Hon Nicola Willis

Minister of Finance
Minister for Economic Growth
Minister for Social Investment

27 July 2026

Hon Chris Bishop
Minister for Infrastructure
Parliament Buildings
Wellington

REQ- 0036665

Dear Chris

Thank you for the opportunity to comment under the Fast-track Approvals Act 2024 on the referral applications for Whangapouri Road (FTAA-2606-1247), Out of Scope [redacted]

I am providing these comments in my capacity as Minister for Economic Growth. They focus on whether each application is likely to deliver significant economic benefits under section 22(2)(a)(iv) of the Act, based on the information provided by the applicants. The quantitative estimates below are drawn from economic assessments prepared for the applicants.

Whangapouri Road, FTAA-2606-1247

The application is for an integrated residential-led development across approximately 100 hectares near Whangapouri Road and Bycroft Road, north of State Highway 22 in Drury, Auckland. It would provide approximately 1,050 to 1,150 dwellings, comprising 850 to 950 general residential dwellings and 200 retirement village dwellings on an 11.9-hectare site, together with a local centre, open space, and supporting infrastructure.

According to the formal economic assessment prepared for the applicant, total project investment is estimated at approximately $764 million. Over the seven-year development programme, construction and development activity is estimated to contribute approximately $543 million to Auckland's gross domestic product (GDP), comprising $173 million in direct effects and $370 million in indirect effects. It is also estimated to support 3,030 full-time-equivalent (FTE) years of employment, comprising 925 direct and 2,105 indirect FTE-years. The assessment expresses this as equivalent to around 433 FTEs per year over the development programme. The associated employment is estimated to generate approximately $271 million in wages and salaries, comprising $86 million from direct activity and $185 million from indirect activity.

Once complete, the local centre is expected to provide approximately 3,500 square metres of retail and commercial floorspace. At full build-out, it is estimated to support approximately 80

ongoing FTEs, equivalent to employment for around 84 people, and generate more than $8.2 million in annual GDP and approximately $4.9 million in annual wages and salaries.

The wider benefits would be primarily regional. The proposed 1,050 to 1,150 dwellings, including retirement living options, would substantially increase housing capacity in southern Auckland and may improve the market's responsiveness to demand growth. Co-location with a local centre and supporting infrastructure may improve access to existing and planned employment opportunities.

On balance, the proposal appears likely to deliver significant regional economic benefits under section 22(2)(a)(iv) of the Act, given the scale of the proposed investment, construction activity, and housing delivery. It may also be relevant to section 22(2)(a)(iii), as it would increase housing supply and contribute to a well-functioning urban environment.

Out of Scope

Out of Scope

Out of Scope

Out of Scope

Out of Scope

Out of Scope

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

Yours sincerely



Hon Nicola Willis
Minister for Economic Growth

Hon James Meager

Minister for the South Island
Minister for Hunting and Fishing
Minister for Youth
Associate Minister of Transport

27 JUL 2026

JMITC-65

Hon Chris Bishop
Minister for Infrastructure
Parliament Buildings
WELLINGTON

By email: infrastructure.portfolio@parliament.govt.nz

Invitation to comment on the Whangapouri Road project under the Fast-track Approvals Act 2024

Tēnā koe Minister Bishop,

Thank you for the invitation to comment on the Whangapouri Road project under section 17 of the Fast-track Approvals Act 2024.

Māori Crown Relations: Te Arawhiti and Māori Development:

I have considered the application and its alignment with my portfolios as Acting Minister for Māori Crown Relations: Te Arawhiti and Acting Minister for Māori Development.

I support the application progressing and I encourage the applicant and the panel to have due regard to:

- relevant Treaty settlement legislation and instruments; and
- any feedback received from relevant Māori groups, as set out in the Treaty settlements and other obligations (Section 18) report.

Housing:

I have also considered the application as Acting Minister of Housing. The proposal comprises a residential development including approximately 1,050 to 1,150 dwellings, including around 200 retirement village dwellings, a local centre providing mixed-use and employment opportunities, and associated transport and three waters infrastructure. The proposal would provide a substantial increase in housing supply and housing choice within the wider Drury growth area.

The proposal would make a significant contribution to housing supply in southwest Auckland. There are currently 153 households on the Housing Register in the Franklin Local Board area, and the proposal would provide additional housing capacity, including retirement living opportunities. While the development appears primarily focused on market housing outcomes, it is located within the broader Drury growth area, which is undergoing significant urban transformation and is expected to accommodate substantial future residential and employment growth. The site's proximity to the future Ngākōroa train station, emerging centres within Drury,

and planned employment areas, including the proposed Fisher & Paykel Healthcare campus, is expected to improve future access to jobs, services and public transport.

The site is currently zoned Rural – Mixed Rural and Rural Coastal and is not identified for growth under the Auckland Future Development Strategy 2023. While future urban development is anticipated nearby, and the surrounding area is undergoing significant change, the site is not currently planned for urbanisation and is not serviced by public water or wastewater infrastructure. The proposal relies on private water supply, a private wastewater treatment plant and on-site stormwater management solutions. Consideration will need to be given to future infrastructure provision, servicing arrangements, network integration and natural hazard management should the project proceed.

From the perspective of the Housing Portfolio, the proposal has the potential to increase housing supply and housing choice in southwest Auckland and contribute to the broader growth of the Drury area. While there are planning, infrastructure, servicing and natural hazard matters that warrant further consideration, these can be worked through during the detailed assessment process. I have no objection to this application being referred to the next stage of the fast-track process. Thank you again for the opportunity to comment.

Nāku noa, nā

Hon James Meager
Acting Minister for Māori Crown Relations: Te Arawhiti
Acting Minister for Māori Development
Acting Minister of Housing

Your written comments on a project under the Fast Track Approvals Act 2024

Project name	Whangapouri Road project

Before the due date, for assistance on how to respond or about this template or with using the portal, please email contact@fasttrack.govt.nz or phone 0800 FASTRK (0800 327 875).

All sections of this form with an asterisk (*) must be completed.

1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
***Portfolio**	Seniors		
***First name**	Hon Casey		
***Last name**	Costello		
Contact person (if different from above)			
***Contact phone number**	+64 4 817 6827	**Alternative**	
***Email**	c.costello@ministers.govt.nz		

2. Please provide your comments on this application
My comments are attached below.

Minister's signoff



Hon Casey Costello

Minister for Seniors

Date 23/7/2026

Hon Casey Costello

Minister of Customs
Minister for Seniors
Associate Minister of Health
Associate Minister of Immigration
Associate Minister of Police

Hon Chris Bishop
Minister for Infrastructure
Parliament Buildings
Wellington

Fast-track Approvals Act referral application: Whangapouri Road project, FTAA-2606-1247

Dear Chris,

Thank you for the opportunity to comment as Minister for Seniors on this application for referral under the Fast-track Approvals Act 2024 (the Act).

I have considered whether this application is likely to '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)', under s22(2)(a)(iii) of the Act, based on the information provided in the application. I will leave it to you and other relevant Ministers to assess the other criteria.

The following aspects of the project are likely to meet this criterion:

- construction of approximately 850-950 residential dwellings and 200 retirement village dwellings.

Based on this information, the project is suitable for referral to the fast-track process. If the application is referred, I would welcome the opportunity to comment on the project in more detail.

Sincerely,

Hon Casey Costello

Minister for Seniors

Private Bag 18041, Parliament Buildings, Wellington 6160, New Zealand | +64 4 817 6827 | c.costello@ministers.govt.nz

Your written comments on a project under the Fast Track Approvals Act 2024

Project name	Whangapouri Road – Residential Development (FTAA-2606-1247)

Before the due date, for assistance on how to respond or about this template or with using the portal, please email contact@fasttrack.govt.nz or phone 0800 FASTRK (0800 327 875).

All sections of this form with an asterisk (*) must be completed.

1. Contact Details

Please ensure that you have authority to comment on the application on behalf of those named on this form.

Organisation name (if relevant)	Auckland Council		
***First name**	Doug		
***Last name**	Fletcher		
Postal address	Private Bag 92300, Victoria Street West, Auckland 1142		
***Contact phone number**	s 9(2)(a)	**Alternative**	-
***Email**	s 9(2)(a)		

2. Please provide your comments on this application

Overview

Thank you for the opportunity to provide comments on the referral application for the ((FTAA-2606-1247)) by 132 Whangapouri Drury Limited (Whangapouri Road Project). We provide feedback below from the various relevant departments of Auckland Council, Council-Controlled Organisations (CCOs), and the Franklin Local Board.

1. This Planning Memorandum (**Memorandum**) sets out Auckland Council's (**the Council**) regulatory planning assessment and comments on the Referral application for the 'Whangapouri Road – Residential Development Project' (**the Application**) lodged by 132 Whangapouri Drury Limited (the **Applicant**) under the Fast-track Approvals Act 2024 (**FTAA**). This Memorandum is provided in response to the invitation to comment issued by the Minister under section 17(1) of the FTAA and has taken into account the criteria that inform the Minister's decision-making progress on referral applications at section 22.
2. This Memorandum presents the Council's response in its capacity as the relevant local authority and reflects the regulatory planning assessment of the Council officers responsible for administering the resource management functions of the Council. It is intended to assist the Minister / EPA in their consideration of the Application and should not be interpreted as

representing the views of Auckland Council's governing body or other non-regulatory parts of the organisation.

3. Council encourages on going pre-application engagement with the applicant team on this proposal, and we look forward to working with the Applicant' team as part of a Substantive pre-application engagement process if the Minister is minded to accept the Referral application.

4. In providing these comments, Auckland Council has sought to confine its input to matters relevant to the Minister's referral decision under sections 21 and 22 of the FTAA, consistent with the invitation letter and section 17(3)(b) of the FTAA.

5. In summary, the Application represents a substantial urbanisation of rurally zoned land. The subject land is not recognised in any national or regional planning document as an area for urban growth. Because the land is not anticipated for urbanisation, it has not been factored into the planned delivery of any infrastructure by the main infrastructure providers. The application also raises unresolved concerns regarding loss of highly productive land, and Council is not satisfied that the project has appropriately demonstrate that it will result in significant net regional or national benefits. Overall, the Council **does not support** the project proceeding to a substantive application through the fast-track consenting process.

Section 17(3) questions

6. In the invitation letter, it has been requested that the Council provide input on two questions pertaining to s17(3) of the FTAA. We respond below:

Any applications that have been lodged with the Council that would be a competing application or applications if a substantive application for the project were lodged. If no such applications exist, please provide written confirmation.

7. We are not aware of any applications that have been lodged with the Council that would represent a competing project if a substantive application for the project were lodged.

8. Council notes that the applicant has lodged a separate groundwater take application referenced (WAT60467602) to take water from one of the underlying aquifers via the standard RMA process. In addition, the applicants Groundwater Supply Feasibility Assessment lodged with the referral application outlines that the applicant team have also investigated other potential sources for groundwater that could assist them to meet the anticipated demand for water that the project will require. This suggests that if this referral project is accepted, any associated future substantive application may include an additional groundwater take. At present a number of the underlying aquifers still have available water that the applicant could apply for. Groundwater is discussed further below.

In relation to projects seeking approval of a resource consent under section 42(4)(a) of the FTAA, whether there any existing resource consents issued where sections 124C(1)(c) or 165ZI of the Resource Management Act 1991 (RMA) could apply, if the project were to be applied for as a resource consent under the RMA. If no such consents exist, please provide written confirmation.

9. The Council is not aware of any existing resource consents where sections 124C(1)(c) or 165ZI of the RMA could apply.

Whether you consider the project may involve an ineligible activity, and if so, why (as defined in section 5 of the FTAA).

10. Based on the information provided, the Council has not identified any activity that clearly constitutes an ineligible activity under section 5 of the FTAA.

Whether you consider any of the reasons to decline a referral application may be applicable to this application, and if so why (under section 21(5) of the FTAA).

11. The Application is not considered to be inconsistent with section 21(5)(a) of the FTAA.

12. We note that urban residential development of the site is not anticipated under the operative Rural – Mixed Rural Zone provisions and would ordinarily require rezoning through a plan change. Whether it would be more appropriate for these matters to be dealt with under the standard RMA process (including any rezoning) is a relevant consideration for the Minister. Given the land is not identified for future urbanisation, the Council considers it to be more appropriate to deal with these matters under the RMA Schedule 1 process - section s21(5)(b) of the FTAA.

13. From a preliminary assessment, the proposal will result in the permanent loss of the project land to urban activities. This is contrary to both the AUP and the NPS-HPL and therefore Council considers the proposal may have significant adverse effect in terms of section 21(5)(c) of the FTAA.

14. The application lacks information regarding natural inland wetlands, water supply and esplanade requirements and more information is required on these matters to determine a level of effect in accordance with section 21(5)(c) of the FTAA.

15. The applicant has declared they do not have any relevant compliance history under any Acts relating to this application- 21(5)(d) of the FTAA.

16. With regard to s21(5)(e) of the FTAA, the Application area is not within the Council's Treaty Settlement alert layer.

17. With regard to s21(5)(f) of the FTAA, the application confirms the proposal may require the removal of natural inland wetlands which is a prohibited activity under Clause 53 of the National Environmental Standards for Freshwater 2020 (NES-F). Should the application confirm this is the case, Council considers the Application will not meet the requirements of s21(5)(f) and the referral should be declined.

18. With regard to s21(5)(g) of the FTAA – no other competing applications were identified.

19. With regard to s21(5)(h) of the FTAA, Council is not aware of any existing resource consents of the kind referred to in section 30(3)(a) of the RMA.

Having regard to the above, Council considers there to be clear reasons for decline of the referral with respect to the inconsistency with the zoning provisions which is more appropriately dealt with under the RMA through a Plan Change (section 21(5)(b)).

Section 22

Auckland Council considers there are matters relevant to the Minister's assessment under section 22 of the FTAA.

Does the project have significant regional or national benefits?

20. Auckland Council is not satisfied that this has been demonstrated.

21. Auckland Council's appointed Economist has reviewed the EIA (refer Attachment A) and notes that the proposed development is a relatively large master-planned housing development with a mix of housing types in a part of Auckland in which there is expected to be growth in employment. This may well meet criteria for fast-track approval through the increase in housing supply. However, the realisation of benefits relies crucially on the counterfactual and specifically whether (1) the new development will result in additional housing, (2) if it will displace other housing developments that might occur otherwise, or (3) a combination with additional total supply but not the full 1,100.

22. The proposed development may well produce significant net regional or national benefits, but it is not possible to conclude on the size of the benefits and their significance from the applicants EIA because of the absence of the counterfactual analysis.

23. The Council's Policy team notes that, the Drury – Opāheke Structure Plan 2019 has set out a pattern for development of the wider future urban area in Auckland's southern sector. It has a land area of 1921 hectares. Its development over 30 years is estimated to provide about 22,000 houses and about 12,000 jobs with a population of about 60,000. Given the extensive provision for growth in this southern growth area, planned and programmed by the council, the Whangapouri Road project cannot be considered a necessary or timely addition. It adds 99.58 hectares, a five percent increase providing for approximately 1,100 dwellings (inclusive of retirement units).

24. The application has not demonstrated why substantial residential growth is required in this rural location outside the areas already identified for substantial structure planned urban development within the Drury-Ōpaheke growth area.

25. Taken together, whether the Application delivers "significant regional or national benefits" for the purposes of section 22(1)(a) is a matter of judgement for the Minister. Council's position on this matter, as evidenced by the specialist input, indicates the Application's benefits have not been clearly demonstrated to be 'significant' at a regional or national scale.

Would referring the project facilitate its delivery in a more timely and cost-effective way?

26. Referral may facilitate the consenting of the project in a more timely and cost-effective way than the standard RMA pathway. Urban development of the site is not enabled under the operative Rural – Mixed Rural Zone provisions and would ordinarily require rezoning through a plan change. By avoiding that step and consolidating the required approvals into a single process, referral may offer time and cost efficiencies relative to pursuing rezoning followed by resource consents under the standard process.

Is the referral unlikely to materially affect the efficient operation of the fast-track approvals?

27. Council has no comment in this regard.

Has the project been identified as a priority in any government or sector plan or strategy?

28. The project has not been specifically identified as a priority project in any government or sector plan or strategy, nor on a government infrastructure priority list.

29. The subject land is not recognised in any national or regional planning document as an area for urban growth. The proposal is not in line with the urban growth strategy outlined in the Auckland Council's Regional Policy Statement (**RPS**) and it is not identified in Councils Future Development Strategy 2023-2053 (**FDS**) which has identified 30 years of future urban zone land for future urban development. The proposed urban development of this large area of rural land is not consistent with the strategic direction set out in the FDS The subject land being outside of the area covered by the FDS also means it has not been factored into planned delivery of infrastructure by the main infrastructure providers.

Will the project deliver new or support existing regionally/nationally significant infrastructure?

30. No regionally or nationally significant infrastructure is proposed.

31. Watercare has confirmed there is no current or planned public water or wastewater servicing to the subject site, and any provision of public servicing would first require a Council policy assessment, which has not occurred.

Will the project increase housing supply or contribute to a well-functioning urban environment?

32. The project would increase housing supply, providing approximately 1050-1150 residential lots. However, the quantum of dwellings proposed is not significant at a regional, or sub-regional scale.

33. The Council does not consider the project contributes to a well-functioning urban environment. The site is rurally zoned, disconnected from existing centres, and lacks the transport infrastructure to support this scale of development. Auckland Transport notes that current public transport services in the area are no existant and that no material improvements are planned. Future residents would be highly reliant on private vehicles therefore the application would not contribute to a 'well-functioning urban environment'.

Will the project deliver significant economic benefits?

34. As noted above, the Council's Economist considers that, while the project would generate economic benefits, it is unclear whether those benefits are significant at a regional or national scale.

Will the project deliver new or support primary industries (e.g. aquaculture)?

35. The project will not deliver new or directly support primary industries.

Will the project support development of natural resources (e.g. minerals, petroleum)?

36. The project will not directly support the development of natural resources.

Will the project support climate change mitigation (e.g. reduce/remove greenhouse gas emissions)?

37. The project is not considered to materially support climate change mitigation. The application site is greenfield, rurally zoned and with limited public transport options.

Will the project support climate change adaptation, reduce risk arising from natural hazards or support recovery from natural hazard events?

38. The project is not considered to deliver climate change adaptation, natural hazard risk reduction, or recovery benefits.

Will the project address significant environmental issues?

39. The project is not directed at addressing existing significant environmental issues.

Is the project consistent with local or regional planning documents (e.g. spatial strategies)?

40. The project is considered to be inconsistent with all of the relevant local and regional planning documents, including the Auckland Unitary Plan (**AUP**), the National Policy Statement on Urban Development 2020, Subpart 4 (**NPSUD**)or the National Policy Statement – Highly Productive Land (**NPS-HPL)**.

41. The purpose of the Mixed Rural Zone (H19.4.1) is to "provide for rural production generally on smaller rural sites and non-residential activities of a scale compatible with smaller site sizes". The purpose of the Rural Coastal Zone (H19.5.1) is "to retain and enhance the rural character and amenity values, local coastal character and biodiversity values of rural areas along Auckland's harbours, estuaries and coastline. It is also to enable rural production activities, local non-residential activities, maintain recreational opportunities and manage the effects of existing scattered rural lifestyle development." In both these zones residential subdivision and development is not provided for and is a non-complying activity. The referral project is contrary to the purposes and provisions of the two main rural zones that apply and in my opinion is not supportable given its unjustified use of highly productive land for urban purposes (discussed further below).

42. The application site includes land classified as Land Use Capability (LUC) 2 and 3. Under the NPS-HPL, land is classified as highly productive if it is rurally zoned and features a LUC of 1, 2 or 3, therefore the subject site is considered highly productive land. The referral project would result in the permanent loss of a large landholding of just under 100 hectares of "highly productive land" – classified LUC2 and LUC3 under the New Zealand Resource Inventory and zoned for rural production in the AUP - this is directly contrary to the NPS-HPL unless justified in terms of the relevant criteria. Critically, in terms of clause 3.10 of the NPS-HPL there is no evidence of permanent or long-term constraints on the land such that use for land-based primary production is not able to be economically viable for at least 30 years.

43. the project would not give effect to the NPS-HPL because it:
    (a) proposes the permanent loss to urban activities of 99 56ha of highly productive land which is primarily in one large landholding that is zoned for rural production activities; and
    (b) does not provide the required comprehensive assessment under Part 3.10 of NPS-HPL such that the loss is not justifiable under the NPS-HPL.

44. The FDS is Auckland Council's spatial strategy for accommodating growth, and it sequences the timing of future urban areas in coordination with infrastructure. The application site is not included within the FDS meaning the area is not identified for urbanisation and has not been factored into planned delivery of infrastructure by the main infrastructure providers.

Are there any other relevant matters to consider?

45. Drawing reference to the comments attached to this Memorandum, there are several relevant additional matters to consider alongside the above.

<u>Water Supply and Wastewater servicing</u>

46. Watercare Services Limited (**Watercare**) have confirmed, in accordance with Watercare's Growth Servicing Policy 2026, that they do not provide water or wastewater connections to rurally zoned land unless Council determines public servicing should proceed.

47. Watercare consider that the applicant should clearly outline the intended long-term servicing plan for water supply and wastewater servicing and demonstrate that the proposed solutions are feasible and sustainable in perpetuity, including from financial, operational and environmental perspectives.

48. While the schemes are proposed to be privately owned and operated, Watercare recommended that they are designed and constructed in accordance with Watercare's relevant Codes of Practice for Land Development and Subdivision to ensure long-term safety and reliability of the water and wastewater networks. Please refer to Attachment F for Watercare's full comments.

49. Both the Councils Growth and Spatial Strategy team and the Franklin Local Board highlight that the private provision of water supply and wastewater services also creates liability issues for Auckland Council as if the services fail to provide compliant services, Auckland Council will be required to assume responsibility for these systems.

50. The application documents outline that estimated annual water demand for the development is 496m3/day or 181,040m3/year. They also outlined that rainwater harvesting has the potential to provide an average of about 279m3/day and 101,835m3/year.

51. The Council notes that a separate groundwater take resource consent application has been recently lodged with Council by the same applicant as this referral and the purpose of the application is to service this proposed development. The resource consent application is referenced (WAT60467602) has been lodged by 132 Whangapouri Drury Limited and is seeking to take 16m^3/hr, 380m^3/d and 69,500m^3/yr from the Pukekohe Kaawa Aquifer. This volume would be sufficient to provide for approximately 38% of the projects estimated water demand.

52. The application documents particularly the applicants report by Earthtech, outline additional opportunities for further groundwater takes from the Pukekohe Kaawa Aquifer and other aquifers accessible from the site. However, these require further investigation to determine factors such as water quality and whether the underlying aquifers have greater availability than what is currently listed.

53. The Council considers that, should the Project proceed to Substantive stage, the issue of water supply via the limited groundwater resource in this catchment, must be considered further. Please refer to Attachment F for Watercares full comments.

<u>Other matters</u>

54. Auckland Transport (**AT**) has a neutral position on the application being referred but has outlined significant transport issues. AT states that as the proposal is not contemplated in growth strategies it creates ongoing challenges associated with planning for Auckland's transport infrastructure. AT has concerns about the proposed connection to SH22 and considers that a suitable and safe connection for the development to SH22 is critical to its viability. AT is concerned that there are no current active modes or public transport links from the proposed development to the Ngākōroa Railway Station. AT does not have any proposed bus services to the proposed development and this needs to be considered in any transport effects assessment. Finally, AT are concerned that the referral application provides no specific commitment or sequencing to deliver the paper road connection to Oira Rd. Please refer to Attachment E for Auckland Transport's full comments.

55. Council's Healthy Waters and Flood Resilience department (**Healthy Waters**) are neutral on referral of the Application. Healthy Waters have highlighted the Regionwide Network Discharge Consent is unable to be utilised for rurally zoned land, therefore private stormwater discharge and diversion consents will be required. Should the application progress, Healthy Waters expects further information regarding - the operation and maintenance of stormwater infrastructure proposed to be vested; the opportunity to review the flood model used to assess flooding; a detailed assessment of stream erosion risk; and regarding the extent and location of any land proposed for vesting for stormwater management purposes. This should be accompanied by evidence and clear rational linked to Manaaki Tāmaki Makaurau: Auckland Open Space, Sport and Recreation Strategy that the land delivers essential stormwater function as well as wider public benefit. Finally, Healthy Waters considers that the private ownership entity that is proposed to be established for the operation and management of the private water supply and wastewater networks should also be aligned with the proposed stormwater network given the stormwater discharge consent will also need to be private. Please refer to Attachment G for Healthy Waters' full comments.

56. Auckland Council's Parks and Community Facilities (**Parks**) has a neutral position on the application being referred. From an open space perspective, Parks considers that the proposal provides a generally positive outcome through the provision of two neighbourhood parks, an integrated pedestrian network, and a wider framework of wetlands, stormwater corridors and associated open spaces that have the potential to support passive recreation, amenity and connectivity. However, they consider that the information reviewed does not provide sufficient clarity regarding the extent and location of any reserve vesting, including any potential esplanade reserve provision associated with the stream corridor or outcomes under the Urban Ngahere Strategy. Such information would be required to determine whether any public open space outcomes associated with reserve vesting and tree coverage would be of regional significance. Parks also notes that the application is silent on ownership structures of the various open spaces and may have impacts on Parks and Community Facilities if ownership and maintenance responsibilities are assumed. Please refer to Attachment H for Park's full comments.

57. Overall, whilst Council recognises there will be benefits associated with the development, including provision of housing and employment opportunities, it has not been established and demonstrated, to a sufficiently robust degree, that the Application will have significant regional or national benefits. Additionally, the application is inconsistent with the relevant regional planning documents. Overall, Auckland Council **opposes** the Application proceeding to a substantive application through the fast-track consenting process

58. Finally, the attached expert reviews have identified a range of additional information that would be expected to be provided with any substantive application should the application for referral be approved. We encourage pre-application consultation be completed with Council prior to a substantive application being made.

Auckland Council accompanying feedback

The following attachments are provided to inform the Section 22 decision-making process:

- Economic Comments – Attachment A
- Growth and Spatial Strategy – Attachment B
- Franklin Local Board Comments – Attachment C
- Policy Comments – Attachment D
- Auckland Transport Comments – Attachment E
- Watercare Comments – Attachment F
- Healthy Waters Comments – Attachment G
- Auckland Parks Comments– Attachment H

Note: All comments will be made available to the public and the applicant when the Ministry for the Environment proactively releases advice provided to the Minister for the Environment.

Prepared and approved for release by



Doug Fletcher
Principal Project Lead
Planning & Resource Consents
Dated: 28 July 2026

Attachment A – Economic Comments

Review of Economic Assessment of Proposed Residential Development in Karaka for Fast Track Referral

Tim Denne
24th July 2026

Introduction

This report provides a review of the economic assessment by Insight Economics (IE) of the Karaka residential development proposed for referral under the Fast Track Approvals Act (FTAA).[1] The IE report describes the project, estimates the construction costs and undertakes an economic impact assessment (EIA) using multiplier analysis to estimate the effects on GDP and employment in the short and long terms. IE makes further comments on the expected benefits of the project in more descriptive or qualitative terms. This includes economic efficiencies in construction and longer-term use of the site.

The authors conclude that the proposal would "increase housing supply, contribute to a well-functioning urban environment, and deliver significant regional economic benefits" (p1).

I and others have commented previously on the use of EIA and suggested the superiority of cost benefit analysis (CBA) in identifying regional or national benefits.[2] I do not repeat these arguments here but concentrate on assessing whether the benefits as defined by IE are expected to materialise.

IE's Analysis

Input Assumptions

The first input to the analysis is the estimate of the size of the project taking housing numbers from a masterplan for southern Auckland.[3] Using regional averages, an estimate is made of the expected size and costs for the housing,[4] while for other enabling works (earthworks, stormwater infrastructure etc) a mix of project-specific information and industry averages were used.

Multipliers to Estimate Main Impacts

As is standard practice in EIAs, multipliers are then applied to the costs to estimate the total economic impacts as GDP increases and employment. IE acknowledges some of the regular criticisms of multipliers:[5]

[1] Colegrave et al (2026)
[2] See Denne and Stroombergen (2026) for example.
[3] Arup (2023); Barker & Associates (2026)
[4] Table 2, p9
[5] Section 4.3, p7

- Assumes that businesses use inputs in fixed proportions: ie without substituting towards more cost-effective options if/when they become available.

- Ignores capacity constraints: it assumes that labour, materials, and other inputs are always available when needed, which may be unrealistic in a tight economy.

- Does not capture price effects: multiplier models are fixed-price frameworks, which ignore cost inflation, wage pressures, and so on.

To address this, they note that they have used up-to-date multipliers, applied conservative (ie low) estimates of construction costs and they have ignored induced effects, which are the additional GDP effects associated with increased spending by households because of the increased wages. IE suggests much of this spending would have occurred anyway.

Other Effects

IE assesses other effects that include:

- The large scale of the project in the context of the local housing market.
    - With more than 1,100 new dwellings set against Auckland Council's demand growth projection of up to 800 households per year for the Franklin ward, it equates to 1.4 years of growth.
    - All else being equal, this increase in supply would increase housing market competitiveness and its responsiveness to demand growth.

- The **broad range of housing types**, meeting demand of different demographic groups.

- The **economic efficiency of a master-planned development**, including economies of scale, infrastructure build optimisation and sustained employment.

- The **spatial match with employment growth**. IE notes expectations of growth in economic activity and employment opportunities in the area, including a Fisher & Paykel campus. This too provides greater efficiencies, eg in travel times to work.

- **Greater economic confidence** in the area, encouraging additional development.

Counterfactual

The development is compared with alternative, low value use of the site in the form of agriculture in a mix of sheep & beef and crop farming.

Review of the Analysis

The merits of the proposed development and the expected benefits relate to it being a relatively large master-planned housing development with a mix of housing types in a part of Auckland in which there is expected to be growth in employment. This suggests, as IE has noted, that it would result in economic efficiencies (that is lower costs) compared to fragmented development, because of the economies of scale and optimised infrastructure development. In addition, the concentrated development might spur associated developments close to it, yielding additional longer-run cost savings, such as via lower commuting costs. However, the analysis provided by

IE does not enable these benefits to be identified quantitatively and the counterfactual is not fully defined so that the benefits that are quantified may be over-estimated. I explore these issues below.

Counterfactual

The counterfactual used in analysis is the specification of what would happen without this project. IE has compared the GDP and employment benefits of the proposed housing development with the alternative use of the site (agriculture) but has not estimated the impacts of the housing developments that might otherwise occur, despite suggesting in the report that this would be more fragmented forms of development.[6]

Section 8.1 notes the proposed development is equivalent to 1.4 years of expected growth in the Franklin Ward. What is not clear is whether the proposed development is part of this expected growth but in a more concentrated and lower cost form, or if it is additional. The analytical approach used that applies multipliers to the total estimated costs of the development suggests that the new housing is entirely additional to that expected by Auckland Council. This is perhaps implied also by the phrase "*All else being equal*" at the start of the second paragraph of Section 8.1.

However, IE does not discuss this issue or justify the assumption, and this begs the question of what would happen otherwise. The expectation would be that, if there are scarce resources that limit local housing development, including labour supply or infrastructure capacity, the housing project would displace other housing developments. Displacement is hinted at elsewhere in the report, eg when IE notes that induced effects have been ignored because much of the assumed spending of the additional wages would have likely occurred regardless of the proposal.[7] This suggests that there is little increase in wages because the workers would otherwise be employed; whether this is on building work is not mentioned, but it does suggest that the development is not creating fully additional jobs.

The analysis would benefit from a clear specification of the counterfactual, particularly how much house development that would otherwise occur. If the new master-planned development is at the expense of fragmented development, then the regional or national benefits of the project are the difference in benefits compared to this counterfactual. This is likely to be from the cost savings, reflecting the economies of scale and optimised infrastructure investment. These savings are noted by IE but not quantified as the benefits.

Analytical Approach

As noted above, the benefits of the project noted by IE are the economies of scale and optimised infrastructure investments, both yielding lower costs relative to a dispersed development counterfactual. However, these benefits are not quantified. Rather, IE has used a multiplier approach under which measured benefits increase with increased costs. Multipliers are applied to the estimated total costs of development, including site-preparation costs. Using this approach, the cost savings would result in lower estimated benefits relative to a dispersed development! IE's analysis produces a positive benefit estimate using this technique because they have ignored the counterfactual or have assumed that the new development is entirely additional, resulting an 1,100 plus increase in total housing supply.

[6] Section 8.5, p15
[7] See Strategy 1 to address limitations of multipliers in Section 4.3

Mitigation Strategies

Acknowledging the problems with multiplier analysis, as repeated above (Section 2.2), IE has ignored induced effects, used up-to-date multipliers and used conservative (low) construction cost estimates. While this produces lower numbers, it is not entirely internally consistent and does not fully address the problems.

- As I note above, ignoring induced effects because much of the assumed spending would have occurred otherwise, suggests that there is little increase in total wages paid, which might in turn suggest little increase in total jobs. This is then inconsistent with the estimates of jobs created, which assumes otherwise idle labour resources.

- Using up-to-date multipliers is useful only to the extent that the multipliers approach is useful itself. As noted above, if the major benefits are from the efficiencies compared to more fragmented housing, then multipliers applied to costs (regardless of the quality of the multipliers themselves) is till not providing a useful estimate of the benefits.

- Applying conservative construction costs similarly reduces the total estimate of benefits but does not change the problem that would arise if the development was compared to a counterfactual of fragmented development. Estimated benefits would still be higher in the counterfactual because of higher construction costs.

Concluding Remarks

The proposed development is a relatively large master-planned housing development with a mix of housing types in a part of Auckland in which there is expected to be growth in employment. This may well meet criteria for fast-track approval through the increase in housing supply. However, the realisation of benefits relies crucially on the counterfactual and specifically whether (1) the new development will result in additional housing, (2) if it will displace other housing developments that might occur otherwise, or (3) a combination, with some additional supply but not the full 1,100.

The proposed development may well produce significant net regional or national benefits, but it is not possible to conclude on the size of the benefits and their significance from IE's work because of the absence of the counterfactual analysis.

I would expect the benefits that would arise are those mentioned by IE but not quantified, ie the efficiencies in construction costs and infrastructure development, and potentially the longer-run savings in transport costs (depending on the location of new employment opportunities compared to the location of housing).

References

Arup (2023) *Economic Masterplan Southern Auckland*. A Report for Tātaki Auckland Unlimited.

Barker & Associates (2026) *Planning Memorandum for Whangapouri*. Memorandum from Rebecca Sanders/Nick Roberts to Listed Projects Team – Ministry for the Environment.

Colegrave F, Chaumeil D and Keith N (2026) *Economic Assessment of Proposed Residential Development in Karaka for Fast Track Referral*. Insight Economics report for 132 Whangapouri Drury Ltd.

Denne T and Stroombergen A (2026) *Economic Analysis under the Fast Track Approvals Act*. Resource Economics & Infometrics. https://www.rmla.org.nz/rmla-insights/benefits-analysis-under-the-ftaa

Attachment B –Growth and Spatial Strategy Comments

Referral Application Feedback Form

This form is to be used by Council agencies, asset owners and specialists to provide feedback on referral applications under section 17 of the Fast-track Approvals Act 2024 (FTAA). Please complete the relevant sections below, considering the criteria set out in section 22 of the FTAA.

Project Information

Project Name	Whangapouri Road
Address	132 Whangapouri Rd, Karaka
FT application number	FTAA-2606-1247
Council ref	PRR00044403

Respondent Information

Name	Eva Zombori
Role	Senior Advisor, Growth and Spatial Strategy
Agency / Department	Policy
Date	17.07.2026

Do you support the proposal proceeding through fast-track?

☐ Support

☒ Oppose

☐ Neutral

Agency/Department Response

1. Ineligible Activities (Section 5 FTAA)

Growth and Spatial Strategy has not identified any matters suggesting the proposal involves ineligible activity as defined by section 5 of the Fast-track Approvals Act 2024. Assessment of statutory eligibility and activity-specific constraints would more appropriately sit with planning, environmental and infrastructure specialists.

2. Reasons Potentially Relevant to Referral Decision (Section 21(5))

From a Growth and Spatial Strategy perspective, the principal concern is not project eligibility, but its inconsistency with Auckland's adopted growth and spatial planning framework.

The proposal would introduce substantial residential development on rural land that is not identified for urbanisation within Auckland's Future Development Strategy (FDS). While adjoining existing and planned urban development in Drury West, the proposal has potential implications for the integrity of Auckland's long-term growth management approach, coordinated infrastructure planning, and management of rural land beyond identified growth areas.

These matters are relevant considerations for the Minister when assessing whether referral is appropriate under the Act.

3. Strategic Growth and Infrastructure Planning Assessment (Section 22)

3.1 Consistency with Auckland's Strategic Growth Framework

The proposal seeks approval for approximately 1,050-1,150 dwellings, a retirement village, local centre and associated infrastructure on approximately 100ha of rural land adjoining the Rural Urban Boundary in Drury West.

The site is not identified for urbanisation within Auckland's Future Development Strategy. From a strategic planning perspective, the proposal is therefore inconsistent with Auckland's adopted growth framework, which seeks to align urban development with planned infrastructure investment and service provision.

3.2 Housing Supply and Well-functioning Urban Environment

The proposal may contribute positively to housing supply and housing choice through the provision of a range of dwelling types, including retirement living.

However, Auckland's existing planning framework already provides significant residential capacity within the Drury-Ōpaheke Future Urban area. While additional housing supply is acknowledged as a benefit, the application has not demonstrated a strategic need for this growth to occur outside Auckland's planned growth areas.

A well-functioning urban environment relies not only on the provision of development capacity, but also on growth occurring in locations identified through strategic planning processes and coordinated with infrastructure and service delivery.

3.3 Infrastructure Planning and Growth Sequencing

The proposal relies on private water and wastewater servicing solutions and is outside of areas currently planned for urban servicing.

While the application indicates servicing can be provided independently of public networks, development occurring outside identified growth areas may create future pressures for infrastructure integration, service provision and public investment that have not been anticipated through Auckland's existing growth and infrastructure planning programmes. The private provision of water supply and wastewater services also creates liability for Auckland Council as if the services fail to provide compliance services, Auckland Council will be required to assume responsibility for these systems.

3.4 Rural Land and Strategic Growth Management

The proposal would urbanise land currently used for rural purposes, including land identified by the applicant as predominantly LUC 2 and LUC 3.

This is inconsistent with the broad strategic intent of the FDS and its sub-part, the Southern Rural Strategy, to protect highly productive land from development and to manage urban growth in a coordinated manner and maintain a distinction between urban and rural areas. It is also inconsistent with the National Policy Statement for Highly Productive Land.

3.5 Strategic Benefits Relevant to Section 22

Notwithstanding the concerns outlined above, the proposal may deliver benefits relevant to the Minister's assessment under section 22, including:

- Provision of approximately 1,050-1,150 additional dwellings and retirement living opportunities.
- Increased housing choice in southern Auckland.
- Construction and ongoing employment opportunities.
- Potential support for economic growth associated with the wider Drury growth area.

4. Overall GSS Position

The proposal presents a tension between:

- potential housing and economic benefits; and
- inconsistency with Auckland's planned growth framework, Future Development Strategy and integrated infrastructure planning framework.

Accordingly, from a Growth and Spatial Strategy perspective, there are strategic growth management concerns that weigh against referral. While the proposal may contribute additional housing supply and economic benefits, it is not aligned with Auckland's adopted strategic growth framework. The application has not demonstrated why substantial residential growth is required in this rural location outside the areas already identified for substantial structure planned urban development within the Drury-Ōpaheke growth area. However, we acknowledge that the proposal may deliver housing and economic benefits that the Minister may consider relevant when applying the section 22 referral criteria.

Attachment C – Franklin Local Board Comments

Referral Application Feedback Form

This form is to be used by Council agencies, asset owners and specialists to provide feedback on referral applications under section 17 of the Fast-track Approvals Act 2024 (FTAA). Please complete the relevant sections below, considering the criteria set out in section 22 of the FTAA.

Project Information

Project Name	Whangapouri Road
Address	132 Whangapouri Rd, Karaka
FT application number	FTAA-2606-1247
Council ref	PRR00044403

Respondent Information

Name	Andrew Kay
Role	Franklin Local Board Pukekohe Subdivision Resource Consents Lead
Agency / Department	Franklin Local Board
Date	22 July 2026

Do you support the proposal proceeding through fast-track?

☐ Support

☒ Oppose

☐ Neutral

Agency/Department Response

The Franklin Local Board opposes this subdivision as it does not support independent waste treatment plants. It has concerns as to the viability – who will take it over if it fails?

The local board also has huge concerns around the addition loading to State Highway 22, which is already under pressure. It does not support another intersection onto this highway. Supports New Zealand Transport Authority's position.

The proposal does not meet any of the criteria under the National Policy Statement for Highly Productive Land so the application should be rejected.

Attachment D – Auckland Council Policy Comments

Referral Application Feedback Form

This form is to be used by Council agencies, asset owners and specialists to provide feedback on referral applications under section 17 of the Fast-track Approvals Act 2024 (FTAA). Please complete the relevant sections below, considering the criteria set out in section 22 of the FTAA.

Project Information

Project Name	Whangapouri Road
Address	132 Whangapouri Rd, Karaka
FT application number	FTAA-2606-1247
Council ref	PRR00044403

Respondent Information

Name	Ewen Patience
Role	Policy Planner
Agency / Department	Central South Planning, Planning and Resource Consents
Date	22 July 2026

Do you support the proposal proceeding through fast-track?

☐ Support

☒ Oppose

☐ Neutral

Agency/Department Response

Key requirements

The activity is non-complying under the Auckland Unitary Plan (AUP) being a comprehensive residential development in a rural zone location outside the Rural Urban Boundary (RUB) on 'highly productive land'. This response focuses on two key aspects of the legislation.

Section 21(5)(c) of the FTAA provides that a referral application may be declined if the project "may have significant effects on the environment". A relevant significant adverse effect would be the permanent loss of 99.58 hectares of highly productive land, contrary to

the New Zealand Policy Statement for Highly Productive Land 2022, where the loss is not justified in terms of the relevant criteria of the policy statement and not consistent with all the relevant planning policy documents.

A key issue is that the proposal would urbanise land identified by the applicant as LUC 2 and LUC 3 land. The applicant's Planning Memorandum identifies approximately 42ha of LUC 2 land and 58ha of LUC 3 land, and acknowledges that the proposal does not strictly meet the relevant Part 3.10 criteria of the NPS-HPL. In my view, this is a significant policy issue because the proposal would remove highly productive rural land from land-based primary production and replace it with urban development outside the RUB.

The key consideration of section 22 of the FTAA by which the referral project may be accepted is consistency with local or regional planning documents, including spatial strategies. The relevant local and regional planning documents and spatial strategies are:

- The Auckland Plan 2050 and Auckland Future Development Strategy 2023-2053

- The Drury – Opāheke Structure Plan 2019 and the Southern Rural Strategy 2025-2055

- The Auckland Unitary Plan incorporating the Regional Policy Statement.

In my opinion, the referral project is not consistent with or supported by any of the relevant policy or spatial strategy documents

Discussion

Strategic documents

1. The Auckland Plan 2050 has given rise to the Auckland Future Development Strategy 2023-2053 (FDS) which is required by the National Policy Statement on Urban Development 2020, Subpart 4 (NPSUD). The common emphasis is on compact urban development which is integrated with infrastructure and supported by transport, commercial and community facilities and services towards "well-functioning urban environments" (NPSUD Policy 1). The NPSUD also has an emphasis on robust strategic planning and the need to integrate urban development with infrastructure (Objective 6).

2. The FDS provides for the sequencing of development and required infrastructure inside the Rural Urban Boundary (RUB) and focuses on land zoned Future Urban Zone (FUZ), while some land is already live zoned such as in the Waipupuke Precinct. The Drury west area has significant areas of land zoned FUZ, and the 'ready for development' of these areas is sequenced for "not before 2035+" because of various wastewater, water, rapid transit and other transport projects that are necessary prerequisites to urban development (refer FDS Appendix 6). These areas cannot be used for urban purposes until supported by infrastructure. The Whangapouri Road project adjoins FUZ land which has not been structure planned (as required by the Regional Policy Statement). Accordingly, the project does not align with the FDS, being outside the RUB and given that the adjoining land inside the RUB is at least 10 years from being ready for urban use.

3. The project is at the western edge of the RUB, across the Oira stream which forms a natural and appropriate western edge to the future urban area. Its development well ahead of schedule will not provide for its effective integration into a well-functioning urban environment. Its reliance on private water and wastewater reticulation may mean it proceeds well ahead of urban development within the RUB which is inconsistent with the orderly and compact urban growth pattern that is planned and does not promote a 'well-functioning urban environment' in this location. It would connect to the Drury west future

urban area solely by way of one connector (paper) road, linking to Oira Road, with the Oira stream otherwise isolating the project area. This provides limited connectivity with the developing urban area inside the RUB. The project would not promote orderly, compact or integrated urban growth in my opinion.

4. The project is stated as being approximately 1600 metres from the proposed future Ngākōroa (Drury West) Train Station, however this distance is from its closest point, in a straight line. The actual walking distance to the centre of the project area would be in the order of 3,000 metres which is well outside the walking distance metric for intensification around RTN stations of 800 metres used in the council's Plan Change 120: Housing Intensification and Resilience. Furthermore, this necessitates crossing State Highway 22 (SH22, Karaka Road). The project proposes that its primary transport access point is by way of a new double-lane roundabout onto SH22 which is not a roading layout supportive of safe pedestrian or cycling movement (and is not a solution accepted by NZTA Waka Kotahi). NZTA intends there to be crossing facilities further east at Jesmond Road, however this route adds to the distance required to access the future train station. The application also states that the project area is well connected to the arterial road and motorway network for access to the Manukau Metropolitan Centre and the Auckland CBD. As such, there would be a long term dependence on private car trips into and out of the project area which would not "support reductions in greenhouse gas emissions", a key component of a well-functioning urban environment (NPSUD Policy 1(e)). In my opinion the project would not promote non-car forms of transport, in particular walking and use of the train network.

5. The Drury – Opāheke Structure Plan 2019 has set out a pattern for development of the wider future urban area in Auckland's southern sector. It has a land area of **1921** hectares. Its development over 30 years is estimated to provide about 22,000 houses and about 12,000 jobs with a population of about 60,000. Given the extensive provision for growth in this southern growth area, planned and programmed by the council, the Whangapouri Road project cannot be considered a necessary or timely addition. It adds 99.58 hectares, a five percent increase providing for approximately 1,100 dwellings (inclusive of retirement units).

6. The referral application has not provided any evidence that the council's housing targets are not being met or will not be met by the structure plan area. The key argument is that the project area would replace land proposed to be lost to business uses within the RUB, land that is subject to private Plan Change 121. There has been no assessment as to whether this loss is significant in the context of 30 years or requires to be made up by an extension of the RUB. In the absence of such evidence, the project is considered to be inappropriate and inconsistent with the Drury – Opāheke Structure Plan.

7. The Southern Rural Strategy 2025-2055 (May 2025) states: "(the) 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." (page 58, emphasis added). It is accepted, as the applicant states and as envisaged in the FDS, that some of this urbanisation will occur by way of private plan changes but these will be required to be integrated into the structure that the council's strategic plans has set down and which would be set by further structure planning of FUZ land (as required by the Regional Policy Statement). In the absence of this wider structure planning, the project is considered to inappropriate and not in alignment with the Southern Rural Strategy 2025-2055.

8. Private plan change 121 proposes to change 86.5 hectares inside the RUB from Future Urban Zone to Business - Light Industry Zone, on the south side of SH22. This plan change is yet to be determined; the further submissions period closed in March 2026. A

major part of the applicant's case is based on the assumption that this private plan change will be successful, will provide jobs for residents of the project area, will take residential land out of use, and thereby justifies a significant expansion of the urban area westwards for urban purposes onto 'highly productive land'. Reliance on a yet to be determined private plan change is not considered a valid strategic reason for a major departure from the RUB boundary. The extent to which this change might significantly reduce overall residential development capacity given a 30 year timeframe is yet to be established. Land within the RUB yet to be rezoned may occur at far greater densities than is currently envisaged.

9. In reference to the Southern Rural Strategy, the referral application states at page 27 of the planning memorandum that the project would increase "housing choice within rural settlements". This statement is repeated in the Economic Assessment (Attachment 6). The locality is not a rural settlement or part of a rural settlement. The Southern Rural Strategy states that rural and coastal settlements will experience very limited growth.

10. The Southern Rural Strategy's support for limited housing choice within rural settlements should not be read as support for a new urban residential settlement of approximately 1,050 to 1,150 dwellings outside the RUB.

11. The strategy provides no support for the referral project, and the project is not aligned with this strategy in any way in my opinion.

12. With respect to the criteria of section 22 of the FTAA, the project is not identified as a priority project in any council strategic document, but is inconsistent with those documents, and while it would add to housing supply would not contribute to a well-functioning urban environment and is not supported by any evidence that urban growth within the RUB is falling, or will fall, short of the intended housing targets. The project site is rural land (and is also 'highly productive land'). The FDS anticipates minimal growth in rural areas to retain the rural environment and rural productivity which in turn contributes to rural amenity and the maintenance of a defensible rural/urban boundary. The urban development of this large area of rural land is not consistent with the strategic direction set out in the FDS (see Principle 1(a) {page 16} and section 4.1.1 of the FDS {page 36}).

<u>The Auckland Unitary Plan and Regional Policy Statement (RPS)</u>

The Auckland Unitary Plan (AUP)

13. The major part of the project land is zoned in the AUP as (Rural) Mixed Rural Zone and a minor part Rural Coastal Zone with the tidal coastal edges zoned Coastal - General Coastal Marine Zone. Parts of the land are subject to floodplains and coastal erosion/inundation.

14. The referral application confirms that the land is classified in the New Zealand Land Resource Inventory (NZLRI) as LUC 2 (42ha) and LUC 3 (58 ha). As such the site contains prime soils which is 'highly productive land' in terms of the National Policy Statement for Highly Productive Land 2022 (NPS-HPL).

15. AUP objective 19.2.1(3) applies to all rural zones: "Elite soil is protected, and prime soil is managed, for potential rural production." Policy 19.2.2(3) is: "Enable rural production activities on elite and prime soil and avoid land-use activities and development not based on, or related to, rural production from locating on elite soil and avoid where practicable such activities and development from locating on prime soil." The referral project is not related to rural production and therefore contravenes the overarching rural objective and policy. The referral application has not

demonstrated that it is 'not practicable' to avoid urban residential activities on the subject land. The primary reason given is that the project would replace land due to be lost to residential development within the Rural Urban Boundary (RUB) and that urban development benefits outweigh any loss of rural production.

16. The purpose of the Mixed Rural Zone (H19.4.1) is to "provide for rural production generally on smaller rural sites and non-residential activities of a scale compatible with smaller site sizes". The purpose of the Rural Coastal Zone (H19.5.1) is "to retain and enhance the rural character and amenity values, local coastal character and biodiversity values of rural areas along Auckland's harbours, estuaries and coastline. It is also to enable rural production activities, local non-residential activities, maintain recreational opportunities and manage the effects of existing scattered rural lifestyle development." In both these zones residential subdivision and development is not provided for and is a non-complying activity. The referral project is contrary to the purposes and provisions of the two main rural zones that apply and in my opinion is not supportable given its unjustified use of highly productive land for urban purposes (discussed further below).

The Regional Policy Statement (RPS)

17. The RPS seeks to achieve a quality compact urban form by promoting urban growth and intensification within the urban area, towns, and rural and coastal towns and settlements (B2.2.2(4) to (9)). It promotes residential intensification in and around centres, corridors and close to public transport, social facilities and employment (B2.2.2(6)). The RPS objectives and policies are consistent with the promotion of well-functioning urban environments under the NPSUD.

18. The RUB is the method by which a quality compact urban form is promoted and urbanisation outside it is avoided. The project is outside the RUB which in this location is well defined at its western edge by the Oira Stream. Policy B2.2.2(2) seeks to align the RUB with strong natural boundaries or otherwise with natural elements such as streams or well defined human elements. The Oira Stream achieves this and the project breaches this natural demarcation. It has Whangapouri Road as the main new western urban boundary. A significant shift of the RUB should be justifiable against all relevant criteria and the referral project does not achieve this.

19. The RPS (and district plan, chapter G1) provide for the shifting of the RUB where specified elements can be provided or avoided and structure plan and plan change processes are employed. A key factor of relevance in this rural location is "avoiding elite soils and avoiding where practicable prime soils which are significant for their ability to sustain food production" (B2.2.2(2)(j)). As stated, the project site is made up of LUC 2 and LUC 3 land which means it contains prime soils and therefore is subject to the National Policy Statement for Highly Productive Land 2022 (NPS-HPL).

20. The referral application has not demonstrated that the land is not suitable for rural production activities and confirms the rural production activities presently occurring. It fails to consider the value of maintaining rural areas as a component of achieving 'quality compact urban form' and fails to avoid the urban development of prime soils significant for food production. This in turn increases pressure on surrounding productive land for further urbanisation because the project cannot satisfy all the relevant assessment criteria.

<u>National Policy Statement for Highly Productive Land 2022 (NPS-HPL)</u>

21. The referral project would result in the permanent loss of a large landholding of just under 100 hectares of “highly productive land” – classified LUC2 and LUC3 under the New Zealand Resource Inventory and zoned for rural production in the AUP - and this is directly contrary to the NPS-HPL unless justified in terms of the relevant criteria. Critically, in terms of clause 3.10 of the NPS-HPL there is no evidence of permanent or long-term constraints on the land such that use for land-based primary production is not able to be economically viable for at least 30 years.

22. The objective of the NPS-HPL is to protect highly productive land for land-based primary production both now and for future generations; it has a long range perspective. Key policies include:

• Policy 1: Highly productive land is recognised as a resource with finite characteristics and long-term values for land-based primary production.

• Policy 4: The use of highly productive land for land-based primary production is prioritised and supported.

• Policy 5: The urban rezoning of highly productive land is avoided, except as provided in this National Policy Statement.

• Policy 7: The subdivision of highly productive land is avoided, except as provided in this National Policy Statement.

23. Under Part 3.2 *Integrated management* of the NPS-HPL, regional councils and territorial authorities must manage the effects of subdivision, use, and development of highly productive land, in an integrated way, which includes taking a long-term, strategic approach to protecting and managing highly productive land for future generations. The established RUB at this location, supported by the RPS and AUP and reinforced by the council’s strategic documents, employs this long-term strategic approach.

24. The relevant criteria for any allowance of the proposed project are in Part 3.10 of the NPS-HPL: *Exemption for highly productive land subject to permanent or long-term constraints*. The applicant has accepted that the referral application “does not strictly meet these criteria” and justifies the loss of land in other terms at page 21 of the Planning Memorandum.

25. Under Part 3.10, clause 1, the council may only allow highly productive land to be subdivided, used or developed if it is satisfied that (emphasis added):

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.

26. In my opinion, the referral application:-

a. does not identify any permanent or long-term constraints pertaining to the land and does not attempt to justify the project in terms of the unsuitability of the land for productive purposes;

b. does not consider the loss of 99.58 hectares of highly productive land to be significant in any way, and has only accounted for "low-intensity rural activities" in its economic (forgone rural production) assessment and not more intensive activities that might generate higher returns (Attachment 6; section 9.3 Economic Assessment);

c. does not acknowledge the large size of the landholding and its contribution to the rural environment arising from the unfragmented nature of the landholding in this location;

d. according to the master plan would have urban development immediately adjacent to rural land, in some situations separated by road, which would add to reverse sensitivity effects;

e. claims that the loss of highly productive rural land at this location would, by its conversion to urban use, support a reduction of loss of 'more productive' highly productive land elsewhere within the district to urban growth, but does not identify where this 'more productive' land is or how it would be prevented from being used for urban purposes when the justification for the project site is not supported by key policy documents;

f. does not account for any "long-term environmental, social, cultural {or} economic costs associated with the loss of highly productive land for land-based primary production, taking into account both tangible and intangible values" ;

g. relies primarily on subclause c of Part 3.10(1) and outlines the benefits of the project but overlooks that the various requirements of Part 3.10(1) are conjunctive and all require to be satisfied to enable the council to be able to allow urban development of highly productive land.

27. In summary, the project would not give effect to the NPS-HPL because it:

(a) proposes the permanent loss to urban activities of 99 56ha of highly productive land which is primarily in one large landholding that is zoned for rural production activities; and

(b) does not provide the required comprehensive assessment under Part 3.10 of NPS-HPL such that the loss is not justifiable under the NPS-HPL.

Accordingly, I consider the permanent loss of the project land to urban activities to be a significant adverse effect in terms of section 21(5)(c) of the FTAA.

Attachment E – Auckland Transport Comments

Referral Application Feedback Form

This form is to be used by Council agencies, asset owners and specialists to provide feedback on referral applications under section 17 of the Fast-track Approvals Act 2024 (FTAA). Please complete the relevant sections below, considering the criteria set out in section 22 of the FTAA.

Project Information

Project Name	Whangapouri Road
Address	132 Whangapouri Road, Karaka
FT application number	FTAA-2606-1247
Council ref	PRR00044403

Respondent Information

Name	Hedre Dednam
Role	Team Leader - Development Planning South
Agency / Department	Auckland Transport
Date	20/07/2026

Do you support the proposal proceeding through fast-track?

☐ Support

☐ Oppose

☒ Neutral

Agency/Department Response

Overall Summary of Auckland Transport (AT) Position

- The project comprises an extension of the proposed future urban area of Drury West, which is scheduled for urban development in Auckland Council's Future Development Strategy (FDS) after 2035. Fast-track applications in areas not previously contemplated in growth strategies create ongoing challenges to plan for Auckland's transport infrastructure. The site is currently subject to rural zoning and is outside the Ōpaheke–Drury Structure Plan boundary. Accordingly, the proposal at 132 Whangapouri Road was not contemplated as part of previous transport infrastructure network planning and funding workstreams including the Development Contributions policy for Drury.

- Waipupuke Precinct in the Auckland Unitary Plan applies to live urban-zoned land between Oira Road and Jesmond Road. The Precinct Plan includes future transport network upgrades to support urbanisation including an east-west connection across the precinct. While the main transport corridor currently serving this land is State Highway 22 (SH22) which is a New Zealand Transport Agency (NZTA) managed road, the development will also impact on the wider Auckland Transport network including future east-west connections to provide alternatives to SH22 as the areas of Drury West and Drury East urbanise. AT also understands that NZTA has concerns about the proposed connection to SH22. A suitable and safe connection for the development to SH22 is critical to its viability.

- While the Ngākōroa Railway Station (Drury West) is currently under construction it will provide improved public transport opportunities when it opens in 2027[1]. However, there are no current active modes or public transport links from the proposed development to this station. AT does not have any proposed bus services to the proposed development which needs to be considered in any transport effects assessment. More information is needed on how this development could contribute to an active modes connection to Ngākōroa Station, including any development triggers for providing infrastructure.

- Further, while there is a paper road connection to Oira Road to the east within the Future Urban Zone providing for connectivity to future east-west connections in the Ōpaheke–Drury Structure Plan and the proposed and existing schools further to the east, this connection is not a formed road, and the referral application provides no specific commitment or sequencing to deliver this connection.

- Accordingly, there remain significant transport issues for the Applicant to consider in detail to show how this development can successfully integrate with the transport network, active modes opportunities, development staging, and what transport network upgrades are necessary to support each stage (including with and without the transport upgrade proposed as part of the Waipupuke Precinct development transport upgrades). Funding and delivery mechanisms for any necessary transportation network works beyond the Applicant's development site would need to be confirmed.

[1] https://www.kiwirail.co.nz/our-network/our-regions/amp/drury-rail-stations/

- The detailed layout of the development, road network and intersections will be important considerations at the substantive application phase should this application be referred for fast-track.

Road Safety/Traffic Engineering Specialist Comments

- The proposed development is located on rural zoned land adjacent to future urban zoned land. This raises concerns about the timing of the proposed fast-track development in relation to the development of the surrounding area.

- Sections 2.4 and 2.5 of the Applicant's Transportation Memorandum prepared by Hughes Traffic and Transportation note that existing public transport accessibility to the site is currently limited with the nearest public transport services some 4 km away in Drury West and that the "*existing walking and cycling accessibility to the site is currently poor".* AT agrees with this assessment. If the proposal were to be constructed now, then it would be highly car-dependent with private vehicle usage,

with private motor vehicles the only practical way to travel to and from the site for most residents.

- Section 3 of the Transportation Memorandum then goes on to describe a number of future upgrades on SH22 proposed by NZTA, public transport improvements in the area (in particular the Ngākōroa Railway Station), and upgrades in the Waipupuke Precinct land immediately east of Oria Road which would potentially provide active modes and public transport connectivity to the site.

- AT has concerns that the timing of many of these improvements is uncertain. Many of NZTA's proposed SH22 upgrades listed in Section 3.1 of the Transportation Memorandum are not funded, and Figure 2 indicates that they only extend as far west as the Jesmond Road intersection. Ngākōroa Station is expected to open in 2027, but it is too far from the site for most people to walk and AT has no plans to provide any feeder bus service to the station serving the site give it is not urban zoned. The improvements inside the Waipupuke Precinct required by the Precinct Plan would help provide connectivity between the site and adjacent land to the east, but as of July 2026 the Waipupuke Precinct (urban zoned) is undeveloped and there is still a lot of land in the Future Urban Zone between the west side of Oria Road and the Applicant's site.

- If the proposal were to be constructed today it would be out of sequence with anticipated development. Until such a time as the surrounding area to the east was developed it would be an island of urban development surrounded by rural land with no viable means of access for most residents other than by private motor vehicle.

- Matters of detail relating to the master plan and specific road cross sections and intersections are not assessed in detail in this response and are matters for further consideration in a substantive application should the matter be referred for fast-track.

Public Transport

- The likely initial bus route based on the master plan would link SH22 along the main north-south Spine Road and connect to Oira Road via the east-east paper road. If areas are developed for urban use further to the west across Whangapouri Road (e.g. for another greenfield development), any bus route may need to be re-routed to Whangapouri Road in the future. Further, AT also understands NZTA has concerns about the proposed spine road connection to SH22. The road network should take this into account to future proof road cross sections for this contingency. Further, consideration of proximity of the public transport route to the retirement village, particularly for workers on low wages who may utilise such services, needs to be considered.

- The connection to Oira Road would be important and would need to be provided early in the development with a roundabout connection to Oira Road. The referral application has made no specific commitment to completing this connection or any staging trigger to deliver it. How and when this connection would be provided is an important consideration to be addressed.

Stormwater

- Whilst this is a matter of detail to be addressed in a substantive application, the Applicant should refer to the latest AT design guidelines (e.g. AT's Bioretention Design Guide Version 2) for any solutions intended to treat road runoff. AT does not support the proliferation of small, individual stormwater devices within the road reserve due to high operational and maintenance costs.

Having considered the assessment criteria on the following page, please explain your position and provide any other relevant details.

Attachment F – Watercare Comments

Response to referral application for the Whangapouri Road Project at 132 Whangapouri Road, 8 Arana Drive and 362 Karaka Road, Karaka under the Fast-track Approvals Act 2024

Introduction

1. Watercare Services Limited (**Watercare**) welcomes the opportunity to provide comments on the Whangapouri Road Fast-track referral application (**Application**), made under section 13 of the Fast-track Approvals Act 2024 (**Act**).

2. 132 Whangapouri Drury Limited (Applicant) is proposing a residential development (the Project) on approximately 99.58 hectares of land on the northern side of State Highway 22, near the intersection with Whangapouri Road and Bycroft Road, west of Drury (the Project Area). The Project consists of three main components:

- Residential development of approximately 1,050 to 1,150 dwellings made up of:
  - 850–950 dwellings on lots between 300–500 m², with a smaller proportion of higher-density and larger lots
  - 200 retirement village dwellings set within a total 11.9-hectare retirement village
- A local centre with approximately 0.7 hectares of commercial floorspace
- Associated infrastructure - including transport, water, wastewater, stormwater, energy, and supporting civil works required to service and enable the development.

- The subject land is predominantly zoned Rural – Mixed Rural under the Auckland Unitary Plan – Operative in Part (**AUP-OP**) with the northern part of the site zoned Rural – Rural Coastal. The Applicant is proposing to privately service the development for both water and wastewater. The Application states the possibility of future connections to Watercare's network could be explored but the development is not reliant on this possibility.

- Watercare provided initial comments to Auckland Council in response to the Applicant's section 11(1)(b) notice. The comments in the letter dated 14 May 2026 still stand, unless otherwise stated in this letter.

- Watercare's comments in this letter are based on the Application as at today's date, in particular the following lodged Application documents:

  - Whangapouri Road Fast Track Referral Application Covering Letter, Barker & Associates dated 11 June 2026
  - Fast-track referral application form from Rebecca Sanders dated 11 June 2026
  - Attachment 1 – Planning Memorandum for Whangapouri, Barker & Associates dated 9 June 2026
  - Attachment 4 – Whangapouri Consultation Record, Barker & Associates
  - Attachment 5 – Whangapouri Road Urban Design Drawing Pack, Barker & Associates dated June 2026
  - Attachment 7 – Civil Infrastructure Report: 132 Whangapouri Road, Karaka, Maven Associates Limited dated 8 June 2026
  - Attachment 8 – 132 Whangapouri Fast-track Referral Application: Water Supply Servicing Report, GWE Consulting dated June 2026
  - Attachment 9: Groundwater Supply Feasibility Assessment, Earthtech dated 29 May 2026

- Attachment 10: 132 Whangapouri Fast-track Referral Application: Wastewater Servicing Report, GWE dated June 2026.

- Any amendment to the Application will require further review from Watercare.

    - This advice is valid as at the date of this letter. All servicing advice is based on the best available information at the time and may change if updated network modelling or programme and/or funding reviews indicate materially different outcomes.

Watercare's purpose and statutory obligations

- Watercare is New Zealand's largest provider of water and wastewater services, operating as a substantive council-controlled organisation owned by Auckland Council with the purpose embodied in the Māori whakatauki *"Ki te ora te wai, ka ora te whenua, ka ora te tangata"* (When the water is healthy, the land and the people are healthy), reflecting the connection between its services and the wellbeing of the community and local environment.

- Watercare is required to manage its operations efficiently, with a focus on minimising overall costs while maintaining long-term asset integrity. These obligations are subject to economic regulation under the Watercare Charter, with oversight provided by the Commerce Commission as the appointed Crown monitor. Watercare must also give effect to the relevant aspects of Auckland Council's Long-term Plan and act consistently with other council plans and strategies, including the Auckland Plan 2050 and the Future Development Strategy (**FDS**).

- Through its annual Statement of Intent responding to the council's Letter of Expectation, Watercare commits to contributing to Auckland Plan 2050 outcomes. This includes working collaboratively with the wider council group to support areas of growth identified by the council, acting consistently with the FDS for major infrastructure development for future urban areas and ensuring alignment of infrastructure projects with other utilities. Watercare also commits to fully recovering growth-related costs so that growth pays for growth.

Watercare's comments

- Watercare has considered the Project against the assessment criteria set out in section 22 of the Act and provides the following comments.

<u>Overview of Watercare's servicing policy</u>

12. The Project Area is zoned Rural – Mixed Rural and Rural – Rural Coastal under the AUP-OP. Watercare's Growth Servicing Policy 2026 sets out Watercare's approach to servicing growth. The policy recognises rural or equivalent zoned land as a distinct servicing category located outside of Watercare's area of service. It also recognises that development may be proposed through Fast-track or resource consent processes, in which case Auckland Council will undertake a policy assessment considering consistency with its plans and strategies and wider infrastructure requirements needed to support a thriving community. Watercare will follow Auckland Council's lead on strategic consistency and provision of public infrastructure servicing for such proposals.

13. In line with this policy, Watercare does not provide water or wastewater services to rural land unless Auckland Council has determined through its policy assessment that provision of public servicing should proceed. As of the date of this letter, no policy assessment for servicing the Project Area has been provided by Auckland Council.

14. Notwithstanding this policy position, the comments below are provided in relation to the

Applicant's proposed servicing options.

Water supply

15. The Civil Infrastructure Report by Maven states that the proposed development is estimated to generate an average potable water demand of approximately 498 m3 per day. The Applicant proposes a private water supply network primarily utilising bore water and supplemented by roof-caught water as required.

16. Watercare defers to Auckland Council for comments on the proposed private water supply servicing for the proposed development including design, governance and environmental performance. Additionally, any private water supply would be subject to regulation by Taumata Arowai as the water services regulator.

17. While the Project does not rely on a public water connection, the Civil Infrastructure Report notes that it may be possible to connect to the bulk supply point near Quarry Road. As per the Growth Servicing Policy, Watercare does not service rural land unless directed by Auckland Council.

Wastewater servicing

18. The Applicant is proposing a private, centralised wastewater treatment plant with disposal of treated effluent to land or the coastal marine area via a stream. The preferred wastewater reticulation approach is not confirmed but options identified by the Applicant include a low-pressure sewer system or a conventional gravity network with wastewater pump stations. These options are proposed to be evaluated by the Applicant at the detailed design stage.

19. Watercare defers to Auckland Council for comments on the proposed private wastewater servicing for the Project, including design, governance and environmental performance.

20. The Civil Infrastructure Report also notes that there could be a possible connection to the nearby public network proposed to support development to the eastern side of State Highway 22. While the proposed development is not reliant on a public connection, the report states that the possibility of a future public connection "is an ongoing consultation piece with Watercare". Watercare has no current plans to service the Project Area, and its ongoing planning for future wastewater infrastructure does not provide for the Project to be connected to, or vested to, Watercare in the future. As the site is located within a rural zone, it should be assumed that the wastewater system will remain permanently private, including its ownership, operation and maintenance.

General comments on private servicing

20. The Applicant should clearly outline the intended long-term servicing plan for water supply and wastewater servicing and demonstrate that the proposed solutions are feasible and sustainable in perpetuity, including from financial, operational and environmental perspectives.

21. While the schemes are proposed to be privately owned and operated, it is recommended that they are designed and constructed in accordance with Watercare's relevant Codes of Practice for Land Development and Subdivision to ensure long-term safety and reliability of the water and wastewater networks.

22. Additionally, should a future connection to the public network be proposed, Watercare has concerns regarding the ability to vest private water and wastewater treatment assets that have been operational, managed and maintained outside of Watercare's control without significant additional investment.

Conclusion

23. Watercare does not provide water supply or wastewater connections to rural land unless Auckland Council, through a policy assessment, has determined that provision of public servicing should proceed. As at the date of this letter, no policy assessment for servicing the Project has been provided by Auckland Council.
24. Watercare is open to further discussions with the Applicant and Auckland Council.

Yours faithfully,
Helen Shaw
Head of Strategy and Consenting
Watercare Services Limited

Attachment G – Healthy Waters Comments

Referral Application Feedback Form

This form is to be used by Council agencies, asset owners and specialists to provide feedback on referral applications under section 17 of the Fast-track Approvals Act 2024 (FTAA). Please complete the relevant sections below, considering the criteria set out in section 22 of the FTAA.

Project Information

Project Name & FTAA number	Whangapouri Road – FTAA-2606-1247

Respondent Information

Name	Hillary Johnston
Role	Fast-Track Lead
Agency / Department	Healthy Waters & Flood Resilience
Date	17.07.2026

Do you support the proposal proceeding through fast-track?

☐ Support

☐ Oppose

☒ Neutral

Agency/Department Response

Healthy Waters & Flood Resilience (HWFR) has reviewed the referral application for the proposed comprehensive residential development located on the northern side of SH22, west of Drury at 132 Whangapouri Road. We understand that the proposed project includes approximately 1,050–1,150 dwellings, including residential and retirement village housing, a local centre, and associated and associated infrastructure and servicing.

Reasons for Consent

HWFR holds a Regionwide Network Discharge Consent (RWNDC) which authorises the diversion into and discharge from public stormwater networks within the Auckland Region. The RWNDC is only applicable to existing urban zoned land or land rezoned urban through a Plan Change process.

The proposed development is located within the *Rural - Mixed Rural* and *Rural - Rural Coastal* zones and therefore will not be able to be authorised under the RWNDC.

A private diversion and discharge consent will be required to authorise the diversion and discharge of stormwater from the proposed development. This is acknowledged within the Planning Memorandum and consent has been sought under Chapter E8.

HWFR remains available to work closely with the Applicant's team and the regulatory stormwater specialists in respect of any private diversion and discharge consent that may be required should the proposed development proceed.

Stormwater Management

A high-level conceptual stormwater management strategy has been provided within the Civil Infrastructure Report, including indicative pipe network layouts, treatment device locations, and outfall locations.

The proposal indicates that Stormwater Management Area Flow (SMAF) requirements would be achieved through a combination of raingardens, wetlands, tree pits, and stormwater tanks. Public road runoff is proposed to be managed through raingardens, wetlands, and tree pits, while runoff from private accessways and lots would be managed through wetlands and tanks, with tanks providing extended detention functions for private accessways.

The assessment states that the stormwater system will be designed to maintain post-development hydrology through retention of pre-development flows for the 2-year rainfall event, in combination with SMAF mitigation measures. To support this approach, more than 30 raingardens are indicatively proposed, along with multiple discharge points and limited direct discharge of clean roof runoff to facilitate wetland recharge where required.

Should the application progress, HWFR would expect a detailed stormwater assessment to be provided at the substantive application stage. This should include further information on the proposed stormwater management approach, including device selection, design methodology, treatment and detention performance, catchment servicing, and indicative footprints.

Natural Hazards

HWFR does not have significant concerns regarding flooding at a high level. A preliminary flood assessment has been provided and indicates that overland flow paths are generally contained within existing streams, gullies, and associated margins. The preliminary flooding assessment outlines that the proposed development is not expected to result in adverse upstream or downstream flooding effects. We understand the flood model at this stage has been used to assess flooding at a high-level and inform finished floor levels and infrastructure design. Based on the information provided, HWFR is satisfied at the referral stage that flooding related matters can be appropriately addressed through any subsequent substantive application process.

Should the development proceed, HWFR would welcome the opportunity to review the model in greater detail. As suggested by the Applicant’s Engineers within the Civil Infrsturtcure Report HWFR is happy to work with the Applicant's Team to confirm the modelling assumptions, parameters and outputs prior to lodgement of any substantive application.

Stream Erosion

Based on our knowledge of the catchment HWFR understand that active erosion is occurring in the Oiroa Creek and its tributaries. The erosion potential of the streams (lateral and incision) needs to be understood so that structures (including but not necessarily limited to roads, retaining walls, bridges, and culverts) are designed with adequate setback and will not be undermined by an eroding stream during their lifetime.

Should the project proceed, the Substantive Application should include a detailed assessment of stream erosion risk, together with proposed erosion mitigation measures and supporting design information, demonstrating how potential adverse erosion effects will be avoided or appropriately managed. The Applicant’s Engineer has acknowledged this within the Civil Infrastructure Report.

Asset Ownership

The information provided indicates that approximately 28ha of Open Space / Drainage Reserve is proposed. *Auckland Councils Manaaki Tāmaki Makaurau: Auckland Open Space, Sport and Recreation Strategy* which was adopted by Council in May 2025 sets out the how Council will consider the provision of open space including for stormwater management purposes. The strategy also seeks to support the vesting of stream corridors or natural wetlands where the function sits best in public ownership. This is to avoid vesting of land that would result in an ongoing financial maintenance burden to Council without a clear and tangible public benefit. If the project were to progress, the extent and location of any land proposed for vesting for stormwater management purposes should be accompanied by evidence and clear rational linked to *Manaaki Tāmaki Makaurau: Auckland Open Space, Sport and Recreation Strategy* that the land delivers essential stormwater function as well as wider public benefit.

While the application outlines that SMAF hydrology mitigation and water quality treatment will be achieved, no further information has been provided on the proposed stormwater management or treatment approach. If the project were to progress, HWFR seek further input on proposed stormwater management so that, if necessary, there is opportunity to comment on the operation and maintenance requirements of any public stormwater system.

It is understood that a private ownership entity is proposed to be established for the operation and management of the private water supply and wastewater networks to be aligned with the proposed private water and wastewater consents. It may also be appropriate for this entity to consider the proposed stormwater network alongside the wastewater and water servicing given the stormwater discharge consent will also need to be private. Healthy Waters remain open to further discussions with the applicant over these future arrangements.

Summary

From a HWFR perspective, the information provided does not currently identify any stormwater related matters that would warrant recommending decline of the referral application under section 21 of the FTAA. However, it is noted that the proposed development cannot be authorised under the RWNDC due to current zoning, and a private diversion and discharge consent will be required.

If the application is to proceed, further information will be required including confirmation of the proposed approach to address water quality treatment and hydrology mitigation and to manage effects on the receiving environment including stream erosion and flooding, particularly in respect of upstream and downstream properties, and infrastructure.

HWFR welcomes further engagement with the Applicant's Agent should the proposal progress.

Attachment H – Auckland Parks Comments

Parks Referral Application Feedback Form

This form is to be used by Council agencies, asset owners and specialists to provide feedback on referral applications under section 17 of the Fast-track Approvals Act 2024 (FTAA). Please complete the relevant sections below, considering the criteria set out in section 22 of the FTAA.

Project Information

Project Name	Whangapouri Road
Address	132 Whangapouri Rd, Karaka
FT application number	FTAA-2606-1247
Council ref	PRR00044403

Respondent Information

Name	Roja Tafaroji
Role	Senior Parks planning
Agency / Department	Parks Planning, Parks and Community Facilities
Date	20/07/2026

Do you support the proposal proceeding through fast-track?

☐ Support

☐ Oppose

☒ Neutral

Agency/Department Response

Proposal Overview

The proposal relates to the Whangapouri Road development at 132 Whangapouri Road, Karaka (FTAA-2606-1247 / PRR00044403), comprising a master-planned residential community of approximately 1,050-1,150 dwellings, including a retirement village, local centre, associated infrastructure, two proposed neighbourhood parks, and a wider network of wetlands, stormwater reserves, open space corridors, pedestrian accessways and shared path connections.

From a Parks Asset Owner perspective, the assessment is focused on the proposed open space outcomes and their contribution to a well-functioning urban environment.

Open Space Provision and Pedestrian Connections and Accessibility

It is acknowledged that the proposal sits outside the Manaaki Tāmaki Makaurau Open Space, Sport and Recreation Strategy, given its Rural Mixed Rural and Rural Coastal zoning and being unanticipated for development. Two neighbourhood parks are provided to retain frontage to local roads and are supported by a connected pedestrian network.

The proposal also includes a broader network of open space areas associated with wetlands, riparian corridors, stormwater management areas and landscape buffers where they have the potential to provide secondary benefits for passive recreation, amenity and pedestrian connectivity.

Parks notes that the long-term vesting, ownership, management and maintenance arrangements for these open space areas are not clearly identified in the information reviewed. Consequently, the extent and location of any reserve vesting cannot be confirmed from the information currently available, including whether any such land would constitute open space of regional significance.

From an open space perspective, the combination of neighbourhood parks, the centrally located neighbourhood centre, pedestrian connections and the wider open space network is expected to support the development of a well-functioning urban environment to provide some positive recreational, amenity and environmental outcomes for the region it will locate within.

Stream Corridor and Potential Esplanade Reserve Outcomes

Parks notes that a stream is present within the development area for which requirements have been advised on during pre-application engagement. The Masterplan Overview and Movement Network, Open Space and Amenity plans provided in Masterplan and Urban Design Assessment (Attachment 5) do not identify any esplanade reserve and appears to show open space areas adjoining the stream corridor as landscape buffer within stormwater reserve or associated open space.

While the masterplan provides for open space associated with the stream corridor, the relationship between any potential esplanade reserve provision and the proposed stormwater reserve network is not readily apparent and from a Parks perspective the overall reserve outcomes to establish regional significance from an open space perspective, has not been identified.

Urban Ngahere and Streetscape Landscaping Outcomes

Parks notes that the Auckland Urban Ngahere Strategy and the Drury planning framework promote increased urban tree canopy cover to deliver a range of benefits, including climate resilience, biodiversity enhancement, improved amenity, walkability and overall neighbourhood liveability.

While the masterplan identifies a hierarchy of roads, including a spine road providing a strategic north-south connection through the development, limited information has been provided, to determine whether the proposal would contribute to the strategic urban canopy objectives or whether it constitutes infrastructure of regional significance from a Parks and Community Facilities perspective.

Parks Conclusion

From an open space perspective, the proposal provides a generally positive outcome through the provision of two neighbourhood parks, an integrated pedestrian network, and a wider framework of wetlands, stormwater corridors and associated open spaces that have the potential to support passive recreation, amenity and connectivity.

However, the information reviewed does not provide sufficient clarity regarding the extent and location of any reserve vesting, including any potential esplanade reserve provision associated with the stream corridor or outcomes under the Urban Ngahere Strategy. As a result, Parks is unable to determine whether any public open space outcomes associated with reserve vesting and tree coverage would be of regional significance.

Assessment Criteria (Section 22 FTAA)

Please consider the below assessment criteria in preparing your response:

- **Does the project have significant regional or national benefits?**
  From a Parks and Community Facilities perspective, the proposal provides a range of open space outcomes but is silent on the outcomes around the provision of esplanade areas to complete the assessment for overall benefits of the provision of open space for the area in support of creating liveability of a substantial new community within the Drury growth area. Parks is therefore unable to determine that the proposal will provide a public open space network that are of regional or national significance due to uncertainty regarding the extent and location of any future reserve vesting.

- **Would referring the project facilitate its delivery in a more timely and cost-effective way?**
  This is outside the scope of Parks and Community Facilities, and we defer to the other technical specialists and planners in this regard.

- **Is the referral unlikely to materially affect the efficient operation of the fast-track approvals process?**
  This is outside the scope of Parks and Community Facilities, and we defer to the other technical specialists and planners in this regard.

- **Has the project been identified as a priority in any government or sector plan or strategy?**
  This is outside the scope of Parks and Community Facilities, and we defer to the other technical specialists and planners in this regard. There are no currently operative parks planning strategies at play for the location.

- **Will the project deliver new or support existing regionally/nationally significant infrastructure?** From a Parks and Community Facilities perspective, the proposal will deliver new community infrastructure through the provision of two neighbourhood parks, a centrally located neighbourhood centre, pedestrian connections, and a broader network of open spaces associated with wetlands and stormwater corridors but is silent on the provision of esplanade reserve outcomes to determine whether overall open space provide a regionally significant open space outcome.

- **Will the project increase housing supply or contribute to a well-functioning urban environment?**
  While the assessment of the housing supply aspects of the proposal is outside the scope of Parks and Community Facilities, we consider that the proposed open space network, neighbourhood parks,

neighbourhood centre and pedestrian connections will somewhat contribute positively to the development of a well-functioning urban environment but clarity is to be received on the provision for esplanade reserves.

- **Will the project deliver significant economic benefits?**
  This is outside the scope of Parks and Community Facilities, and we defer to the other technical specialists and planners in this regard.

- **Will the project support primary industries (e.g., aquaculture)?**
  This is outside the scope of Parks and Community Facilities, and we defer to the other technical specialists and planners in this regard.

- **Will the project support development of natural resources (e.g., minerals, petroleum)?** This is outside the scope of Parks and Community Facilities, and we defer to the other technical specialists and planners in this regard.

- **Will the project support climate change mitigation (e.g., reduce/remove greenhouse gas emissions)?**
  This matter is generally outside the scope of Parks and Community Facilities, and we defer to technical specialists and planners regarding the proposal's contribution to climate change mitigation. However, Parks notes that the proposal incorporates wetlands, vegetated open space corridors and landscape buffer areas that may provide ancillary environmental benefits. The extent to which these features contribute to climate change mitigation is best assessed by the relevant technical specialists.

- **Will the project support climate change adaptation or recovery from natural hazard events?**
  This is outside the scope of Parks and Community Facilities, and we defer to the other technical specialists and planners in this regard.

- **Will the project address significant environmental issues?**
  This is outside the scope of Parks and Community Facilities, and we defer to the other technical specialists and planners in this regard.

- **Is the project consistent with local or regional planning documents (e.g., spatial strategies)?**
  From a Parks and Community Facilities perspective, the proposal's open space outcomes are generally consistent with relevant local and regional open space strategies. The proposed neighbourhood parks, pedestrian connections and wider open space network align with Parks' expectations for a development of this scale. However, the proposal does not adequately address matters for esplanade reserves as required by the AUP and s230 of the RMA.

- **Are there any other relevant matters to consider?**
  See comments below.

- **Is the application clearly inconsistent with the Auckland Unitary Plan and/or not aligned with the outcomes in the Auckland Plan 2050?**

Outcome: Transport and access, 'Direction 2' of the Auckland Plan 2050 notes the outcome to improve connectivity through all modes of transport to enable people access to amenities and encourage ease on emission-heavy journeys.

Outcome: Homes and Places, 'Direction 4' of the Auckland Plan 2050 is directly relevant to the project and seeks to provide inclusive and accessible public open spaces in urban areas to "*support multiple uses, be able to adapt and change in the future, play dual roles in recreation and action on climate change, reflect who we are as communities, Aucklanders and New Zealanders*".

Summary:

There does not appear to be any obvious inconsistencies with the Auckland Plan 2050 or the Auckland Unitary Plan as it relates to the provision of parks and open spaces except that the provision of esplanade reserves would need to be addressed to determine the overall outcome.

We defer to the other technical specialists and planners to comment further on this matter.

- **Is the application out of sequence with the Auckland Plan Development Strategy and Future Urban Land Supply Strategy?**
  We understand this area to be outside of the Future Development Strategy scope since it is located outside of the Rural Urban Boundary and therefore could be considered to be 'out of sequence'. Parks and open space matters have, however, been considered regardless of sitting outside the Manaaki Tāmaki Makaurau Open Space, Sport and Recreation Strategy generally address matters for provision of open spaces that would align with that of new residential developments.

  We, however, defer to the other technical specialists and planners to further comment on this matter.

- **Is there insufficient infrastructure to support the application, or would the project result in significant impacts on Auckland Council, CCO, or third-party infrastructure, including the need for substantial investment or upgrades?**
  The application is silent on ownership structures of the various open spaces and may have substantial impact on Parks and Community Facilities if ownership and maintenance responsibilities are assumed.

- **Is there the potential for significant adverse environmental effects to occur?**
  Based on the limited information provided, it does not appear that there would be significant adverse environmental impacts as it relates to parks and open spaces.

Please note that the above is initial advice only and is based on the limited plans and information presented at this referral stage. The above is not a final specialist memo and is not a written approval of the scheme. If you have queries relating to this document, please contact me via s 9(2)(a)

Prepared by:



Roja Tafaroji
Senior Parks Planner - Parks Planning
Parks and Community Facilities
Date: 18 July 2026

Agency lead / Manager release:



Hester Gerber
Manager Parks Planning - Parks Planning
Parks and Community Facilities
Date: 20/07/2027

Your written comments on a project under the Fast-track Approvals Act 2024

Project name	Whangapouri Road

Before the due date, for assistance on how to respond or about this template or with using the portal, please email contact@fasttrack.govt.nz or phone 0800 FASTRK (0800 327 875).

All sections of this form with an asterisk (*) must be completed.

1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
Organisation name	Director-General of Conservation Statutory delegations are in place for the Department of Conservation (DOC / the Department) to provide commentary on behalf of the D-G.		
***First name**	Bridgette		
***Last name**	Munro		
Postal address			
***Contact phone number**	s 9(2)(a)	**Alternative**	
***Email**	Fast-track@doc.govt.nz;		

2. Please provide your comments on this application
Comments follow overleaf.

Note: All comments will be made available to the public and the applicant when the Ministry for the Environment proactively releases advice provided to the Minister for the Environment.

Manager's signoff



Linda Kirk 28 July 2026

Fast Track Applications Manager

Director-General of Conservation s17 comments

Project name	Whangapouri Road
Applicant name	132 Whangapouri Drury Limited
Application number	FTAA-2606-1247
Project summary details	The Project is for a residential development of approximately 99.58 hectares on the northern side of SH22, near the intersection with Whangapouri Road and Bycroft Road, west of Drury in the Auckland Region. The Project consists of three main components being: • Residential development – with a total of approximately 1,050 to 1,150 dwellings made up of approximately 850 – 950 dwellings on lots between 300 – 500m^2, with a smaller proportion of higher density and larger lots (final yield and mix subject to change through detailed design), and approximately 200 retirement village dwellings set within a total 11.9 hectare retirement village; • A local centre in the northern portion of the development that provides opportunities for mixed use and employment activities, including approximately 0.7 hectares of commercial floorspace; and • Associated infrastructure – including transport, water, wastewater, stormwater, energy, and supporting civil works required to service and enable the development. The Project will require the following approvals: • Resource consents under the Resource Management Act 1991 (the 'RMA'); • Permits under the Wildlife Act 1953 for the relocation of skinks within the site; and • Possibly – approval or dispensation under regulations 42 and 43 of the Freshwater Fisheries Regulations 1983 in respect of a potential complex freshwater fisheries activity (this has not been confirmed and is subject to further detailed assessment). The Project Site is not located on Public Conservation land ('PCL').

1 Overview of comments

1.1 Applicant Engagement

1.1.1 As the Project includes an approval under a specified Act for which the Director-General of Conservation is the administering agency, the Applicant was required to notify the Department of Conservation ('DOC') and allow 20 working days to respond before lodging the referral application in accordance with section 11 of the Fast Track Approvals Act (the 'FTAA' or the 'Act').

1.1.2 In relation to this application, DOC has had the following engagement with the Applicant:

1.1.2.1 The Applicant first contacted DOC on the 21st of April 2026;

1.1.2.2 DOC responded to the Applicant on the 24th of April 2006, regarding pre-lodgement engagement. The Applicant subsequently completed and provided a pre-lodgement notification form on the 28th of April, together with an aerial plan and preliminary masterplan update.

1.1.3 DOC provided a pre-lodgement consultation summary to the Applicant on the 18th of May 2026, this document is included as a part of the Applicant's consultation record lodged with the referral application.

1.1.4 The referral application was lodged on or around the 11th of June 2026 (in accordance with the date on the referral application cover letter and application form).

1.2 Conservation Approvals

1.2.1 The referral application states that the Project will require approval under the Wildlife Act 1953 for the relocation of skinks within the Site, in case the number of skinks that require relocation is greater than 20.

1.2.2 The referral application also states that the Project may require approval or dispensation under regulations 42 and 43 of the Freshwater Fisheries Regulations 1983 in respect of potential complex freshwater fisheries activities (however, it is noted that this has not been confirmed and is subject to further detailed assessment).

1.3 Conclusion

1.3.1 In conclusion, DOC is not aware of any reason the Project should not be referred.

2 Criteria for Minister's decision on referral application

2.1.1 Sections 21 and 22 of the FTAA set out matters to be considered by the Minister in determining whether a referral application should be accepted.

2.1.2 DOC notes that other agencies are better placed to comment on most matters, including those in section 22. Comments below are targeted to provisions where DOC has specific interests or information relevant to the Minister's decision.

2.2 Criteria for declining a referral application

2.2.1 Section 21 sets out the criteria for the Minister for declining a referral application. DOC has considered these criteria and provides comments in the table below.

Section	Criteria	Comments
21(3)(b)	Does the project involve an ineligible activity	Based on the information available, DOC has considered the ineligibility criteria at sections 5(1)(h), (i), (j) and (k), and has not identified any aspect of the Project that would be ineligible based on those criteria.
21(3)(c)	Is there adequate information to inform a decision	With respect to the approvals identified in the referral application for which DOC is the administering agency, DOC considers the information **adequate** in terms of a referral decision. DOC notes however, that there are records of Threatened (inanga) and At Risk species (longfin eel, banded kokopu, giant bully) being present at, and in the vicinity of the Site. Natural wetlands are also present on the Site. Given its location, there is also the potential for inanga spawning sites to be present. With regard to terrestrial species, wetland birds including Nationally Critical species (bittern) are likely to be present within the vicinity of the Site. At Risk – Declining species such as copper skinks and ornate skinks may also be present. In addition, long tailed bats Threatened – Nationally Critical species such as long-tailed bats may use the Site as a feeding area. Comprehensive surveys and detail on the ecological values that are present, how impacts will be managed, how wetland loss will be avoided or offset, and any other offsetting or compensation requirements will need to be addressed as part of the potential substantive application.
21(4)	Are there any other reasons to decline the application?	Based on the information available, DOC has not identified any reason why the Project should be declined.

Section	Criteria	Comments
21(5)(a)	Is the project inconsistent with: • a Treaty settlement; • Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019; • Marine and Coastal Area (Takutai Moana) Act 2011.	Based on the information available, DOC has not identified any inconsistency with any relevant Treaty settlement or other obligations. Relevant Treaty Settlement Acts are: • Nga Mana Whenua o Tamaki Makaurau Collective Redress Act 2014; • Ngāi Tai ki Tāmaki Claims Settlement Act 2018; • Ngāti Tamaoho Claims Settlement Act 2018. The Project site sits within the Oira Creek and its tributaries Statutory Acknowledgement Area. **Treaty settlements under negotiation** It is noted that there are Treaty settlements under negotiation including: • Ngāti Maru (Hauraki); • Ngāti Tamaterā; • Te Ākitai Waiohua; and • Waikato Tainui – Remaining Claims It is not yet clear what impact these Treaty settlements may have, however, the indicated area of interest includes the Project site.
21(5)(b)	Would it be more appropriate to deal with the proposed approvals under another Act(s)	Based on the information available, DOC has not identified any reason why the Project should not be dealt with under the FTAA.
21(5)(c)	Would the project have significant adverse effects on the environment	Based on the information available, DOC considers it is likely that adverse effects of the Project can be addressed through appropriate conditions on any substantive approvals.
21(5)(d)	Does the applicant(s) have a poor compliance history under a specified Act	DOC has not identified any issues with the Applicant's compliance history.
21(5)(g)	Would a substantive application have any competing applications	Based on the information available, DOC has not identified any competing applications in respect of conservation approvals.

2.1 Criteria for accepting a referral application

2.1.1 Section 22 sets out the criteria for the Minister for accepting a referral application.

2.1.2 DOC has considered these criteria and has provided comments in the table below.

Section	Criteria	Comments
22(1)(b)(i)	Would referring the project to the fast-track process facilitate the project, including in a way that is more timely and cost-effective than under normal processes?	Wildlife Act and Complex Fisheries Activity approvals would generally take approximately three-four months to process, which is not significantly longer than the FTAA process is expected to take. However, there may be benefits for the Applicant in terms of consideration being combined with RMA approvals (rather than being advanced by a separate process) given the different decision-making framework under the FTAA.
22(2)(a)(ix)	Will this project address significant environmental issues?	No.
22(2)(a)(x)	Is the project consistent with local or regional planning document, including spatial strategies?	The following DOC Statutory Planning Documents are relevant to the Project: • Conservation General Policy 2005 ('CGP'); • Auckland Conservation Management Strategy 2014. The referral application is not inconsistent with the relevant statutory planning provisions. However, consideration needs to be given to: • Conserving any threatened and at-risk species to ensure their persistence. • Protecting and restoring relevant indigenous ecosystems. • Protecting freshwater fish habitat and fish passage.

22(b)	Any other matters the Minister may consider as relevant?	Together with a Wildlife Act approval, the referral application notes that the Project may require approval or dispensation under regulations 42 and 43 of the Freshwater Fisheries Regulations 1983 in respect of potential complex freshwater fisheries activities however, this is subject to further detailed assessment. In addition, the referral application records that resource consents will likely be required for a range of reasons under the National Environmental Standards: Freshwater ('NES-F'), and that the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 ('NES-CS') provisions will apply to future development at the locations where HAIL activities are likely to have occurred. A comprehensive assessment to confirm the relevant approvals that will be required and potential effects resulting from the Project, will need to be provided within the potential substantive application to address this.

3 Matters for the Minister to specify (s27)

3.1.1 None identified.



Linda Kirk
Fast Track Applications Manager

Acting pursuant to delegated authority on behalf of the Director-General of Conservation.

Date: 28 July 2026

Note: A copy of the Instrument of Delegation may be inspected at the Director-General's office at Conservation House Whare Kaupapa Atawhai, 18/32 Manners Street, Wellington 6011

Invitation to provide written comments on a project under the Fast Track Approvals Act 2024

You have been invited to provide written comments to the Minister for Infrastructure (the Minister) on an application to refer a project under the Fast-track Approvals Act 2024 (the Act) to the fast-track process.

Please upload comments directly via the portal by completing this template.

Before the due date, for assistance on how to respond or about this template or with using the portal, please email contact@fasttrack.govt.nz or phone 0800 FASTRK (0800 327 875).

Written comments must be received by MfE, on behalf of the Minister for Infrastructure, no later than the due date.

Important information

Your personal information will be held by MfE and be used in relation to the project application and process. You have the right to access and correct personal information held by MfE.

A copy of your comments, including all personal information, will be provided to the Minister and the applicant.

If you are a corporate entity making comments on this application, your full contact details will be publicly available.

For individuals, your name will be publicly available, but your contact details (phone number, address, and email) will not be publicly available.

A copy of your comments will also be published on the Fast-track website. If you believe any of the information you have provided is confidential or sensitive and should be withheld from publication, please highlight the information concerned and provide an explanation to support your request for withholding it. Your comment and explanation will be decided by the Ministry on whether to withhold the information from publication.

Please do not use copyright material without the permission of the copyright holder.

All information held by MfE is subject to the Official Information Act 1982.

More information on the fast-track approvals process and providing comments can be found at Process overview | Fast-track website

Your written comments on a project under the Fast Track Approvals Act 2024

Project name	Whangapouri Road

Before the due date, for assistance on how to respond or about this template or with using the portal, please email contact@fasttrack.govt.nz or phone 0800 FASTRK (0800 327 875).

All sections of this form with an asterisk (*) must be completed.

1. Contact Details

Please ensure that you have authority to comment on the application on behalf of those named on this form.

Organisation name (if relevant)	NZ Transport Agency		
***First name**	Nicola		
***Last name**	Foran		
Postal address			
***Contact phone number**	s 9(2)(a)	**Alternative**	
***Email**	environmentalplanning@nzta.govt.nz		

2. Please provide your comments on this application

NZTA thanks the Minister for the opportunity to comment on the referral of this application into the fast track approvals process.

NZTA has had pre-application engagement with the applicant regarding this project via the applicant's planning consultants – Barkers & Associates. An online meeting was held with NZTA and the applicants team on 19 May 2026. NZTA provided preliminary feedback on the proposed access points off the state highway. The overarching feedback was that State Highway 22 (SH22) is already experiencing congestion and has been assessed as at capacity for the infrastructure currently in place and that any additional access points (and development) would further exacerbate this issue. This feedback was sent in writing to the applicant's team on 15 June 2026 via email to Rebecca Sanders (Barkers & Associates).

As per the matters set out on the invitation to comment, NZTA provides the following commentary:

1. Proposed Access Arrangement

The site frontage with the state highway does not have an appropriate location for a new vehicle access due to the crest, horizontal curvature, constrained visibility, heavy vehicle environment, high-speed corridor context, and insufficient spacing from nearby intersections. As such, if development was to proceed, NZTA would expect that any development of this scale would be utilising existing access points or local roads to the state highway.

The key existing access in proximity to the site is the intersection of Whangapouri Road and SH22. The applicant's team raised constraints regarding upgrading the existing intersection due to the need to purchase private property.

Insert Fast-track logo

NZTA made it clear in the meeting held on 19 May that NZTA would not support any additional access points off SH22 and consider that a development of this scale should not proceed without appropriate and safe transport infrastructure in place. As it is unlikely the appropriate transport connection can not be constructed on to the state highway, the applicant should consider connections to other local roads or reconsider the proposed location of the development.

Section 5 of the Transport Memo prepared by Hughes Traffic & Transportation Limited (dated 8 June 2026) has reduced NZTA's concerns of a new access to a "broader desire to minimise the proliferation of intersections along SH22 and consolidate access wherever practicable." This does not address NZTA's concerns that the site frontage has undesireable geometrics along SH22 or the limited capacity of SH22 in general in its current form.

These concerns are coupled with and excacerbated by the fact that Auckland Council's Future Development Strategy (FDS) has not identified this area as being urbanised in the future. It is just to the west of an area identified as being urbanised in 2035+ (Drury West). As such, the proposed development and dwelling numbers are unlikely to have been assessed through the future development strategy growth projections, spatial plans or transport planning. Consequently, these figures have not been factored into any prior or current planning work to established future transport upgrades needed.

2. NZTA Project/ SH22 Improvement works

NZTA has no planned projects or upgrades on the SH22 corridor adjacent to 132 Whangapouri Road. NZTA has a project in the vicinity to four-lane SH22 between Drury and Jesmond Road. That project is currently undergoing the funding application process.

3. General Comments

This section of SH22 is designated under the Auckland Unitary Plan reference 6705 with NZTA as the requiring authority. The purpose is "land for road widening - 5m where indicated on Map 100, to a minimum width of 30m of road reserve".

This section of SH22 is also gazetted as a "Limited Access Road" and as such, any new or altered vehicle access to the subject site directly from SH22 would require NZTA approval under Section 91 of the Government Roading Powers Act 1989. The subject site currently has no authorised or allocated vehicle crossings from the state highway given access via Whangapouri Road is provided for. NZTA are not required to provide approval for a vehicle access off SH22 in this location where a site has practicable alternative access.

4. Information Requirements

If this application is accepted for processing through the FTAA, NZTA would require that a robust intergated transport assessment (ITA) is provided for as part of the substantive application. The ITA would need to provide modelling, appropriate transport infrastructure and funding/delivery mechanisms to address the exacerbation of capacity constraints this development will generate on SH22.

NZTA has explicitly expressed that a new vehicle access directly off SH22 for this site would not be supported, if the applicant proceeds with progressing this option, NZTA stresses that unless evidence can be provided that effects would be less than minor on the state highway network, this vehicle access will not be supported.

NZTA is not opposed to the application being referred into the fast track approvals process, however NZTA would want to ensure that the effects of the proposal on the state highway network are appropriately mitigated if the project is able to go ahead. NZTA would welcome the opportunity to provide comments on any substantive application in due course.

Note: All comments will be made available to the public and the applicant when the Ministry for the Environment proactively releases advice provided to the Minister for the Environment.

Managers signoff



Nicola Foran

Date 23 July 2026