Memorandum

To: Listed Projects Team – Ministry for the Environment

From: Rebecca Sanders/Nick Roberts – Barker & Associates Limited

Date: 9 June 2026

Re: Planning Memorandum for Whangapouri

1.0 Introduction

1.1 Whangapouri Road

132 Whangapouri Drury Limited (**the applicant**) has engaged Barker & Associates (**B&A**) to provide planning services for the master planning, consenting and design of ***Whangapouri Road***. The site is located on the northern side of SH22 near the intersection with Whangapouri Road and Bycroft Road, within the wider Drury West area of Auckland. The site comprises a total of 99.58 hectares. ***Whangapouri Road*** is a residential development that will form an extension to Drury West. The ***Whangapouri Road*** masterplan has three key components:

1) Approximately 1,050 – 1,150 dwellings comprising:
    - Approximately 850-950 dwellings. The current masterplan includes approximately 904 residential dwellings ranging in lot sizes between 300 m² and 500 m², supplemented by a smaller proportion of higher-density and larger-format lots, however, this may adjust slightly within the indicative range with more detailed design; and
    - Approximately 200 retirement village dwellings set within a 11.9 hectare retirement village .
2) A local centre in the northern portion of the development that provides opportunities for mixed use and employment activities and includes approximately 0.7 hectares of commercial floorspace; and
3) Associated infrastructure.

The Masterplan is shown below in **Figure 1**.

The development is not proposed to be staged.

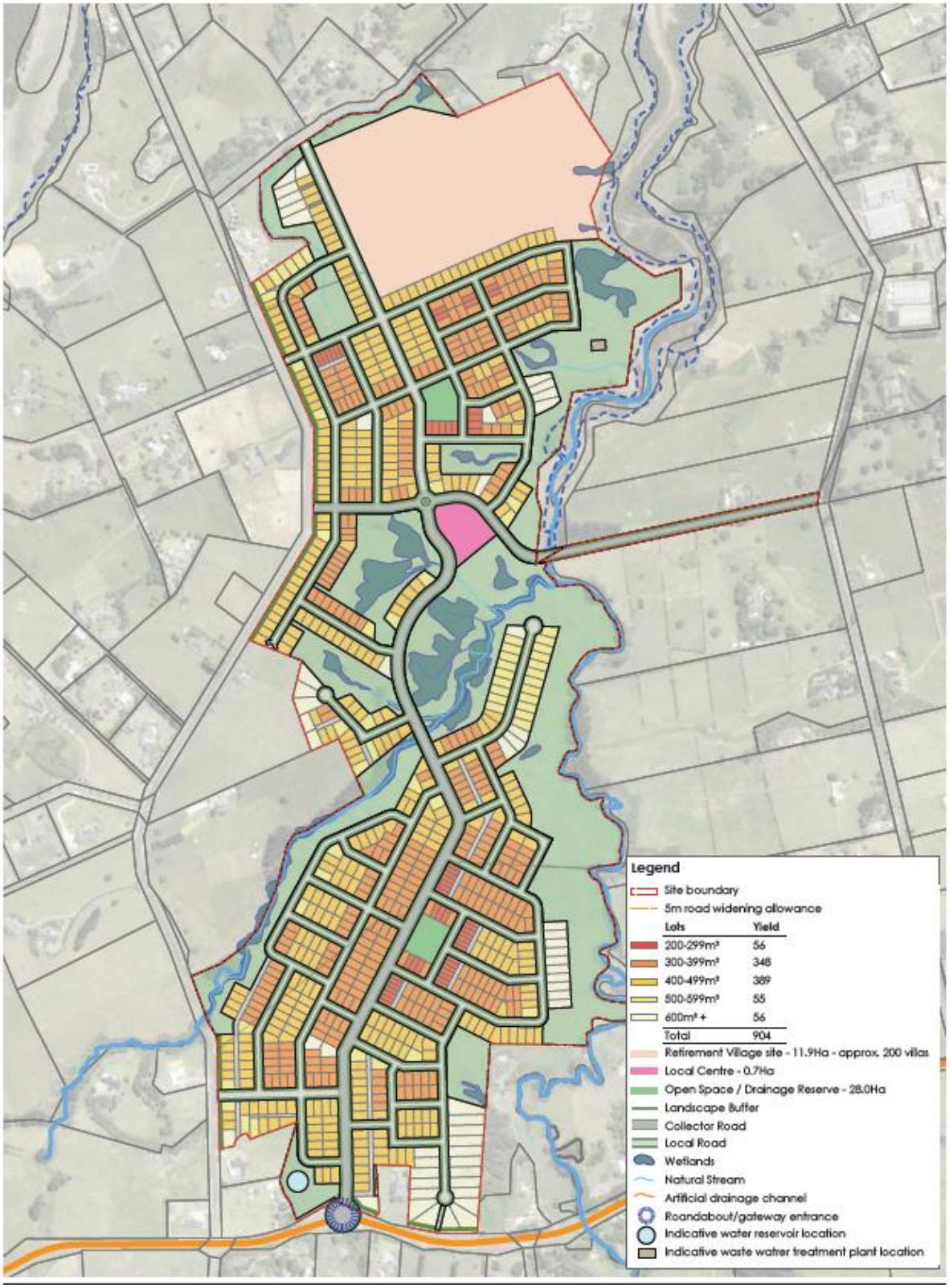


Figure 1: Whangapouri Masterplan. Source: Barker & Associates

1.1.1 Transport

The proposed roading and access arrangement is set out within the Transport Memorandum (**Attachment 11**). In summary, the proposal includes the following key roading arrangements:

- Access to the development is proposed through a new double-lane roundabout onto SH22.
- The double-lane roundabout option is the preferred access arrangement due to the physical constraints associated with the existing Whangapouri Road intersection, including limited space for widening and intersection storage. However, a secondary option of signalising the Whangapouri Road intersection remains viable should it be required.
- Secondary access to the development will be available via an eastern Collector Road link to Oira Road which will connect to the future collector road linking Oira Road and Jesmond Road required within the Waipupuke Precinct.
- The secondary access connection is significant because it will provide an alternative route for local trips to Drury West, Auranga that would otherwise need to use SH22.
- The masterplan provides for a north-south Collector Road spine through the centre of the development, connecting the external network to the residential areas and neighbourhood centre.
- The Collector Road will provide footpaths on both sides and a two-way cycleway along the eastern side.
- External active mode improvements are also anticipated in the form of a shared path along the site's SH22 frontage, with opportunities to extend the connection eastward to Oira Road, then connecting to the future frontage path along the Waipupuke Precinct frontage that connects to Jesmond Road.
- At Jesmond Road, crossing facilities are being provided to connect to the Ngākōroa Rail station and associated facilities.

1.1.2 Three Waters

The proposed three-waters strategy for the Site is set out in the Preliminary Civil Infrastructure Report (**Attachment 7**). By way of summary, the follow strategies are proposed.

Stormwater

There is currently no public stormwater infrastructure within the Site.

The preliminary Civil Engineering Assessment prepared by Maven proposes a water-sensitive design approach to maintain hydraulic neutrality in line with Stormwater Management Area Flow condition 01 (SMAF-1) to improve water quality and protect downstream environments. This will be provided through a combination of catchment raingardens, wetland and treepits (public roads) and through a combination of wetlands, and tanks in support of the private accessways and lots. For private accessways not benefited by a catchment-wide solution, tanks will provide extended detention only.

The proposed stormwater infrastructure will provide a means of disposal for all impervious areas (public roads, common accessways, driveways and buildings). A new public stormwater network will be provided within the public roads, and this will provide a means of stormwater disposal for each lot created within the development. The pipe network will discharge into the various overland flowpaths, streams and wetlands within the site, and will largely accord with the existing catchments, with specific emphasis being placed on maintaining hydrology and flows to the wetlands.

Water supply

Water supply will be privately sourced and will not rely on the public network.

The Preliminary Civil Infrastructure Report prepared by Maven, the Water Supply Servicing Report by GWE and the Groundwater Feasibility assessment by Earthtech collectively confirm that there is viable long term water servicing solutions that do not rely on Watercare's public network. In particular the proposal will be serviced through a combination of roof rainwater capture and groundwater abstraction.

Earthtech has confirmed that there are three potential sources to meet the water demand of 181,040m^3/d. The preferred source is from the Pukekohe Kaawa from which 69,574m^3/yr can be sourced from the existing allocation and 111,466m^3/yr sourced from additional availability determined for the 2020 Earthtech groundwater modelling carried out for Pukekohe WCS Municipal Supply. Total water demand will be reduced through the implementation of water-efficient fixtures and rainwater harvesting systems, significantly reducing reliance on potable supply. Rainwater harvesting has been assessed to provide an average of approximately 279 m3/day for non-potable uses.

As outlined within the Water Supply Servicing Report by GWE centralised treatment, storage, and reticulation system is proposed to collectively provide a resilient and sustainable water supply for the development.

Wastewater

There is currently not public wastewater connection available at the Site.

The proposal will therefore be supported by a private, centralised wastewater treatment plant (WWTP), with disposal of treated effluent via land to the Coastal Marine Area via thestream. GWE Consultant engineers have been engaged to provide specialist wastewater and water advice to the proposal. GWE have proposed a Membrane Bioreactor (MBR) or hybrid Membrane Aerated Biofilm Reactor (MABR-MBR) system to provide wastewater treatment.

A network utility company will be established to own and operate the WWTP and the Water Treatment Plant.

1.1.3 Power and Telecommunication

Telecommunications in the area are managed by Chorus, Power supply in the area is managed by Counties Power. The Preliminary Civil Infrastructure Report outlines that with upgrades in place, services will be available to service the development. The applicant will continue to work with Counties Power and Chorus prior to the lodgement of a substantive application.

2.0 Site Context

2.1 The Site

The site is a large rural site (approximately 99.58 ha comprising several land parcels) located adjoining the rural urban boundary within Drury West. The following parcels form part of the wider site:

Appellation	Landowner Name(s)	Area (hectares)
8 Arana Drive, Karaka *Lot 3 Deposited Plan 387516 and Lot 2 Deposited Plan 438393*	Celtic Dales Limited	13.774 Ha

132 Whangapouri Road, Karaka *Lot 3 Deposited Plan 387516 and Lot 2 Deposited Plan 438393*	Celtic Dales Limited	59.7521 Ha
Karaka Road, Karaka *Lot 2 Deposited Plan 464886*	Prosperous Farms Limited	26.0556 Ha

The subject site is irregular in shape and is bound by Arana Drive to the north, Whangapouri Road the west, Karaka Road (State Highway 22) to the south and the Oira stream to the east.

The site is currently being used for agriculture / pastoral farming uses. There are several existing dwellings and building located within the site. Legal access to both properties is from the existing vehicle crossings from Whangapouri Road.

The site is characterised as gentle to moderately sloping contours. There are steeper contours which exist around the streams and wetland features in the central part of the site, with the balance largely gently sloping and north and or north-east facing. The site is split into two areas by a stream that runs largely west-east.

The site is well connected being located directly adjacent to Karaka Road (State Highway 22) which connects directly via Great South Road to State Highway 1 providing quick and convenient access to Manukau Metropolitan Centre and Auckland CBD to the north. The site is located south west of the proposed Ngākōroa railway station and associated bus interchange infrastructure which represent significant future transport investments which materially improve the strategic accessibility of the site.

In terms of existing infrastructure, the Site is primarily in rural productive use and is not currently served by any primary wastewater or water infrastructure networks.

While the site sits outside of the Urban area it is located directly adjacent to the Rural Urban Boundary and the Ōpaheke–Drury Structure Plan area which is under-going rapid transformation. In particular, the site is opposite the Plan Change 121 - Karaka Road Plan Change area[1] which is rezoning Future Urban land to enable the development of the Fisher and Paykel Healthcare campus a significant employment node. Further to the west the Drury West/Auranga development will provide two schools and a town centre.

[1] https://www.aucklandcouncil.govt.nz/en/plans-policies-bylaws-reports-projects/our-plans-strategies/unitary-plan/auckland-unitary-plan-modifications/proposed-plan-changes/pc-121-private-karaka-road-precinct.html

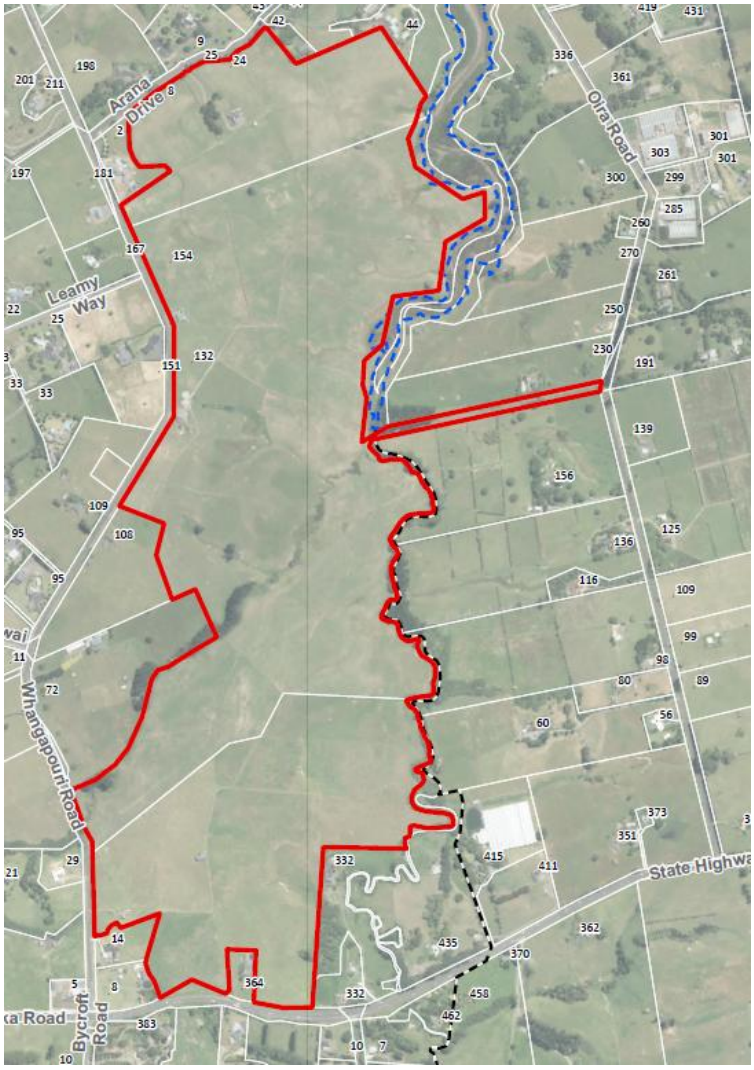


Figure 2: Site Locality Plan. Source: Emaps.

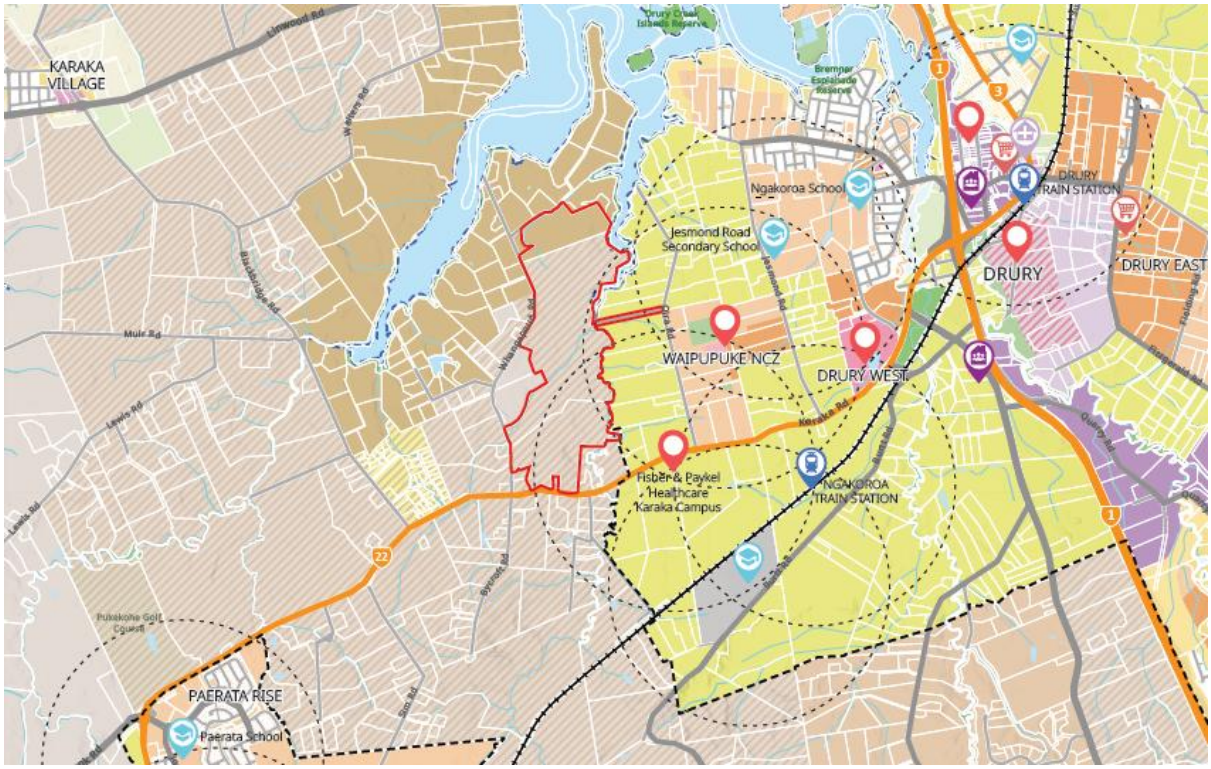


Figure 3: Wider site context map.

2.2 Auckland Unitary Plan – Zoning, Overlays, Controls and Designations

The subject Site is largely zoned Rural – Mixed Rural Zone with the northern portion of the site zoned Rural – Rural Coastal Zone. The following additional restrictions apply to the site under the AUP:

- Overlays: Significant Ecological Areas Overlay - SEA-M2-29a, Marine 2;
- Overlays: High-Use Aquifer Management Areas Overlay - Pukekohe Kaawa Aquifer;
- Controls: Coastal Inundation 1 per cent AEP Plus 1m Control – 1m sea level rise;
- Controls: Macroinvertebrate Community Index – Rural;
- Controls: Macroinvertebrate Community Index – Native; and
- Designations: 6705, State Highway 22: Karaka to Pukekohe - Road widening, Designations, New Zealand Transport Agency.



Figure 4: Auckland Unitary Plan

2.3 Regional Significance of the Project

The Fast-track Approvals Act 2024 has established a framework that differs from the Resource Management Act 1991. The matters outlined in Sections 22(1)(a) and 22(2)(a) of the Fast Track Approvals Act direct the considerations available to the Minister when assessing a project's eligibility for referral.

In summary, ***Whangapouri Road*** is a project that will create economic benefits and address housing needs of southern Auckland in terms of supply, type and scale that will provide significant regional benefits. The substantial scale of the proposal will enable approximately 1,050 – 1,150 dwellings (comprising approximately 850-950 dwellings and a 200 dwelling retirement village)and a new local centre. The site is located strategically adjoining the rural urban boundary within an area that is rapidly urbanising. The site is spatially aligned with employment opportunities as it is directly opposite the planned Fisher and Paykel Healthcare campus. Furthermore, ***Whangapouri Road*** is generally consistent with the relevant strategic outcomes identified in local and regional planning documents.

Section 22(2)(a)(iii) – will increase the supply of housing, address housing needs, or contribute to a well functioning urban environment (within the meaning of policy 1 of the National Policy Statement on Urban Development 2020):

Whangapouri Road is a new residential community that will form an extension of the existing urban area enabling approximately 1,050 – 1,150 dwellings (comprising approximately 850-950 dwellings and a 200

dwelling retirement village) making a substantial contribution to dwelling capacity in southern Auckland and improving the responsiveness of the local housing market to demand growth. The proposal caters to a variety of needs and preferences by providing for a range of dwelling typologies, including retirement living, standalone homes of various sizes and configurations as well as terraces / duplexes. This will significantly boost housing supply and choice within an accessible location within Auckland's southern area, contributing to a well-functioning urban environment.

Whangapouri Road has many locational benefits that ensure the proposed development will contribute to a well-functioning urban environment for the following reasons:

- While the site has a rural zoning it adjoins the rural urban boundary and the surrounding area is undergoing significant urban transformation and growth. As such, the long-term development of the site provides opportunity to integrate with the planned future urban environment and make efficient use of the infrastructure investment associated with the wider Drury–Ōpaheke growth area.
- The subject site is opposite the proposed Fisher and Paykel Healthcare campus (proposed to be rezoned through Plan Change 121) which is set to become a significant employment anchor within the area as it is expected to accommodate 16,200 FTEs within the campus by 2070[2].
- The proposal provides for direct connections to Oira Road and the existing developments to the east including Waipuke Precinct and the Auranga development which will provide a new primary and secondary school and Town Centre.
- The site is well connected to the wider region as it is approximately 1600m from the proposed future Ngākōroa (Drury West) Train Station and less than 3.5km from the State Highway 1 (SH1) motorway interchange.
- The site is also accessible to the Drury Metropolitan Centre under development in Drury East.

Section 22(2)(a)(iv) – will deliver economic benefits

The Economic Assessment sets out the economic benefits that will be delivered by ***Whangapouri Road*** In summary these include:

- Total direct capital expenditure (excluding land) of $770 Million.
- Approximately 3,075 FTE-years of employment across Auckland over the development period, equivalent to around 440 FTEs per annum over the seven-year construction programme.
- Additional household incomes of over $275 million.
- One-off economic impacts through the direct construction activity and supporting services.
- Local employment opportunities once the local centre is operational.
- **The proposal will also enable the land to be put to its highest and best use, which is a precondition for economic efficiency to hold in the underlying land market.**

[2] FPH Karaka Rd Structure Plan and Plan Change Economic Assessment: https://www.aucklandcouncil.govt.nz/en/plans-policies-bylaws-reports-projects/our-plans-strategies/unitary-plan/auckland-unitary-plan-modifications/proposed-plan-changes/pc-121-private-karaka-road-precinct.html

Section 22(2)(a)(vii) – will support climate change mitigation, including the reduction or removal of greenhouse gas emissions:

Whangapouri Road supports climate change mitigation, particularly through the management of flooding hazards and incorporates measures to support the reduction of greenhouse gas emissions (such as active mode transport infrastructure).

Climate change will be accounted for within the final stormwater design. In particular, the stormwater design will manage the development layout to move impermeable surfaces and built structures away from identified flood prone areas. Development works will mitigate downstream concerns relating to 1% AEP events. The final design details will be informed by flood modelling utilising climate adjusted stormwater rainfall data to safeguard people and infrastructure against potential future extreme storm events and manage the potential effects of climate change.

Whangapouri Road is designed to reduce dependency on private motor vehicles and encourages the residential population to take up more sustainable modes of transport, thereby reducing greenhouse gas emissions, to ensure that the project supports climate change mitigation. The proposal presents opportunities to establish an integrated active mode network from the outset. It is strategically located opposite the Fisher and Paykel Healthcare campus and the Ngākōroa train station. This development will result in a significant increase in housing opportunities within walking distance of major employment..

The proposed Ngākōroa railway station and associated bus interchange infrastructure represent significant future transport investments which materially improve the strategic accessibility of the site. These future investments support the proposal's ability to achieve high levels of public transport accessibility compared to many greenfield development locations.

The proposal involves significant ecological enhancement of the Site through extensive native planting.

Section 22(2)(a)(x) – is consistent with local or regional planning documents, including spatial strategies:

Overall, the proposal is consistent with the relevant local and regional planning documents, as set out in section 5.5 and 5.6 below.

2.4 Benefit of the Fast-Track Approvals Act (2024) for Whangapouri

As outlined in Section 22(1)(b)(i) and (ii), part of the determination for accepting a referral application includes outlining whether the FTAA (2024) process would facilitate a more efficient and timely delivery of the project;

(b) referring the project to the fast-track approvals process—

i. would facilitate the project, including by enabling it to be processed in a more timely and cost-effective way than under normal processes; and

ii. is unlikely to materially affect the efficient operation of the fast-track approvals process.

The fast-track process will enable the project to be processed in a more timely and cost-efficient manner than under the normal process, for the following reasons:

- Under the Fast-track Approvals Act 2024, expert panels will consider required approvals as a single application package, as opposed to the normal process where several applications would be required for the different activities and to different authorities;

- Under the Fast-track Approvals Act 2024, public and limited notification is precluded, expert panels are only permitted to invite comments from specified persons who have a short timeframe to provide comment. Given the scale of this development, it would likely be a fully notified application under the RMA which would significantly slow down the consenting process and add to cost, taking into account the appeal rights enabled under the standard RMA process;
- Under the Fast-track Approvals Act 2024, timeframes are shorter and stricter than that of the normal process resulting in significant less time for obtaining resource consent and efficiencies for the project; and
- There is resourcing in place to process the application efficiently and certainty around timeframes for the applicant to ensure the project remains 'shovel ready'.

3.0 Reasons for Consent

3.1 Auckland Unitary Plan (Operative in Part)

At this stage, we understand that resource consent will be required under the AUP rules listed below. This list is not exhaustive and is based upon the information available to date. Further consent triggers may be identified as the proposal develops.

E3 Lakes, Rivers, Streams and Wetlands

- Conservation planting not complying with the standards listed in E3.6.1.2 is a **restricted discretionary activity** pursuant to E3.4.1(A3).
- Diversion of a river or stream to a new course and associated disturbance and sediment discharge is a **discretionary activity** pursuant to E3.4.1(A19).
- Any new structures and associated diversion of water not complying with the general permitted activity standard E3.6.1.14 is a **discretionary activity** pursuant to E3.4.1(A44).
- Pursuant to Rule E3.4.1(A49) the reclamation of streams is a **non-complying activity**.

E6 Wastewater Network Management

- Pursuant to Rule E6.4.1(A6) the discharge of wastewater on-site is a **discretionary activity.**

E7 Taking, Using and Diversion of Water and Drilling

- Temporary diversion of surface water for urban development purposes not otherwise listed is a **discretionary activity** pursuant to E7.4.1(A13).
- The diversion of groundwater caused by excavation that does not meet the permitted activity standards is a **restricted discretionary activity** pursuant to E7.4.1(A28).

E8 Stormwater Discharge and Diversion

- Pursuant to Rule E8.4.1(A10) the diversion and discharge of stormwater runoff from impervious areas not otherwise provided for is a **discretionary activity.**
- The proposal involves the diversion and discharge of stormwater runoff from a new stormwater network. This is a **discretionary activity** pursuant to E8.4.1(A11).

E9 Stormwater Quality – High Contaminant Generating Carparks and Roads

- Pursuant to Rule E9.4.1(A6) development of a high contaminant generating carpark is a **controlled activity.**
- The proposal involves the construction of a new high use road greater than 5,000m² in area. This is a controlled activity pursuant to E9.4.1(A7).

E11 Land Disturbance – Regional

- Pursuant to Rule E11.4.1(A5), earthworks greater than 50,000m^2 where land has a slope of less than 10 degrees outside a Sediment Control Protection Area is a **restricted discretionary activity.**
- Pursuant to Rule E11.4.1(A8), earthworks greater than 2,500m^2 where land has a slope of equal to or greater than 10 degrees is a **restricted discretionary activity.**
- Pursuant to Rule E11.4.1(A9), earthworks greater than 2,500m^2 within the Sediment Control Protection area is a **restricted discretionary activity.**

E12 Land Disturbance – District

- Pursuant to Rules E12.4.1(A6) and (A10) the proposal to undertake cut / fill greater than 2,500m^3 is a **restricted discretionary activity**.

E15 Vegetation Management and Biodiversity

- Vegetation alteration or removal, including cumulative removal on a site over a 10-year period, of greater than 250m^2 of indigenous vegetation is a **restricted discretionary activity** pursuant to E15.4.1(A10).
- The proposal involves the removal of vegetation within 20m of rural streams. This is a **restricted discretionary** activity pursuant to E15.4.1(A16).
- Vegetation alteration or removal within 10m of rural streams in the Rural Mixed Use Zone is a **restricted discretionary activity** pursuant to E15.4.1(A17).
- The proposal involves the removal of vegetation within 20m of a natural wetland and in the bed of a stream. This is a **restricted discretionary** activity pursuant to E15.4.1(A18).

E23 Signs

- Signs in the Mixed Rural and Rural Coastal Zones are a **discretionary** and/or **non-complying activity** pursuant to E23.4.1(A11 and A12).

E25 Noise and Vibration

- Construction works are anticipated to exceed the applicable maximum 75dB LAeq long-term construction noise limits under Standard E25.6.27. This is a **restricted discretionary activity** under E25.4.1(A2).

E26 Infrastructure

- Aboveground pipelines and attached ancillary structures for the conveyance of wastewater are a **restricted discretionary activity** pursuant to E26.2.3.1 (A50).
- Wastewater treatment plants are a **restricted discretionary activity** pursuant to E26.2.3.1(A54).

- Pursuant to Rule E26.2.3.1(A55), stormwater detention/retention ponds/wetlands are a **controlled activity.**

E27 Transport

- Pursuant to Rule E27.4.1(A3), the generation of more than 100vph is a **restricted discretionary activity**.

E30 Contaminated Land

- Pursuant to Rule E30.4.1(A6), the potential discharge of contaminates onto the land not meeting Standard E30.6.1.2 but meeting Standard E30.6.2.1, is a **controlled activity**.

E36 Flooding and Natural Hazards

- Construction of stormwater management devices in the 1 per cent annual exceedance probability (AEP) floodplain is a **restricted discretionary activity** pursuant to E36.4.1(A33).
- The proposal involves piping an overland flow path. This is a **restricted discretionary activity** pursuant to E36.4.1(A41).
- The proposal involves infrastructure on land subject to overland flow paths and the 1% AEP floodplain. This is a **restricted discretionary activity** pursuant to Rule E36.4.1(A56).

E39 Subdivision

- Subdivision establishing an esplanade reserve is a **restricted discretionary activity** pursuant to E39.4.1(A5).
- Subdivision of land within the 1% AEP floodplain is a **restricted discretionary activity** pursuant to E39.4.1(A8).
- Subdivision which does not meet the standards in E39.6.1 is a **discretionary activity** pursuant to E39.4.1(A9).
- The proposal involves subdivision for open spaces, reserves and roads in the Mixed Rural zone. This is a **discretionary activity** pursuant to E39.4.2(A11).
- Subdivision which does not meet the standards in E39.6.5.1 is a **non-complying activity** pursuant to E39.4.2(A13).
- The proposal involves subdivision in the Mixed Rural Zone not provided for in Tables E39.4.1 or E39.4.2. This is a **non-complying activity** pursuant to E39.4.2(A27).

E40 Temporary Activities

- The proposed construction activity associated with the proposed development will exceed 24 months. This is a restricted discretionary activity pursuant to E40.4.1(A24).

H19 Mixed Rural Zone and Rural Coastal Zone

- Pursuant to Rule H19.8 new buildings have the same activity status and standards as applies to the land use activity, new dwellings are a **non-complying activity** pursuant to H19.4.1(A78)
- Pursuant to Rule H19.4.1(A78), the construction of approximately 1955 dwellings across 1 title areas is a **non-complying activity.**

- Pursuant to Rule C1.7(1), the proposal to establish retail and commercial activities is a **discretionary activity**.

Overall, under the Auckland Unitary Plan, the proposal would require consent as a **Non-Complying Activity.**

3.2 National Environmental Standard – Freshwater

Resource consents will likely be required for a range of reasons under the National Environmental Standards: Freshwater (**NES:F)**, including earthworks or, vegetation clearance within 10m of a natural inland wetland, or the diversion of water or the discharge of water into water within 100m of a natural inland wetland. Reclamation of some streams and wetlands with lower ecological values may be required to facilitate development.

More detailed work will confirm if work around wetlands triggers a prohibited activity status by way of Regulation 53 of the NES:F. Regardless, s21(7) of the Fast-track Approval Act enables the Minister to accept a referral application for an activity that is prohibited under the Resource Management Act 1991. The effects of any proposal will be assessed as part of a substantive application if successfully referred.

3.3 National Environmental Standards for Assessing and Managing Contaminants in Soil to Protect Human Health

The Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 ('**NES:CS'**) sets a nationally consistent set of planning controls and soil contaminant values.

Given the historical rural uses of the site, it is likely that provisions of the NESCS will apply to future development at the locations where HAIL activities are likely to have occurred. A detailed site investigation (DSI) involving a targeted soil sampling will be undertaken at the site in support of the substantive application. This will ascertain whether NESCS and/or AUP:OP contaminated land resource consents are required to be sought in support of the development.

3.4 Other Approvals

3.4.1 Wildlife Act Authority (Permit)

A Wildlife Approval is required under the Wildlife Act from the Department of Conservation for the relocation of skinks within the site, in case the number of skinks that require relocation is likely to be greater than 20. This threshold is important as the region wide wildlife permit held by herpetologists is usually limited to 20 individuals. In this case, as the site is large, it is prudent to apply for this permit just in case the numbers that need to be relocated when suitable vegetation is cleared (e.g. weedy vegetation / rank grass) exceed 20.

3.4.2 Complex Fisheries Freshwater Approvals

The consultation with the Department of Conservation (**DOC**) has noted that there are records of Threatened and At-Risk freshwater species present at and in the vicinity of the site. DOC also considers it probable that there are inanga spawning sites within the project area. It is possible that works including instream structures such as culverts, weirs or similar structures, or where culverts do not meet the relevant permitted standards may trigger the need to obtain Complex Freshwater Fisheries Activity approvals (CFFA).

At this stage, the detailed culvert and stream crossing design has not been undertaken, so it is difficult to confirm definitively whether the approval will be required. It is prudent to apply for this approval just in case it is required.

No other permits are requested.

4.0 Consultation

In preparing this application consultation has been undertaken with Ministry for the Environment, Auckland Council, Department of Conservation, New Zealand Transport Authority and Iwi. An overview of the consultation undertaken and the feedback received is outlined in **Attachments 3** and **4.** This memorandum provides a response to the feedback received within the relevant sections. The Iwi Engagement Report and Consultation Record (**Attachments 3** and **4**) provide a more detailed overview in response to feedback received.

The applicant has undertaken engagement and consultation with key stakeholders, and the outcomes are summarised below.

- **Iwi**: All Iwi with interests in the area have been contacted and invited to engage on the proposal. Ngāi Tai ki Tāmaki and Ngāti Tamaoho responded seeking to engage. An onsite hui was held with representatives from both Iwi on the 18th May 2026. A detailed overview of the engagement is contained within **Attachment 3**. No responses were received from the other Iwi contacted within the 20 working day notification period required under S11(b)(ii) of the FTAA 2024.
- **Auckland Council and Council Controlled Organisations** – Consultation has occurred with the Premium Consenting Team, Auckland Transport and Watercare Services Ltd. Detailed feedback has been received from the Premium Consenting Team. The applicant will continue to work through the more detailed feedback raised as part of the preparation of a substantive application. An initial response to the detailed feedback is provided in **Attachment 4**.
- **Department of Conservation** (**DoC**) – Pre-lodgement consultation initiated via formal application to DoC email at Fasttrackapplicationenquires@doc.govt.nz. Subsequently, DoC were provided with a description of the project. DoC has provided feedback. The Consultation Report (**Attachments 4**) provide a more detailed overview in response to feedback received. Engagement with DoC is primarily in relation to the Wildlife Act and will be ongoing as part of the preparation of a substantive application.
- **New Zealand Transport Authority** – A pre application meeting was held with NZTA who indicated a preference for any future access solution to be focused around the existing Whangapouri Road / SH22 intersection rather than creating a new intersection further east. This position reflects a broader desire to minimise the proliferation of intersections along SH22. A detailed response to this feedback is provided within Section 5 of the Hughes Transport Memorandum. In summary, the double-roundabout access arrangement located further east along the site frontage remains the applicants preferred access option due to the existing Whangapouri Road intersection presenting a number of significant physical constraints. An alternative access option involving signalisation of the existing SH22 / Whangapouri Road / Bycroft Road intersection remains under consideration. This can be investigated further with NZTA as part of a substantive application if successfully referred.

A summary of consultation undertaken and copies of the feedback received is included at **Attachment 4**.

4.1 Treaty Settlements

Section 7 of the FTAA requires all persons performing and exercising functions, powers, and duties under the Act must act in a manner that is consistent with the obligations arising under existing treaty settlements, while Section 16 sets out the requirements for the Minister.

Treaty settlements with the following iwi/groups are therefore of relevance to the project area:

- Ngāti Tamaoho
- Ngāi Tai ki Tāmaki
- the Tāmaki Collective.

The Ngāti Tamaoho Claims Settlement Act 2018 gave effect to the deed of settlement signed by the Crown, Ngāti Tamaoho and the Ngāti Tamaoho Settlement Trust on 30 April 2017.

Ngāi Tai ki Tāmaki, the trustees of the Ngāi Tai ki Tāmaki Trust and the Crown signed a deed of settlement on 7 November 2015. Amendment deeds were signed in 2016, 2017 and 2018. The Treaty settlement was enacted by the Ngāi Tai ki Tāmaki Claims Settlement Act 2018.

Ngā Mana Whenua o Tāmaki Makaurau (the Tāmaki Collective) signed the Tāmaki Makaurau Collective Redress deed on 5 December 2012. An amendment deed was signed 23 August 2013, and legislation to give effect to the deeds is contained in the Ngā Mana Whenua o Tāmaki Makaurau Collective Redress Act 2014. The FTAA defines this Act as a Treaty settlement Act for the purposes of the FTAA.

Neither the Ngāi Tai ki Tāmaki or the Ngāti Tamaoho create any new co-governance or co-management processes which would affect decision-making under the RMA for this project. No areas covered by a statement of association, statutory acknowledgement or any other form of cultural or commercial redress provided in the Ngāi Tai ki Tāmaki Treaty settlement would be directly affected by the project. As a general principle, an absence of specific settlement redress does not indicate the absence of an iwi's cultural association with ancestral lands, sites, wāhi tapu or other taonga within an area. Therefore, the applicant has acknowledged the cultural relationship of Ngāi Tai ki Tāmaki within its rohe, and have contacted Ngāi Tai ki Tāmaki regarding engagement on the proposed development. Ngāi Tai ki Tāmaki will undertake a cultural values assessment as part of a substantive application. This is outlined further in the consultation summary (Attachment 3).

The Ngāti Tamaoho Claims Settlement Act 2018 covers the site as it falls within a Statutory Acknowledgement area. The purpose of the Ngāti Tamaoho Settlement Act 2018 is to:

> *(a) to record in English and te reo Māori the acknowledgements and apology given by the Crown to Ngāti Tamaoho in the deed of settlement; and*
> *(b) to give effect to certain provisions of the deed of settlement that settles the historical claims of Ngāti Tamaoho.*

Section 9 of the Ngāti Tamaoho Settlement Act 2018 sets out the Crown's acknowledgements of its past failings and of Ngāti Tamaoho's grievances. Section 9(12) summarises the impact of these failings, acknowledging that the alienation of Ngāti Tamaoho from their lands has hindered their economic, social and cultural development and is a breach of te Tiriti o Waitangi/the Treaty of Waitangi and its principles.

Section 10 of the Ngāti Tamaoho Settlement Act 2018 sets out the Crown's apology.

Section 31 sets out that the relevant consent authority "must have regard to the statutory acknowledgement relating to the statutory area in deciding, under section 95E of the Resource Management Act 1991, whether the trustees are affected persons in relation to the activity".

Schedule 1 of the Ngāti Tamaoho Settlement Act 2018 contains a list of areas subject to statutory acknowledgement, which is also recorded at Appendix 21 of the AUP (OP). A map of "Oira Creek and its tributaries (deed plan OTS-129-21)" is included below. The site is located within this statutory acknowledgement area.

Oira Creek and its tributaries (OTS-129-21)

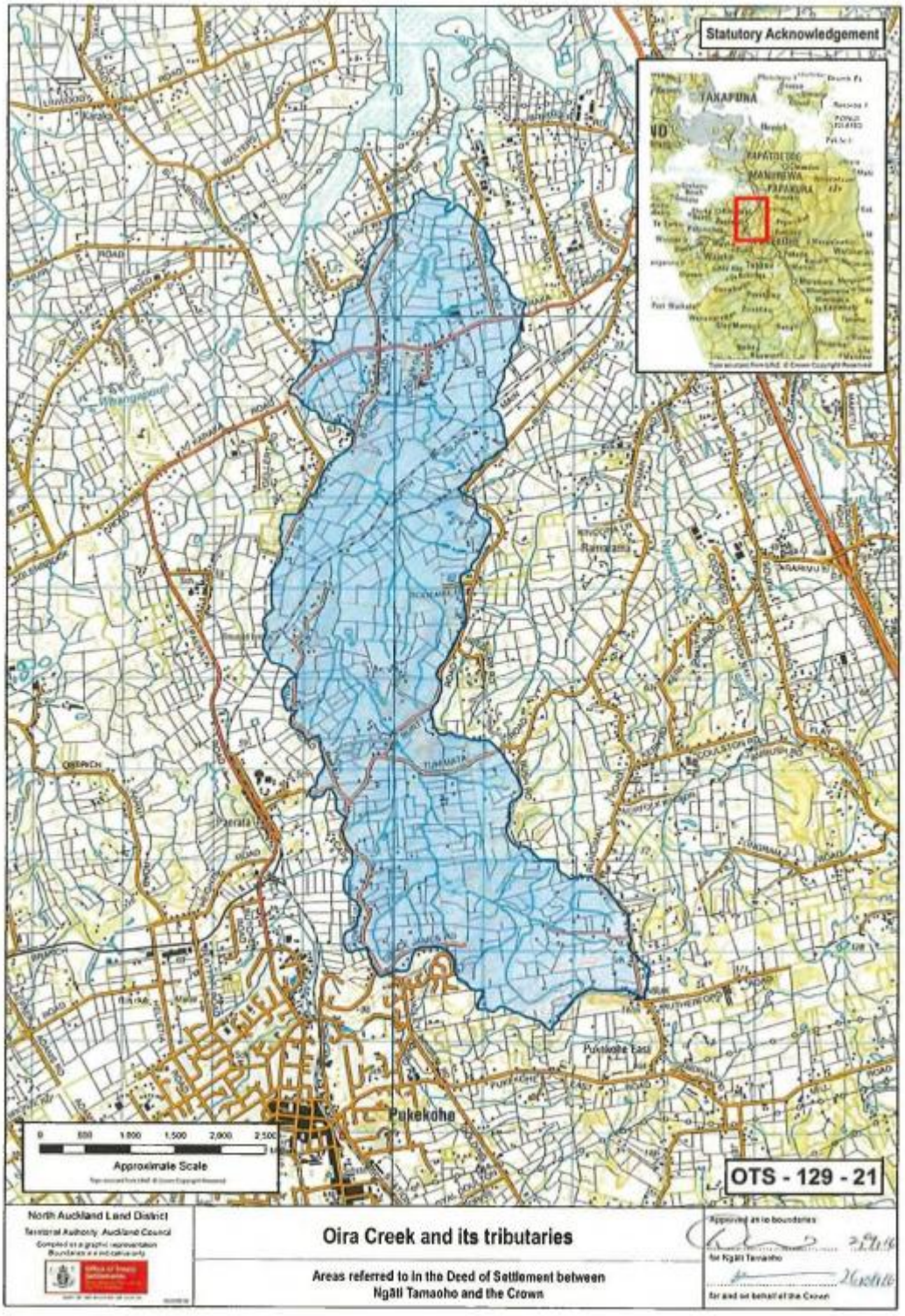


Figure 5: Ngāti Tamaoho Claims Settlement Act 2018 – Statutory acknowledgment area

The applicant has acknowledged the cultural relationship of Ngāti Tamaoho within its rohe, and have engaged early and meaningfully with them on the proposed development. This is outlined further in the consultation summary (Attachment 3). Ngāti Tamaoho will undertake a cultural values assessment as part

of a substantive application. The proposed stormwater management approach and potential downstream water quality effects will be subject to further assessment as part of a substantive application. Engagement with Ngāti Tamaoho is ongoing and will continue throughout the course of the project.

The Ngā Mana Whenua o Tāmaki Makaurau Collective Redress Act 2014 and its associated deed provide collective redress for the shared interests of the 13 iwi and hapū of the Tāmaki Collective in maunga, motu and lands within Tāmaki Makaurau. These provisions do not settle any historical Treaty claims; this is addressed instead through the specific settlements with each iwi/hapū. The redress provided through the Act is provided 'on account' of those individual Treaty settlements.

A significant part of the collective redress is concerned with governance and management arrangements over the maunga of central Auckland and some of the islands of Tīkapa Moana (the Hauraki Gulf).

Some commercial redress is also included, in the form of rights of first refusal (RFR) over Crown properties over a wide area of Auckland, and second rights to purchase deferred selection properties not selected or acquired by iwi/hapū under their individual settlements.

5.0 Statutory Framework

This section is provided in accordance with subclause 2(1)(a)(i) – (iii) of Schedule 5. This requires that applications include an assessment of the activity against the relevant provisions and requirements of the following statutory documents:

a) any relevant national policy statements:

b) any relevant national environmental standards:

c) If relevant, the New Zealand Coastal Policy Statement:

5.1.1 National Policy Statement for Freshwater Management

The National Policy Statement for Freshwater Management 2020 ('**NPS-FM**') seeks to manage natural and physical resources to prioritise firstly, the health and well-being of water bodies and freshwater ecosystems, secondly, the health and needs of people, and thirdly the ability to provide for the social, economic, and cultural well-being of people and communities. The NPS-FM was amended in 2025 (with provision taking effect from January 2026) in relation to quarrying and mining activities.

It is considered that the project is consistent with the relevant policies of the NPS-FM that relate to land development for the following reasons:

- The proposed masterplanning of ***Whangapouri Road*** has taken into account the location of wetlands and waterways to design the development around these features (Policies 6, 7 and 9).
- The proposal provides the opportunity for wetland redevelopment and restoration and ecological restoration of an area including the establishment of planted and protected riparian margins of waterways which will improve the overall quality of freshwater environments on site (Policy 5).
- Engagement with Iwi is on-going for this project (Policy 2).
- Maximising the opportunities within the proposed reserve and open space areas for future enhancement, ecological restoration and replanting (Policy 5).

- Ongoing monitoring will take place to ensure the condition of water bodies and freshwater ecosystems is not degraded (Policy 13).

Based on the assessment above, it is considered that the project is consistent with the NPS-FM.

5.1.2 National Policy Statement Highly Productive Land

The National Policy Statement for Highly Productive Land 2022 ('**NPS-HPL**') ensures the availability of New Zealand's most favourable soils for food and fibre production, now and future generations. The NPS-HPL came into effect on 17 October 2022 and was amended in August 2024.

The NPS-HPL applies to land in the General Rural or Rural Production Zone, or the equivalent zone. The site is within the Mixed Rural Zone under the AUP:OP and is arguably **not equivalent** to the General Rural and Rural Production Zone. However, in the event that decision-makers consider that it is, then an assessment of the project against the NPS-HPL is provided below.

The New Zealand Land Resource Inventory (NZLRI) maps have classified the site as LUC 2 (42ha) and LUC 3 (58 ha).

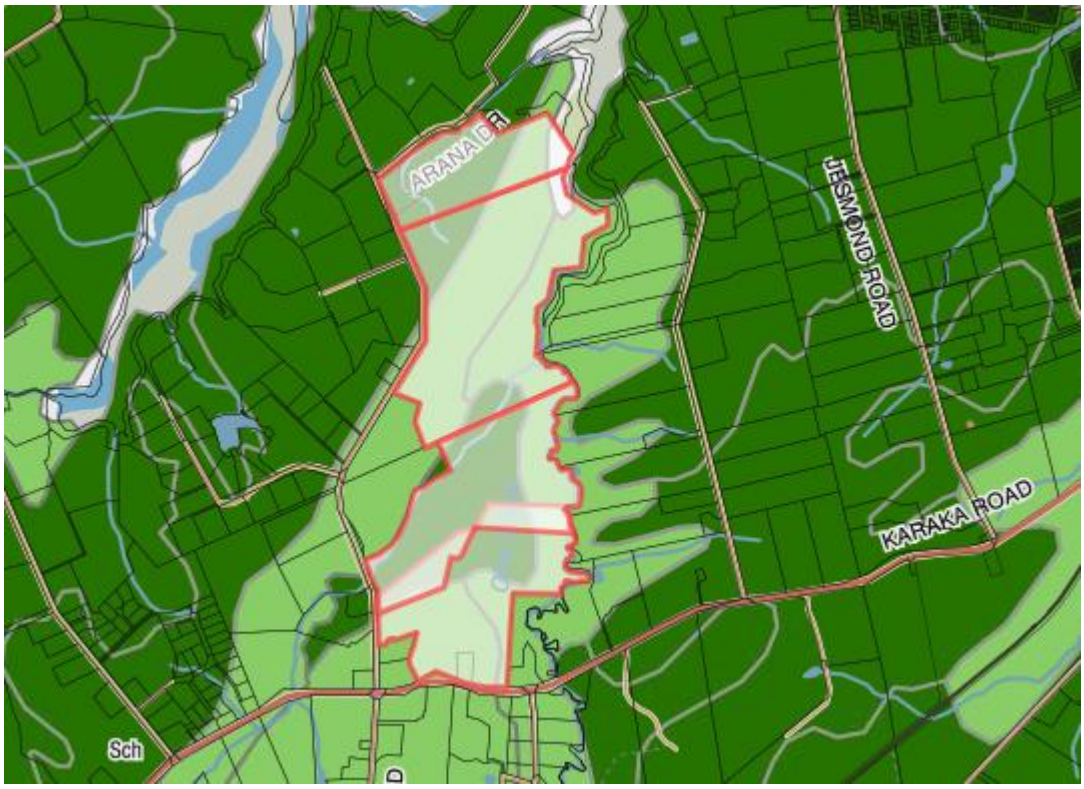


Figure 6: New Zealand Land Resource Inventory Map Source: Our Environment

The objective of the NPS-HPL is to protect highly productive land for use in land-based primary production, however, there are exceptions to this in particular circumstances.

Further, under Clause 3.10, Auckland Council may allow highly productive land to be subdivided, used or developed if satisfied that:

a. there are permanent or long-term constraints on the land that mean the use of the highly productive land for land-based primary production is not able to be economically viable for at least 30 years; and

b. the subdivision, use, or development:

i. *avoids any significant loss (either individually or cumulatively) of productive capacity of highly productive land in the district; and*

ii. *avoids the fragmentation of large and geographically cohesive areas of highly productive land; and*

iii. *avoids if possible, or otherwise mitigates, any potential reverse sensitivity effects on surrounding land-based primary production from the subdivision, use, or development; and*

c. *the environmental, social, cultural and economic benefits of the subdivision, use, or development outweigh the long-term environmental, social, cultural and economic costs associated with the loss of highly productive land for land-based primary production, taking into account both tangible and intangible values.*

The proposal does not strictly meet these criteria, however:

- The NZLRI is based on an LUC assessment of the whole of New Zealand and has been carried out at a scale of 1:50,000. It is intended for regional use and planning and is not meant to be used at am individual site scale.
- According to the Economic Assessment undertaken by Insight Economics the Housing Capacity Assessment [3] identified a housing demand in the Franklin Local Board District, where the site is located, of 800 households per annum over the 30 years to 2053. On that basis, the 1,050 – 1,150 dwellings (comprising approximately 850-950 dwellings and a 200 dwelling retirement village) enabled by the proposal equate to at least 1.4 years' of supply for the area.
- The Drury Opaheke Structure Plan adopted in August 2019 identifies the Future Urban zoned land directly opposite the site for residential growth. That site is now proposed to be rezoned Light Industry to enable the Fisher and Paykel Healthcare Campus a significant employment anchor for the area. As such the proposed residential yield at Whangapouri effectively replaces residential capacity that had previously been anticipated within the nearby Fisher & Paykel Healthcare Karaka landholding which will now longer be delivered.
- Through the technical analysis in support of this application the site has been identified as appropriate and practicable for future urban development.
- The supply proposed by ***Whangapouri Road*** will support a reduction of loss of 'more productive' highly productive land within the district as it provides the necessary supply to meet demand in an appropriate and practicable location in Karaka adjoining the existing urban area.
- The Insight Economics Memorandum identifies that ***Whangapouri Road*** can achieve social and economic benefits and that the proposal will enable the land to be put to its highest and best use.
- It is considered that through design, particularly with cultural and ecological input, ***Whangapouri Road*** can deliver a development that provides environmental, social, cultural and economic benefits that outweigh the long-term environmental, social, cultural and economic costs associated with the loss of highly productive land.

[3] Housing Capacity Assessment 2023, Auckland Council [October 2023].

5.1.3 National Policy Statement for Indigenous Biodiversity

The National Policy Statement for Indigenous Biodiversity ('**NPS-IB**') ensures the protection, maintenance and restoration of New Zealand's most threatened indigenous species. It is noted that the NPS-IB came into effect, gazetted on 4 August 2023. The NPS-IB was amended in 2025 (with provision taking effect from January 2026) in relation to quarrying and mining activities.

The project is consistent with the relevant objectives and policies of the NPS-IB for the following reasons:

- The site has been used as a farm and as such there is little in the way of trees or vegetation left.
- The proposal provides the opportunity to improve the site's terrestrial biodiversity through enhancement and protection activities, which will improve the overall diversity, native species habitat and quality of the site's terrestrial features (Policies 13 and 14).
- The proposed restoration actions, including planting of riparian margins and wetland buffers, will increase indigenous terrestrial ecological values by increasing ecological connectivity, indigenous plant species diversity and abundance, and habitat values (Policies 13 and 14).
- The benefits from ecological restoration on the site will provide a significant positive contribution in relation to the indigenous biodiversity loss this part of the region has historically experienced (Policies 13 and 14).
- Engagement with Iwi is ongoing for this project (Policy 2).

Based on the assessment above, it is considered that the project is consistent with the NPS-IB.

5.1.4 National Policy Statement on Urban Development 2020

The NPSUD came into force on 20 August 2020 and replaced the National Policy Statement on Urban Development Capacity 2016. The NPSUD includes a focus on achieving well-functioning urban environments, promoting intensification within urban environments, such as Auckland, as a means of increasing housing supply, supporting competitive land markets and improving affordability. There is now a much greater focus on:

a) Introducing and defining the concept of well-functioning urban environments with a key component being the provision of a variety of homes that meet the needs of different households in terms of type, price and location. (Objective 1 and Policy 1);

b) A greater emphasis on enabling more people to live in and more business to locate in areas that are near centres, planned public transport and where there is high demand (see Objective 3);

c) A greater emphasis on improving housing affordability (see Objective 2);

d) A greater emphasis on robust strategic planning and the need to integrate urban development with infrastructure (see Objective 6);

e) Changing the policies from providing sufficient development capacity to providing at least sufficient development capacity (see Policy 2). This is coupled with other changes that direct Councils to provide more development capacity, and replacing 'minimum targets' with 'housing bottom lines';

f) Being more directive about what it means for Councils to be 'responsive' in the urban environment with respect to Plan Changes (Policy 8); and

g) Ensuring New Zealand's urban environments support reductions in greenhouse gas emissions and are resilient to the current and future effects of climate change (Objective 8, Policy 1(e)).

The proposal is consistent with the NPS-UD for the following reasons:

- The proposal will establish a master planned community which enables a variety of homes including retirement living opportunities with a focus on accessibility via active transport modes. The provision of a local centre will assist to reduce the number of private traffic movements out of ***Whangapouri Road*** on the road network that would otherwise occur;
- The project will deliver an accelerated supply of dwellings to the market, which will be serviced by infrastructure and roading (including provision of active transport facilities) infrastructure. The dwellings are considered to support competitive land and development markets;
- The proposal will deliver a range of typologies and sizes which will contribute to the emergence of a diverse and vibrant community. This will also assist in responding to the changing needs of people, communities and future generations;
- The proposal will be coordinated with the delivery of private infrastructure (including roading and active transport facilities, stormwater, wastewater, water supply, electricity, gas and telecommunications).
- The proposal provides a range of open spaces, all of which are within walking or cycling distance from proposed residential dwellings.
- The proposal will likely contribute to an overall reduction in greenhouse gas emissions across the Auckland region by enabling residential growth on land close to significant employment opportunities and railway network as it is the site is located xx from Ngakoroa Station and associated bus interchange.
- The proposal is consistent with Objective 3 and Policy 1(c) as the existing public transport service provides future residents with accessibility to a Metropolitan Centre and sub-regional employment, entertainment and service hubs. In particular, the site is opposite the proposed Fisher and Paykel Healthcare campus (proposed to be rezoned through PC 121) which is set to become a significant employer within the area. The proposal provides for direct connections to Oira Road and the existing developments to the east including Waipuke Precinct and the Auranga development which will provide a new primary and secondary school and Town Centre.

Importantly, it should be noted that the proposed residential yield at Whangapouri effectively replaces residential capacity that had previously been anticipated within the nearby PC 121 landholding which was proposed for residential use within the Drury-Opaheke Structure Plan. Under PC 121 Fisher & Paykel Healthcare are seeking that this site is rezoned Light Industrial zone to accommodate research and development activities and employment-generating uses. Therefore, the Whangapouri proposal is a redistribution of anticipated residential growth within the broader Drury West area, rather than the creation of entirely new unanticipated residential demand. In this regard the proposal is entirely consistent with the directive to ensure sufficient capacity (Policy 2) and the requirement to be responsive (Policy 8).

Based on the assessment above, it is considered that the project is consistent with the NPSUD.

5.1.5 New Zealand Coastal Policy Statement

The NZCPS sets out a number of objectives and policies for achieving the purpose of the RMA in relation to the coastal environment of New Zealand. While the Site does not adjoin the Coastal Marine Area it is located within the vicinity of the coast.

The project is consistent with the relevant objectives and policies of the NZCPS for the following reasons:

- The Site largely consists of unkept pasture, low lying shrubs and sparse trees. The proposal will continue to be designed to result in ecological gains through the provision of comprehensive native landscaping (Policy 11).
- The final design will be informed by a visual landscape assessment to ensure any effects on natural coastal character are mitigated and enhanced (Policies 13 and 14).
- The final proposal will be informed by geotechnical and civil engineering assessments to ensure that management conditions are proposed to avoid the runoff of sediment or contaminants into the CMA (Policies 22 & 23).
- The Site has not been identified as an ONL.

Based on the assessment above, it is considered that the project is consistent with the NZCPS.

5.1.6 National Policy Statement for Natural Hazards 2025

The NPS-NH applies to flooding, landslip, coastal erosion, coastal inundation, active faults, liquefaction, and tsunami natural hazards. The NPS-NH seeks to manage natural hazard risk associated with subdivision use and development to people and property using a risk-based proportionate approach, with the risk level being assessed using the NPS-NH risk matrix.

The site is subject to flood hazards including overland flow paths, flood plains and flood prone areas. The proposed masterplanning of ***Whangapouri Road*** has taken into account the location of these flood hazards. Initial Flood modelling undertaken by Maven has confirmed no upstream or downstream effects. Further modelling will be undertaken in support of a substantive application to ensure the development does not result in downstream effects and to confirm if any mitigation is required.

In terms of potential geotechnical hazards, a detailed Geotechnical Assessment will be undertaken to support a substantive application. This will identify any potential geotechnical natural hazard risk and confirm if mitigation is required to ensure the development is consistent with the NPS-NH.

Based on the assessment above, it is considered that the project is consistent with the NPS-NH.

5.1.7 National Policy Statement for Infrastructure 2025

The NPS-I provides national direction under the RMA to guide the efficient development, management, and upgrading of infrastructure across New Zealand. The NPS-I is applicable to all infrastructure activities, except for activities managed under the NPS-REG and NPS-EN.[4]

Whangapouri includes supporting infrastructure activities and therefore the NPS-I applies. The proposal is considered to be in keeping with the objective of the NPS-I. In particular, the proposed infrastructure will support development and contribute to the social and economic wellbeing of people and communities as well as their health and safety, has been appropriately designed to be compatible with the proposed activities and surrounding environment, and will be delivered in a timely manner that is coordinated with the proposed activities.

Based on the assessment above, it is considered that the project is consistent with the NPS-I.

[4] See NPS-I, clause 1.3.

5.2 National Environmental Standards for Air Quality

The Resource Management (National Environmental Standards for Air Quality) Regulations 2004 ('NES:AQ') sets standards to guarantee a minimum level of health protection for people living in New Zealand.

The potential for effects on air quality in relation to the Project relate primarily to dust during the construction phase. Measures will be proposed in the substantive application to manage potential effects in response to the air quality objectives and policies.

The management of dust and odour will be addressed in the Construction Management Plan and an Erosion and Sediment Control Plan as part of a substantive application. As such, ambient air quality will be maintained once constructed.

The Resource Management (National Environmental Standards for Air Quality) Regulations 2004 ('NES:AQ') sets standards to guarantee a minimum level of health protection for people living in New Zealand.

No specific consents relating to this standard are required for the Project, although the relevant regulations in the NES:AQ have informed the assessment of construction and operational air quality effects. The potential for effects on air quality in relation to the Project relate primarily to dust during the construction phase. Measures are proposed to manage potential effects in response to the air quality objectives and policies.

The management of dust and odour will be addressed in the Construction Management Plan and an Erosion and Sediment Control Plan. As such, ambient air quality will be maintained once ***Whangapouri Road*** is constructed.

5.3 National Environmental Standards for Freshwater

The Resource Management (National Environmental Standard for Freshwater) Regulations 2020 ('NES:F') sets standards to regulate activities that pose risks to the health of freshwater and freshwater ecosystems. Of particular relevance to the project are provisions which prohibit works in and around natural wetlands, and works affecting rivers and streams. Resource consent will be required under the NES:F as outlined above.

The masterplan is relatively high level to support this referral application. More detailed design will occur to support the substantive application if the project is successfully referred. This more detailed work will confirm if work around wetlands triggers a prohibited activity status by way of Regulation 53. Regardless, s21(7) of the Fast-track Approval Act enables the Minister to accept a referral application for an activity that is prohibited under the RMA. The effects of any proposal will be assessed as part of a substantive application if successfully referred.

5.4 National Environmental Standards for Assessing and Managing Contaminants in Soil to Protect Human Health

The Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 ('NES:CS') sets a nationally consistent set of planning controls and soil contaminant values.

Given the historical rural uses of the site, it is likely that provisions of the NESCS will apply to future residential development at the locations where HAIL activities are likely to have occurred. A detailed site

investigation ('DSI') involving a targeted soil sampling will be undertaken at the site in support of the substantive application. This will ascertain whether NESCS and/or AUP:OP contaminated land resource consents are required to be sought in support of the development.

5.5 Auckland Regional Policy Statement

The Urban Growth and Form objectives and policies are the heart of the Regional Policy Statement (RPS) and set the policy framework for managing Auckland's growth. The RPS seeks to achieve a quality compact urban form by:

a) Promoting urban growth and intensification within the urban area, towns, and rural and coastal towns and villages (B2.2.2(4));

b) Promoting quality compact urban form (B2.2.2(4) – (9));

c) Enabling higher residential intensification in and around centres and close to public transport (B2.2.2(5)); and

d) Ensuring that employment, commercial and industrial opportunities meet current and future demands (B2.5.1(1)).

Plan Change 80 (PC80) sought to align the with the objectives and policies of the NPSUD. PC80 is now operative. The RPS seeks to achieve a "quality compact urban form" to urban development in Auckland, by applying a centres-based approach (B2.2.2(7)), and promoting residential intensification in and around centres, corridors and close to public transport, social facilities and employment (B2.2.2(6)). This approach is broadly consistent with the NPSUD concept of well-functioning urban environments.

While the proposal is located outside of the urban area 2016 it adjoins the rural urban boundary. The RPS does enable the rural urban boundary to be relocated. In particular, B2.2.2.1(2) requires the urban growth is primarily located within the urban area 2016. B2.2.2(2) provides guidance for shifting the rural urban boundary and identifying land for urbanisation. The technical reporting and subsequent masterplanning of the site demonstrates that the elements of B2.2.2(2) are given effect to including:

- Urbanisation of the site promotes a quality compact urban form as it adjoins the existing rural urban boundary in an area that is rapidly urbanising (B2.2.2(2)(a));
- The project enables approximately 1,050 – 1,150 dwellings (comprising approximately 850-950 dwellings and a 200 dwelling retirement village)ensuring sufficient residential supply and supporting the competitive operation of development markets (B2.2.2(2)(b)&(ee));
- The project supports housing choice through enabling different housing typologies across the development including a retirement village (B2.2.2(2)(e));
- The urbanisation of the site integrates transport and land use planning and supports different transport modes through providing integrated active mode network from the outset and a direct connection to Oira Road and the existing developments to the east including Waipuke Precinct and the Auranga development to provide an alternative to SH22 (B2.2.2(2)(c));
- The project supports efficient infrastructure through the provision of onsite wastewater and water supply servicing (B2.2.2(2)(d));
- The project avoids scheduled items, areas with significant natural hazard risk and adverse effects on receiving water bodies and mana whenua values (B2.2.2(2)(g), (e) & (l)).

The proposal avoids the urbanisation of elite soils and is consistent with the policy directive to avoid where practicable prime soils because it will support a reduction of loss of 'more productive' highly productive land within the district as it provides the necessary supply to meet demand in an appropriate and practicable location in Drury West adjoining the existing urban area. The technical reporting and subsequent masterplanning of the site demonstrates that the proposal to urbanise the plan change area, and provide for the expansion of Drury West, is consistent with B2.2.2(2).

5.6 The Auckland Future Development Strategy 2023-2053

The Auckland Future Development Strategy (**FDS**) provides a long-term growth strategy for Auckland looking ahead to 2053. The purpose and content of the FDS set out in clause 3.13 of the NPSUD however, is important. This states that its purpose is to promote long-term strategic planning, within which it must identify broad locations in which development capacity will be provided over the long term. The FDS does not specifically identify the site as a growth area nor does it appear to have been ever considered by the Council in its evaluation of the spatial scenarios.

The FDS spatial response for rural areas acknowledges more work needs to be done to specifically address growth in existing rural towns and settlements and in the interim, merit-based development in areas adjacent to existing towns and settlements. There is a supporting action to develop a Rural Strategy (prioritising the southern rural area) to inform the future approach to rural areas. The Southern Rural Strategy has now been developed and was adopted by Council in May 2025. This is discussed further in relation to Drury West below.

5.7 The Southern Rural Strategy

The Southern Rural Strategy 2025-2055 anticipates the southern rural area will see an increase of 89,900 people, 37,500 households, and 16,500 jobs by 2052. Most of this growth is expected to occur in the existing urban and future urban areas of Pukekohe, Drury, Ōpaheke and Paerātā. Some growth is expected in the existing urban and future urban (where relevant) areas in Patumāhoe, Glenbrook Beach, Waiuku, Kingseat, Karaka, Clevedon, Beachlands and Maraetai. Other settlements are expected to experience very limited growth.

The Southern Rural Strategy notes that Drury Ōpaheke and Runciman, is a large future urban area that has been identified for significant urban development over the long term. The Strategy notes that:

> *Drury-Ōpaheke future urban area will undergo significant change after 2035 as it becomes a fully urbanised part of the Auckland region within the Rural Urban Boundary. In time, there will be one large centre at Drury East and two smaller centres at Drury West, all connected to the existing rail network via three stations. These new centres will serve the growing population with a wide range of services and facilities as well as provide significant employment opportunities for the new community and wider rural south.*

It should be noted that the Strategy does not acknowledge that private plan changes will see much of the Future Urban Zone at Drury urbanised prior to 2035. These private plan change requests are shown in Figure 3 above, which include significant rezoning for employment. The strategy does not the loss in residential capacity through the rezoning of the PC121 site area as Light Industry zone, when this was anticipated within the Structure Planning for residential development.

The proposal is consistent with this strategic direction as it will assist with growing Drury West into a fully urbanised part of the Auckland region. The growth enabled by the proposal adjoins the Future Urban zone and is not reliant on bulk wastewater or water supply servicing. Furthermore the proposal provides for a mix of lot sizes, together with a retirement village, to cater to a range of household needs, budgets and life stages. This is consistent with the Strategy, which recognises the importance of increasing housing choice within rural settlements.

5.8 Southern Auckland Economic Masterplan

The Southern Auckland Economic Masterplan is a 30-year plan for Drury-Opāheke and the surrounding areas developed by Tātaki Auckland Unlimited. The Southern Auckland Economic Masterplan is intended to guide iwi, local and central government, and the private sector in the development of Drury-Opaheke and the surrounding areas. This plan acknowledges the desirability of southern Auckland for growth give its strategic location on the growing Auckland to Hamilton economic corridor. It further notes that there is significant private interest in development across the area which, Council and Government will continue to respond to by providing infrastructure to support development. Additionally, the masterplan recognises that the existing significant investment in road and rail that is underway is a catalyse for further private sector development.

The Southern Auckland Economic Masterplan includes a potential land use plan. While the site is not included within this plan give it is not currently zoned Future Urban, the proposed land use is consistent with the neighbouring sites.

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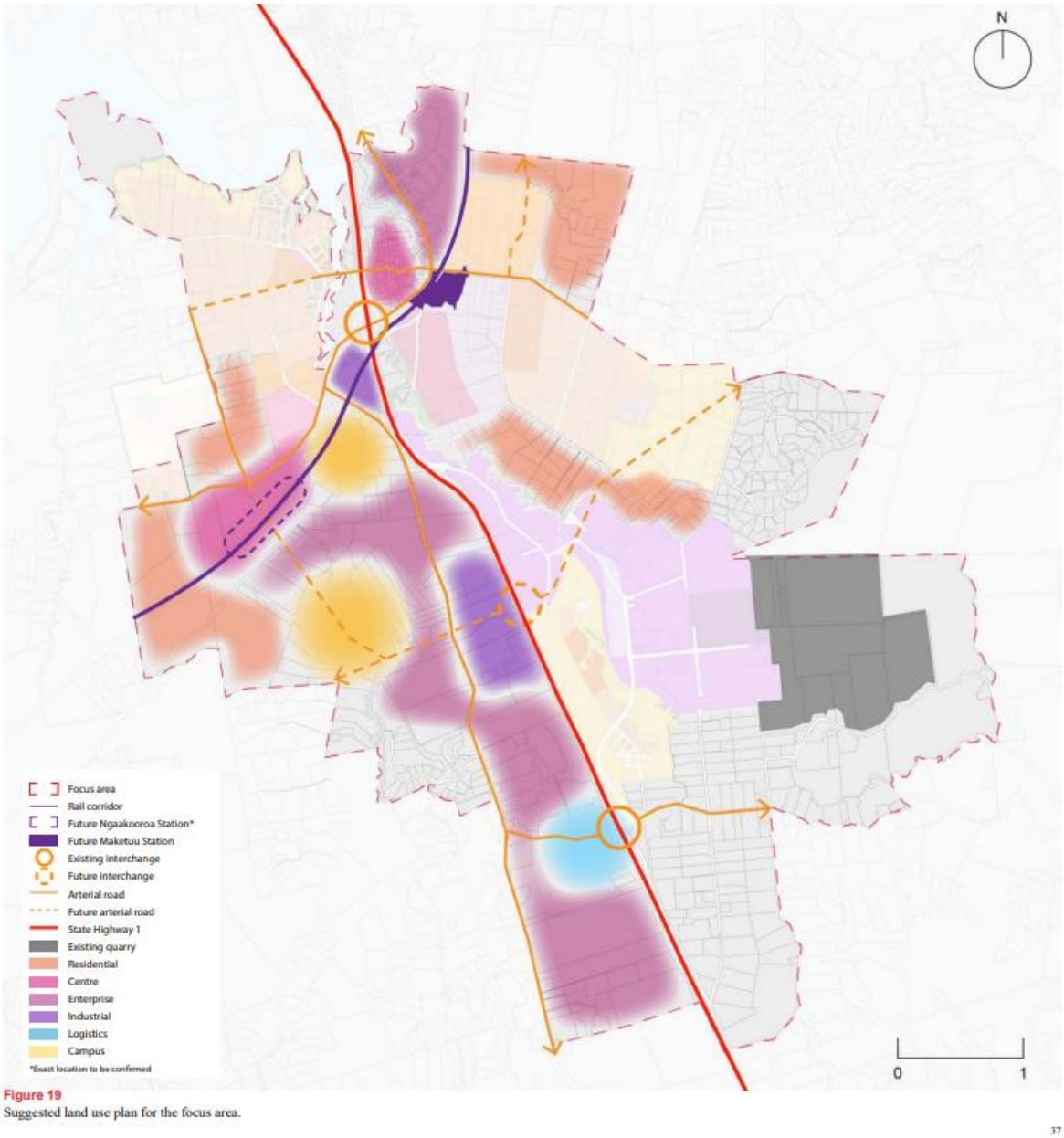


Figure 7: Suggested land use plan Drury. Source: Southern Auckland Economic Masterplan

6.0 Assessment of Effects

This section is provided in accordance with s13(4)(h) of the FTAA. This requires that applications include a description of the anticipated and known effects of the project on the environment.

The proposal will not generate significant adverse effects on the environment, and any adverse effects on the environment will be appropriately avoided, remedied or mitigated to be minor or less than minor in nature. The key potential adverse effects are addressed in general below and should be reviewed in conjunction with the supporting technical expert memorandums accompanying this application.

6.1 Economics

An Economic Assessment of the proposal has been undertaken by Insight Economics. This assessment finds that a steady supply of new homes (800 per year) is needed within Franklin to accommodate growth. According to the report from Insight Economics this proposal addresses that need directly and:

a) Makes a significant contribution to regional housing supply; and
b) Generates significant regional economic benefits including:
    - A one-time boost in national GDP of around $548 million;
    - Employment for 3,075 FTE-years (or 440 FTEs per annum spread over seven years); and
    - Additional household incomes of over $275 million.
c) The proposal's non-residential areas could sustain the following activity at full build-out:
    - Full-time employment for 84 people;
    - Annual GDP of $8.2 million; and
    - $4.9 million paid annually in salaries / wages.

In respect of the economic benefits particularly associated with the proposed urbanisation the Economic Report finds that the proposal enables approximately 1,050 – 1,150 dwellings (comprising approximately 850-950 dwellings and a 200 dwelling retirement village), which will help the market be more responsive to growth in demand and foster competition in the land market. The proposal caters to a variety of needs and preferences by providing for a range of dwelling typologies, including standalone homes of various sizes and configurations as well as terraces / duplexes.

Insight Economics are also of the view that the proposal would help improve the spatial alignment between housing and employment by enabling a substantial residential community close to emerging job opportunities. In particular, the employment opportunities in southern Auckland that are in close proximity to the site include Papakura, Manukau, the planned urbanisation in Drury West and the planned Fisher & Paykel Healthcare campus on Karaka Road, directly opposite the subject site. The Fisher and Paykel Campus is intended to provide a major long-term employment anchor for the area.

Insight Economics concludes that the fast-track process ensures these benefits are realised sooner than traditional development pathways would otherwise normally allow. In their expert view, the proposal meets criteria 22(2)(a)(iii) and 22(2)(a)(iv) of the FTAA and is supportable on economic grounds.

6.2 Transport

A Transportation Memorandum has been prepared by Hughes Transportation which outlines the transportation context, anticipated effects, and future assessment needs, and concludes that there are no transportation issues that would prevent the proposal from progressing to the Fast Track consenting stage.

Importantly, the transport memorandum states that while the site sits outside the urban area it is strategically located in close proximity to significant future employment areas, the proposed Ngākōroa Railway Station, future bus services, and planned transport infrastructure within Drury West. The proposal also provides opportunities to improve active mode connectivity, enhance access to public transport, and establish future east-west connections into the wider Drury transport network.

Detailed transport modelling will be undertaken as part of any substantive substantive application, and this will involve consultation with NZTA, Auckland Transport and the Auckland Forecasting Centre to assess the operation of SH22, future access arrangements, network integration, infrastructure staging and any required mitigation measures. The Transportation Memorandum does note that the secondary access to the

development available via an eastern Collector Road link to Oira Road which will connect to the future collector road linking Oira Road and Jesmond Road required within the Waipupuke Precinct. This will provide an alternative route for local trips to Drury West, Auranga that would otherwise need to use SH22.

6.3 Earthworks

During construction, erosion and sediment control measures will be utilised to avoid an adverse environmental effect. All proposed sediment and erosion control measures will be designed in accordance with the Auckland Council's GD05.

Any adverse dust effects can be appropriately managed with standard conditions of consent.

On the basis of the above, it is considered that any adverse effects associated with earthworks can be managed in that they will be less than minor.

6.4 Infrastructure

Details of the proposed infrastructure services such as stormwater, wastewater, water supply and utilities are outlined above and further detailed within the Preliminary Civil Infrastructure Report from Maven.

There is currently not public wastewater or water supply connection available at the Site however, the Preliminary Civil Infrastructure Report from Maven confirms that the Site is able to be adequately serviced now, and in the future. As previously outlined, the proposed development can be serviced for water supply through a combination of roof rainwater capture and groundwater abstraction.

In relation to wastewater the proposal will be supported by a private, centralised wastewater treatment plant (WWTP), with disposal of treated effluent to land. GWE have proposed a Membrane Bioreactor (MBR) or hybrid Membrane Aerated Biofilm Reactor (MABR-MBR) system to provide wastewater treatment.

A recent example of a consented and operational wastewater treatment plant is the Karaka North Village development, which had no access to a reticulated water supply or sewer. The water treatment plant includes pH correction, greensand filtration for the removal of iron and manganese, UV disinfection, chlorine disinfection using an on-site electrochlorination system and fluoridation. Wastewater is treated via a membrane bioreactor (MBR) and UV disinfection, with waste solids dewatered using a decanter centrifuge.

Karaka Village Infrastructure Ltd has been sent up for operating the infrastructure. A similar model will be utilised for Whangapouri.



Figure 8: Karaka Village Private Water and Wastewater Treatment Plant.

On the basis of the above, there will not be any significant adverse effects in relation to infrastructure and servicing.

6.5 Flooding

Flooding within the site and downstream are largely limited to the streams, gullies and riparian areas. Given the location of the site, being at the bottom of the catchment, the risk of downstream effects from the intended urbanisation is reduced. However, in support of the Fast Track referral, Maven has built a catchment flood model using TUFLOW software and has undertaken pre and post development modelling for the 100-yr event.

The modelling has been undertaken in accordance with Auckland Council Stormwater Code of Practice approach referenced in Section 3.8 and Auckland Council's current 3.8°C climate change guidance. The modelling confirms no upstream or downstream effects and has been used to confirm minimum FFLs and height of the bridge and culverts contained within the civil design.

6.6 Ecology

As previously discussed, the subject site is largely in unkept pasture and devoid of indigenous vegetation. The proposal involves significant opportunities for extensive revegetation of the Site.

For the reasons set out above, any potential adverse ecological effects will be less than minor.

6.7 Cultural Values

A summary of consultation undertake with iwi through the life of the proposal will be included with the final application.

The project will not occur on land returned under a Treaty Settlement. The Ngāti Tamaoho Claims Settlement Act 2018 covers the site as it falls within a Statutory Acknowledgement area. Engagement with Ngāti Tamaoho is ongoing and a CVA will be undertaken as part of a substantive application. In addition, Ngāi Tai ki Tāmaki have also indicated an interest in the proposal. Ngāi Tai ki Tāmaki will undertake a cultural values assessment as part of a substantive application.

The Applicant is committed to working with all iwi groups that have registered their interest in this project to develop the masterplan should the project be referred.

6.8 Positive Effects

Whangapouri Road will deliver a number of positive effects, including but not limited to:

- Increasing housing supply in Auckland's southern area and Franklin ward area where there is an identified demand of 800 households per annum over the 30 years, noting that these projections would increase significantly under a high growth scenario and with a 50-year outlook, which the Government has signalled it intends to do;
- Delivery of a diverse mix of housing typologies to suit families of various sizes and different lifestyle choices to address housing needs including retirement living. This is consistent with Policy 1 of the NPS-UD, and with Auckland Council's Southern Rural Strategy, which recognises the importance of increasing housing choice within rural settlements;
- Creation of a well-functioning urban environment with a local centre to service day to day needs and provide ongoing local employment;
- Improvements to the spatial alignment between housing and employment by enabling a substantial residential community close to emerging job opportunities particularly within Drury West and the planned Fisher and Paykel Healthcare campus which is proposed to be a significant employment anchor;
- Enhancement of the natural environment through significant wetland redevelopment and restoration and the design which seeks to weave natural space through the development; and
- Generation of a wide range of economic benefits, such as providing a direct boost in housing supply to meet growing demand, meeting the needs of an evolving population, and contributing significant regional economic benefits.

6.9 Mitigation

This memorandum, and the supporting memorandums from the technical experts, identify a range of measures to address potential adverse effects and ensure that those adverse effects are avoided, remedied or mitigated. This includes the application of standard and well-established mitigation measures and more bespoke approaches to manage the particular effects of this proposal. These can be addressed through design, conditions of consent, and monitoring.

7.0 Conclusion

Having undertaken a high-level planning assessment, it is considered that there are no planning-related reasons why ***Whangapouri Road*** could not proceed under the Fast-Track Approvals Act 2024. Through strong design and technical input, ***Whangapouri Road*** can achieve a built form that positively impacts on the wider Drury community, without having an adverse effect on the environment.

It is acknowledged that a full and comprehensive Assessment of Environmental Effects will be undertaken as part of the resource consent application, however at this stage, no more than minor adverse effects have been identified that preclude the development from occurring.