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

Project name	Rangitoopuni Forest FTAA-2605-1244

• **Contact Details**			
Organisation name	Auckland Council		
***First name**	Joe		
***Last name**	Wilson		
Postal address	Private Bag 92300, Victoria Street West, Auckland 1141		
***Contact phone number**	s 9(2)(a)	**Alternative**	
***Email**	s 9(2)(a)		

• Please provide your comments on this application

The following outlines the responses to the invitation for comments received by Auckland Council on 30 June 2026. This response has been provided on behalf of the regulatory function of Auckland Council in its capacity as the relevant local authority, in response to the invitation to comment.

This response has been compiled alongside input from a range of experts from Auckland Council as well as comments from Council Controlled Organisations, and has taken into account the criteria that informs the Minister's decision-making progress on referral applications at Section 22 of the Fast-Track Approvals Act (the Act).

The received supporting expert inputs are appended to this response as follows, these memorandums have been compiled and structured to respond to the specific referral matters invited to comment on and should be read in full:

- **Attachment 1** – Economist
- **Attachment 2** – Healthy Waters and Flood Resilience
- **Attachment 3** – Auckland Transport
- **Attachment 4** – Watercare Services Limited
- **Attachment 5** – Groundwater
- **Attachment 6** – Parks and Community Facilities

In addition to the above regulatory responses a detailed and considered response has also been provided by the Rodney Local Board for the review of the Panel contained within the following document. Whilst separate to this regulatory response this provides important and considered

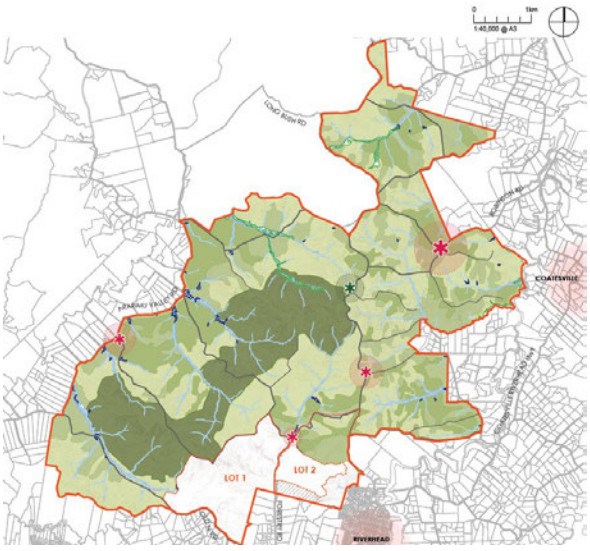
feedback on matters and issues for the Minister to consider in their decision, benefitting from the Local Boards understanding and knowledge of this location.

- **Attachment 7 –** Rodney Local Board

Representatives of the Houkura (Independent Māori Statutory Board) have reviewed the project and provided the following feedback:

Based on the information provided, the Secretariat is supportive that this proceeds to the next stage of the FTAA process, as it is very enabling for Te Kawerau ā Maki and the wider benefits it will bring.

Under section 17(3) of the Act and with reference to the direction within the Invitation to Comment Auckland Council provides comments below. This is structured first to respond to the more technical eligibility based questions around competing applications, existing resource consents where sections 124C(1)(c) or 165ZI of the Resource Management Act 1991 (RMA) and alternative process with regard to s21(5)(b, g and h) before commenting the scheme in respect to the criteria of S22 of the FTAA. The memorandum also includes under the heading other matters high level advice and key matters that the project is recommended to consider should the project be accepted and progress.

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. ***competing application**, in relation to a substantive application (**application A**), means a substantive application or an application for an approval under a specified Act (**application B**) if—* *(a) the approval sought or applied for by application B relates to the same natural and physical resources as an approval sought by application A; and* *(b) the approval sought or applied for by application B*	The referral application within the lodged Civil Infrastructure Report (Maven) and Planning Assessment for Referral under the Fast-Track Approval Act (Campbell Brown) in reference to water supply identifies groundwater supply as a potential supplementary supply source for the 'Community Recreational Hubs' (Planning Assessment) and/or 'town centres / community centres' in the Infrastructure Report. A reasonable interpretation when referring to this terminology and the illustrative masterplan is that this (groundwater supply as supplementary) relates to the indicative 'centre' locations shown on this plan by red and green icon.  In respect to these uses, and the predominant residential subdivision the documentation consistently identifies that water supply will be

could not be fully exercised (if at all) if the approval referred to in paragraph (a) were granted; and
 	
(c) application B was lodged by someone other than the person who lodged application A
	primarily derived from roof water collection. Primarily, infers a potential supplementary and secondary water supply which with the exception noted previously (community and recreation centres/hubs) is not advised for the residential subdivision.
	
	The Planning Assessment notes that in the eventuality of a ground water take/supply being required as a secondary/supplementary water supply source this would be subject to a '*separate bore application outside the fast track proposal'*.
	
	The planning consideration of the projects reliance and resilience in terms of water supply for potable, non potable and firefighting use is as a separate matter discussed elsewhere in this response.
	
	In respect to potential groundwater supply (*a natural resource*), we note the following with respect to other applications.
	
	The site straddles a groundwater divide between the Lower Kaipara Waitemata (majority) and the Rangitoopuni Waitemata Aquifers (parts of lot 7 and lot 5):
	
	• Our Groundwater Team advise that at the date of this letter their current understanding of the remaining allocation for the Lower Kaipara Waitemata is 3,329,265m3/year however they have advised that there are ongoing enquiries in respect to the use of this allocation so this number is subject to change.
	• For the Rangitoopuni Waitemata aquifer, is has been identified that water availability in this Aquifer is under review and may be subject to change. Council currently has an estimated remaining allocation of 365,927m3/year, however there are two other fast-track proposals which are expected / or are based on requiring water takes from this aquifer (*specific details held back for confidentiality reasons but can be shared on request*):
	  ○ Fast Track Listed Project A: A substantive application has been made and includes a significant groundwater water take as a consent and approval sought.
	  ○ Fast Track Proposal B: This project is currently under awaiting referral decision by the Minister. However a separate application under the RMA to Council has been made for a water take from this allocation for the prospective project. No decision has yet been made on that application at the date of this letter.

	Individually these two projects would require the majority of the understood remaining Rangitoopuni Waitemata allocation (subject to any changes arising from the current internal Council review) and there would be insufficient water allocation for the two projects combined in respect to what is estimated to be remaining in the allocation by our Groundwater Team. With this background and context, the following concluding points are noted: • Technically, and before considering whether the proposal should separate the approval of any water take (if sought) from a singular application, the proposal does not include approvals for a water take and therefore does not on this technical basis contravene the competing applications consideration for purposes of 17(3)(a)(i). However, under s 17(3)(b), the following is considered notable. • The Rangitoopuni Waitemata aquifer in the context identified may not be reasonably relied on for water supply for the sections of the development proposed in this aquifer. • If secondary water ground water supply is to be applied for as stated, or at a wider scale to enhance the reliance of the proposed water supply for the project this will likely require careful consideration in response to the arrangement of the development and the potential for parts of the western catchment within the Rangitoopuni Waitemata Catchment connecting through infrastructure to bores drilled in the Lower Kaipara Waitemata. This is based on it remaining the case of this Aquifer has a more significant remaining water allocation. If the project is revised to confirm a groundwater take in the future, we would advise that this competing applications question would need to be considered with confirmation of the proposed allocation sought, relative to a specific aquifer. In the time and based on the information provided no other competing applications/matters have been identified based on our current review.
In relation to projects seeking approval of a resource consent under section 42(4)(a) of the Act, whether there any existing resource consents issued where	The proposed development overlaps with the existing consent for "Rangitoopuni" FTAA-2504-1055 within and for the northern portion of Lot 2. It is understood that the proposed development will conflict with the approved wastewater treatment plant and dispersal area required to service the approved retirement village on Lot 2 to enable the subject

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	development. It is stated that the applicant will seek a s127 variation to this existing consent to relocate these elements. In process terms this is considered a viable approach noting the wastewater arrangements relate to the Retirement Village element of that existing consent. It is however recommended an application is made and consent secured first (i.e.: prior to a substantive application being lodged) to provide clarity and confirm that these important and required elements of that consent can be relocated and enable an assessment of the potential effects of that revised location in terms of the underlying consent and the wider environment. The documentation and masterplan establish this referred project and the existing consent FTAA-2505-1055 (Rangitoopuni) as the overall project. Careful consideration is required of how this project and the approvals sought will consider this existing consent within this application, this relates for instance to any dependencies on the delivery of the existing consent (for instance the upgraded and vested Forestry Road within the existing consent application site). At this point no existing resource consents where sections 124C(1)(c) or 165ZI of the RMA could apply have been identified but we will await if the project progresses further detailed information.
are there any reasons it would be more appropriate for the project to proceed through existing RMA processes rather than the processes under the Act?	The proposal would establish a substantial new settlement in size in a rural location that sits outside Auckland's identified growth areas and planned growth sequencing framework. In respect to the proposed direction of the ecological, recreational and cultural benefits and aspects of the proposal these benefits are recognised and notable. However, this needs to be balanced with the scale of development proposed in a location without the current or planned infrastructure services to provide for this level of growth. In the concluding comments in this response, we have identified the Council's keenness to work with the applicant in respect to their proposals and use of the Treaty Settlement Land. However, if this was not to be explored and given the significant scale of the project and the importance Council recognise it has, we consider that consideration of the site and proposals at this scale may be better suited to consideration under the Strategic Spatial Planning process (either under the current FDS process or potentially the upcoming Regional Spatial Plan / Land Use Plan process under the proposed Planning Act) before then progressing to a resource consent application.

	We recognise that this would be a longer process, but it would allow the challenges associated with growth outside of the planned growth areas (as identified later in this response) to be better discussed.

Auckland Council Overall Regulatory feedback – Informed by Assessment Criteria 22 of the FTAA

1. Does the project have significant regional or national benefits for the Auckland Region?

Auckland Council Regulatory response:

The applicant cites several regional benefits.

Auckland Council agrees that there will be significant benefits from the proposal for Te Kawerau ā Maki of regional significance. Auckland Council note the potential for significant environmental and social benefits to be delivered by the proposal through the significant ecological enhancement works and privately owned open space network proposed most notably the Te Kawerau ā Maki Reserve which is to be publicly accessible. This will be reliant on the detailed design demonstrating and developing what is detailed in this application, the operation and suitable connectivity to the wider public open space network through greenway connections. Collectively this element of the proposal underpinned by the Reserve has the potential to deliver benefits of regional significance to both Te Kawerau ā Maki and the wider Auckland region on the basis of the public access, amenity and ecological outcomes proposed/envisaged. It is however queried and requested that clarification is provided on the timing and long-term management structure of these benefits most notably the Te Kawerau ā Maki Reserve. This appears to be located in stage 4 of the 8-stage development and therefore there are matters to consider in terms of both the appropriateness of this, practicalities which may be underpinning this sequencing and the securities that will exist/are provided to ensure its delivery if other stages were to come forward before this aspect.

The referral application lacks sufficient evidence with respect to the other purported benefits (economic and housing) to substantiate that these benefits are significant in the context of the Auckland region. Attachment 1 (Economist) provides expertise on these matters and notes that the net economic benefits of the proposal are likely to be materially smaller than those presented in the applicant's assessment with many of the gross economic benefits not net additional to the wider Auckland economy but displaced from elsewhere in the region.

2. Has it been identified as a priority project in a central government, local government, or sector plan or strategy, or a central government infrastructure priority list?

Auckland Council Regulatory response:

This project has not been identified by Auckland Council, CCOs, or any relevant plans and strategies as being a priority project.

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

Auckland Council Regulatory response:

- Water Supply and Wastewater infrastructure is proposed to be private.
- Stormwater infrastructure is primarily proposed to be private excepting the infrastructure contained within the proposed road reserves.
- The proposed roading infrastructure will be local only, and will largely service the subject future community. Through connections are proposed through the site, and the roading network will also provide connections to the large recreational and small commercial features within the site, however these are not of a scale that will be regionally significant transport infrastructure.
- The proposal accommodates the establishment of a significant (~569ha) privately owned reserve that will facilitate public access and use. This includes a wide range of walking and cycle trails, neighbourhood parks, community spaces and supporting recreational services.

The proposed reserve (~569ha), being publicly accessible, this has the potential, with the other recreational and ecological planting (protected by covenants) to cumulatively reflect regionally significant social/recreational infrastructure, however there are questions and clarifications needed in respect to the sequencing of the delivery of the reserve and security if not provided in the first stages of the development; and, more importantly, the long term management and structures that will provide for it as a sustained publicly accessible benefit.

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

Auckland Council Regulatory response:

The project will provide for an estimated 3407-4164 new residential lots for future residential use, and identifies potential opportunities for papakāinga to be included in the project.

There are, however, concerns pertaining to its ability to deliver a well-functioning urban form. The proposal represents a materially different pattern of development from that anticipated through Auckland's strategic growth framework. The proposal is located outside Auckland's planned growth areas and in a location with limited public transport accessibility and will be reliant on onsite services for wastewater and water supply. The scale of development proposed results in a more vehicle-dependent pattern of growth than anticipated through Auckland's strategic planning framework and is relevant to considerations of a well-functioning urban environment.

The proposal has the potential to generate significant effects on the efficient functioning of existing roading infrastructure as outlined in the feedback from Auckland Transport. It also poses

a strategic risk, and challenges of a settlement of this scale and demand being exclusively serviced by on-site water and wastewater services, and whether this is appropriate, resilient and/or may place undue pressure in future to service this area with public infrastructure that has not been planned or funded. This land does not have a predominant Countryside Living Zoning, and in respect to water supply in particular the risks of having this many dwellings and activities reliant on a single system susceptible and reliant on rainfall is of question. If groundwater take is proposed then, as acknowledged in the 'competing applications' section of this response, this should be confirmed and demonstrated as feasible.

5. Will the project deliver significant economic benefits?

Auckland Council Regulatory response:

While Auckland Council are satisfied that the proposal will generate economic benefits the application lacks sufficient information to confirm the scale of these benefits as regionally significant. This has been expanded upon in the Economic Feedback appended to this response (Attachment 1).

6. Will the project support primary industries (e.g., aquaculture)?

Auckland Council Regulatory response:

No primary industries are proposed as part of this project. The project will involve the development of land currently primarily zoned for Rural Production and has historically been in production forestry use. The proposal seeks to transition the site from the production forestry use to a settlement within an indigenous forest landscape. The referral application contains limited assessment in regard to this matter (effects on the forestry use of land) however with the consideration of the background of the lands 2014 Treaty Settlement transfer this matter is not considered of substantial concern or comment for the decision on this Referral application.

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

Auckland Council Regulatory response:

N/A. No development of natural resources is proposed as part of this project.

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

Auckland Council Regulatory response:

As outlined in the feedback from AT, the proposal has limited/poor access to public transport infrastructure and as such will have a high level of private vehicle dependency.

It is considered that the ecological restoration located throughout the site will result in some benefits subject to their developed design and feasibility being established. However, there is no evidence in the proposal that the project will support climate change mitigation.

9. Will the project support climate change adaptation or recovery from natural hazard events?

Auckland Council Regulatory response:

It is anticipated that infrastructure to support the proposal (particularly stormwater infrastructure) will be designed to adapt to climate change, however there is insufficient information available in the application at this time to confirm.

Natural hazard risks primarily relate to flooding and instability, and these would be addressed in the detailed assessment of the project. It is important to highlight the specific comments from Healthy Waters in respect to Stormwater Management, Stream Erosion and Geomorphic Risk, and Flooding.

10. Will the project address significant environmental issues?

Auckland Council Regulatory response:

It does not appear likely that this project will address significant environmental issues, and this has not been adequately demonstrated in the Referral application.

As noted previously, the proposal does accommodate significant ecological restoration works across the site which will be an environmental and ecological benefit of the proposal. The application does not appear, however, to have established that it would address any existing significant environmental issue.

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

Auckland Council Regulatory response:

There are concerns pertaining to the alignment of the proposals with the strategic spatial strategy of urban growth for the Auckland Region (Auckland Plan 2050; Auckland Unitary Plan Regional Policy Statement; Future Development Strategy 2023-2053):

- The proposal responds to those aspects of these strategic documents that support Māori land development aspirations and Treaty settlement outcomes.
- However, the proposal is less well aligned with the spatial growth and development direction contained within those same documents.
- The proposal would introduce a significant scale development outside identified growth areas and growth sequencing frameworks. This raises broader strategic questions regarding the effectiveness of Auckland's spatial planning framework in providing certainty around the location, timing and sequencing of future growth and associated infrastructure investment. It also creates ongoing risk for future occupants in regard to

the resilience, maintenance, management and potential costs associated with the infrastructure provided.

With respect to the AUP: OP, the proposal accommodates cumulatively a large development and extent of settlement within Rural Production Zoned Land.

The AUP's Treaty Settlement Land (TSL) provisions are intended to be enabling of development on TSL, however these provisions when applied to a particular site such as this also require consideration and balance of the underlying zone amongst other matters. The Panel decision on FTAA-2505-1055 (Rangitoopuni) concurred that an application must be considered on balance of the underlying zone and TSL provisions, but that Panel considered that greater weight should be given to the TSL provisions. It is noted that the current application accommodates a greater intensity of use than that approved in FTAA-2505-1055 despite the less intensive underlying zoning. It is also recognised however that this application in comparison to FTAA-2505-1055 includes the substantial publicly accessible reserve. If of assistance to the Minister a more detailed overview of the policy context can be provided.

Auckland Council have concerns at this stage that this proposal does not strike an appropriate balance between the spatial growth direction (and the reasons that underpin this) and enablement of Treaty Settlement land. Auckland Council recognise this Treaty Settlement Land is located in a rural location and that this fact creates a complexity/tension in balancing these provisions and provides a different policy baseline to consider the project and the intensity/extent of development at this site in comparison to other rural locations.

With respect to the NPS: HPL, we note that at this referral stage, the provisions of Clause 3.7 re. LUC3 soils do not affect the application at this stage (as this does not constitute a resource consent application) and the NPS: HPL is therefore still a relevant consideration. There are small portions of the site that are subject to LUC3 soils and therefore is subject to the NPS: HPL.

Conclusion:

Auckland Council acknowledges the significance of this whenua as Te Kawerau ā Maki Treaty Settlement Land, and recognises the importance of enabling mana whenua to realise cultural, social, environmental and economic aspirations for returned land. We also recognise the RPS and AUP: OP provisions include clear enabling direction for Treaty Settlement Land and Mana Whenua (Chapters B6 and E21). Council considers that the project will have potential regionally significant benefits, particularly in relation to social, recreational, ecological and cultural elements and aspects.

The proposal, however, accommodates development and related activities and demand at a significant scale within a primarily Rural Production Zone in an area that is not within the planned future growth areas of the Auckland Region. This poses concerns for the long-term strategic growth of the region, focuses homes and activities in locations of reduced infrastructure resilience and greater risk and creates greater car dependency amongst other matters. Further, the very large scale of the proposal, its rural location, reliance on private infrastructure, transport

impacts, environmental effects and long delivery timeframe add complexity to the development that requires careful and thorough consideration.

Given these challenges, Auckland Council regulatory response is that should the Minister decide that the project should proceed through the Fast-Track consenting process we respectfully consider that it would be beneficial that a direction is given on the need to carefully review the proposed intensity of the development. Auckland Council recognise the specific factors to this Treaty Settlement Land and project including:

- The interplay and specific regard needed to aspects of the FDS, RPS, and AUP: OP in respect to growth[1] and Mana Whenua enablement[2]. There are relative competing considerations across these provisions where this policy enablement is to be applied to a rural locations that is outside the strategic planned growth of the region that. This is particularly relevant at the regional policy statement level where no priority level is detailed between the two outcomes.
- The unique nature of this proposal and its potential for substantial cultural, social and ecological benefits for the Auckland region.

Auckland Council would encourage the applicant to consider working with Council to respond to these comments and find a balance between the intensity of the development required to both facilitate these benefits; allow it to sit more comfortably within the rural framework of the site, and alleviate these strategic issues and infrastructure concerns/potential effects with the current scale of the proposal.

Other Matters:

Within the various subject matter expert responses matters highlighted for further consideration or information if the referral application was accepted and the project development into a substantive application are identified. It is also noted that the Rodney Local Board response (**attachment 7**) also contains a series of matters that further information would be sought if the project progresses that are generally relevant matters to regulatory considerations. For the ease and assistance of the reviewer these have been summarised and collated below:

a. As the staging and sequencing of the project is developed consideration and clarification on the timing of the delivery of aspects of the scheme, notably the Te Kawerau ā Maki Reserve and other recreational, amenity and functional infrastructure is needed.
b. Further information will be expected in regard to the instruments to secure proposed public access to reserve and other recreational/amenity connections within the project. Also, the legal mechanisms/long term structures and funding that will provide for their long-term operation and enable confidence that these aspects should be viewed as sustainable long-term benefits. This includes as well set out in the Rodney Local Board comments the public access arrangements, trail maintenance responsibilities, safety obligations, emergency access, closures, biosecurity controls and funding model.

[1] Chapters B2 and B9 of the AUP RPS
[2] Chapters B6 of the AUP RPS and E21 of the AUP OP

c. In respect to amendments to FTAA-2505-1055 (Rangitoopuni) Lot 2 to enable the development proposed under this project for that land confirmation that an application will be made and consent established for this, prior to the lodgement of any substantive application.
d. The documentation and masterplan establish this referred project and the existing consent FTAA-2505-1055 (Rangitoopuni) as the overall project. Careful consideration is required of how this project and the approvals sought will consider this existing consent within this application, this relates for instance to any dependencies on the delivery of the existing consent (for instance the upgraded and vested Forestry Road within the existing consent application site).
e. Further information, clarification, evidence and examples of the short- and long-term resilience, risk and suitability of exclusively serviced by on-site water and wastewater services for a scale of development of this extent. The Rodney Local Board submission identifies the following matters which are considered well set out and relevant from a regulatory perspective:
    - infrastructure will be legally, financially and operationally sustainable over the long term;
    - there will be clear accountability for maintenance, renewals, failures and upgrades;
    - wastewater disposal and stormwater systems will be resilient, independently reviewed and enforceable;
    - staging of infrastructure will match staging of development; and
    - community hubs, open space and public access areas will be serviced safely and appropriately.

Transport (with consideration of Auckland Transport **attachment 3**)

a. Confirmation of the scheme and assessments reliance on strategic transport projects in the Northwest area under the Supporting Growth Programme, including the SH16 Northwest Alternative State Highway, the Northwest Busway extension, and the Kumeu/Huapai rapid transit stations. Including the reliance on projects not funded or long term (overlap with staging).
b. Further detail on local road network upgrades and how they provide for integrated and provide for suitable links to Dairy Flat, Riverhead and Kumeu/Huapai.
c. Referral Application proposes to develop the project over stages, further detail and consideration if needed on how the proposed staging will be linked/timed to the completion of transport infrastructure upgrades funded by the applicant in the surrounding immediate and wider network.
d. Modelling undertaken on effects local areas and network Riverhead, Coatesville, Kumeū-Huapai, Waimauku, Dairy Flat and the wider network including SH to be based and reflect the staged delivery of the project and sequenced upgrades.
e. Consideration and detail on construction management and approach over staged delivery for onsite and offsite effects; and the consideration given to emergency service access.

Economist (**attachment 1**)

The Economist has noted that Cost-Benefit Analysis (CBA) would enable a more comprehensive assessment of the project's economic efficiency. However, for reasons detailed within his memorandum considers an Economic Impact Assessment (EIA) can provide a credible approach but has identified various areas of concern/further evidence should the project be accepted and proceed, summarised as follows:

a. A clearer demonstration of net economic benefits, including the extent to which the anticipated economic activity represents genuinely additional activity rather than redistribution or displacement from elsewhere within Auckland.
b. Assessment of the development timing and present value of benefits.
c. Additional evidence supporting the commercial provision, including market analysis, benchmarking against comparable urban regeneration projects, or other empirical evidence demonstrating the anticipated increase in local demand.
d. A stronger assessment of wider economic benefits.
e. Whilst recognising that some of the effects described in this list are difficult to predict, and recommend sensitivity testing of key assumptions, particularly those relating to development time frame, commercial occupancy and employment generation, to demonstrate the robustness of the conclusions under a range of plausible scenarios.

Healthy Waters and Flood Resilience (**attachment 2**)

a. Recognised that further, more detailed catchment-specific modelling and detailed engineering design will be undertaken if the application proceeds with Stormwater management, flood risk, and hydrological effects including on stream environments will be key matters of interest for any future substantive application. This particularly the case given the scale of the development, the number of receiving catchments, and the reliance on catchment wide attenuation. This modelling to be undertaken and based on staged delivery / sequencing of stormwater management infrastructure and development.
b. In the context of the scale of the development and with a recognition of the consideration of this matter under FTAA-2505-1055 (Rangitoopuni), noted that the CN assumptions, initial abstraction assumptions, model build, and sensitivity of the modelling results should be reviewed and clearly justified as part of any future substantive application.
c. Any future substantive application in respect to attenuation features and structures within the stormwater system should provide clear, measurable, and enforceable attenuation targets, including across a range of storm events, and outlining management of culvert blockage and exceedance flows, and mechanisms to secure the long-term operation and maintenance responsibilities for the private attenuation structures.
d. In respect stream erosion and geomorphic risk noting the topography of this site and the proposal is considered that any future substantive application should be supported

by assessment of stream geomorphic condition, erosion susceptibility, flow regime changes, and outfall / culvert effects.

The following recommendation of the Rodney Local Board is signposted below.

The Board requests that, if referred, the Expert Panel actively seek local input from the Rodney Local Board, affected communities, adjoining landowners, recreation groups, emergency services, Auckland Transport, Watercare, Healthy Waters, and relevant council departments.

The Board also requests ongoing engagement with the Riverhead, Coatesville, Kumeū-Huapai, Waimauku and wider Rodney communities as the project progresses.

This is signposted in regard to the decision of the Minister under S27(3)(iii) of the FTAA to set out the persons or groups from whom a panel must invite comments in addition to those specified in S53 of the FTAA.

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

This response has been prepared and collated by the following persons acting under delegation of Auckland Council to provide this regulatory response to the Ministers invitation to comment.



Emma Chandler

Consultant Planner

Acting on Behalf of Council

22/07/2026



Joe Wilson

Principal Project Lead

Auckland Council

22/07/2026

Attachment 1 – Economist

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	Rangitoopuni Forest Project PRR00044383

Respondent Information

Name	Rodney Yeoman
Role	Economics consultant
Agency / Department	Formative Limited
Date	17 July 2026

Do you support the proposal proceeding through fast-track?

☐ Support

☐ Oppose

☒ Neutral

Agency/Department Response

While I consider that the proposal is likely to generate positive economic effects, I am not certain that the information provided demonstrates those benefits reach the threshold of significant regional benefits contemplated by the Fast-track Approvals Act.

The Economic Impact Assessment (**EIA**) from Property Economics identifies substantial construction activity. However, many of the quantified benefits rely on development assumptions which are not stated in the report and many of the assessed economic benefits will not be net additional benefits to the Auckland region.

Given Auckland's large and diverse economy, it is not immediately evident that the scale of both one-off construction and ongoing economic benefits would, in themselves, be regionally significant.

However, while not quantified in the economic report, I consider that the benefits to the iwi from this development is likely to be regionally significant. I consider that these benefits are likely to be significant to Te Kawerau ā Maki, and while I accept that the details may be commercially confidential, they could nonetheless have been addressed in the Economic Assessment.

The EIA has not quantified the potential ongoing benefits from the proposed commercial centres. Nor has it assessed the feasibility of these centres or their implications within the wider economy.

My neutral position should not be interpreted as disagreement that the project has economic merit, but rather reflects some uncertainty as to whether the evidence currently presented demonstrates the level of significance required under the FTAA.

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

Does the project have significant regional or national benefits?

The extent to which the economic benefits associated with the proposal are genuinely additional to the regional economy remains unclear.

I note that in other FTAA decisions involving large-scale residential developments in the Auckland region, commissioners have acknowledged that the net economic benefit is likely to be "well less than" the gross economic benefits identified through an EIA of construction activity. In particular, the commissioners in the Sunfield FTAA concluded that less than one quarter of the housing provided by the development would be additional and that the resulting economic benefits would be materially lower than the gross values reported in the EIA.

Given that Property Economics prepared the economic assessment for the Sunfield FTAA, it is surprising that a similar adjustment was not applied in the assessment for Rangitopuni. Applying the findings from Sunfield would imply that the majority of the gross economic values presented in the EIA are not net additional to the wider Auckland economy, but instead represent activity displaced from elsewhere in the region. Consequently, the net economic benefits of the proposal are likely to be materially smaller than those presented in the applicant's assessment.

Furthermore, aspects of the assessment are not adequately explained, and several assumptions that are critical to the quantified benefits may be questionable, as discussed further in the sections below

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

From an economic perspective, yes, although this is not addressed in the Economic Assessment.

It is reasonable to conclude that referral through the Fast-track process would enable delivery of the project more quickly, allowing any economic benefits to be realised sooner than under an RMA application.

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

From an economics perspective I would expect that the referral would not materially affect the efficient operation of the fast-track approvals process.

Has the project been identified as a priority in any government or sector plan or strategy?
Unknown, and no such identification is stated in the application.

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

No, in my opinion the project will not deliver new or support existing regionally/nationally significant infrastructure.

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

Unclear.

The project would result in an increase in housing supply, providing approximately 3,446 to 4,212 dwellings and replacing an unstated, albeit relatively small, number of existing dwellings within the project area. However, the extent to which this housing supply would be additional within the regional context is not discussed in the EIA. It is likely that a substantial proportion of the housing enabled by the development would represent a transfer of development activity from other locations within the region, rather than net additional supply.

In addition to increasing housing supply, the proposal incorporates commercial, retail and community facility uses that are expected to generate economic activity and support local businesses. However, these outcomes are not discussed in the EIA and would need to be addressed in the substantive application.

The implications of the proposal for both housing supply and commercial activity need to be established in order to assess the extent to which the development would contribute to a well-functioning urban environment. While the EIA identifies this as an important aspect of the assessment of Rangitopuni, it does not provide any analysis or commentary on the implications of the development for the urban environment.

Will the project deliver significant economic benefits?

In my opinion the proposal is likely to deliver significant local economic benefits across both the construction and operational phases. During construction, the project would generate substantial investment in Riverhead local area, employment and value added, providing a short-term stimulus to the economy. Once operational, the proposal would increase housing supply, introduce additional commercial and retail premises, and support increased activity within the Riverhead areas.

However, as discussed above the quantification in the EIA does not provide sufficient evidence to conclude that the benefits will be regionally significant as required in the FTAA.

Will the project support primary industries (e.g., aquaculture)?
No.

Will the project support development of natural resources (e.g., minerals, petroleum)?
No.

Will the project support climate change mitigation (e.g., reduce/remove greenhouse gas emissions)?
No.

Will the project support climate change adaptation or recovery from natural hazard events?
No.

Will the project address significant environmental issues?
No.

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

Broadly, yes from an economic perspective, the proposal is generally aligned with the strategic direction of regional and local planning documents that anticipate low-density residential development in this location as part of Te Kawerau ā Maki's Treaty Settlement outcomes.

Although I note that this is primarily a planning matter. The situation is complex, as a central objective of the Council's Future Development Strategy (FDS) and associated lower-order planning documents is to direct and focus growth towards locations that are best served by existing and planned infrastructure and services. Future Urban Zoned (FUZ) land has been identified for intensification based on anticipated infrastructure provision, timing, and funding arrangements. However, the FDS and lower-order planning documents also recognise and provide for the aspirations of Mana Whenua, including enabling the development of Treaty Settlement land.

These competing considerations create a degree of uncertainty, particularly where of Treaty Settlement land is located within a rural setting and sits outside the sequencing assumptions that underpin the broader growth strategy. Therefore, on balance, while the development of this land is supported in principle, the current scale, form, and intensity of development proposed do not appropriately strike that balance in the context of the wider strategic planning framework.

Moreover, my understanding is that there are also other planning provisions and objectives that apply to this location, including those relating to environmental values, amenity, and primary production, with which the proposed development may not be fully consistent.

Are there any other relevant matters to consider?

From an economic perspective, no additional matters materially affect my conclusions. I note, however, that while the construction-related analysis is based on established economic modelling techniques and provides a reasonable indication of the gross scale of economic activity associated with the project, the operational impacts have not been quantified and are not strongly evidence based. As such, both the construction and the wider operational benefits should be interpreted with caution.

Auckland Council Criteria

From an economic perspective, the application meets most of the Auckland Council assessment criteria relevant to economics. The proposal would deliver a range of positive economic outcomes, including enabling construction activity, increasing housing supply, providing commercial premises to meet local needs, and facilitating the utilisation of Te Kawerau ā Maki's Treaty Settlement land.

Notwithstanding this, the assessment is stronger in demonstrating that the proposal will generate positive, and potentially significant, economic benefits within the local economy than it is in demonstrating that those benefits satisfy the higher threshold of significant regional benefits contemplated by the Fast-track Approvals Act. Many of the enduring benefits, such as operational and wider economic benefits, are based on professional judgement rather than empirical evidence. Accordingly, some caution should be exercised in the weight placed on these benefits.

While I acknowledge that EIA have become the predominant form of economic evidence accompanying Fast-track applications, they should not necessarily be regarded as the optimal framework for assessing whether a project generates significant economic benefits. EIAs primarily measure changes in economic activity and therefore tend to emphasise gross impacts without fully accounting for displacement, transfer effects, opportunity costs, or other factors relevant to determining net economic benefits to society.

I note the following issues that should be considered when assessing the quantified economic benefits:

- **Development timeframe**: the EIA provides no information on the assumed phasing of development, which means it is not possible to assess the reasonableness of the timing assumptions underpinning the analysis. I note that the EIA provides no assessment of the demand for, or supply of, comparable developments in Auckland. As a result, there is no supporting evidence to justify the assumed 20-year development timeframe. For a development of this scale, the rate of uptake is a critical assumption that directly affects the timing and present value of the estimated economic benefits. Without analysis of market capacity, competing supply, and likely absorption rates, the assumed development period appears unsupported.

- **Net Present Value**: the EIA provides limited information on the derivation of the reported GDP contribution of $3.8 billion. Using the limited information provided in Table 1 and assuming a straight-line development profile, I have attempted to replicate the assessment. My replication results in a GDP estimate that is materially lower than that reported in the EIA (more than one-third lower). This suggests there may be an error or inconsistency in the methodology that has resulted in a material overstatement of the reported gross construction benefits.

- **Net Economic Value**: the EIA reports only gross construction benefits and implicitly assumes that every dwelling constructed at Rangitoopuni would not otherwise have been built elsewhere in Auckland. As noted previously, the decision on the Sunfield proposal recognised that gross economic impacts materially overstate the true economic benefits of development. The same issue arises for Rangitoopuni, where it is likely that a substantial proportion of the construction activity would occur elsewhere in Auckland even if the development did not proceed.

- **Dwelling Construction Cost**: the EIA provides limited detail on the assumptions used to estimate construction costs, and the figures reported imply unusually high build costs. The assessment states that the development will comprise 3,760 dwellings with an average floor area of 150m², equating to approximately 564,000m² of residential floorspace. Table 1 reports construction costs of $4,042 million, equivalent to approximately $1.1 million per dwelling or more than $7,000 per square metre of floorspace. This is more than double the typical range of residential construction costs in Auckland reported by QV Cost Builder. There is no explanation in the EIA as to how these costs have been derived, raising concerns that the gross construction impacts may have been materially overstated.

In terms of the wider economic benefits, these are discussed in the EIA largely in theoretical terms rather than being supported by quantitative analysis. While such benefits may occur to some extent, I consider that they are unlikely to be material to the assessment of whether the development is of regional or national significance within the FTAA framework.

As an example, the generic claim that the development will improve housing affordability is based on the simplistic assumption that increasing housing supply will automatically reduce prices. However, the EIA indicates that the construction cost of each dwelling is approximately $1.1 million. When combined with any reasonable land value assumption, the resulting total development cost is likely to exceed the price of most existing homes in the surrounding market.

For example, even if vacant sections were available for approximately $500,000, the combined land and construction cost would be over $1.5 million per dwelling.[1] This suggests that dwellings within Rangitoopuni would be priced above the current average house price in Riverhead ($1.46 million) and Auckland ($1.04 million). Accordingly, while the development may increase the supply of housing, the evidence does not demonstrate that it would materially improve affordability outcomes. Rather, the proposed development appears more likely to provide higher-end housing targeted towards the upper segment of the market, with limited impact on overall housing affordability in Riverhead or Auckland.

Also I note that Cost-Benefit Analysis (**CBA**) would have enabled a more comprehensive assessment of the project's economic efficiency and the extent to which the claimed benefits represent genuine net gains. Nevertheless, given current practice and the qualitative nature of many of the project's anticipated benefits, I do not consider the absence of a CBA materially undermines the conclusions reached in the EIA.

Overall, I consider the EIA provides a credible basis for concluding that the proposal is likely to generate meaningful economic benefits and make a positive contribution to housing delivery, and the commercial supply. However, whether those benefits are of sufficient magnitude to satisfy the FTAA threshold of

[1] I note that the total development cost identified in the EIA (excluding land costs) is $5.688b. Dividing this cost across the 3,760 proposed dwellings results in an average cost of approximately $1.51m per dwelling before allowing for land acquisition costs, developer margin, and other transition costs (real-estate fees, etc). Once a reasonable land value and development margin are incorporated, the required sales price to make the development commercially viable would likely be in the order of $1.7m to $1.9m per dwelling. This further suggests that the proposed housing is likely to be targeted towards the higher end of the market and is unlikely to materially improve housing affordability outcomes for the wider Auckland housing market.

significant regional benefits ultimately remains a matter of planning judgement informed by, but not determined solely by, the economic evidence.

To better understand the potential economic effects against FTAA criteria, the Economic Impact Assessment would need to provide a more robust assessment of the economic costs and benefits, in order to show that the costs do not outweigh the benefits, and also to enable a conclusion as to whether the proposal will have significant regional or national benefits. If the application is referred and proceeds to the substantive phase, I recommend that an economic assessment provided at that stage should provide:

- A clearer demonstration of net economic benefits, including the extent to which the anticipated economic activity represents genuinely additional activity rather than redistribution or displacement from elsewhere within Auckland.
- Assessment of the development timing and present value of benefits.
- Additional evidence supporting the commercial provision, including market analysis, benchmarking against comparable urban regeneration projects, or other empirical evidence demonstrating the anticipated increase in local demand.
- A stronger assessment of wider economic benefits.
- I recognise that some of the effects described in this list are difficult to predict, and recommend sensitivity testing of key assumptions, particularly those relating to development time frame, commercial occupancy and employment generation, to demonstrate the robustness of the conclusions under a range of plausible scenarios.

Attachment 2 – Healthy Waters

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	Rangitoopuni Forest
Address	Riverhead/Coatesville
FT application number	FTAA-2605-1244

Respondent Information

Name	Hillary Johnston
Role	Fast-Track Lead
Agency / Department	Healthy Waters & Flood Resilience
Date	13.07.2026

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 Rangitoopuni Forest development which proposes approximately 3,446-4,212 residential bush lots, four community hubs, open space and restoration areas, and associated stormwater, along with other relevant development servicing.

Scope of comments

As the majority of the stormwater management will remain in private ownership, HWFR has reviewed the referral application material from a catchment effects and management perspective.

Comments provided are for the purposes of informing assessment at the referral stage and are not intended to provide a detailed technical assessment of matters that more appropriately would be considered through any future substantive application.

HWFR acknowledges that the proposal is currently at an indicative masterplan referral stage, and that the application material identifies that further, more detailed catchment-specific modelling and detailed engineering design will be undertaken if the application proceeds.

Overall position on referral

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. Stormwater management, flood risk, and hydrological effects including on stream environments will be key matters of interest for HWFR for any future substantive application particularly given the scale of the development, the number of receiving catchments, and the reliance on catchment wide attenuation.

Stormwater authorisation and asset ownership

HWFR holds a Regionwide Network Discharge Consent (RWNDC) which authorises the diversion into and discharge from public stormwater networks. As outlined within comments on the Rangitoopuni Lot 1 & Lot 2 application, the RWNDC is only applicable to urban zoned land. As the underlying zoning of the development is rural (predominantly the *Rural – Rural Production* zone,) the development cannot be authorised under the RWNDC. Private diversion and discharge consent would be required for this proposed development also. This has been identified by the Applicant's Agent within the Planning Assessment.

Natural hazards

Flood risk and hydrological effects are likely to be HWFR's key areas of interest for any future substantive application should the development proceed. The Lot 2-8 Civil Infrastructure Report identifies known flooding both within the site and in downstream catchments, and outlines that flood mitigation and attenuation to ensure no downstream effects is one of the key civil engineering matters for the referral and any future substantive application.

HWFR notes that the applicant's flood modelling approach for Lots 2-8 relies on the approach taken for the approved Lot 1 & Lot 2 fast-track consent, including the same approach to CN assumptions and catchment wide attenuation. The Lot 2-8 Civil Infrastructure Report outlines that the CN value issue was scrutinised heavily through the Lot 1 & Lot 2 RFI process and that Maven's position and assumptions were upheld by the Expert Panel. It identifies a pre-development forest cover CN value of 74 and a post-development CN value of 70 for planted and protected bush in perpetuity.

HWFR does not consider the referral stage to be the appropriate stage to relitigate this matter for the wider Lot 2-8 development and does not recommend that the referral application be declined on the basis of the CN assumptions. Given the scale of the wider development and the potential precedent implications of relying on the Lot 1 & Lot 2 decision across a broader forest block, HWFR considers that the CN assumptions, initial abstraction assumptions, model build, and sensitivity of the modelling results should be reviewed and clearly justified as part of any future substantive application.

Stormwater management – attenuation

The Civil Infrastructure Report indicates that approximately 20 attenuation structures may be required, located in all catchments but more concentrated in the east and south where the majority of development is proposed. It also identifies that that at least one larger device in the Dairy Flat catchment may be a classified dam due to the likely contained volume.

Consistent with the Lot 1 & Lot 2 consent conditions, any future substantive application for Lots 2-8 should provide clear, measurable, and enforceable attenuation targets, including across a range of storm events, and outlining management of culvert blockage and exceedance flows, and mechanisms to secure the long-term operation and maintenance responsibilities for the private attenuation structures.

Stream erosion and geomorphic risk

Stream stability and erosion risk are addressed at a high-level within the referral documents and will need to be a key component of any future substantive assessment should the application proceed. The Lot 1 & Lot 2 HWFR memorandum identified that waterways within the development area were sensitive due to forestry activity, steep slopes and erosion-prone soils, and that hydrology mitigation and riparian planting alone may not prevent erosion or protect stream health in the long term.

The Lot 2-8 proposal is materially larger than Lot 1 & Lot 2 and includes multiple catchments and discharge points. While HWFR acknowledges the proposed revegetation and restoration outcomes, it is considered that any future substantive application should be supported by assessment of stream geomorphic condition, erosion susceptibility, flow regime changes, and outfall / culvert effects to demonstrate that stream stability can be maintained or appropriately mitigated long term.

Summary

HWFR is not opposed to the proposal proceeding to referral under the FTAA. However, support for referral should not be interpreted as technical acceptance of the stormwater management approach, the attenuation strategy, or flood modelling assumptions relied on in the referral application material.

HWFR welcomes further engagement with the applicant's team if the proposal is referred and progresses to substantive application.

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

Attachment 3 – Auckland Transport

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	Rangitoopuni Forest
Address	Riverhead/Coatesville
FT application number	FTAA-2605-1244

Respondent Information

Name	Jono Ryan
Role	Consultant Planner
Agency / Department	Auckland Transport
Date	20 July 2026

Do you support the proposal proceeding through fast-track?

☐ Support

☒ Oppose

☐ Neutral

Agency/Department Response

Does the project have significant regional or national benefits?

Benefits resulting from the project have not been identified in relation to the wider transport network.

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

While the project will increase the housing supply, it does not align with the National Policy Statement on Urban Development's criteria for a well-functioning urban environment in relation to good accessibility and supporting reductions in greenhouse gas emissions. The application site has poor accessibility to public transport and active transport connections to the wider transport network. Subsequently, the project has potential to result in a car-dependent development and greenhouse gas emissions associated with private car trips. It is also unclear, based on the information provided, whether the project meets the well-functioning urban environment criterion for climate change resilience. There is potential that additional vehicle traffic generated by the project will be exposed to flood hazards along roads, and therefore flood risk may increase.

Is the application out of sequence with the Auckland Plan Development Strategy and Future Urban Land Supply Strategy?

Given the extent of the project for up to 4,164 additional dwellings in the rural zone and on the fringe of Riverhead, the project is unanticipated, inadequately served by rural roading infrastructure and is therefore not supported. The proposal would introduce traffic volumes of an urban-scale onto a high-speed rural road network that has not been planned, funded, or constructed to accommodate demand of this nature.

The scale and location of the project have not been considered as part of the strategic planning of the wider transport network. The Referral Application should not rely on the Notices of Requirement Auckland Transport has in place to accommodate the trips generated by the live zoning of the Future Urban Zone (**FUZ**) without demonstrating that those designs can adequately accommodate the additional demand beyond the assumptions made in planning those networks.

The application site currently has poor accessibility to public transport as there is only one bus route (Route 126 along Coatesville-Riverhead Highway) and this does not connect to the site. There is currently no active mode access to bus stops. Even if footpaths were to be provided to connect to bus stops, these would be relatively remote from the site. A car-dependent settlement of this scale outside the public transport network is inconsistent with Auckland Council's strategic direction unless serviceable public transport can be demonstrated and funded. The project is remote from the Northwest Busway and the future Kumeu/Huapai rapid transit stations, noting those stations are unfunded and remote from the site. Moreover, future residents would need to use private vehicles in order to access the rapid transit stations.

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?

Potential gaps in multimodal transport infrastructure supporting the project may require Auckland Council to divert funds from other areas to address the infrastructure shortfall. The Transport Memo supporting the Referral Application refers to strategic transport projects in the Northwest area under the Supporting Growth Programme, including the SH16 Northwest Alternative State Highway, the Northwest Busway extension, and the Kumeu/Huapai rapid transit stations. It is not specified in the Memo whether these strategic projects are relied on in their assessment. Many of the projects referred to are unfunded strategic projects and cannot presently be assumed to accommodate the trip generation from the project.

The Transport Memo also identifies local road network upgrades in the surrounding area, such as intersection upgrades, required to mitigate road safety effects. These will be addressed by further assessment in the substantive application. The proposed upgrades are considered piecemeal and do not provide for an external integrated transport linkage network, including integrated and suitable links to Dairy Flat, Riverhead and Kumeu/Huapai, or provision for external active mode links.

Overall, the project has potential to create significant gaps in infrastructure and areas where further substantial upgrades are needed. This would create pressure for Auckland Council to fund these projects ahead of schedule and result in an opportunity cost in terms of not being able to fund projects to support planned growth elsewhere, leading to fragmented infrastructure investment and out-of-sequence development.

Is there the potential for significant adverse environmental effects to occur?

It is unclear, based on the current level of information, whether the transport effects resulting from a project of this scale and location can be acceptably managed. Without the right multimodal transport infrastructure supporting the project, the traffic safety effects are likely to result from significant car trip volumes which create downstream capacity and operational effects. The Referral Application proposes to develop the project over stages, however there is no detail on whether the proposed staging will be linked to the completion of transport infrastructure upgrades in the surrounding network. It is difficult to determine the scale of these transport effects until an integrated transport assessment is prepared for the project.

Based on the current level of information, it is also unclear whether the project will support climate change mitigation and adaptation due to its reliance on private vehicle travel, and potential exposure of vehicle traffic along roads in flood hazard areas which may increase risks from natural hazards.

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

Attachment 5 – Groundwater

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	Rangitoopuni Forest
Address	Riverhead/Coatesville
FT application number	FTAA-2605-1244

Respondent Information

Name	Nicola Jones
Role	Water Allocation Specialist
Agency / Department	Planning and Resource Consents - Groundwater
Date	20 July 2026

Agency/Department Response

Comment was sought from the Planning team in respect to this referral application and the availability of groundwater if this was to be sought by the proposed project. The development makes reference to groundwater supply as a secondary/supplementary option for certain uses.

Response:

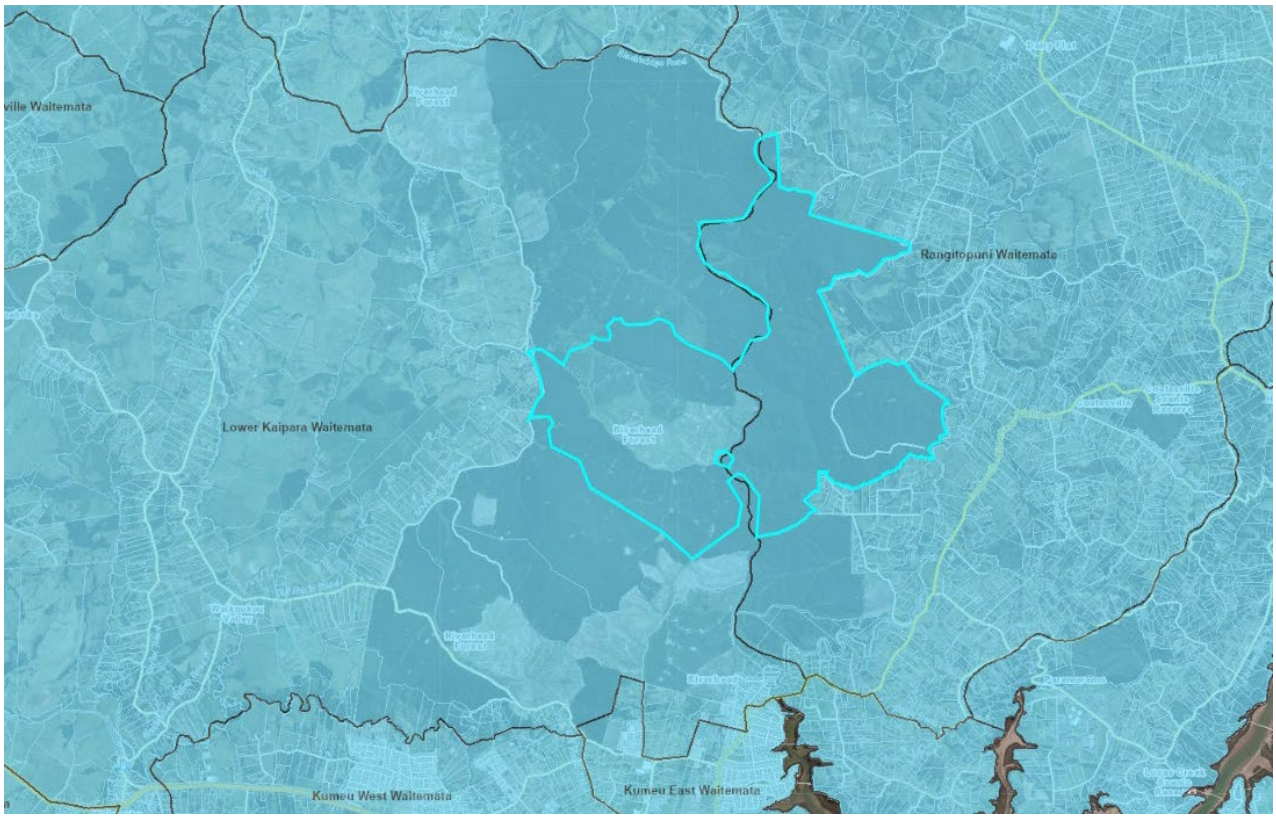
The applicant has indicated that the proposed development will include an estimated 3,407 – 4,164 homes. Ground water availability for the proposed development will depend on where the Applicant decides to drill their water supply bores, as the site straddles a groundwater divide between the Lower Kaipara Waitemata and the Rangitoopuni Waitemata, as shown in the image below. Auckland Council's GIS database GeoMaps, shows that Lots 5 and 7 DP590677 cross the groundwater divide between the two aquifers, so the bore locations would need to be selected carefully to ensure the right aquifer is targeted. The snip below shows Lot 7 in the light blue outline to provide some orientation, alongside the dividing line of the two aquifers. Lot 5 of the application site also appears to be partially sited in the Rangitoopuni Waitemata Aquifer area.

For the Rangitoopuni Waitemata aquifer, on paper we currently have a remaining allocation of 365,927m^3/year; however, a new groundwater consent application to take and use 217,000m^3 has recently been lodged. This application relates to a Fast Track project at referral stage, although the water take component has been lodged separately with Council. We are also aware that the Surf Park Fast Track

application has recently been relodged and is seeking 256,230m^3/year of groundwater from the same aquifer. Based on the volumes being sought in the applications above, and the current water availability value for the Rangitoopuni Waitemata aquifer, the aquifer would be over allocated. As such, there would be no capacity for a further take, and any water supply bores would need to be drilled to target the Lower Kaipara Waitemata. However, the water availability for the Rangitoopuni Waitemata is currently in review by Auckland Council's Environmental Evaluation and Monitoring Unit, and as such, may be subject to change.

Our current remaining allocation for the Lower Kaipara Waitemata is 3,329,265m^3/year; however, we have recently had enquiries about water availability in this area, so this number is subject to change. Nonetheless, based on present numbers we consider that there would be sufficient capacity available in this aquifer, although this would need to be confirmed once water demand information was provided.

Supply from the Lower Kaipara Waitemata is likely to be the most reliable based on current capacity subject to testing; however, bores in this area can be low yielding. We would recommend the Applicant drill a programme of test bores if groundwater is to be a preferred supply option.



Attachment 4 – Watercare Services Limited

Watercare Services Limited
73 Remuera Road, Remuera,
Auckland 1050, New Zealand
Private Bag 92521, Victoria Street West,
Auckland 1142, New Zealand
Telephone +64 9 442 2222
www.watercare.co.nz

17th July 2026

Joe Wilson
Principal Project Lead, Auckland Council
s 9(2)(a)

Dear Joe,

Rangitoopuni Forest Project Fast Track Application
Lots 2-8 DP 590677 in Riverhead

Introduction

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

2. Rangitoopuni Developments Limited Partnership (Te Kawerau ā Maki and Avant Group) (**Applicant**) proposes to include in their development:
   - Approximately 3,407 – 4,164 residential forest lots;
   - Four community hubs, including smaller scaled commercial / retail, smaller scaled housing, community infrastructure, accommodation and education;
   - Te Kawerau ā Maki owned Rangitoopuni Forest Reserve, including regenerating native forest and providing amenity for public access comprising approximately 573 hectares;
   - Approximately 200 km of publicly accessible walking and cycling paths;
   - Opportunities for marae and papakāinga housing;
   - Private infrastructure owned and operated by Te Kawerau ā Maki;
   - Protection and enhancement of riparian margins and wetland areas;
   - Extensive landscaping and native planting, including large-scale ngahere restoration over time;
   - All associated activities and infrastructure necessary to enable the development including earthworks, roading, creation of open space areas, stream works, and on-site stormwater, wastewater, and water supply facilities; and
   - Development of residential forest lots within an area of Lot 2 currently proposed for the wastewater irrigation field intended to service the Integrated Māori Development - Retirement Village. The wastewater irrigation field will be relocated to the south of the retirement village via a variation to 'Rangitoopuni' FTAA-2504-1055 to facilitate this amendment and a consequential boundary adjustment within Lot 2. The variation will be progressed under the RMA rather than under the Fast-track Approvals Act (**the Project**).

3. The zoning of the Project Area is Rural Production Zone, Mixed Rural Zone and Countryside Living Zone under the Auckland Unitary Plan – Operative in Part (**AUP-OP**).

4. Watercare's comments in this letter are based on the Application as at today's date, in particular the following lodged Application documents:
   - Planning Assessment for Referral under the Fast-track Approvals Act 2024, Rangitoopuni Forest Project, dated 2 June 2026.
   - Appendix F Rangitoopuni Forest Masterplan, dated 2 June 2026.
   - Appendix J Civil Infrastructure Report, dated 20th May 2026.

- Appendix N Consultation Summary.

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

Watercare's purpose and statutory obligations

6. 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.

7. 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**).

8. 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

<u>Watercare's Growth Servicing Policy</u>

9. As noted, the Project Area is zoned a mix of Rural Production Zone, Mixed Rural Zone and Countryside Living Zone under the AUP-OP.

10. Watercare's Growth Servicing Policy 2026[1] 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 Council's lead on strategic consistency and provision of public infrastructure servicing for such proposals.

11. In line with this policy, Watercare does not provide water or wastewater connections 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 has been provided by Auckland Council.

12. The Applicant is proposing private servicing and as such any comments on the proposed private water supply and/or wastewater servicing for the Project will be made by Auckland Council.

[1] Watercare_Growth_Servicing_Policy_2026_1e6fdac9c4.pdf

Additionally, any private water supply would be subject to regulation by Taumata Arowai as the water services regulator.

Adjacent land owned by Watercare

14. The land to the north of the Project and a small Lot (Lot 2 DP 138520) in the middle of the Project are owned by Watercare.

15. The land to the north of the Project is subject to a Water Supply Management Areas Overlay in the AUP-OP. The land subject to this overlay includes water supply catchments that are mainly in public ownership. The land owned by Watercare is intended to be developed to provide for a potential future water supply reservoir site. The exact timing and implementation of this is uncertain.

Conclusion

16. Any comments on the proposed private water supply and/or wastewater servicing for the Project will be made by Auckland Council. Additionally, any private water supply would be subject to regulation by Taumata Arowai as the water services regulator.

17. Watercare owns land adjacent to the Project which is planned for a potential future water supply reservoir however the exact timing and implementation of this is uncertain.
18. Watercare is available to discuss these matters further with Auckland Council and the Applicant as the Project progresses.

Nga mihi nui,



Anna Jennings
Manager – Major Developments
Watercare Services Limited

Address for correspondence:
Annika Swanberg
Senior Development Planner
Phone: s 9(2)(a)
Email: fasttrack@water.co.nz

Attachment 6 – Parks and Community Facilities

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	Rangitoopuni Forest
Address	Lots 2-8 DP 590677 Riverhead (Rangitoopuni) Forest
Council reference	PRR00044383
FT application number	FTAA-2605-1244

Respondent Information

Name	Douglas Sadlier
Role	Senior Parks Planner
Agency / Department	Specialist Operations Parks & Community Facilities (PCF) Community Directorate
Date	20 July 2026

Do you support the proposal proceeding through fast-track?

☐ Support

☐ Oppose

☒ Neutral

Agency/Department Response

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

Assessment Criteria (Section 22 FTAA)

Please consider the below assessment criteria in preparing your response:

- *Does the project have significant regional or national benefits?*
  Yes, the private owned open space network outlined in the application, through its sheer size, will have significant regional benefits, when connected appropriately to adjacent public open space areas. If these recommended greenway connections are implemented, it would be in accord with policies and objectives utilised by Parks and Community Facilities.
- *Would referring the project facilitate its delivery in a more timely and cost-effective way?*

Not from a Parks and Community Facilities perspective.

- *Is the referral unlikely to materially affect the efficient operation of the fast-track approvals process?*
  Not from a Parks and Community Facilities perspective.
- *Has the project been identified as a priority in any government or sector plan or strategy?*
  No indication from a Parks and Community Facilities perspective.
- *Will the project deliver new or support existing regionally/nationally significant infrastructure?*
  Yes, the project, as outlined in the application, will deliver significant green regional infrastructure in the form of walking and cyclist tracks, although in private ownership but with public access. The private forest reserve of 573ha could be of regional significance should it be accessible to the wider public.
- *Will the project increase housing supply or contribute to a well-functioning urban environment?*
  Not in scope and therefore not a matter for Parks and Community Facilities to advise on.
- *Will the project deliver significant economic benefits?*
  Not in scope and therefore not a matter for Parks and Community Facilities to advise on.
- *Will the project support primary industries (e.g., aquaculture)?*
  Not in scope and therefore not a matter for Parks and Community Facilities to advise on.
- *Will the project support development of natural resources (e.g., minerals, petroleum)?*
  Not in scope and therefore not a matter for Parks and Community Facilities to advise on.
- *Will the project support climate change mitigation (e.g., reduce/remove greenhouse gas emissions)?*
  Not in scope and therefore not a matter for Parks and Community Facilities to comment on.
- *Will the project support climate change adaptation or recovery from natural hazard events?*
  Not in scope and therefore not a matter for Parks and Community Facilities to advise on.
- *Will the project address significant environmental issues?*
  Not from a Parks and Community Facilities perspective.
- *Is the project consistent with local or regional planning documents (e.g., spatial strategies)?*
  Overall not in scope of Parks and Community Facilities to advise on except that where connectivity is provided as identified in the localised Greenways plan positive linkages within the region's infrastructure and surrounding parks can be established.
- *Are there any other relevant matters to consider?*
  See assessment below.

Auckland Council assessment criteria for fast-track referrals

Please consider the below assessment criteria in preparing your response:

- *Is the application clearly inconsistent with the Auckland Unitary Plan and/or not aligned with the outcomes in the Auckland Plan 2050?*
  Not in scope and therefore not a matter for Parks and Community Facilities to advise on.
- *Is the application out of sequence with the Auckland Plan Development Strategy and Future Urban Land Supply Strategy?*

From a Parks and Community Facilities perspective, it is noted that the area is developed within an area zoned for Rural Production and Rural Countryside Living which is not captured within the Manaaki Tāmaki Makaurau: Auckland Open Space, Sport and Recreation Strategy. Open space requirements are therefore not modeled for development within a rural context.

- *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?*
  Except for the provision of connectivity and green infrastructure provision, this is not in scope of Parks and Community Facilities to advise on.
- *Is there the potential for significant adverse environmental effects to occur?*
  No potential for significant adverse environmental effects to occur from a Parks and Community Facilities perspective and areas of interest.

Other relevant matters

Preamble

- Thank-you for your request for specialist input from the Parks Planning Team representing the wider Parks and Community Facilities Department (PCF) for this referral application under the Fast-track Approvals Act 2024 (FTAA).

- The following comments are provided at a high-level only and reflect the detail supplied in the referral request to flag any immediate matters of concern regarding potential effects on adjacent public owned land.

Greenways – Network View

- Council is interested in progressing walking and cycling connections as identified within the Rodney Greenways plans and access improvements as part of the Rangitoopuni development could assist in unlocking broader recreational path connections between Dairy Flat (in the north), and Kumeu/ Huapai (to the south).

Esplanade provisions

- A significant stream network has been noted in the application documentation for the subject site. Esplanade provisions are likely to be triggered under s.230(3)(4) of the Resource Management Act 1991 (RMA) and survey details of streams would be required to confirm application requirements in this regard/

Right of way – public access

- For public access onto future private land it is unclear as to the intention for instruments to secure this and to illustrate walkability for regional significance it will be important to understand how this will be secured.

Open space provision

- The provision of a substantial area for reserve purposes is acknowledged and would be a positive outcome on a regional scale if it is made accessible to the public.
- No need for parks and open spaces has been identified for the area and it can be confirmed that Council will not seek to acquire any land for that purpose

Final conclusions

- PCF acknowledge the positive outcomes of the proposal from the point of view of access improvements that are included as part of the Rangitoopuni development. This would assist in unlocking broader recreational path connections between Dairy Flat and Coatesville (in the north), Kumeu/ Huapai (to the south) and Riverhead Village to the east.

- This would ensure consistency with local and regional parks planning documents.

Prepared by:



Douglas Sadlier - Senior Parks Planner
Parks Planning Team
Parks and Community Facilities

Date: 20 July 2026

Accepted for release by:



Hester Gerber – Manager Parks Planning, Agency Lead for Parks and Community Facilities

Date: 20 July 2026

Attachment 7 – Rodney Local Board

Local Board Feedback – Fast-track Approvals Act 2024

Project Name: Rangitoopuni Forest
Location: Lots 2–8 DP 590677, Riverhead / Rangitoopuni Forest
Date: 9 July 2026
Prepared by: Guy Wishart, Chairperson, Rodney Local Board

1. Context – About Fast-track Applications and Referral Question Guidance

The Rodney Local Board understands that the Fast-track Approvals Act 2024 provides a streamlined consenting process for projects considered to have significant regional or national benefit. The Local Board does not have a formal decision-making role, but can provide local insights on community impacts, transport, open space, mana whenua engagement, infrastructure alignment and local implementation risks.

The Board's comments are therefore focused on matters relevant to the referral decision, particularly whether the project's potential regional and national benefits are balanced by the scale of local effects, infrastructure requirements, environmental risk, transport impacts and community consequences.

2. Local Board Feedback

Overall position

The Rodney Local Board acknowledges the significance of this whenua as Te Kawerau ā Maki Treaty Settlement Land, and recognises the importance of enabling mana whenua to realise cultural, social, environmental and economic aspirations for returned land.

The Board also acknowledges that the proposal is not a conventional subdivision. It is described as a large-scale, iwi-led, intergenerational development, with approximately 3,400–4,200 residential forest lots, four community hubs, opportunities for marae and papakāinga housing, extensive ecological restoration, approximately 200km of walking and cycling paths, and a proposed 573ha Rangitoopuni Forest Reserve.

The Board considers that the project appears to have potential regional and national benefits, particularly through Treaty settlement land development, housing supply, ecological restoration, public recreation, and long-term economic benefit for Te Kawerau ā Maki. However, the Board is concerned that the very large scale of the proposal, its rural location, reliance on private infrastructure, transport impacts, environmental effects and long delivery timeframe mean it should not be treated as straightforward.

If the project is referred, the Board requests that the Minister and any Expert Panel ensure the substantive application is subject to rigorous assessment, strong staging requirements, enforceable infrastructure triggers, enduring public access mechanisms, and clear protections to ensure costs and risks are not transferred to existing Rodney communities or Auckland ratepayers.

Treaty Settlement Land and cultural outcomes

The Board recognises the unique status of the land as Treaty Settlement Land returned to Te Kawerau ā Maki, and accepts that this context is central to any assessment of the proposal. The planning assessment notes that the Auckland Unitary Plan Treaty Settlement Land provisions are intended to enable a scale, intensity and range of activities that may not otherwise be anticipated by the underlying zoning.

The Board supports the principle that Te Kawerau ā Maki should be able to pursue long-term cultural, environmental, social and economic outcomes on its own whenua. The Board also acknowledges the proposal's intention to support rangatiratanga through Te Kawerau ā Maki-led planning, delivery, infrastructure ownership and long-term stewardship.

However, the Board also considers that Treaty Settlement Land status does not remove the need for robust assessment of local effects. The project must still demonstrate that transport, servicing, environmental, social infrastructure, natural hazard and community impacts can be properly managed over time.

Scale, rural location and planning alignment

The proposal is of a scale rarely seen in Rodney. It involves approximately 3,052ha of land, with around 2,242ha identified as developable, and a potential yield of more than 4,000 dwellings.

This is not a small rural subdivision. It would create a substantial new rural-residential settlement pattern across a large part of Riverhead / Rangitoopuni Forest. The Board considers that the Minister should be satisfied that this scale of development is consistent with Auckland's long-term growth, infrastructure and transport planning, and that it will not create an out-of-sequence growth outcome that places pressure on existing local communities.

The Board requests specific consideration of the relationship between this project, the Auckland Plan, the Future Development Strategy, the Auckland Unitary Plan rural framework, and the Treaty Settlement Land provisions.

Transport and road network effects

Transport is one of the Board's strongest concerns.

The surrounding road network is rural in nature. The transport assessment states that roads around Riverhead Forest generally have no footpaths or cycling facilities, and that Coatesville Riverhead Highway is the only arterial road in the area. It also identifies access

via Forestry Road, Robinson Road, Ararimu Valley Road, Mill Flat Road and Blackbridge Road.

The Board is concerned that adding thousands of dwellings in this location has the potential to significantly affect rural roads, intersections, safety, travel times, construction traffic, emergency access and the wider northwest transport network.

The Board notes that the applicant's own transport material identifies that further traffic modelling, intersection modelling, vehicle tracking and a full Integrated Transport Assessment will be required at the substantive application stage. This reinforces the Board's view that transport effects are not yet resolved.

The Board requests that any referral require:

- full Integrated Transport Assessment before substantive approval;
- modelling of cumulative effects across Riverhead, Coatesville, Kumeū-Huapai, Waimauku, Dairy Flat and SH16 connections;
- clear staging triggers so that road and intersection upgrades are delivered before lots are occupied;
- developer-funded upgrades where effects are generated by the project;
- safe walking, cycling and public transport connections beyond the site boundaries;
- proper assessment of construction traffic over the long development period;
- emergency service access and evacuation planning, including fire risk and natural hazard events.

The Board also notes that while future rapid transit and northwest transport projects are referenced, some remain unfunded or long-term. The proposal should not rely on future infrastructure that may not be delivered in time to serve the development.

Public transport and active modes

The Board supports the proposed 200km walking and cycling network in principle, and recognises the potential regional recreation benefits. However, trails within the site do not by themselves resolve transport impacts.

The transport assessment notes that the existing 126 bus route operates between Albany and Westgate via Riverhead, but that the absence of safe pedestrian connections and formal bus stop infrastructure limits its usability.

The Board requests that any substantive application include safe, practical and funded public transport access, bus stop infrastructure, walking and cycling links to existing settlements, and integration with Auckland Transport's future network planning. Internal trails must connect safely to the wider network and not leave residents dependent on private vehicles.

Infrastructure and servicing

The Board notes that the proposal relies on private infrastructure owned and operated by Te Kawerau ā Maki, including water, wastewater, stormwater and transport networks.

The Board does not oppose private infrastructure in principle, but seeks assurance that:

- infrastructure will be legally, financially and operationally sustainable over the long term;
- there will be clear accountability for maintenance, renewals, failures and upgrades;
- Auckland Council, Auckland Transport, Watercare, Healthy Waters or ratepayers will not inherit unfunded liabilities;
- wastewater disposal and stormwater systems will be resilient, independently reviewed and enforceable;
- staging of infrastructure will match staging of development;
- community hubs, open space and public access areas will be serviced safely and appropriately.

The Board also requests particular scrutiny of the proposed relocation of wastewater irrigation servicing the already approved retirement village on Lot 2, and how that interacts with the new proposal.

Flooding, stormwater and natural hazards

The Board notes that flooding occurs within parts of the site and downstream catchments, and that flood management is identified as a key consideration for the future substantive application. The planning assessment refers to building platforms being located outside identified overland flow paths where possible, use of stream corridors and gullies, revegetation, and around 20 attenuation structures based on preliminary modelling.

Given Rodney's recent flood history and community experience of natural hazard impacts, the Board requests very robust assessment of:

- 1% AEP plus climate change flood scenarios;
- downstream flood effects;
- cumulative catchment effects;
- long-term maintenance of attenuation devices;
- performance of stormwater systems after forestry harvesting and during revegetation;
- resilience of access roads during storm events;
- emergency access and evacuation.

The Board considers that flood and stormwater assumptions should be independently peer reviewed before any substantive approval.

Ecological restoration and environmental effects

The Board strongly supports the aspiration to transition large areas of exotic pine plantation into indigenous ngahere, protect riparian margins and wetlands, and establish a large connected forest reserve. The ecological material identifies extensive revegetation, a 573ha reserve, and significant long-term biodiversity gains.

However, the ecological assessment also identifies risks that must not be minimised. It notes that protected indigenous vegetation, wetlands, streams and riparian margins are proposed, but also that the works could result in harm to native fauna, including possible effects on

birds, lizards, bats and kauri snails, and that surveys and wildlife authorities are likely to be required.

The Board requests that any referral require:

- full ecological surveys before substantive consent decisions;
- avoidance of Significant Ecological Areas, wetlands, streams and high-value habitat wherever possible;
- independent ecological peer review;
- legally enforceable revegetation, weed control and pest control obligations;
- monitoring and reporting over the life of the project;
- clear mechanisms to protect covenanted vegetation on private lots;
- careful management of earthworks, sediment, stream works and culverts;
- fish passage and freshwater approvals to be fully addressed.

The Board supports the environmental ambition, but the ecological benefits must be secured, measurable and enforceable, not simply aspirational.

Open space, public access and recreation

The Board recognises the major potential benefit of a publicly accessible Rangitoopuni Forest Reserve and approximately 200km of walking and cycling paths. This could become a significant regional recreation asset.

However, the Board requests clarity on the legal mechanism that will secure public access in perpetuity. If the reserve remains privately owned, the public access arrangements, trail maintenance responsibilities, safety obligations, emergency access, closures, biosecurity controls and funding model must be clear.

The Board does not support a situation where a significant public recreation asset is promoted as a regional benefit, but its maintenance, safety or access costs later fall to Auckland Council without prior agreement.

Community hubs, social infrastructure and local services

The Board notes the proposal includes four community hubs with small-scale commercial, retail, community, accommodation and education activities.

The Board supports local services being provided within the development, as this could reduce travel demand and create local employment. However, the Board considers that the hubs must be more than indicative. A development of this scale will create demand for education, health, recreation, community facilities, emergency services, waste services and social infrastructure.

The Board requests that the substantive application include a clear social infrastructure assessment, including how and when community facilities will be delivered, how they will be funded, and how the development will avoid placing additional pressure on existing services in Riverhead, Kumeū-Huapai, Waimauku, Coatesville, Dairy Flat and Helensville.

Earthworks and construction effects

The project will require substantial earthworks, roading, stream works, servicing, construction traffic and staged development over an extended period, with completion forecast out to 2048.

The Board requests that construction effects be treated as a major issue, not a secondary matter. The long development timeframe means local residents may experience construction traffic, noise, sediment risk, road disruption and environmental disturbance for many years.

The Board requests robust construction management plans, staging controls, haul route restrictions, sediment and erosion controls, community communication requirements, and enforceable monitoring.

Engagement and local voice

The Board is concerned that the fast-track process limits public notification and appeal rights. For a project of this scale, local knowledge is essential.

The Board requests that, if referred, the Expert Panel actively seek local input from the Rodney Local Board, affected communities, adjoining landowners, recreation groups, emergency services, Auckland Transport, Watercare, Healthy Waters, and relevant council departments.

The Board also requests ongoing engagement with the Riverhead, Coatesville, Kumeū-Huapai, Waimauku and wider Rodney communities as the project progresses.

Ineligible activities and referral scope

The Board is not in a position to determine whether the project involves any ineligible activity. However, the Council invitation material notes that the applicant may seek approvals including resource consents for activities potentially prohibited under regulation 53 of the National Environmental Standards for Freshwater, wildlife approvals, archaeological authorities and freshwater fisheries-related approvals.

The Board requests that Auckland Council's regulatory, legal and technical teams carefully review whether any aspect of the proposal raises eligibility, scope or decline issues under the FTAA before referral is confirmed.

Assessment against FTAA referral criteria

The Rodney Local Board has considered the project against the relevant Fast-track Approvals Act referral criteria and Auckland Council's fast-track referral assessment considerations.

Referral criterion	Rodney Local Board comment

Does the project have significant regional or national benefits?	**Potentially yes.** The Board acknowledges the potential regional and national benefits arising from Treaty Settlement Land development, Te Kawerau ā Maki rangatiratanga, housing supply, economic activity, ecological restoration, public recreation and cultural outcomes. The applicant identifies approximately 3,446–4,212 residential lots, four community hubs, a 573ha Rangitoopuni Forest Reserve, approximately 200km of walking and cycling trails, and extensive restoration planting.
Would referring the project facilitate delivery in a more timely and cost-effective way?	**Likely yes for the applicant, but not without risk.** The Board accepts that referral could accelerate delivery of a complex, staged, iwi-led development. However, speed must not come at the expense of proper assessment of transport, infrastructure, ecological, flooding, servicing and community impacts. The Board requests that any referral include clear expectations for rigorous assessment at substantive application stage.
Is the referral unlikely to materially affect the efficient operation of the fast-track approvals process?	**The Board is not certain.** The scale of the proposal, long staging period to 2048, multiple approvals, possible freshwater, wildlife and archaeological matters, private infrastructure model, and significant transport effects mean this is a highly complex proposal. The Board considers it should only proceed through fast-track if the process is sufficiently resourced and scoped to deal with that complexity.
Has the project been identified as a priority in any government or sector plan or strategy?	**No. Not clearly identified in the material available to the Board as a named priority project.** The Board acknowledges alignment with broader Treaty settlement, housing supply, ecological restoration and iwi development outcomes. However, it is totally out of sequence with the Auckland Unitary Plan and PC 120.

Will the project deliver new or support existing regionally/nationally significant infrastructure?	**Partly, but this requires caution.** The project proposes significant private infrastructure, including water, wastewater, stormwater and transport networks owned and operated by Te Kawerau ā Maki. It also proposes a large recreation reserve and walking/cycling network. However, the Board does not consider these benefits should be treated as regionally significant public infrastructure unless public access, maintenance, funding and long-term responsibility are legally secured.
Will the project increase housing supply or contribute to a well-functioning urban environment?	**Yes and No. It will increase housing supply, but the well-functioning urban environment test is not a likely outcome.** The proposal would provide a substantial number of dwellings, including opportunities for marae and papakāinga housing. However, the Board is concerned about the rural location, low-density settlement pattern, private-vehicle dependency, limited existing public transport and the out-of-sequence growth.
Will the project deliver significant economic benefits?	**Potentially yes.** The applicant claims significant economic benefits, including 28,000 FTE years of employment over the life of the development and $3.88 billion in total value added to the Auckland region. The Board supports Te Kawerau ā Maki achieving long-term economic independence from Treaty Settlement Land, but requests that wider infrastructure costs and risks are also assessed as we have serious infrastructural deficits already.
Will the project support primary industries, such as aquaculture?	**No clear relevance.** The project does not appear to support aquaculture or primary production. It would transition land away from production forestry toward rural-residential development, open space and indigenous revegetation.
Will the project support development of natural resources, such as minerals or petroleum?	**No.** This criterion does not appear relevant to the proposal.

Will the project support climate change mitigation?	**Potentially, but not yet proven.** Large-scale indigenous revegetation, wetland enhancement and riparian restoration could contribute to climate mitigation and carbon sequestration. However, this must be balanced against emissions from construction, long-term vehicle dependency, infrastructure development and the loss of production forestry. The Board requests a clear climate impact assessment.
Will the project support climate change adaptation or recovery from natural hazard events?	**Potentially, but this requires robust independent review.** The applicant states that flood risk can be managed through retained flow paths, revegetation and attenuation devices. The Board considers this must be independently peer reviewed, including 1% AEP plus climate change scenarios, downstream effects, access resilience and long-term maintenance obligations.
Will the project address significant environmental issues?	**Potentially yes.** The Board strongly supports the aspiration to transition large areas of pine plantation into indigenous ngahere, protect wetlands and riparian margins, and create a large connected ecological network. However, ecological gains must be legally secured, monitored and enforceable. The ecological benefits cannot remain aspirational.
Is the project consistent with local or regional planning documents?	**No.** The land has a unique Treaty Settlement Land overlay, and the Board recognises this is central to the planning assessment. However, the project's scale, rural location and density raise questions about alignment with the Auckland Unitary Plan rural framework, Auckland Plan 2050, Auckland Future Development Strategy, infrastructure sequencing and transport planning. Auckland Council should provide a clear planning assessment on this issue.
Are there other relevant matters?	**Yes.** The Board considers the key additional matters are transport effects, emergency access, public transport, rural road upgrades, infrastructure ownership and liability, wastewater and stormwater servicing, flood resilience, public access mechanisms, social infrastructure, ecological

protection, construction effects, long-term staging, and meaningful local engagement.

Auckland Council fast-track referral assessment considerations

The Rodney Local Board also asks that Auckland Council's referral advice specifically address the following matters:

Auckland Council assessment matter	Rodney Local Board comment
Is the application clearly inconsistent with the Auckland Unitary Plan and/or not aligned with Auckland Plan 2050 outcomes?	Yes, it is inconsistent with the AUP. The site's Treaty Settlement Land status is significant, but the underlying rural zoning, scale of development, density, transport effects and settlement pattern need careful assessment against the Auckland Unitary Plan and Auckland Plan 2050.
Is the application out of sequence with the Auckland Plan Development Strategy and Future Urban Land Supply Strategy?	Yes. This is a major concern. The project would create a large new rural-residential community in a location where transport and social infrastructure are limited. The Board requests a clear assessment of whether the project represents out-of-sequence growth and what infrastructure consequences would follow.

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 substantial investment or upgrades?	No. This is one of the Board's strongest concerns. The proposal relies on private infrastructure, but the effects on the wider road network, public transport, emergency services, stormwater, downstream catchments and community infrastructure may still be significant. The transport assessment confirms existing rural roads have limited walking and cycling facilities, and further modelling and an Integrated Transport Assessment are still required.
Is there potential for significant adverse environmental effects?	Yes, there is potential for significant effects if not properly managed. The project involves large-scale earthworks, stream works, roading, wastewater disposal, stormwater systems, ecological restoration, vegetation clearance following forestry harvest, and long-term staged construction. The Board supports the restoration intent but requests independent ecological, stormwater and flood peer review.

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3. Conclusion

On balance, the Rodney Local Board considers that the project may meet several of the FTAA referral criteria, particularly in relation to Treaty Settlement Land development, housing supply, economic benefit, ecological restoration, cultural outcomes and regional recreation. However, the Board does not consider these benefits are sufficient, on their own, to justify referral unless the Minister is satisfied that the fast-track process can properly address the project's scale, complexity and significant local effects.

The Board's position is therefore a qualified one: the project has potential significant regional and national benefits, but referral should only proceed if there is clear direction that the substantive application must fully resolve transport,(Brighams Creek to Fosters Rd Alternate route-a current RoNS project), infrastructure, flooding, ecological, public access, staging, social infrastructure and long-term liability matters. The Board does not support any pathway that would transfer unresolved costs, risks or infrastructure burdens to Rodney communities, Auckland Council, Auckland Transport, Watercare, Healthy Waters, emergency services or Auckland ratepayers.

The Rodney Local Board recognises the exceptional Treaty Settlement Land context and the potential for significant cultural, environmental, housing, recreation and economic benefits from the Rangitoopuni Forest project.

However, the Board considers that the project's scale, rural location, transport impacts, infrastructure requirements, ecological effects, flood management, public access arrangements and long delivery timeframe make it a highly complex proposal.

The Board does not consider this project should be referred unless the Minister is satisfied that the substantive fast-track process can properly assess and manage these matters.

If referred, the Board requests that the Expert Panel be directed to give particular attention to:

- transport and road safety effects;
- infrastructure funding, ownership and long-term accountability;
- flood risk, stormwater and climate resilience;
- ecological protection and enforceable restoration outcomes;
- public access and reserve management mechanisms;
- social infrastructure and community facility provision;
- staging, construction effects and cumulative local impacts;
- meaningful engagement with affected Rodney communities.

The Board's position is that the project may have significant regional and national benefits, **but those benefits must not come at the expense of unresolved local infrastructure burdens, unmanaged environmental effects, or long-term costs being transferred to Rodney communities and Auckland ratepayers.**

4. Contact for Further Information

Name: Guy Wishart
Role: Chairperson, Rodney Local Board
Email: s 9(2)(a)

Dear Ashiley

Further to our call last week I am emailing you further to the Council's written comments issued on the 22.07.26 regarding the Rangitoopuni Forest Project. Within that response detailed response comments were provided in regard to the Rangitopuni Waitemata Aquifer and potential groundwater availability, if the proposal were to seek the use of that aquifer.

In that response it was identified, and in the context of various proposals relating to the Rangitoopuni Waitamata Aquifer, that the Council Groundwater Team and Environmental Evaluation and Monitoring Unit were proactively undertaking a review of the estimated remaining allocation. The outcome of this workstream is that the reviewed water availability for Rangitopuni Waitemata aquifer has been confirmed at a greater remaining estimated allocation than understood on 22.07.26.

The effect of this on the advice previously provided is:

- Importantly - The advice set out in the 22.07.26 letter that the proposal does not include approvals for a water take and therefore does contravene the competing applications consideration for the purposes of our invited comments under s17(3)(a)(i) is retained.
- However, even if the proposal did include a water take from this aquifer, based on the updated figure of remaining allocation there would not at the date of this advice be a competing applications concern in respect to this natural resource.
- The revised understood greater allocation within the Rangitopuni Waitemata Aquifer provides a different context/availability for the comments provided under S17(3)(b) if a water take was to be proposed from this Aquifer and it could be established to be accessible from the site (subject to detailed). At a high level this becomes a potential option for the project if this were to be sought and the project accepted and advanced.

Trust that update is helpful as an update. I have separately advised the applicant's agent that the Aquifer has more remaining allocation at this date than was understood in our referral letter.

Thanks

Joe

Joe Wilson | Principal Project Lead
Planning & Resource Consents Department| Premium Unit
Mobile: s 9(2)(a)
135 Albert Street, Auckland Central

Please note that I work from the Albert Street office Monday and Thursday, Albany office on Friday, and either from home or the office Tuesday and Wednesday. I am contactable by phone or email. Many thanks.

From: Infrastructure Portfolio
To: FTAreferrals
Subject: FW: For the Minister"s Office - Invitation to comment Rangitoopuni Forest FTAA-2605-1244
Date: Thursday, 9 July 2026 10:39:22 am

From: Paul Goldsmith (MIN) <P.Goldsmith@ministers.govt.nz>
Sent: Thursday, 9 July 2026 10:28 AM
To: Infrastructure Portfolio <Infrastructure.Portfolio@parliament.govt.nz>
Subject: RE: For the Minister's Office - Invitation to comment Rangitoopuni Forest FTAA-2605-1244

Good morning,

No comment from ACH.

Thank you,

Victoria
Private Secretary – Arts, Culture and Heritage | Office of Hon Paul Goldsmith
Minister for Arts Culture and Heritage | Minister of Justice
Minister for Media and Communications | Minister for Pacific Peoples
Minister for the Public Service and Digitising Government
Minister for Treaty of Waitangi Negotiations
Email: s 9(2)(a) Website: www.Beehive.govt.nz
Private Bag 18041, Parliament Buildings, Wellington 6160, New Zealand

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From: Infrastructure Portfolio
Sent: Tuesday, 30 June 2026 9:46 AM
To: Nicola Willis (MIN) <N.Willis@ministers.govt.nz>; Nicola Grigg (MIN) <N.Grigg@ministers.govt.nz>; Tama Potaka (MIN) <T.Potaka@ministers.govt.nz>; Paul Goldsmith (MIN) <P.Goldsmith@ministers.govt.nz>; Erica Stanford (MIN) <E.Stanford@ministers.govt.nz>; Chris Penk (MIN) <C.Penk@ministers.govt.nz>; Simon Watts (MIN) <S.Watts@ministers.govt.nz>
Cc: FTAreferrals <ftareferrals@mfe.govt.nz>
Subject: Invitation to comment on Fast-track referral application for the Rangitoopuni Forest project under the Fast-track Approvals Act 2024 – FTAA-2605-1244

To:

- Minister for Economic Growth
- Minister for the Environment
- Minister for Māori Crown Relations: Te Arawhiti
- Minister for Māori Development
- Minister of Conservation
- Associate Minister of Housing
- Minister for Arts, Culture and Heritage
- Minister of Education
- Minister of Defence
- Minister for Auckland

NOTE - This project lodged an application after 31 March 2026, therefore a 15-day comment period applies.

Dear Ministers,

Hon Chris Bishop, the Minister for Infrastructure (the Minister), has asked for me to write to you on his behalf.

The Minister has received an application from Rangitoopuni Developments Limited Partnership for referral of the Rangitoopuni Forest project under the Fast-track Approvals Act 2024 (the Act) to the fast-track process (application reference FTAA-2605-1242).

The purpose of the Act is to facilitate the delivery of infrastructure and development projects with significant regional or national benefits.

Invitation to comment on referral application

I write in accordance with section 17 of the Act to invite you to provide written comments on the referral application. I have provided summary details of the project below.

If you wish to provide written comments, these must be received by **return email** within **15 working days** of receipt of this email, being **22 July 2026**. The Minister is not required to consider information received outside of this time frame. Any comments submitted will contribute to the Minister's decision on whether to accept the referral application and to refer the project.

If you do not wish to provide comments, please let us know as soon as possible so we can proceed with processing the application without delay.

If the Minister decides to accept the application and to refer the project, the Applicant will need to complete any preliminary steps required under the Act and then lodge their substantive application for the approvals needed for the project. An expert panel will be appointed to decide the substantive application.

Process

The application documents are accessible through the Fast-track portal. Please note that application documents may contain commercially sensitivity information and should not be shared widely. If you haven't used the portal before, you can request access by emailing ftareferrals@mfe.govt.nz. Once you are registered and have accepted the terms and conditions, you will receive a link to view the documents. Existing users will be able to see application documents via the request when logging into the portal. Should you need for your agency to provide any supplementary information, a nominated person can be provided access to the portal, access can be requested by emailing ftareferrals@mfe.govt.nz.

To submit your comments on the application, you can either provide a letter or complete the attached template for written comments and return it by replying to this email, infrastructure.portfolio@parliament.govt.nz.

Before the due date, if you have any queries about this email or need assistance with using the portal, please email contact@fasttrack.govt.nz. Further information is available at https://www.fasttrack.govt.nz/.

Important Information

Please note that all comments received from Ministers invited to comment will be subject to the Official Information Act 1982. Comments received will be proactively released at the time the Minister for Infrastructure makes a referral decision, unless the Minister providing comments advises the Minister for Infrastructure's office they are to be withheld, at the time they are submitted.

If a Conflict of Interest is identified by the Minister providing comments at any stage of providing comments, please inform my office and the Cabinet Office immediately. The Cabinet Office will provide advice and, if appropriate, initiate a request to the Prime Minister to agree to a transfer of the project/portfolio invite to another Minister (a request to transfer a COI from one Minister to another can take 1-7 days).

Project summary

Project name	Rangitoopuni Forest
Applicant	Rangitoopuni Developments Limited Partnership
Location	Riverhead, Auckland
Project description	The project is a staged, large-scale subdivision that will transition the

	existing production forest to a predominantly rural-residential and open space environment. Development staging is proposed to align with the forestry harvest cycle. The project provides for predominantly low-density residential "forest lots", generally ranging from approximately 2,500 m^2 to 1 hectare, and a smaller component of more compact housing located within and adjacent to proposed community hubs. The project also includes provision for marae and papakāinga housing. The project involves the construction and establishment of: a. approximately 3,407–4,164 residential forest lots b. four community hubs, including small-scale commercial and retail activities, housing, community infrastructure, accommodation, and education facilities c. a recreation hub, including outdoor recreation services and associated community, cultural, and accommodation infrastructure d. the establishment of the Te Kawerau ā Maki-owned Rangitoopuni Forest Reserve, comprising approximately 573 hectares of regenerating native forest and land available for public access e. approximately 200 km of publicly accessible walking and cycling tracks f. private infrastructure to be owned and operated by Te Kawerau ā Maki g. the protection and enhancement of riparian margins and wetland areas h. landscaping and native planting, including large-scale ngahere restoration across the site, with approximately 2,500 hectares of protected native vegetation across the reserve and covenanted areas on private lots i. all associated works required to enable the development, including earthworks, roading, open space formation, stream works, and on-site stormwater, wastewater, and water supply infrastructure. The project is proposed to be undertaken in eight stages over an approximately 20-year timeframe, with construction expected to commence in late 2027 to early 2028, and overall completion anticipated by 2048. A single substantive application is to be lodged for all stages of the project.

Kind regards,

Office of Hon Chris Bishop
Attorney-General | Minister of Housing | Minister for Infrastructure | Minister Responsible for RMA Reform | Minister of Transport | Associate Minister of Finance | MP for Hutt South

Office: 04 817 6802 | EW 6.3
Email: c.bishop@ministers.govt.nz Website: www.Beehive.govt.nz
Private Bag 18041, Parliament Buildings, Wellington 6160, New Zealand

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Ngā mihi.

Hon James Meager

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

21 JUL 2026

JMITC-62

Hon Chris Bishop
Minister for Infrastructure
Parliament Buildings
WELLINGTON

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

Invitation to comment on the Rangitoopuni Forest Project under the Fast-track Approvals Act 2024

Tēnā koe Minister Bishop,

Thank you for the invitation to comment on the Rangitoopuni Forest Project under section 17 of the Fast-track Approvals Act 2024.

Maori Crown Relations: Te Ariwhiti and Maori 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 prepared by the Ministry for the Environment.

Housing:

I have also considered the application as Acting Minister of Housing. The proposal comprises a staged, large-scale development including approximately 3,407 to 4,164 residential forest lots, community hubs, marae and papakāinga housing opportunities, significant native forest restoration, public open space and associated infrastructure. The proposal would also establish the Te Kawerau ā Maki-owned Rangitoopuni Forest Reserve and extensive walking and cycling networks.

The proposal would contribute to housing supply and housing choice in Rodney. There are currently 105 households on the Housing Register in the Rodney Local Board area, with demand concentrated in smaller households. The proposal would provide additional housing capacity and retirement living opportunities, although it is primarily focused on low-density residential and retirement living outcomes.

The project has a unique Treaty settlement context. The land was returned to Te Kawerau ā Maki through its Treaty settlement and the proposal is intended to support the iwi's long-term

social, cultural, environmental and economic aspirations. The proposal would also deliver significant environmental benefits through native forest restoration, ecological enhancement and the establishment of approximately 573 hectares of reserve land and public open space.

The site is zoned Rural – Countryside Living and Rural Production and is not identified for future urban development under the Auckland Future Development Strategy. While Future Urban land is located nearby, development of those areas has been delayed due to infrastructure constraints. The proposal relies on private water and wastewater servicing, and consideration will need to be given to future infrastructure provision, servicing arrangements and environmental management should the project proceed. The site is relatively close to Riverhead village, although access to services and public transport is limited and the wider area experiences congestion on State Highway 16 and local roads. Infrastructure capacity, transport accessibility, flooding and environmental management matters will require further consideration through the detailed assessment process.

From the perspective of the Housing Portfolio, the proposal would contribute additional housing supply in Rodney while supporting the development aspirations of Te Kawerau ā Maki on Treaty settlement land. While there are planning, infrastructure, transport and environmental 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.

Nāku noa, nā

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

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-0035811

Dear Chris

Thank you for the opportunity to comment under the Fast-track Approvals Act 2024 (the Act) on the following referral applications:

- Rangitoopuni Forest, FTAA-2605-1244

Out of Scope

I am providing comment in my capacity as Minister for Economic Growth, focusing on whether these applications are likely to deliver significant economic benefits under section 22(2)(a)(iv) of the Act, based on the information provided in their referral applications.

Rangitoopuni Forest, FTAA-2605-1244

This application is for the Rangitoopuni Forest development, located northeast of Riverhead's existing urban residential areas in Auckland. The proposal relates to around 2,980 hectares of Treaty Settlement Land within Riverhead Forest and includes approximately 3,760 rural lifestyle lots, around 150 small-scale residential dwellings, and provision for small-scale retail, commercial and light industrial activities, tourism activities, community facilities and a small water storage structure.

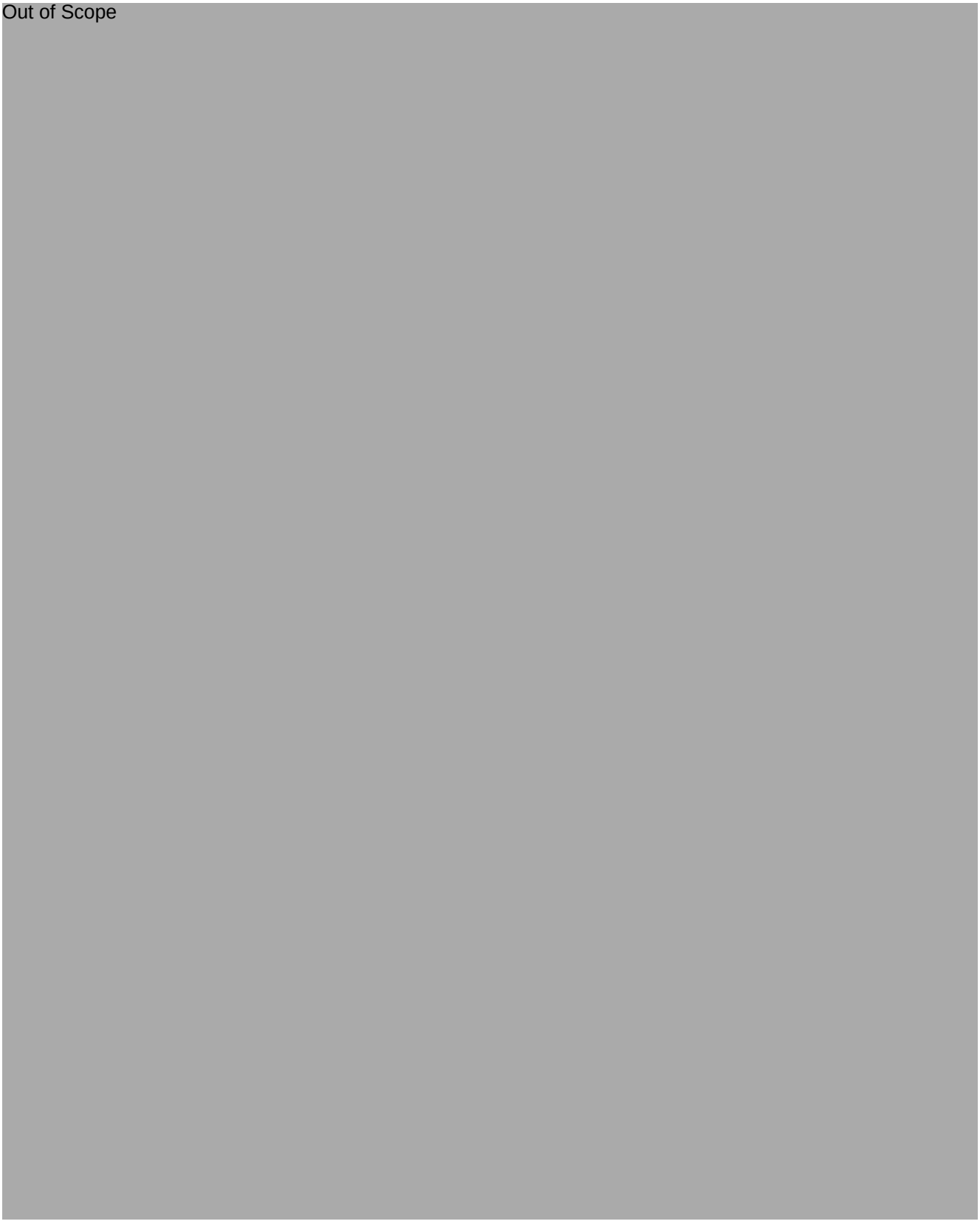
Based on the economic assessment provided by the applicant, the proposal is expected to generate substantial economic activity over its 20-year development period. The project is estimated to involve approximately $5.69 billion in direct expenditure, excluding land, and generate around $3.88 billion in total GDP for the Auckland region. It is also expected to support around 27,820 full-time equivalent (FTE) years of employment over the development period, including direct, indirect and induced employment across all sectors. This includes approximately 2,800 FTE jobs in the peak construction year.

The assessment identifies wider benefits from the proposal, including increased housing and residential capacity, greater housing choice, potential improvements to affordability in West Auckland, and more efficient use of existing and planned infrastructure networks. It also notes that the proposal would enable opportunities for marae and papakāinga housing (properties developed to support collective whānau living), supporting iwi aspirations for housing, intergenerational wellbeing and maintaining cultural connections to ancestral land.

In the short to medium term, the proposal would generate significant capital expenditure, GDP and employment through construction and is likely to deliver significant regional economic benefits for Auckland. Longer-term benefits include increased housing supply and residential

capacity in West Auckland, including support for Māori housing and economic aspirations. This proposal may be considered under section 22(2)(a)(iii) of the Act, to the extent that it would increase housing supply, address housing needs and contribute to a well-functioning urban environment in Auckland.

Out of Scope



Out of Scope

Yours sincerely



Hon Nicola Willis
Minister for Economic Growth

Office of Hon Erica Stanford

Minister of Education
Minister of Immigration
Lead Coordination Minister for the Government's Response to the Royal Commission's Report into Historical Abuse in State Care and in the Care of Faith-based Institutions

22 JUL 2026

Hon Chris Bishop
Minister for Infrastructure

Ref: GEMS - 48966

Tēnā koe Chris,

Thank you for the opportunity to comment on the Rangitoopuni Forest referral application under the Fast Track Approvals Act 2024.

The development proposes approximately 4000 dwellings on Treaty Settlement land north of Riverhead, within the Riverhead schooling catchment and wider Massey-Hobsonville-Kaipara network. The Ministry of Education has calculated the proposed development could result in an estimated 1,200 primary school students and 1,000 secondary students over time.

This level of demand could require the equivalent of a new large primary school and accelerate the timing of future secondary network investment in the area beyond currently anticipated timeframes. Provision of Early Learning pathways would also need to be considered.

The projected demand is not currently accommodated within existing longer term network planning assumptions. Early engagement would enable the Ministry to better understand growth projections and staging in detail, align education provision with preferred school models and respond appropriately to demand as development yields are realised.

While the Ministry has not been engaged to date on the project, my officials welcome engagement with the applicant as the project progresses.

Nāku noa, nā

Hon Erica Stanford
Minister of Education

Private Bag 18041, Parliament Buildings, Wellington 6160, New Zealand | +64 4 817 6805 | e.stanford@ministers.govt.nz

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

Project name	**Rangitoopuni Forest**

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)	Department of Conservation (DOC)		
***First name**	David		
***Last name**	Greaves		
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 22 July 2026

Fast Track Applications Manager

Director-General of Conservation s17 comments

Project name	Rangitoopuni Forest
Applicant name	Rangitoopuni Developments Limited Partnership
Application number	FTAA-2605-1244
Project summary details	The project area is located within the Riverhead (Rangitoopuni) Forest, northwest of Auckland City in the Auckland Region, and comprises seven adjoining landholdings with a total area of approximately 3,052 hectares, of which approximately 2,242 hectares is identified as developable land. The project is a staged, large-scale subdivision that will transition the existing production forest to a predominantly rural-residential and open space environment. The project provides for predominantly low-density residential "forest lots", generally ranging from approximately 2,500 m^2 to 1 hectare, and a smaller component of more compact housing located within and adjacent to proposed community hubs. The project also includes provision for marae and papakāinga housing. The applicant seeks the following approvals via the fast-track approvals process to authorise the project: a. resource consents under the Resource Management Act 1991, potentially including for activities prohibited under regulation 53 of the National Environmental Standards for Freshwater (NES-F), and for standard freshwater fisheries activities b. wildlife approvals under the Wildlife Act 1953 c. archaeological authorities under the Heritage New Zealand Pouhere Taonga Act 2014 d. an approval, a dispensation, or an authorisation that would otherwise be applied for in respect of a complex freshwater fisheries activity under the Freshwater Fisheries Regulations 1983 or the Conservation Act 1987.

1. General comment

1.1 As the Project includes an approval under a specified Act for which DOC is the administering agency (being the Wildlife Act 1953 and Freshwater Fisheries Regulations 1983), the Applicant was required to notify DOC in accordance with section 11 of the Fast Track Approvals Act 2024 (the 'FTAA' or the 'Act').

1.2 No meetings were held between the Applicant and DOC. DOC provided a formal pre-lodgement consultation summary to the Applicant on the 21st of May 2026.

1.3 While DOC does not have sufficient information to determine the level of any actual and potential environmental effects, DOC considers that it is likely that with the appropriate design and conditions, effects can be managed to appropriate levels.

1.4 DOC is not aware of any reason the project should not be referred.

2 Minister's decision on referral application

2.1 FTAA sections 21 and 22 set out matters to be considered in determining whether a referral application should be accepted.

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

2.3 For completeness, DOC has considered the criteria for assessing referral applications in section 22 and has not identified anything it considers the Minister should take into account that has not already been acknowledged by the Applicant in its referral application.

2.4 Section 21(3) and (4) set out when the Minister may/must decline a referral application. DOC has considered these criteria and comments as follows:

Section	Criteria	Comments
21(3)(b)	Does the project involve an ineligible activity	DOC has considered section 5(1) (f), (h), (i), (j) and (k) of the Act. DOC has not identified any aspect of the Project that would be ineligible under these sections.
21(3)(c)	Is there adequate information to inform a decision	DOC considers that there is adequate information to evaluate the proposal in terms of a referral decision. DOC notes that the Applicant has indicated the site is dominated by exotic vegetation, however, there may be limited indigenous species that may need to be cleared. If the project is referred, additional information about the values of the site and any impacts of the proposal to habitat and indigenous vegetation will need to be provided as part of the substantive application. It is recommended that any historical ecological surveys are updated to ensure they reflect the current conditions of the site. DOC notes that lizards, birds and long-tailed bats are likely present on the site. In addition, green and golden bell frogs and Kauri snails have been recorded within the site. It is also likely that wetland birds including Australasian bittern (Nationally

Section	Criteria	Comments
		Critical) inhabit the project site. At this stage the applicant has not identified if Wildlife Act Approval is being sought for handling any of these species. Further clarification is required. The Applicant should be aware that culverts should be designed in accordance with New Zealand fish passage guidelines and that any culverts required may require a complex freshwater fisheries activity approval.
21(4)	Are there any other reasons not specified	DOC has not identified any other reasons why the Project should not be referred.
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.	It is acknowledged that the site consists of Treaty settlement redress land returned to Te Kawerau ā Maki in 2014. DOC notes that some or all of the site falls within the Conservation Protocol Area, or areas defined for similar relationship documents, of the following Treaty settlement entities: • Te Kawerau Iwi Settlement Trust • Ngāti Tamaoho Settlement Trust • Ngā Maunga Whakahii o Kaipara Development Trust • Ngāi Tai ki Tāmaki Trust
21(5)(b)	Would it be more appropriate to deal with the proposed approvals under another Act(s)	DOC has not identified any reason why the Wildlife Act approval or Freshwater Fisheries approval should not be dealt with under the FTAA.
21(5)(c)	Would the project have significant adverse effects on the environment	Based on our knowledge of the existing environment and species expected to occur on the site, our understanding of the Project, and our experience of the kinds of design measures and conditions that could be implemented, DOC considers that once more detailed information is available, it would be possible to achieve a project with the imposition of conditions (that are appropriate, enforceable, include best management practice, and apply the relevant ecological management plans, as and where required), that does not have significant adverse effects on the environment. Treaty settlements are considered relevant to the site: • **Te Kawerau ā Maki Claims Settlement Act 2012**

Section	Criteria	Comments
		• **Ngāti Tamaoho Claims Settlement Act 2018** • **Ngāti Whatua o Kaipara Claims Settlement Act 2013** • **Ngāi Tai ki Tāmaki Claims Settlement Act 2018** The conservation relationship documents require DOC to consult with the relevant Post-Settlement Governance Entities on conservation issues of mutual interest. DOC has a statutory obligation to advocate for the preservation of freshwater fisheries, the protection of wetlands, riparian areas, water quality and indigenous species, vegetation and habitats. Further, DOC has an obligation to preserve and protect all areas of historic and cultural significance on lands managed by the Department. The applicant should carefully consider how to preserve, protect, and minimise impacts on these matters. It is noted that under the Te Kawerau ā Maki Claims Settlement Act 2012, Te Kawerau ā Maki has a Statutory Acknowledgement over the Rangitoopuni Stream and its tributaries. DOC acknowledges the special relationship that Te Kawerau ā Maki has with the Rangitoopuni Stream and its tributaries. It is further noted that the following Treaty settlement under negotiation has been identified as potentially relevant to the site: • Ngāti Whatua (remaining claims) Should this settlement pass, additional conservation-related provisions may apply. Additional information on under-negotiation Treaty settlements can be found at Te Tari Whakatau – The Office of Treaty Settlements. DOC encourages the applicant to stay up-to-date on any potentially relevant advances in Treaty settlement legislation.
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	No competing applications have been identified.

2.5 Section 22 sets out the criteria for the Minister for accepting a referral application. DOC has considered these criteria and comments as follows:

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 Freshwater Fisheries 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) and 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 Proposal: • Conservation General Policy 2005 ('CGP'); • Auckland Conservation Management Strategy 2014. The application is not inconsistent with the relevant planning provisions. However, consideration needs to be given to: • Protecting and restoring relevant indigenous ecosystems • Ensuring the persistence and preservation of threatened species • Protecting freshwater fish habitat and fish passage.

22(b)	Any other matters the Minister may consider as relevant?	• The Applicant has determined a Wildlife Act approval is required, but has not provided any detail about why it is required. Further information is required on this aspect of the Proposal. Detailed assessments should be undertaken to confirm the presence and mitigation needs associated with protected species. • The further information response has indicated that no works are proposed to be undertaken on Public Conservation Land. It is noted that Rangitoopuni Stream Marginal Strip (2797390) is located adjacent to the application site. If the design of the Proposal changes and includes Public Conservation Land (including marginal strips), additional approvals under the Conservation Act 1987 will be required. • Further clarification is required with regards to works within the existing waterways on the Site. The application notes that freshwater fisheries approvals will be required for these works, including culvert installation. Further detail is required of all works in the waterways, to determine if a complex freshwater fisheries approval is required or not. • As identified in the pre-application correspondence, in order to properly assess the application, a comprehensive ecological assessment and assessment of environmental effects is required. The ecological assessment should include: o Findings from surveys of existing ecology onsite, including surveys for any Threatened and At-Risk species, including indigenous flora and stocktake of any waterways, streams and wetlands onsite o Details of any proposed works within streams, wetlands or waterways (including enhancement activities) and how these activities are expected to impact any existing freshwater habitats onsite o Details of any proposed mitigations and how these will reduce any ecological impacts o For any unavoidable ecological impacts, a description of why they cannot be avoided

		and a reference to how they will be offset/compensated for • The pre-application consultation has identified DOC's requirements with regard to the information necessary to support management plans, offsetting and compensation and monitoring plans.

3 Other considerations

3.1 DOC has provided input to a number of fast-track projects to date where additional conservation approvals that would have been available under the FTAA have not been included in a substantive application. In some cases, it has been necessary for applicants to seek additional approvals via normal processing. This can result in inefficiencies, additional costs and undermining the benefits of the 'one stop shop' approach of the FTAA.

3.2 DOC recommends the Applicant consider whether it should seek to include additional approvals that may be required for the project and suggests the Minister should consider whether further information should be sought from the Applicant.

3.3 Given the lack of specific detail in the referral application, DOC considers it would be highly beneficial for the Applicant to engage further with DOC as it relates to any conservation approvals (as well as conservation matters subject to RMA consideration) prior to making any substantive application. Benefits include ensuring information necessary to support decision-making with respect to conservation approvals is included; supporting the management of any actual and potential adverse effects on the environment; and early identification and resolution of any issues.

4 Matters for the Minister to specify (s27)

4.1. None identified.



Linda Kirk
Fast Track Applications Manager

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

Date: 22 July 2025

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

Comments on referral application under the Fast Track Approvals Act 2024

Rangitoopuni, FTAA-2605-1244

Contact Details	
Organisation Name	Heritage New Zealand Pouhere Taonga (HNZPT)
Contact person	HNZPT Fast-track Team
Contact Number	s 9(2)(a)
Email	fasttrack@heritage.org.nz

General Comments

1. Rangitoopuni Developments Limited Partnership (Applicant) has lodged an application for referral of the Rangitoopuni Forest (project) under the Fast-track Approvals Act 2024 (the FTA Act).
2. In accordance with section 17(1)(c) of the FTA Act, Heritage New Zealand Pouhere Taonga (HNZPT) has been invited to comment on the referral application as the administering agency for the Heritage New Zealand Pouhere Taonga Act 2014.
3. HNZPT has not been provided with application documents that are relevant to the archaeological authority application. HNZPT comments as follows:

Consultation and Engagement

4. A pre-lodgement notification was received from the applicant on 1 May 2026. HNZPT responded on 29 May 2026 noting that the wider area contains recorded archaeological sites, and that the project area should be assessed by a suitably qualified archaeologist to determine whether there is potential for unrecorded sites to exist within the project area.

Archaeological Authority Application

5. The Applicant has provided no archaeological assessment with their referral application.
6. Without an archaeological assessment, the potential for subsurface archaeological evidence is unknown. As such, HNZPT is unable to determine whether an authority is required for the project.
7. HNZPT notes that project is an iwi-led intergenerational development project that is shaped by the identify, history and aspirations of Te Kawerau ā Maki and grounded in Te Ao Māori.
8. The project area is Treaty Settlement land returned to Te Kawerau ā Maki as part of their settlement with the Crown, through the Te Kawerau ā Maki Claims Settlement Act (2015). The land is of extremely high significance given it is land returned to the iwi as redress for the Crown's historic breaches of Te Tiriti o Waitangi. It is also noted that, under the Te Kawerau ā

Maki Claims Settlement Act 2015, Te Kawerau ā Maki has a Statutory Acknowledgement over the Rangitoopuni Stream and its tributaries.

9. Tangata whenua has been consulted with, and a Cultural Impact Statement has been provided by Te Kawerau ā Maki. Should the project be referred and an authority sought, appropriate consultation with tangata whenua must be provided with a substantive application.

Conclusion

10. Due to the existence of recorded archaeological sites within the wider forest, HNZPT continues to recommend that the project area should be assessed by a suitably qualified archaeologist to determine whether there is potential for unrecorded sites to exist within the project area.
11. This assessment will inform whether an authority is required for the works, and if so, what conditions will be required to mitigate the adverse effects on archaeological values.
12. If the project is referred and an authority is required, HNZPT anticipates further engagement with the Applicant to ensure all relevant documentation is provided with a substantive application, including:

- A fulsome archaeological assessment;
- Appropriate methodologies and strategies proposed;
- Appropriate draft management plan and research strategy;
- Evidence of appropriate consultation with tangata whenua; and
- Appropriate draft conditions.

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

Project name	Rangitoopuni Forest

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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)	New Zealand Transport Agency Waka Kotahi		
***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

New Zealand Transport Agency Waka Kotahi (NZTA) thanks the Minister for the invitation to comment on the referral of this application to the Fast-track Approvals process.

NZTA had previously provided neutral comments on the substantive application for the Rangitoopuni development, which comprised of a 210-lot subdivision and 296-unit retirement village, which was granted by the EPA in November 2025. The site for Rangitoopuni Forest is located approximately 3 km from State Highway 16 (SH16) and is accessed via local roads under Auckland Transport's jurisdiction.

Most trips generated by the development are expected to be made by private vehicles. With no public transport services or dedicated walking and cycling connections to SH16, the proposal is likely to increase traffic volumes at key intersections, including Coatesville–Riverhead Highway/SH16 and Old North Road/SH16.

NZTA recommends that the following matters be addressed in the substantive application.

Insert Fast-track logo

Traffic Effects on State Highway 16 (SH16)

NZTA has reviewed the Transport Assessment (29 May 2026) and considers that it does not provide sufficient information to assess the scale or acceptability of the proposal's effects on SH16. In particular, it does not identify the distribution of generated trips beyond the site, making it difficult to understand impacts on SH16 and key intersections.

A comprehensive Integrated Transport Assessment (ITA) should therefore be prepared for the future substantive application, including AM and PM peak origin–destination data and directional splits, to assess the proposal's effects on the wider transport network. Detailed crash analysis should be included in the ITA to assess safety impacts at key intersections on SH16.

The Coatesville–Riverhead Highway/SH16 intersection is expected to be a key gateway for development traffic and should be a focus of the ITA. Given the scale of the proposal, microsimulation modelling is recommended to better assess cumulative effects, corridor performance, queue spillback, and network operation along SH16.

The modelling should account for all consented and planned developments in the Kumeū, Huapai, Riverhead, Waimauku, and Whenuapai areas. The ITA should also test scenarios with and without key transport projects, including delayed-delivery scenarios, to ensure the development is not reliant on unfunded or uncommitted NZTA infrastructure.

The Transport Assessment assumes a peak-hour trip generation rate of 0.85 trips per dwelling. Given the site's fringe location and likely reliance on private vehicles, NZTA recommends sensitivity testing using a higher rate of 1.2 trips per dwelling to better assess potential transport effects.

Stage 2 of Brigham Creek to Waimauku Safety Improvements Project

The Transport Assessment assumes that the Stage 2 of the Brigham Creek to Waimauku Safety Improvements Project will provide sufficient capacity. These upgrades include a two-lane roundabout at SH16/Coatesville Riverhead Highway intersection with walking and cycling facilities, a shared path between Brigham Creek and Kumeū, and widening SH16 to four lanes between the Brigham Creek Road and Taupaki Road roundabouts.

Construction of this project is currently expected to begin in early 2028 and be completed by late 2030. However, these timeframes remain subject to change.

Given the existing congestion and poor levels of service on SH16, the ITA should demonstrate that the proposed upgrades to SH16 can accommodate both proposal-generated traffic and future traffic growth.

NZTA also recommends the proposal to consider a staged development approach aligned with the delivery of the Stage 2 Project to help manage the proposal's traffic impacts on SH16.

Conclusion

If the proposal is referred to use the fast- track process, NZTA expects a comprehensive Integrated Transport Assessment (ITA) to be prepared and submitted as part of the substantive application, addressing the potential traffic effects SH16.

The ITA should include trip distribution analysis, detailed crash analysis at key intersections, sensitivity testing, and scenario testing. It should also identify the potential traffic effects of the proposal on State Highway 16 (SH16) and demonstrate how the proposed SH16 upgrades can accommodate both proposal-generated traffic and future traffic growth.

NZTA would welcomes the opportunity to discuss the proposal further and 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 22 July 2026