Memorandum

To:	Helen Atkins, Panel Convener for the purpose of the Fast-track Approvals Act 2024
For:	Application under the Fast-track Approvals Act 2024 (FTAA- 2606-1254) for State Highway 29 Tauriko Network Connections (including Omanawa Bridge To upgrade existing, and construct new, roading corridor between the vicinity of the Omanawa Road/State Highway 29 intersection and the Takitimu Northern Link interchange, together with upgrades to connections between State Highway 29 and State Highway 36 at the intersection with Taurikura Drive and State Highway 29A, through to the Oropi Road–State Highway 29A roundabout, including associated infrastructure and connections or 1 or more sections of new or existing road between the points.
From:	Richard Campion, Principal Planner, Tauranga City Council
Date:	23 September 2026

MEMORANDUM ON BEHALF OF TAURANGA CITY COUNCIL FOR PANEL CONVENER CONFERENCE

1. This memorandum is filed on behalf of Tauranga City Council (**TCC**) in response to Minute 2 of the Panel Convener dated 16 September 2026.

2. TCC acknowledges that the purpose of the conference is to assist the Panel Convener in determining:

   a. the composition of the Expert Panel; and
   b. the appropriate timeframe for the Expert Panel's decision

3. The purpose of this memorandum is to:

   a. Respond to the matters identified in paragraph [6] of the Minute;
   b. Provide TCC's views regarding the complexity of the application;
   c. Provide TCC's views regarding the composition of the Expert Panel; and
   d. Confirm TCC's attendance at the Panel Convener's Conference on 28 September 2026.

Attendance

1. TCC confirms attendance of the conference to be held on 28 September at 10 am, with the following attending:

   - Richard Campion, Principal Planner, Environmental Planning
   - Andrew Mead, Head of City Planning and Growth
   - Tim Fischer, Principal, Rice Speir

Panel Composition

a) Given the scale, complexity, and multidisciplinary nature of the proposal, TCC considers that the composition of the Panel will be critical to ensuring a robust and efficient assessment process. In particular, TCC considers that at least one Panel member should possess recognised expertise in transport engineering, given the central role that transport planning, network performance, road design, and integration with the wider transport network play in the proposal. More broadly, TCC considers it essential that Panel members collectively have substantial experience in assessing and determining large-scale, multidisciplinary infrastructure projects, including the ability to understand, test, and appropriately weigh complex and often interrelated expert evidence across a wide range of technical disciplines.

b) In regard to the nomination of panel members, TCC refers to the memo titled 'Nomination from Tauranga City Council for FTAA-2606-1254 State Highway 29 Tauriko Network Connections (including Omanawa Bridge replacement) expert panel' dated 14 September 2026.

General Comments

(a) Strategic Need and Overall Support for the Project;

Overall, Tauranga City Council acknowledges the significant strategic importance of the project and generally supports its objectives. The proposal responds to a recognised need to provide transport infrastructure capable of supporting planned urban growth, the regional economy, improved network efficiency, and enabling the delivery of housing and employment opportunities within the western Bay of Plenty. TCC recognises the substantial public benefits associated with the project and supports its timely delivery; subject to ensuring that potential adverse effects and outstanding issues through a robust framework of conditions and ongoing collaboration between the parties.

Requested Matters for Comment

(a) comment on the extent of engagement by the applicant both before and following lodgement of the application;

The applicants have conducted extensive pre-lodgement engagement with the relevant local authorities. The applicants have continued this consultation and communication following lodgement.

(b) the applicant aside, identify in-house experts and external consultants engaged on this project;

TCC is primarily relying on in-house technical expertise for its review of the project, supplemented by specialist external consultants where additional expertise is required. Council's input has involved a multidisciplinary team comprising representatives from City Planning and Growth, Transport Engineering, Landscape and Urban Design, Parks and Open Spaces, Noise, Compliance and Monitoring, and Stormwater Infrastructure. Specialist external consultants have also been engaged to provide advice in specific technical disciplines where appropriate

(c) record processes agreed with the applicant to narrow or reduce any issues relevant to the application and the decision that the panel is required to make;

The applicants and TCC are currently working through the relevant areas of expertise individually via 'focus group' sessions to address issues raised in TCC's s46 response and the draft conditions that have been shared by the applicant. These meetings are likely to be ongoing to narrow or reduce the relevant issues prior and refine condition wording prior to a request for substantive comment.

(d) where there is a difference of opinion between the applicant and any other participant, identify the principal environmental effects at issue;

TCC has identified a number of matters that require further discussion, some of them through TCC's s46 response. These are being worked through as described in the process outlined in (c) above.

An key area of concern TCC has is around a range of aspects of the concept design that determine the proposed designation footprint. TCC's concerns relate to whether the design will appropriately accommodate long-term transport demands and planned growth over a 30+ year period, noting Tauranga's overall high growth rate, the current and future focus of urban growth in the Tauriko corridor over the next 30-50 plus years and increasing inter-regional traffic volumes. This concern covers intersection designs, sections of 2 lane (rather than 4 lane) carriageway and tie-ins to the current State Highway network.

Overall, it is unclear what scale of urban growth the project would be able to accommodate and how this compares to the current urban growth plans for the corridor of TCC and the wider SmartGrowth Partnership.

We note the application focuses on network performance in the 2048 transport model year (and associated effects such as delay and congestion), that the project is estimated to take approximately 10 years to be delivered and currently does not have construction funding approved. In addition construction funding is not signalled to be available within the next 10 years as per NZTA's just released State Highway Improvement Plan for the 2027-37 period Draft State Highway Investment Proposal 2027–37 | NZ Transport Agency Waka Kotahi. As such, at best the project will be operational in the late 2030's (if funding becomes available) and at worse may not even be complete by 2048.

In TCC's view, NZTA should consider a much longer time horizon to in relation to its planning and project design to ensure growth and transport network effects are appropriately managed, which ultimately may impact (increase) the designation needed for this project relative to that set out in NZTA's application.

Another significant consideration is the management of stormwater and flood risk. The project is primarily located in the Kopurererua Stream catchment. This catchment has significant existing flood risk including for upstream and downstream urban areas. It is essential that activities like earthworks and increased impervious services associated with the project do not exacerbate flood risk. Further work is underway to understand this using TCC flood models.

(e) describe the complexity of this application;

This application is a large-scale, complex and strategically significant proposal involving not only the integrated delivery of state highway infrastructure and local road connections, but also how this relates to urban growth and supporting services. Its complexity arises not only from the engineering, transport and environmental issues involved, but also from the need to coordinate multiple statutory approvals, consent

authorities, infrastructure providers, and other stakeholders, while ensuring alignment with established growth strategies and long-term transport and urban development outcomes for the Western Bay of Plenty.

(f) state whether the drafting of proposed consent conditions (including any draft management plan filed) is accepted; and

The wording of designation conditions, and the role of management plans within that framework, is particularly important for a major roading infrastructure project of this scale. The conditions are relevant not only to the approval and mitigation of effects but also establish the long-term framework within which the requiring authority can construct, operate, maintain and manage the infrastructure. Careful consideration of the interaction between conditions and management plans is therefore important to ensure environmental outcomes are clearly defined, enforceable, and capable of being achieved in practice, while maintaining sufficient flexibility to accommodate detailed design development and the evolving operational needs of the transport corridor over time. A further consideration is the timing of future TCC infrastructure and growth projects, and these interrelate with the conditions.

Therefore, it is TCC's preference to work through the issues identified in its section 46 response primarily through the collaborative process outlined in paragraph (c) above, together with any other appropriate opportunities and procedural steps available throughout the Fast-track approvals process.

(g) propose efficient processes to enable the panel to understand, resolve or narrow the scope of any likely issues and indicate how these processes may be accounted for under the decision timeframe.

TCC is supportive of continuing the current programme of expert-level engagement between the applicant and Council staff to further refine draft conditions, narrow areas of disagreement, and resolve technical matters where possible. TCC would also be open to participating in any additional expert workshops, focus sessions, conferencing processes, or other approaches proposed by the applicant or directed by the Panel that may assist in efficiently identifying, narrowing, or resolving outstanding issues.

Matters Set Out in Schedules 1 and 2

Schedule 1

TCC has no objection to the timeframes outlined in Schedule 1.

Schedule 2

[1] Approvals

- The application is unclear as to whether approvals that may be required under the Reserves Act 1977 will be sought through the Fast-track process or obtained separately at a later stage. Clarification of the full suite of approvals required would assist in understanding the scope of the application and any associated procedural requirements.

[2-4) Complexity

- The proposal involves multiple approvals and intersects with several statutory and planning frameworks, including the Fast-track Approvals Act, Resource Management

Act and potentially the Reserves Act 1977. While TCC does not presently identify any novel or untested points of law, the scale of the proposal and interaction between the relevant statutory regimes contribute to its overall complexity.

- The application is supported by a substantial volume of technical material and expert evidence across a range of disciplines, including transport, planning, engineering, ecology, urban design, noise and vibration, and geotechnical matters.
- The potential for differing expert opinions is significant and may require careful scrutiny through expert conferencing and focused technical discussions.
- The proposal raises a number of complex technical and factual issues requiring detailed assessment and integration across multiple disciplines.
- Matters such as transport modelling, growth assumptions, network staging and futureproofing, reserve land impacts, and construction effects involve specialised evidence and analysis that will require careful consideration by the Panel.

[5] Issues

(a) Issues arising through consultation and engagement

- Through both pre-lodgement and post-lodgement engagement, and through review of the application material, TCC has identified a number of matters requiring further clarification, refinement or assessment.
- These principally relate to:
    - growth assumptions underpinning the proposal;
    - transport network resilience, futureproofing and corridor design;
    - effects on reserve land and associated recreational, ecological and amenity values;
    - the assessment and management of construction noise and vibration effects; and
    - the drafting and implementation of conditions and management plans.
- TCC notes that these issues are currently being progressed through constructive engagement and technical discussions between the applicant, Council and relevant experts.

(b) Previous applications and section 92 requests

- TCC is not aware of any previous application of the same or similar nature for which section 92 requests are directly relevant.

(c) Coinciding statutory processes

- TCC is not presently aware of any coinciding statutory processes that would materially affect the proposed 30-working-day period, although this may become clearer as the application progresses.

[6] Mātauranga and Tikanga

- TCC considers it appropriate that relevant iwi authorities and Treaty settlement entities provide advice directly to the Panel on matters of tikanga, mātauranga Māori and any considerations relating to culturally sensitive information.

[7] Panel Membership

- Given the scale, complexity and multidisciplinary nature of the proposal, TCC considers that the composition of the Panel will be critical to ensuring a robust and efficient assessment process.
- TCC considers that expertise in transport planning and transport engineering is particularly important, given the strategic transport outcomes sought and the significance of the roading and network-related issues raised by the application.

- TCC also considers that the proposal would benefit from panel members with expertise in resource management planning and major infrastructure projects. TCC remains open on the exact number of panel members.

[8]-[9] Procedural Requirements

- TCC is willing to engage directly with the Panel, applicant and other participants through conferences, briefings, meetings and expert conferencing to assist the efficient progression of the application.
- TCC considers continued expert conferencing and focused technical workshops will be beneficial in narrowing issues and identifying areas of agreement.
- Given the nature of the proposal, TCC considers there is likely to be value in hearing processes that allow for:
    - testing of disputed technical evidence;
    - discussion of proposed conditions and management plans; and
    - consideration of any legal or procedural matters that remain unresolved.

[10] Anything Else?

- As mentioned above, TCC's preference is for continued focused engagement between the applicant and relevant experts to refine outstanding technical matters prior to any hearing process. This approach has the potential to narrow issues, improve efficiency and assist the Panel in focusing its consideration on the matters that remain genuinely in dispute.

Conclusion

TCC is grateful for the opportunity to comment, and looks forward to discussing in further detail the items outlined in this memorandum at the Panel Convener Conference. TCC remains available to provide any additional information or clarification that may assist the Convener in advance of the conference, as well as throughout the ongoing Fast-track approvals process.

DATED at Tauranga this 4th day of March 2026.



Richard Campion
Principal Planner, Environmental Planning
For Tauranga City Council