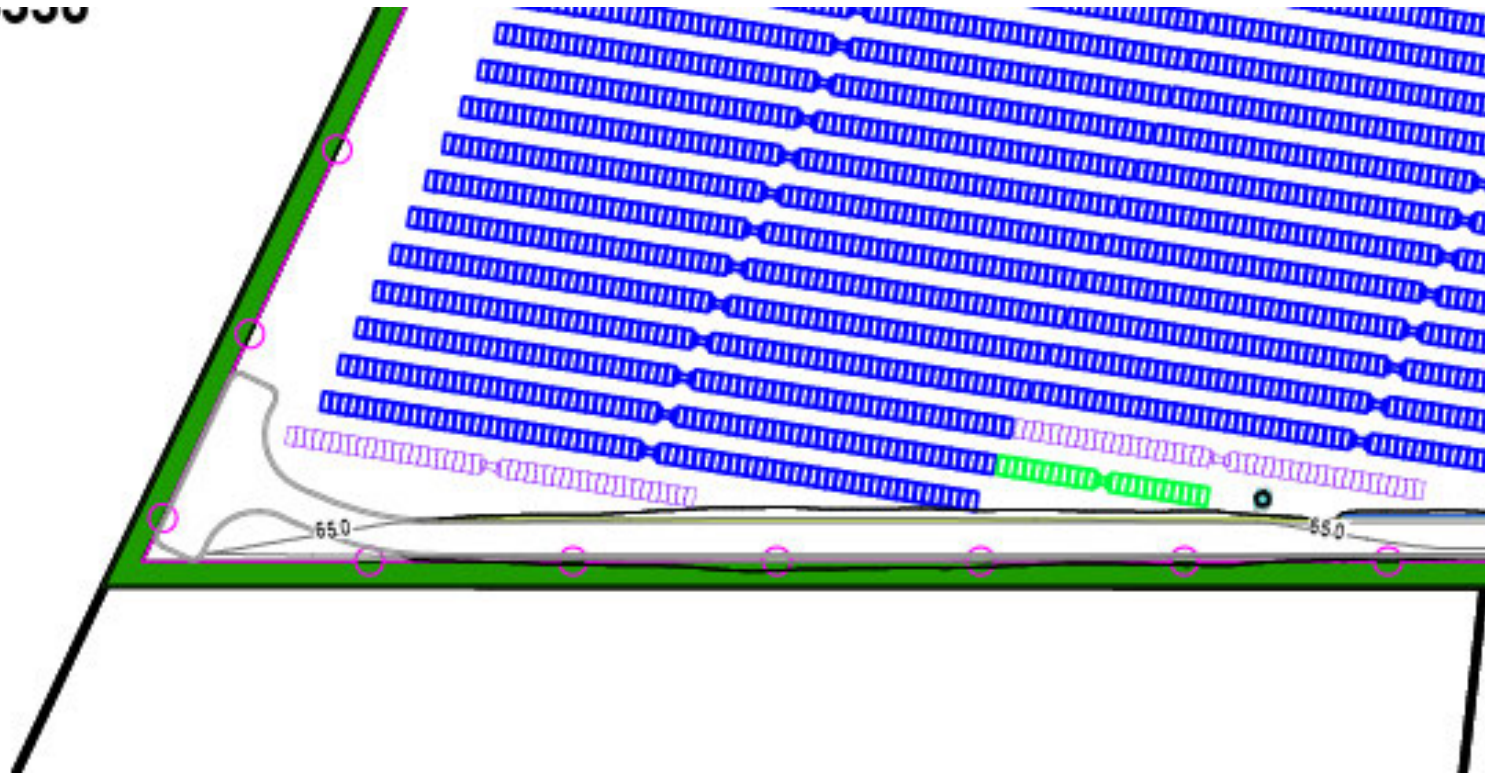
From the information provided to the Expert Panel by the applicant, they are allowing a single integrated gateway through the fenceline, but no room for a digger or cleaning equipment to access a drain that is already prone to flooding.”

On 13 February 2026, the applicant provided updated Engineering Drawings for the Northern Solar farm

([https://www.fasttrack.govt.nz/\\_data/assets/pdf\\_file/0014/21074/Engineering-Drawings\\_NORTHERN-SOLAR-FARM.pdf](https://www.fasttrack.govt.nz/_data/assets/pdf_file/0014/21074/Engineering-Drawings_NORTHERN-SOLAR-FARM.pdf))

On page 10 of 44 Ashbourne Northern Solar Farm for Matamata Developments Ltd – Proposed Contours Key Plan C210 Rev E, the gateway has been replaced by a vehicle turnaround.

04330



There is no access at all to the drain for cleaning as requested by WRC.

Further to that WRC states "Under the Waikato regional plan, landowners with drains on their property that are managed by WRC must ensure there is suitable access for maintenance machinery by - Keeping plants or structures more than 10 m away from the drain.

The planting is right to the boundary and against the drain, as indicated on pg 11 of the document Proposed Contours Plan Sheet 1 of 3 C210-1 Rev E.



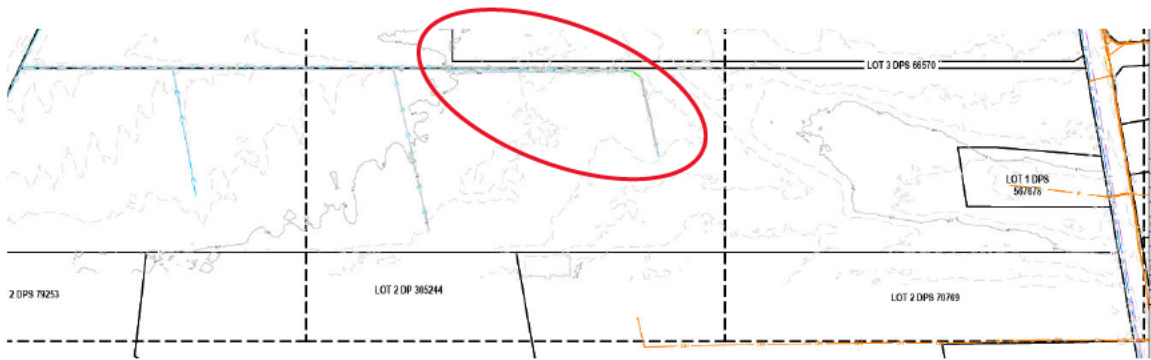
Here it can be clearly seen that there is no 10m accessway for the drain, which I noted in my email is prone to flooding.

This needs to be rectified as agreed previously and in line with WRC rule 4.2.18.1

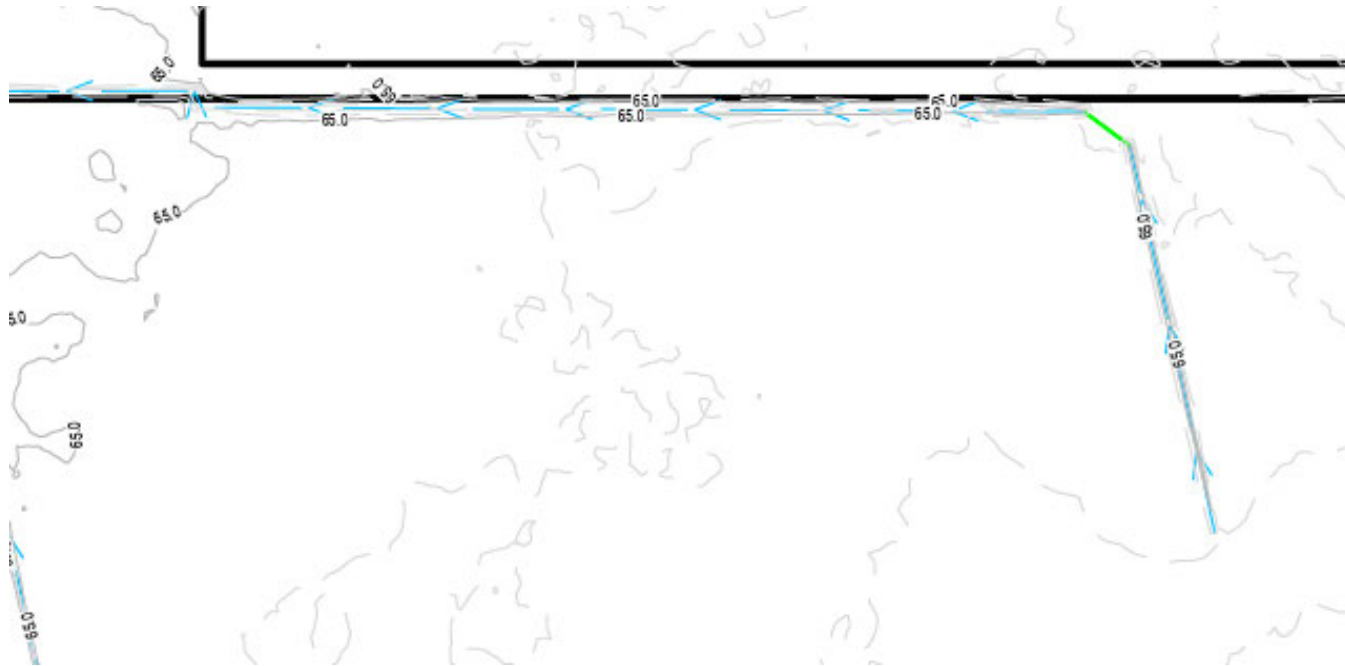
Requested condition:

- That the Northern Solar farm northern boundary has the appropriate access designed and approved by WRC to comply with WRC rule 4.2.18.1, including keeping plants and structures more than 10 metres away from the drain (meaning the buffer planting and security fencing)

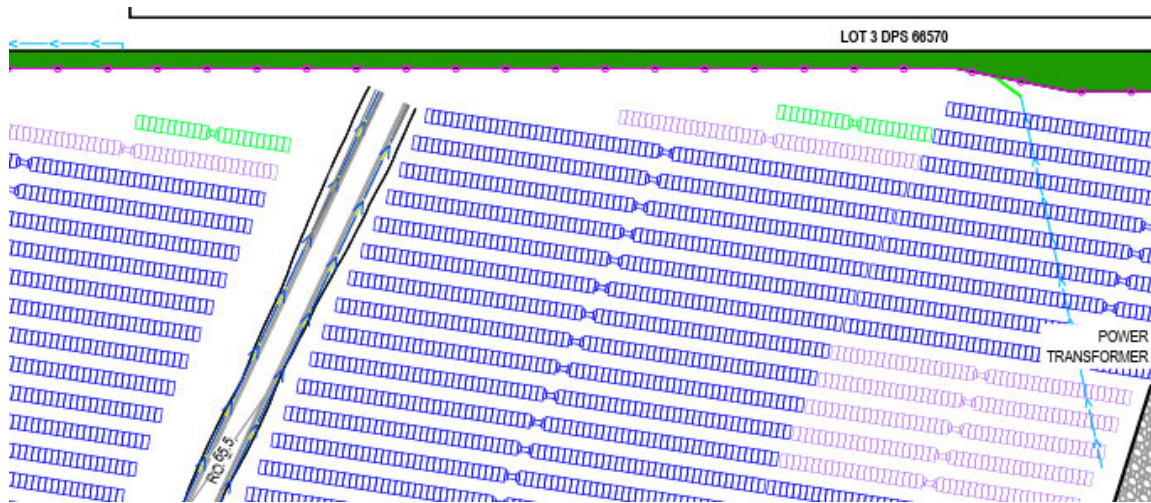
Furthermore, in the same document, there is a farm drain that crosses the boundary from the Eastern boundary of the Northern Solar farm onto [REDACTED] [REDACTED] (see below) from page 6 of 44 Ashbourne Northern Solar farm for Matamata Developments Ltd – Existing Contours Key Plan C200 Rev B



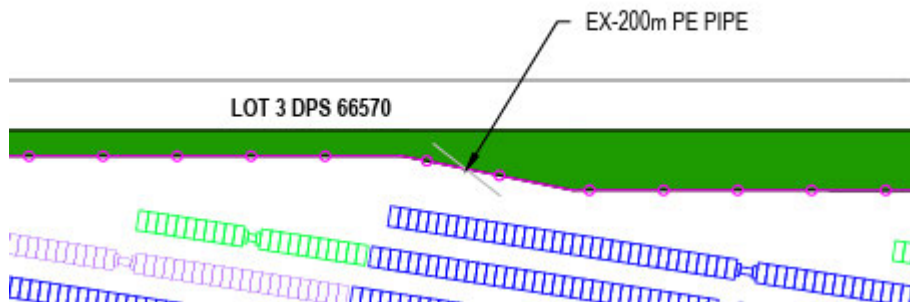
There is a visible open farm drain on the Northern Solar Farm, see below



On page 12 of 44 the drain is covered by 3m of buffer planting and the 2.2 m high security fence (see below) which indicates that the drain will be inside the buffer planting zone before the drain goes across the fence to Lot 3 DPS 66570.



Further evidence of the drain being inside the buffer planting and therefore not accessible for cleaning and maintenance is on page 26 of 44  
Ashbourne Northern Solar Farm for Matamata Developments Ltd – Proposed Rading plan sheet 2 of 3 C300-2 Rev F



The image shows an existing 200mm PE Pipe running from 1 open drain in the paddock to the open drain that runs along the inside of the Northern Solar Farm Eastern Boundary.

This drain heads north and joins the WRC-managed drain on the Northern boundary of the Northern solar farm.

Good farming practice requires drain maintenance, and there is, once again, no maintenance access to the drain located on the Northern Solar Farm.

Requested condition:

- That all farm drains that pass over the boundary of the Northern Solar farm have accessibility from the Solar Farm to clean and maintain the drains.

#### Buffer Planting

The buffer planting around the exterior of the solar farm has two widths, 7m and 3 m. I understand that the buffer planting must be wider by the houses that are situated close to the solar farm, but as the Rural Residentially zoned lot Lot 3 DPS 66570 that at the present is undeveloped land but may be developed in the future, an increase of the width of the buffer zone to equal that of the original with around the Northern Solar Farm when interfacing with Rural Residentially zoned land. The owners may desire to build as close as possible to the boundary of the northern solar farm. The addition of extra width to the buffer zone of Screening Mix Zone planting and Amenity Shrub Mix Screening plants would go a long way to masking the solar farm from the potential future residents.

Requested condition:

- That the buffer planting be increased to 7 metres wide on the Northern Solar farm when interfacing with Rural-Residential zoned land.

#### Water to the Northern Solar Farm

There has been no confirmation that the MPDC are allowing the Northern Solar Farm to join the town water supply that runs past the gate for the purpose of filling the firefighting water tanks, and providing water for stock.

A question was raised about the substantive application information about the water supply for the Northern Solar Farm

In the applicant's reply to the comments from Invited Parties

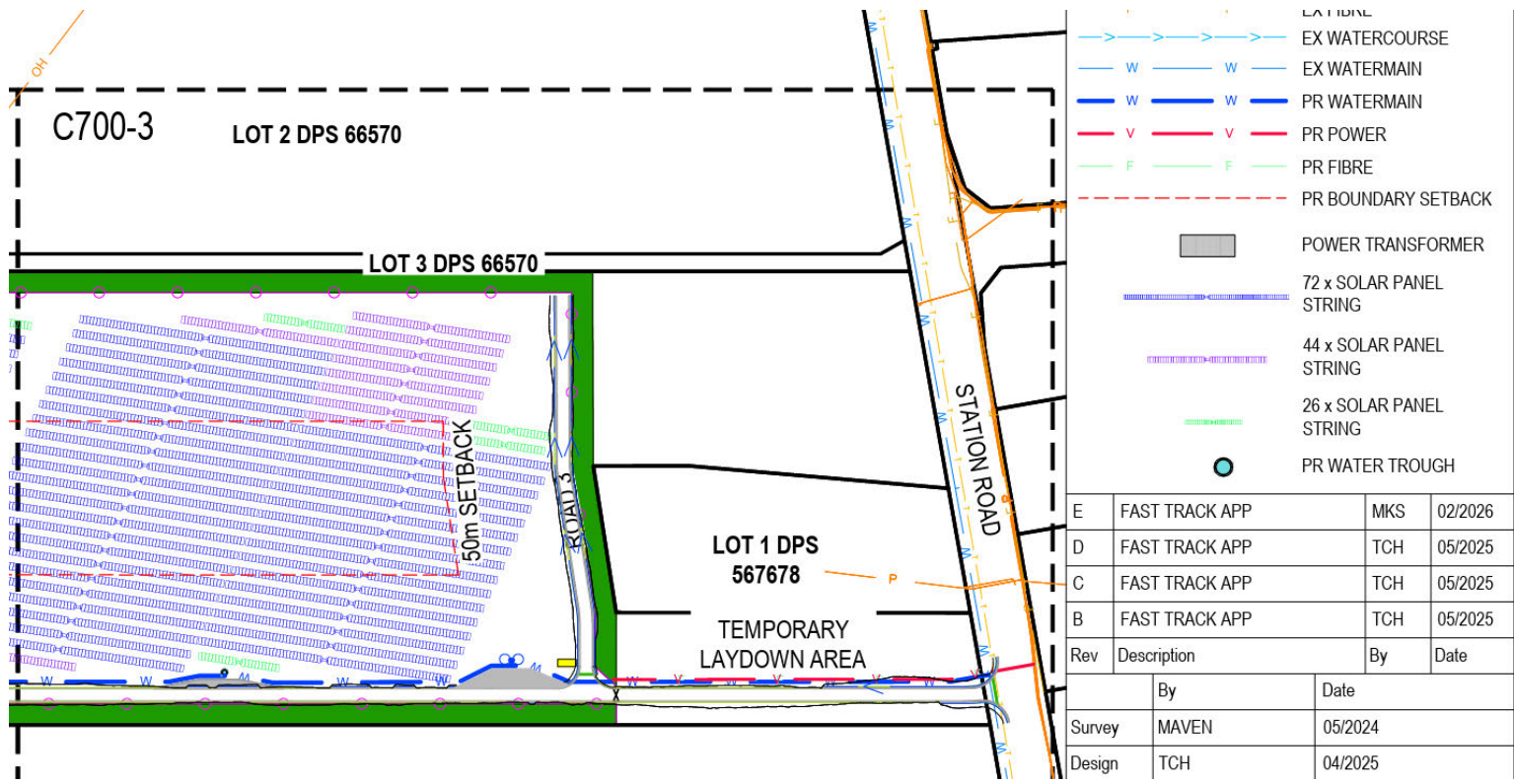
[https://www.fasttrack.govt.nz/data/assets/pdf\\_file/0016/15217/Appendix-A\\_Tracking-Table-Response-to-Affected-Landowners\\_Redacted.pdf](https://www.fasttrack.govt.nz/data/assets/pdf_file/0016/15217/Appendix-A_Tracking-Table-Response-to-Affected-Landowners_Redacted.pdf)

The applicant said (on page 52):

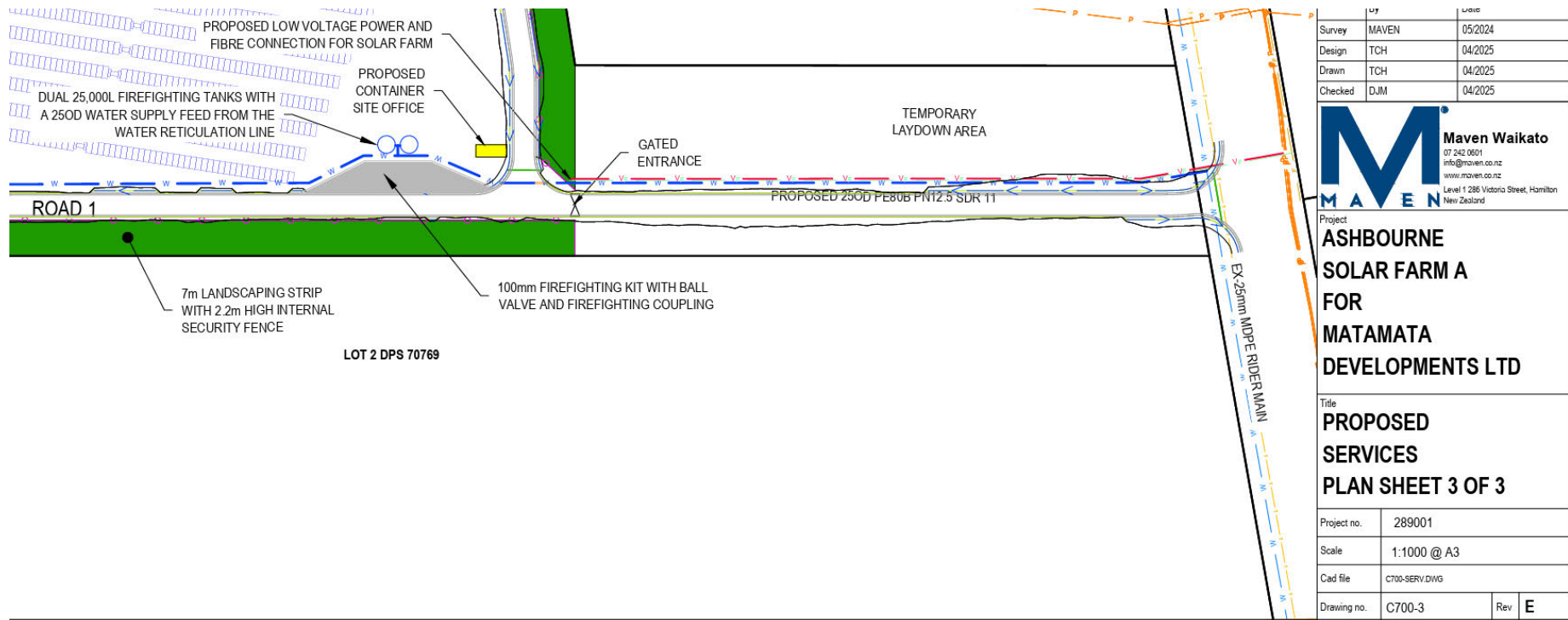
18.	Water supply to northern solar farm	<p>A trickle feed supply has been proposed from the existing 25mm MDPE supply which will be to only fill the fire tanks initially and if ever emptied. This will not effect any other users.</p> <p>The farm does currently provide stock water via the main farm supply. This will be protected and retained to service future stock. New water troughs will be provided as shown on plans for livestock.</p> <p>Water can be delivered by truck for any drought conditions.</p>
-----	-------------------------------------	---

On the latest Engineering Drawings for the Northern Solar Farm, there is an indication that a town water connection will be installed for the firefighting water supply and for the troughs for the animals that will be grazed on the solar farm.

(Page 40 of 44 in the document Ashbourne Northern Solar Farm for Matamata Developments Ltd – Proposed Services Key Plan C700 Rev E)



And evidence that the Applicant is still proposing to connect to the town water supply for water for animals is on Ashoubrne Solar Farm A for Matamata Developments Ltd – Proposed Services Plan Sheet 3 of 3 C700-3 Rev E



The applicant proposes to connect to the EX-25mm MDPE Rider Main using a Proposed 250D PE80B PN12.5 SDR 11 pipe/hose.

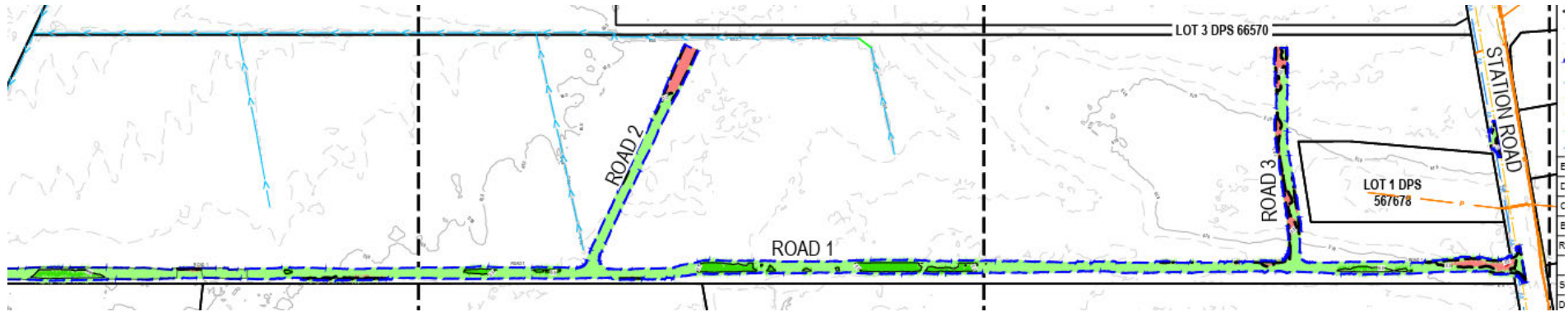
MPDC has set a precedent: existing users of that town's water supply were previously denied a connection for watering animals; therefore, this proposed connection should not be accepted by MPDC. The applicants did mention stock water from the main farm supply being the existing water supply to the Northern Solar Farm Block.

Proposed Condition:

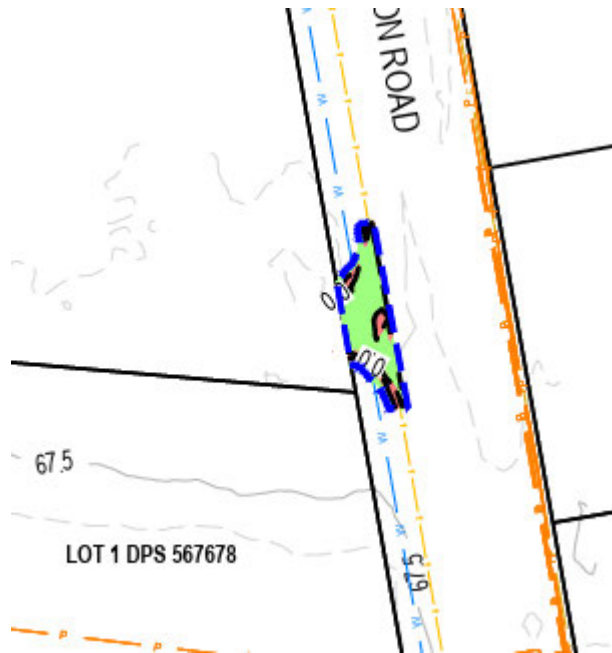
- That the consent holder does not get water for the northern solar farm from the existing 25mm MDPE Rider main for the watering of animals and filling the firefighting tanks, as there is an existing main farm supply already to the Northern Solar Farm block.

Driveway entrance to nowhere

On page 14 of the document, Ashbourne Northern Solar Farm for Matamata Developments Ltd – Proposed Cut/Fill Key Plan C220 Rev E, there is an area of proposed cut where the driveways for the proposed, then cancelled, Lots 8 and 9 were located.



Page 17 of 44 Document Ashbourne Northern Solar Farm for Matamata Developments Ltd – Proposed Cut/Fill Key Plan Sheet 3 of 3 C220-3 Rev E shows a very clear area of fill required for what looks like a driveway.



Why is there a need to have this detailed on the Plan for cut and fill if the subdivision of lots 8 & 9 is not going to occur?

This needs to be removed from the cut-and-fill plan. The property is permitted 1 entrance way for vehicle access. I have attempted to call MPDC to clarify if a property of that width would be permitted a second driveway, but I assume that all the engineers are furiously gathering information for the Council's reply to the draft decision as well.

Looking at the plan, it seems that road three on the northern solar farm has been located too close to the boundary of 172 Station Road to allow access to the land that was going to be Lot 8 & 9 and was recently removed from the project. There is no break in the fencing or planting to allow access into that paddock. To my mind, it is an easy fix to move the solar farm road 3, fencing, and planting 5 m to the north to allow adequate access for vehicles/tractors for animal grazing. Then there would be no need for the extra driveway, and the land can be used as suggested by the applicant.

Requested condition:

- That no additional entrance way is permitted on the Northern Solar Farm land as the applicant can reconfigure the internal roading and buffer planting to allow access to the grazing area (formerly Lot 8 & 9).

### Concluding comments:

I thank you for your time when reading and considering my reply. Please consider incorporating my responses into the conditions of the draft, remembering that I have called for factual, empirical data as a baseline for the project's stormwater, flooding, and wastewater outflows, and to highlight issues that have been omitted by the applicant since the substantive application.

As I have said before, it is better to do this project right the first time, as the alternative would leave the MPDC and WRC with a huge headache to clean up and no developer to assist with the cost of repair or replacement.

Yours Sincerely

Roger Slattery

Part-owner of [REDACTED]