

30 July 2026

Environmental Protection Authority
Private Bag 63002
Wellington 6140
NEW ZEALAND

Teenaa koe

THE REST – REFERRAL APPLICATION

1. These comments are provided on behalf of Te Whakakitenga o Waikato Incorporated (Waikato-Tainui).
2. Te Whakakitenga o Waikato Incorporated is the governing body for the 33 hapuu and 68 marae of Waikato and manages the tribal assets for the benefit of over 100,000 registered tribal members. It is also:
 - a) the trustee of the Waikato Raupatu Lands Trust, the post-settlement governance entity for Waikato-Tainui for the purposes of the Waikato Raupatu Lands Deed of Settlement 1995 and the Waikato Raupatu Claims Settlement Act 1995;
 - b) the trustee of the Waikato Raupatu River Trust, the post-settlement governance entity for Waikato-Tainui for the purposes of the Waikato-Tainui River Deed of Settlement 2009 and the Waikato Raupatu Claims (Waikato River) Settlement Act 2010 (River Settlement);
 - c) the mandated iwi organisation for Waikato-Tainui for the purposes of the Maaori Fisheries Act 2002; and
 - d) the iwi aquaculture organisation for Waikato-Tainui for the purposes of the Maaori Commercial Aquaculture Claims Settlement Act 2004.
3. Waikato-Tainui welcomes the opportunity to provide comment on the Drury West Crossing Fast Track referral application.

WAIKATO-TAINUI COMMENTS

4. Waikato-Tainui understands that the proposal is for a mixed-use rural development at Tauwhare in the Waikato District, comprising an agricultural education institute, up to 36 rural residential lots, a retirement village and aged-care facilities, local-scale commercial activities, storage units, and associated transport and three waters infrastructure. The proposal also includes integrated open space, stormwater

management, ecological enhancement, and active transport connections adjoining existing watercourses.

5. The applicant proposes that the development be delivered in stages to align with the provision of key infrastructure, particularly stormwater and transport infrastructure. Waikato-Tainui acknowledges the intention to establish an integrated development comprising a range of rural, residential, community, and supporting activities; however, the scale, location, and integration of these components will require careful assessment to ensure appropriate infrastructure provision, environmental outcomes, and long-term land use outcomes are achieved.
6. The "Future Proof Retirement Living Report (October 2025)" identifies that projected demand for retirement living can be accommodated within existing urban areas and established settlements with access to services and community infrastructure. This is consistent with the strategic planning framework, which directs urban growth towards locations with existing or planned infrastructure and services. In this context, Waikato-Tainui supports careful consideration of the appropriateness of locating a retirement village in a rural area outside identified growth areas.
7. The proposal raises matters relating to three waters servicing, including wastewater, water supply, stormwater, and drainage infrastructure. There is currently no wastewater network servicing the site, and while an existing water supply scheme is available, its capacity to accommodate development of this scale requires technical assessment. Waikato-Tainui considers these matters should be assessed by Council and/or IAWAI, to determine whether appropriate three waters servicing can be achieved.
8. Given the scale and location of the proposed development, any substantive application should clearly demonstrate alignment with the objectives and policies of the Waikato Regional Policy Statement, Te Ture Whaimana o Te Awa o Waikato (where applicable), Tai Tumu, Tai Pari, Tai Ao and relevant growth strategies. This assessment should consider the cumulative effects of the proposal, including implications for infrastructure capacity, transport networks, freshwater values, biodiversity, highly productive land, landscape character, and cultural values.
9. The proposed site includes highly productive land and therefore engages matters addressed by the National Policy Statement for Highly Productive Land 2022. Waikato-Tainui has established positions on the protection and sustainable management of highly productive land through Tai Tumu, Tai Pari, Tai Ao. These provisions are relevant to the consideration of the proposal, particularly in relation to the long-term use of productive soils and the management of rural land resources.
10. The application indicates engagement with relevant iwi and hapuu, including Ngati Hauaa and Ngaati Wairere. Should the project advance to the Fast-Track substantive phase, the applicant should continue to engage with and appropriately resource mana whenua to participate in the assessment process, including through the preparation of any Cultural Values Assessments or other cultural assessments that may be identified as appropriate by the relevant iwi to inform the ongoing development and assessment of the proposal.

11. We note that have provided feedback on the referral application and, consistent with our mana whenua-led approach, Waikato-Tainui supports those comments. Ngaati Hauaa have also signalled their desired level of involvement should the proposal proceed to the substantive phase, including the potential development of a memorandum of understanding and a cultural values assessment.
12. The matters raised in these comments are not intended to be exhaustive. Given the preliminary nature of the referral stage and the information currently available, Waikato-Tainui may raise additional matters and provide further comments should the proposal progress beyond the referral stage and further information become available.

OVERALL POSITION

13. Waikato-Tainui does not take a final position on the proposal at referral stage. However, the matters identified above are considered to be of significance to Waikato-Tainui and will require further detailed assessment should the project be advanced to the substantive phase.
14. In particular, further consideration would be required in relation to:
 - effects on freshwater systems;
 - loss of highly productive land and cumulative land use change;
 - cultural values within the project area;
 - alignment of the project with Te Ture Whaimana; and
 - alignment of the project with Tai Tumu, Tai Pari, Tai Ao
15. Waikato-Tainui reserves its position pending further information, including completion of cultural impact assessments, ongoing engagement with mana whenua, and appropriate resourcing by the Applicant to support continued involvement.
16. We are satisfied that the referral application provides a sufficient high-level understanding of the proposal and its potential interface with Waikato-Tainui interests. However, significant matters remain to be addressed at substantive stage to enable a full assessment of effects and mitigation outcomes.
17. Waikato-Tainui looks forward to continued engagement as the proposal progresses through the Fast-track Approvals process.

Naaku i roto i ngaa mihi, naa

Te Maakariini Mapu
ENVIRONMENTAL PLANNER
WAIKATO-TAINUI