

18 September 2026

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Associate Panel Convener
Environmental Protection Authority

Tēnā koe Jennifer

Wairākei South (FTAA-2605-1227): Response to Minute 5 of the Panel Convener

The Wairākei South application was considered by Te Maru o Kaituna River Authority (TMoK) at its 31 July 2026 wānanga and again at its 18 September 2026 meeting. At the September meeting, TMoK confirmed the matters that remain unresolved from a Kaituna River Framework perspective and agreed to provide a further written response.

SCOPE OF CONSIDERATION

Our consideration continues to focus on two questions:

- will the proposal support, maintain or place further pressure on the health and well-being of the Kaituna River and its tributaries; and
- does the proposal align with and contribute to the vision and outcomes of the Kaituna River Document (KRD)?

We acknowledge that the further information provided by the applicant in response to Minute 3 has usefully brought together information that was previously dispersed across the application.

A number of matters raised in our 21 July 2026 response have now been clarified and can largely be considered through the expert panel process and relevant technical review.

WHAT REMAINS UNRESOLVED FOR TMOK

While many individual effects have now been described, TMoK does not have a clear conclusion on what the proposal will mean overall for the health of the Kaituna River and Maketū Estuary.

The following matters remain unresolved:

- **Kaituna River Document and RPS Change 5.** The applicant has assessed the KRD objectives, but not the operative RPS Change 5 provisions that recognise and provide for the KRD.
- **Overall implications for the Kaituna River and Maketū Estuary.** The applicant considers the change from pastoral to urban land use will improve the health of the awa. It is still not clear how the information provided supports that overall conclusion across the life of the development.
- **Stormwater, flooding and long-term system performance.** Further work is still underway on the final stormwater and flood-management approach. TMoK needs confidence that the system relied on to protect the Kaituna River will perform reliably over the long term, including during extreme events or system failure.
- **Clear and lasting environmental outcomes.** Standards and monitoring have been identified, but it is still unclear what environmental outcomes these measures are expected to achieve for the Kaituna River, how success will be determined, and what response is proposed if performance falls short.

1. KAITUNA RIVER DOCUMENT AND RPS CHANGE 5

Does the proposal align with the RPS provisions that recognise and provide for the KRD?

The KRD is a statutory document prepared under the Tapuika Claims Settlement Act 2014. It sets the collective vision, objectives and desired outcomes for the Kaituna River and its tributaries. Those outcomes are recognised and provided for through the operative RPS provisions introduced by Change 5.

The applicant has now provided a useful assessment against the KRD, but has not yet assessed the proposal against the operative Change 5 provisions.

Further clarification sought: assess the relevant Change 5 provisions and explain how the proposal responds to them, including where the proposal aligns with that planning direction and where any tensions remain.

2. OVERALL IMPLICATIONS FOR THE KAITUNA RIVER AND MAKETŪ ESTUARY

Does the information provided support the applicant's conclusion that the proposal will improve the health of the awa?

The applicant considers that changing the land from pastoral to urban use will significantly improve the health of the awa. The further information identifies benefits including reduced untreated pastoral runoff, stormwater treatment, wetlands and riparian planting.

TMoK acknowledges that many of the individual effects have now been described. What is still not clear is **how those effects have been brought together to support the overall conclusion that the development will improve the health of the Kaituna River and Maketū Estuary over its full life.**

Further clarification sought: provide a concise explanation, drawing on the assessments already provided, that:

- brings together the main positive and adverse effects of the change from pastoral to urban use;
- explains how those effects combine over the construction and operational life of the development; and
- shows the basis for the applicant's conclusion that the proposal will improve the health and well-being of the Kaituna River and Te Awa o Ngātoroirangi/Maketū Estuary.



3. STORMWATER, FLOODING AND LONG-TERM SYSTEM PERFORMANCE

Will the final stormwater and flood-management system reliably protect the Kaituna River over the long term?

The applicant has provided further information on the intended ownership, vesting, maintenance and monitoring of stormwater and wetland infrastructure. TMoK acknowledges that this has clarified a number of the matters raised in July.

Stormwater and flood-hazard matters nevertheless remain under further technical review. These are important to TMoK because the proposal relies on permanent drainage, pumping, wetlands and other engineered systems to manage effects on the Kaituna River and its receiving environment.

Further clarification sought: once the outstanding stormwater and flood-hazard work is complete, confirm the final approach and explain how it is expected to perform over the life of the development, including during relevant extreme-event or system-failure scenarios, and how responsibility for ongoing operation and maintenance will be secured.

4. CLEAR AND LASTING ENVIRONMENTAL OUTCOMES

How will we know whether the expected benefits for the Kaituna River are being achieved and maintained?

The applicant has identified proposed water-quality standards, monitoring requirements and ecosystem measures. This has clarified how aspects of the development would be monitored.

TMoK's remaining interest is in understanding what those measures are expected to achieve for the Kaituna River and what will happen if performance falls short.

Further clarification sought: identify the key measurable water-quality and ecosystem-health outcomes expected for the Kaituna River and receiving environment, how achievement will be determined, and what response is proposed if monitoring shows those outcomes are not being achieved.

This response does not represent TMoK's final position on the merits of the application. Its purpose is to identify the remaining Kaituna River Framework matters that need to be addressed and carried forward through the next stages of the process.

TMoK asks that these matters be carried forward for consideration by the expert panel once appointed.

Nāku noa, nā



Jo'el Komene
Chair
Te Maru o Kaituna River Authority