



Memorandum

To: Fast-track Team, Environmental Protection Authority

From: Christine Jones, Acting Chief Executive & Andrew Mead, Head of City Planning & Growth

Date: 28 May 2026

Wairakei South Fast-track Application – TCC response to s 46 consultation

Tauranga City Council (**TCC**) has reviewed the application to assist the Environmental Protection Agency (**EPA**) in determining whether it is complete and within scope under s 46 of the Fast-track Approvals Act 2024 (**FTAA**), having regard to the information requirements in s 43.

TCC is not the primary consenting authority for the project area and has therefore not undertaken a detailed review of the entire application. Rather, because a small part of the application site falls within TCC's district, TCC has focused its review on cross-boundary issues and other issues of ongoing relevance to TCC. That includes a particular focus on whether sufficient information is provided to enable a proper assessment of infrastructure servicing and associated effects.

While the matters raised in this memorandum are detailed, TCC considers that it is preferable to deal with these matters earlier in the process rather than later and therefore seeks that the EPA exercise its powers to request further information from the applicant under s 46(2A) of the FTAA.

The information sought relates to the description of the proposed activity and other activities that are part of the proposal (under clause 5 of Schedule 5 of the FTAA) and the proposal's effects (under clauses 6 and 7 of Schedule 5 of the FTAA).

TCC intends to separately write to the EPA to set out a range of key issues and contextual information for your benefit and for the Expert Panel to be appointed.

Water supply

Relevant part of application

The application proposes that the development be serviced via connection to a water supply transmission main from the Waiari Water Treatment Plant into Tauranga City, at a point near the development site. The application includes correspondence in Appendix N and W from the Western Bay of Plenty District Council (**WBOPDC**) which supports this approach to water supply.

Issues

- While the Waiari water scheme (being the intake, treatment infrastructure, reservoirs and trunk reticulation) is located in the Western Bay of Plenty District, it is owned, funded and operated by TCC
- Therefore, as the asset owner, TCC determines whether connections can be made
- The application relies on connection to water supply infrastructure owned and operated by TCC without demonstrating that this connection is available

- Even if approval to connect is obtained from TCC, a direct connection to the transmission main would not be appropriate for operational reasons. More appropriately, through construction of the Waiari water scheme, an off-take point was provided on No. 1 Road outside of Te Puke (around 7km away from the development site) that would enable WBOPDC to access a share of the consented water take for the Wairakei South proposal if agreement is reached with TCC. An alternative connection point closer to the development site (but not on the transmission main as proposed) is a further possibility subject to more detailed assessment.
- The application states that internal reticulation will be designed to the WBOPDC standards, however, if the development were to connect directly to the Waiari scheme that would be conditional on internal reticulation being designed to TCC's Infrastructure Development Code.
- In Appendix N of the application, WBOPDC refers to investigations around connection to a separate bore supply being undertaken but the results of this are not reported and this option is not included in the application itself.

Information sought

To meet s 43 requirements, the application should include:

- Confirmation of a feasible and available water supply servicing option including necessary approvals from the asset owner; or
- Identification and assessment of alternative servicing scenarios if the proposed connection to TCC's Waiari scheme is not available; and
- If a connection to TCC's Waiari scheme is to remain as part of the proposal the application should:
 - Be based on WBOPDC's identified off-take point on No. 1 Road (unless an alternative location is specifically agreed by TCC):
 - Identify trunk mains, reservoir and other upgrades required and how this would impact the development
 - Demonstrate that the development's internal reticulation will be designed to TCC's Infrastructure Development Code.

Transport

Relevant part of application

The application includes an Integrated Transport Assessment and appendices.

Issues

- The application relies on access to the existing transport network, including Bell Road, the Papamoa East Interchange (**PEI**) the Tauranga Eastern Link and Sands Ave (being a mix of WBOPDC, NZTA and TCC owned assets)
- The application does not provide information to demonstrate that there is approval from the asset owners to access the respective networks
- The reliance placed on the PEI and TCC's transport network would drive the need for a number of additional unplanned transport interventions affecting planned growth in the TCC District



- Some of these interventions would require major investments in the realm of \$10m-\$20m
- Neither the developer nor WBOPDC has taken responsibility for the funding and delivery of the additional upgrades
- No alternative access or network servicing scenario is assessed if access to the PEI is not available
- The relationship between transport modelling outputs and the identification of proposed intersection and network interventions is not clearly explained
- There is insufficient clarity on key intersection operations, including the Sands Avenue / Te Okuroa Drive intersection.
- There is limited documentation on reconciliation between demand inputs used in network modelling, which introduces uncertainty in the assessment of peak capacity conditions.
- The bridge assessment contained in the application is high-level and limited to geometric considerations and does not include a structural assessment of capacity or feasibility, limiting the ability to determine whether proposed transport infrastructure can be delivered.

Information sought

To meet s 43 requirements, the application should include:

- Confirmation that the proposed transport network and access arrangements are available, with necessary approvals from the asset owners including, in particular, TCC
- Identification and assessment of alternative access scenarios if access to the PEI is not available
- Clear explanation of how transport modelling outputs have informed the identification and design of proposed network and intersection interventions
- Clarification of existing and proposed intersection operations, including the Sands Avenue / Te Okuroa Drive intersection, and how these influence capacity and performance
- Additional information on modelling inputs, assumptions, and reconciliation between modelling datasets to enable understanding of peak capacity performance
- An assessment of bridge capacity and feasibility, including:
 - structural assessment using available design information
 - confirmation that assessment is undertaken by appropriately qualified specialists
 - sufficient detail to demonstrate feasibility of proposed modifications and associated infrastructure (including residual capacity of the bridge barrier system post footpath demolition).



Stormwater and flood management

Relevant part of application

The application includes a Stormwater Management Plan, supporting modelling and various other technical assessments. We understand BOPRC has made substantive comments on the sufficiency of this information. In addition to our following points, TCC supports BOPRC's comments.

Issues

- The application does not provide a complete assessment of stormwater and flooding effects beyond the site boundary, including downstream effects and cross-boundary interactions. In this regard it does not include an assessment of TCC's consented but not yet delivered stormwater discharge from the Wairakei Stream to the Kaituna River located downstream from Wairakei South.
- The application does not provide an assessment of stormwater interactions across the TCC/WBOPDC boundary – including whether discharges from the Wairakei urban growth area into the Bell Road catchment will be able to move through or past the proposed development at their current rate.
- Assessment of system performance is incomplete, including limited consideration of failure scenarios (e.g. pump failure from mechanical breakdown or power cuts) – this is a significant risk for a pumping solution with well documented examples of failure from New Zealand and globally.
- The application does not include an assessment of alternative stormwater management options to demonstrate whether large scale pumping is the only practical solution.

Information sought

To meet s 43 requirements, the application should include:

- An assessment of downstream and cross-boundary effects, including impacts beyond the site and implications on TCC's consented discharge to the Kaituna River from the Wairakei Stream.
- An assessment of any other stormwater interactions across the TCC/WBOPDC boundary – including effects on discharges from the Wairakei urban growth area directly into the Bell Road catchment.
- Assessment of pump and system performance under failure scenarios.
- Evaluation of alternative stormwater management approaches sufficient to demonstrate the chosen approach is appropriate.

Natural hazards

Relevant part of application

The application includes natural hazard assessments and tsunami modelling.

Issues

- Wairakei South is located on a challenging site for urban development with a number of natural hazard risks including flooding, liquefaction, lateral spread and tsunami



- The application does not clearly demonstrate that natural hazard effects have been assessed under future climate change conditions including sea level rise, as required by the National Policy Statement for Natural Hazards and the Bay of Plenty Regional Policy Statement.
- Existing tsunami modelling relied upon does not consider the impact of sea level rise over a 100-yr period as it was undertaken to assist with updated evacuation mapping under present day conditions.

Information sought

To meet s 43 requirements, the application should include:

- Assessment of natural hazard risks (including tsunami) under future climate change scenarios.

Conclusion

TCC considers that, in the areas identified above, the application does not currently provide sufficient information to enable a full assessment of infrastructure servicing and associated effects as required by s 43 of the FTAA.

In particular, the reliance on unconfirmed infrastructure solutions and the absence of assessed alternatives limits the ability to determine whether the application is complete under s 46 of the FTAA.

TCC would be available to engage further to clarify these matters if required.



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