07 858 0430 | 0800 TAINUI
reception@tainui.com
waikatotainui.com

23 July 2026

Environmental Protection Authority
Private Bag 63002
Wellington 6140
NEW ZEALAND

Teenaa koe

WHANGAPOURI– REFERRAL APPLICATION

1. These comments are provided on behalf of Te Whakakitenga o Waikato Incorporated (Waikato-Tainui).

2. Te Whakakitenga o Waikato Incorporated is the governing body for the 33 hapuu and 68 marae of Waikato and manages the tribal assets for the benefit of over 100,000 registered tribal members. It is also:

    a) the trustee of the Waikato Raupatu Lands Trust, the post-settlement governance entity for Waikato-Tainui for the purposes of the Waikato Raupatu Lands Deed of Settlement 1995 and the Waikato Raupatu Claims Settlement Act 1995;

    b) the trustee of the Waikato Raupatu River Trust, the post-settlement governance entity for Waikato-Tainui for the purposes of the Waikato-Tainui River Deed of Settlement 2009 and the Waikato Raupatu Claims (Waikato River) Settlement Act 2010 (River Settlement);

    c) the mandated iwi organisation for Waikato-Tainui for the purposes of the Maaori Fisheries Act 2002; and

    d) the iwi aquaculture organisation for Waikato-Tainui for the purposes of the Maaori Commercial Aquaculture Claims Settlement Act 2004.

3. Waikato-Tainui has outstanding and unresolved Treaty of Waitangi claims, including those specific to the Manukau Harbour. These claims form part of the broader Wai 30 claim, encompassing land, coastal and marine areas, and associated social, cultural, and economic interests. While settlement redress is not yet finalised, these claims underpin Waikato-Tainui's recognised interests in the Auckland Region's coastal waters, harbours, waterways, and their connected catchments, alongside the interests of other iwi and hapuu with customary rights and Treaty interests in the region.

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4. Waikato-Tainui welcomes the opportunity to provide comment on the Whangapouri Road Fast Track referral application.

WAIKATO-TAINUI COMMENTS

5. Waikato-Tainui understands that the proposal comprises a large-scale mixed-use development incorporating residential housing, a retirement village, and supporting commercial and community facilities. The applicant describes the proposal as providing additional housing supply and economic benefits and as being generally consistent with the strategic planning direction for the area.

6. The proposal sits within the wider southern Auckland growth context, including the Auckland Regional Policy Statement, Auckland Future Development Strategy 2023–2053, and the Southern Rural Strategy 2025–2055. The site is not identified as a future urban growth area under the current strategic framework but adjoins areas planned for significant urban development, including Drury West, Oopaheke, and Runciman. The proposal therefore represents a potential extension of the anticipated urban growth pattern and requires consideration of how it integrates with wider strategic outcomes.

7. Given the scale and location of the proposed development, any substantive application should clearly demonstrate how cumulative effects associated with urban expansion have been assessed and addressed, including infrastructure provision, transport integration, freshwater outcomes, biodiversity, and landscape change. Mana whenua values and input should continue to inform the assessment and design of the proposal, particularly in relation to waterways, ecological restoration opportunities, and the protection of areas of cultural importance.

8. The Applicant acknowledges that the proposal does not strictly meet the criteria in clause 3.10 of the National Policy Statement for Highly Productive Land 2022 (NPS-HPL). Notwithstanding this, the Applicant contends that the site is appropriate for urban development based on its location, surrounding growth context, housing demand, and anticipated social and economic benefits. In support of this position, the Applicant relies on technical assessments addressing land capability, housing supply and economic benefits, including consideration of housing demand within the Franklin Local Board area and changes to anticipated residential capacity within the surrounding area.

9. The extent to which the NPS-HPL applies to the site, including whether the Mixed Rural Zone is an equivalent zone for its purposes, the proposal's consistency with the relevant policy framework, the significance of any loss of productive land, and the balance between housing, social and economic benefits and the long-term effects of converting productive rural land, will require consideration if advanced to the substantive phase. The Applicant's reference to achieving the "highest and best use" of the land represents an economic consideration that should be weighed alongside the broader planning assessment, including the long-term value and function of rural land.

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10. The Applicant proposes an on-site three waters servicing strategy comprising private stormwater management infrastructure, a private wastewater system, and a mix of groundwater and rainwater-based water supply. The Applicant relies on supporting technical assessments addressing the feasibility of the proposed servicing approach and its ability to support the development. Key matters requiring careful consideration include potential effects on freshwater and coastal receiving environments, the sustainability and resilience of the proposed water supply arrangements, the management of groundwater abstraction (including cumulative effects and availability within the wider catchment), and the long-term operation, maintenance, monitoring, and governance of private wastewater and stormwater infrastructure.

11. The scale of the proposed development raises questions as to whether sufficient land is available to accommodate an appropriately sized on-site wastewater disposal field. This should be carefully assessed, as any constraints on land-based disposal may have implications for the proposed wastewater management approach and the nature of any resulting environmental effects.

12. The application references the relevant Treaty settlement legislation and associated statutory acknowledgements, and indicates ongoing engagement with relevant iwi and hapuu, including Ngati Tamaoho and Ngai Tai ki Taamaki, across a range of matters. The application also proposes the continued development of cultural impact assessments, together with other environmental and technical assessments informed by engagement where appropriate. While that engagement is noted, further detail will be required regarding the scope and outcomes of engagement, including how issues raised by iwi and hapuu have informed the proposal, project design, management plans and proposed conditions.

13. The matters raised in these comments are not intended to be exhaustive. Given the preliminary nature of the referral stage and the information currently available, Waikato-Tainui may raise additional matters and provide further comments should the proposal progress beyond the referral stage and further information become available.

OVERALL POSITION

14. Waikato-Tainui does not take a final position on the proposal at referral stage. However, the matters identified above are considered to be of significance to Waikato-Tainui and will require further detailed assessment should the project be advanced to the substantive phase.

15. In particular, further consideration would be required in relation to:

    - effects on freshwater and marine systems;
    - loss of highly productive land and cumulative land use change;
    - cultural and archaeological values within the project area; and
    - alignment of the project with Tai Tumu, Tai Pari, Tai Ao (Waikato-Tainui Environmental Plan).

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16. Waikato-Tainui reserves its position pending further information, including completion of cultural impact assessments, ongoing engagement with mana whenua, and appropriate resourcing by the Applicant to support continued involvement.

17. The referral application provides a sufficient high-level understanding of the proposal and its potential interface with Waikato-Tainui interests. However, significant matters remain to be addressed at substantive stage to enable a full assessment of effects and mitigation outcomes.

18. Waikato-Tainui looks forward to continued engagement as the proposal progresses through the Fast-track Approvals process.

Naaku i roto i ngaa mihi, naa

T Mapu

Te Maakariini Mapu
ENVIRONMENTAL PLANNER
WAIKATO-TAINUI