Barker & Associates
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31 August 2026

Ministry for the Environment
Attn: Listed Projects Team
Via email: listedprojects@mfe.govt.nz

To Whom It May Concern,

**Response to the request for further information on application for referral of the Whangapouri Road project under the Fast-track Approvals Act 2024**

We refer to the request for further information on application for referral of the Waiheke Onsen project under Section 20 the Fast-track Approvals Act 2024, dated 21 August 2026.

The information request is set out below:

*Please demonstrate the extent to which the project's anticipated housing and economic benefits would be affected if the proposed State Highway 22 upgrade does not proceed.*

*In particular, please quantify, to the extent practicable if the proposed State Highway 22 upgrade, including the planned four-laning and associated intersection improvements, does not proceed:*

> *a. the likely reduction in the number of dwellings and retirement living units that would be delivered; and*
>
> *b. to quantify any changes to the economic benefits attributable to the project.*

Please find attached:

- Transportation Addendum **dated 28 August 2026**
- Economics Memorandum **dated 28 August 2026**

Please note that the Transportation Memorandum confirms that the project is not dependent on the State Highway 22 project proceeding before development can occur. Therefore, the housing yield and the economic benefits set out in the original Economic Assessment are unchanged. This is confirmed in the Economic Memorandum.

We trust that this further information addresses the further information request. Please do not hesitate to contact us should additional clarification be required.

Yours sincerely | Nā māua noa, nā

Barker & Associates Limited






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28 August 2026
Ref: 25046

**Prepared for:** Whangapouri Drury Limited
**Prepared by:** Hughes Traffic & Transportation

**Subject:** **Whangapouri Road Fast Track Referral**
**Response to RFI #2 dated 21 August 2026**

**Issued via:** **rebeccas@barker.co.nz**

# Background

Hughes Traffic & Transportation has been engaged by 132 Whangapouri Drury Limited to provide further transportation information in response to the Request for Further Information issued by the Environmental Protection Authority ("**EPA**"), on behalf of the Minister for Infrastructure, dated 21 August 2026.

The further request seeks clarification of the extent to which the housing and economic benefits of the Whangapouri Road project would be affected if the proposed NZTA State Highway 22 ("**SH22**") upgrade (the four-laning of SH22 between Jesmond Road and SH1, including intersection improvements and active mode connections) does not proceed. In particular, the EPA has requested the following information:

> *"Please demonstrate the extent to which the project's anticipated housing and economic benefits would be affected if the proposed State Highway 22 upgrade does not proceed. In particular, please quantify, to the extent practicable if the proposed State Highway 22 upgrade, including the planned four-laning and associated intersection improvements, does not proceed:*
>
> > *a. the likely reduction in the number of dwellings and retirement living units that would be delivered; and*
> >
> > *b. to quantify any changes to the economic benefits attributable to the project."*

The matters raised would ordinarily be examined through the detailed transport modelling and Integrated Transport Assessment prepared at substantive Fast Track approval stage. Nevertheless, a high-level quantitative assessment has been undertaken to provide additional context regarding the scale of development traffic, its relationship with existing SH22 traffic volumes, and the likely transport infrastructure constraints relevant to development staging.

For clarity, the previous RFI response did not identify completion of the full SH22 Drury Upgrade as a prerequisite or specific trigger for later stages of the development. Rather, it identified that the extent and timing of development would be informed by detailed transport modelling, with appropriate infrastructure triggers or targeted improvements established if required. The assessment below has therefore been undertaken to consider whether there is presently any transport basis for concluding that the full SH22 Upgrade is necessary to achieve the ultimate development yield.

By way of summary, the initial assessment does not indicate that delivery of the full SH22 Upgrade is necessarily a prerequisite to the development proceeding to its ultimate scale.

## High Level Traffic Assessment

A high-level traffic assessment has been undertaken to consider whether the proposed development would itself necessitate the planned four-laning of SH22.

The assessment applies conservative peak-hour residential traffic generation assumptions to the proposed development and makes appropriate allowance for internal trips associated with the mixed-use nature of the proposal. A conservative proportion of external development traffic has then been assigned to SH22 east of the site, notwithstanding the availability of alternative routes toward Paerata, Pukekohe and Papakura and the additional route choice that will ultimately be provided through the Waipupuke Precinct and wider Drury West network.

The resulting development traffic has been considered against recent observed traffic volumes on SH22. At this high-level screening stage, the combined **traffic demands do not indicate that four-laning of the mid-block SH22 corridor would be required** specifically to accommodate the Whangapouri development. Rather, any capacity constraints are more likely to arise at particular intersections, and will require detailed assessment through the substantive-stage network modelling.

This screening assessment should not be interpreted as a detailed forecast of future traffic volumes. Actual future traffic demands will respond to network conditions through changes in route choice, departure time, travel mode and trip-making behaviour. These dynamic effects, together with future land-use changes and transport infrastructure, will be appropriately assessed through the substantive-stage modelling.

The screening assessment does not identify a technical basis for establishing a specific pre-upgrade dwelling threshold at referral stage. Establishing such a threshold would require detailed intersection and network modelling and would risk attributing a level of precision to this high-level assessment that it is not intended to provide.

## Auckland Motorway Strategic Plan

The strategic importance of the SH22 Drury Upgrade is also reinforced by the recently (August 2026) published Auckland Motorway Strategic Plan ("**AMSP**"), which identifies the project as a **short-term intervention** covering the approximately 2km section of SH22 between Jesmond Road and Mercer Street (to the east of which is already four-laned).

The AMSP identifies the purpose of the project as providing access to the new Ngākōroa Railway Station and improving access to new housing developments within the Drury West area. The identified next step is to "continue progressing implementation", with no dependencies or triggers identified for the project.

This is important context when considering the EPA's request. While construction funding for the complete SH22 Drury Upgrade has not yet been confirmed, the upgrade is an established component of the strategic transport response for the wider Drury growth area and is not an intervention initiated solely in response to the Whangapouri proposal. The substantive transport assessment will therefore appropriately consider both the interim network and the planned upgraded network.

Nevertheless, the high-level assessment above does not identify any basis for concluding that the Whangapouri development depends upon completion of the SH22 four-laning project. The particular constraints attributable to the development, and the infrastructure necessary to address those constraints, will be established through detailed modelling at substantive approval stage.

## SH22 / Jesmond Road Intersection

Of particular relevance is the recently completed interim signalisation of the SH22 / Jesmond Road / Ngākōroa Railway Station access intersection.

The interim arrangement provides the necessary access to the new railway station but retains a single eastbound through lane on SH22. The full NZTA SH22 Drury Upgrade would ultimately provide additional through capacity as part of the four-laning of SH22 between Jesmond Road and the Drury Interchange.

Accordingly, the interim Jesmond Road intersection is expected to be an important focus of the substantive transport modelling. If the modelling identifies the single eastbound through lane as the controlling network constraint, it may be possible to provide targeted additional capacity at that intersection without requiring completion of the entire SH22 Drury Upgrade as a prerequisite to the Whangapouri development.

The substantive application will include network modelling undertaken in coordination with NZTA, Auckland Transport and the Auckland Forecasting Centre ("**AFC**"). That work will test the interim and ultimate network, identify the actual controlling constraints, and establish any appropriate development staging thresholds or infrastructure triggers.

## Implications if the Full SH22 Upgrade Does Not Proceed

Based on the high-level screening assessment above, there is currently **no** transport evidence demonstrating that non-delivery of the full NZTA SH22 Drury Upgrade would require a permanent reduction in the proposed ultimate Whangapouri development yield.

Accordingly, in direct response to item (a) of the EPA request, for referral-stage purposes the anticipated permanent reduction in the approximately 912 residential dwellings and 200 retirement village units i**s considered to be zero,** based on the information presently available. Detailed substantive-stage modelling will determine whether particular stages require targeted infrastructure improvements or timing triggers before occupation.

The assessment also indicates that the full four-laning of the approximately 2km SH22 corridor should not be regarded as a relevant development trigger. If the critical constraint is instead identified at a particular intersection – for example the interim SH22 / Jesmond Road intersection – a more targeted upgrade may provide the necessary capacity to support subsequent development stages.

Importantly, the high-level assessment does not identify any transport basis for concluding that earlier stages of the development would create an unacceptable transport outcome in the event that the full SH22 Upgrade was delayed or did not proceed. Any specific network constraint identified through the substantive assessment could instead be considered in terms of the particular infrastructure response required to address that constraint, rather than assuming dependency on completion of the full SH22 Upgrade.

This provides a practical pathway for the project to proceed should the timing of the wider NZTA project change. Detailed modelling can establish the number of dwellings that can be accommodated by the existing and committed network, followed by subsequent development stages linked to targeted infrastructure improvements if necessary.

## Wider Growth Context

The Whangapouri proposal should also be considered in the context of changing land-use assumptions within Drury West.

A substantial residential component previously anticipated within the nearby Fisher & Paykel Healthcare Karaka Road landholding through the Ōpaheke-Drury Structure Plan is proposed to be replaced by employment-generating research and development activity through PC121.

The Whangapouri residential development therefore has the potential to **replace a substantial component of housing that was already anticipated within Council's strategic growth planning for this part of Drury**. No numerical reduction has been made to the Whangapouri traffic generation calculation to account for the removal of that residential activity, meaning the traffic assessment above remains conservative in this respect.

The location of housing at Whangapouri with substantial future employment at Fisher & Paykel Healthcare, Drury West and Drury Centre, together with the Ngākōroa Railway Station and future bus network, also provides strong potential to reduce longer-distance vehicle travel over time.

## Economic Benefits

In direct response to item (b) of the EPA request, the current transport screening assessment does not identify a basis for assuming a permanent reduction in the ultimate project yield if the full NZTA SH22 Drury Upgrade is delayed or does not proceed.

Accordingly, from a transport perspective, no permanent reduction in the economic benefits attributable to the proposed housing and retirement living yield is presently anticipated as a consequence of non-delivery of the full SH22 upgrade.

## Conclusion

As anticipated, the additional screening undertaken in response to the EPA request indicates that the Whangapouri development will result in an increase in peak-hour traffic on SH22. However, the indicative post-development traffic volumes do not demonstrate that the NZTA four-laning project is necessarily required solely to accommodate the development. The SH22 Drury Upgrade is also independently identified as a short-term intervention in the Auckland Motorway Strategic Plan, with

implementation continuing to be progressed as part of the strategic transport response to growth in Drury West.

The likely interim constraints – if any – are expected to occur at key intersections rather than through mid-block SH22 capacity. In particular, the interim SH22 / Jesmond Road / Ngākōroa Railway Station intersection will require detailed assessment, and targeted improvements may provide an appropriate means of supporting later development stages should additional capacity be required.

In direct response to the following matter identified by the EPA:

**a. Likely reduction in dwellings and retirement living units:** On the information presently available, the anticipated permanent reduction is zero. The current assessment does not identify a transport basis for assuming that any of the proposed development activities would need to be permanently removed from the project if the full SH22 upgrade does not proceed.

**Hughes Traffic & Transportation**

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INSIGHT ECONOMICS

# Technical Memo

| | | | |
|---|---|---|---|
| To: | Rebecca Sanders, Barker & Associates | From: | Insight Economics |
| Date: | Monday, 31 August 2026 | Page: | 1 (including this page) |
| Subject: | Whangapouri Road Fast-track Referral – Economic Response to Request for Further Information | | |

**Context**

On 21 August 2026, the Minister for Infrastructure requested further information on the referral application for the Whangapouri Road project (the **project**) under section 20 of the Fast-track Approvals Act 2024. The request asks the applicant to demonstrate the extent to which the project's anticipated housing and economic benefits would be affected if the proposed State Highway 22 (**SH22**) upgrade does not proceed. In particular, it seeks to quantify, to the extent practicable, the likely reduction in the number of dwellings and retirement living units delivered, and any resulting changes to the economic benefits attributable to the project. This memo responds to the request from an economic perspective.

**No Reduction in Economic Benefits to Quantify**

We understand that the project is not dependent on the SH22 upgrade, as set out in the accompanying transport response memo. Because the project is not contingent on the upgrade, we do not anticipate any reduction in the residential yield, which stands at approximately 912 residential lots and 200 retirement village units. It follows that there is no reduction in the project's economic benefits to quantify. The one-time construction impacts, the ongoing impacts of the proposed local centre, and the housing market benefits identified in our assessment all remain applicable.[1]

**Conclusion**

In summary, the project is not dependent on the SH22 upgrade, so there is no reduction in the housing yield or economic benefits if the upgrade does not proceed. Accordingly, there is no reduction in economic benefits to quantify.

I trust this provides all the information that you need for now, but please let me know if you need anything further.

Sincerely,

Fraser Colegrave
Managing Director

[1] Our original assessment was based on the then-anticipated yield of 904 residential lots and 200 retirement village units. The subsequent increase to 912 residential lots means that the housing-related economic impacts reported in that assessment are slightly conservative.