Campbell Brown

18 June 2026

Stephanie Frame
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C/- Environmental Protection Authority

By email: referral@fasttrack.govt.nz

RE: Response to Request for Information of the referral application for the Rangitoopuni Forest project under the Fast-track Approvals Act 2024

We refer to the Request for Information No. 1 (RFI) dated 12 June 2026 from the Secretary for the Environment (the Secretary) in relation to the Rangitoopuni Forest Fast-track referral application. Our response to the RFI is set out below.

1. ***Public conservation land – section 13(2)(d), 13(4)(d), and 13(4)(y)(iii)***

Context: Section 13(4)(d) of the Act requires the referral application to include a description or map of the whole project area that identifies its boundaries in sufficient detail to enable consideration of the referral application. The Department of Conservation's Fast-track pre-lodgement notification response (Appendix N) identifies the following areas of public conservation land (PCL), as defined in the Act, that may be within or affected by the project:
− Rangitoopuni Stream Marginal Strip (2797390)
− Rangitoopuni Stream Marginal Strip (2797391)
− Riverhead Marginal Strip (2797392).

Request: Please confirm whether any of the above PCL (or any other PCL) is within the project area. If so, please confirm whether any additional approvals are proposed to be sought under the fast-track approvals process, including under the Conservation Act 1987. If a concession is sought (being an approval described in section 42(4)(e)), please also provide the information specified in clause 2 of Schedule 6 of the Act, to support the assessment of section 13(4)(y)(ii).

Response:
The Applicant has reviewed the public conservation land (PCL) identified in the Department of Conservation's pre-lodgement response, namely:

- Rangitoopuni Stream Marginal Strip (2797390)
- Rangitoopuni Stream Marginal Strip (2797391)

- Riverhead Marginal Strip (2797392)

The Project area does not include any public conservation land, including the marginal strips identified above. The Project is located entirely on land owned by the Applicant and no works are proposed within public conservation land.

Rangitoopuni Stream Marginal Strip (2797390) is located adjacent to Lot 7 DP 590677 which forms part of the application.

Accordingly, no approvals under the Conservation Act 1987 or any other conservation legislation are proposed to be sought through the fast-track approvals process. No concession, as described in section 42(4)(e) of the Fast-track Approvals Act 2024, is sought as part of the Project.

2. ***Proposed heritage approvals – section 13(2)(d)***

Context: Section 13(2)(d) of the Act requires the referral application to include at least a general level of detail about each proposed approval. The application identifies Heritage New Zealand Pouhere Taonga (HNZPT) as a relevant administering agency and notes that HNZPT has been notified in accordance with section 11(1) of the Act. However, the application states that no approvals are sought under the Heritage New Zealand Pouhere Taonga Act 2014 (HNZPTA).

Request: Please confirm whether any archaeological authorities are required under the HNZPTA for the project. If so, please also confirm whether these approvals are intended to be sought through the fast-track approvals process (including where they may be sought on a precautionary basis), or outside the fast-track approvals process.

Response:

While no recorded archaeological sites have been identified within the Project area, there remains the potential for previously unidentified subsurface archaeological material to be encountered during construction activities. Accordingly, as a precautionary measure, the application seeks an Archaeological Authority under the Heritage New Zealand Pouhere Taonga Act 2014.

The Archaeological Authority is proposed to be sought through the fast-track approvals process and should be included as a proposed approval within the application.

3. **Variation to existing consent – section 13(2)(d) and 13(4)(y)(iii)**

Context: Section 13(2)(d) of the Act requires the referral application to include at least a general level of detail about each proposed approval. The project description refers to a variation to the existing consent for "Rangitoopuni" FTAA-2504-1055 to facilitate a boundary adjustment within Lot 2 and the relocation of the wastewater treatment plant servicing the Integrated Māori Development – Retirement Village. However, the application also states that this variation will be progressed under the Resource Management Act 1991 (RMA) and sought outside the fast-track approvals process. A change or cancellation of a resource consent condition that would otherwise be applied for under the RMA is an approval potentially able to be sought via the fast-track approvals process under section 42(2)(b) of the Act, provided that section 42(6) of the Act is met, including that the change or cancellation is material to the implementation or delivery of the project.

Request: Please confirm whether the proposed variation will be sought outside the fast-track approvals process. If the variation is instead intended to be sought through the fast-track approvals process, please confirm this and provide the information required to support the assessment of section 13(4)(y)(ii), being the information specified in clause 3 of Schedule 5 of the Act.

Response:

A variation to facilitate a boundary adjustment to Lot 2, enabling the relocation of the wastewater irrigation field servicing the Integrated Māori Development - Retirement Village to land south of the village, will be sought outside the Fast-track approvals process. The northern portion of Lot 2 is proposed to be subsequently subdivided and developed for low-density housing. This referral application seeks approval for the inclusion of that future development outcome within the overall Fast-track Project.

4. **Fisheries Act 1996 approvals – section 13(4)(d) and 13(4)(y)(iii)**

Context: Sections 13(2)(d) and 13(4)(t) of the Act require the referral application to identify all proposed approvals, and to outline any other legal authorisations that may be required for the project. The application states that approvals under the Fisheries Act 1996 may be required, and that any necessary approvals will be sought as part of the integrated consenting package for the project. The Fisheries Act 1996 is not a specified Act (as defined in section 4(1) of the Act) and is not relevant to the approvals that may be sought in a substantive application under section 42(4) of the Act.

Request: Please confirm whether any approvals under the Fisheries Act 1996 are required for the project, and clarify whether these are intended to be sought outside the fast-track approvals process. Please also clarify whether these approvals are considered to be

proposed approvals for the purposes of section 13(2)(d), or other legal authorisations required for the project for the purposes of section 13(4)(t).

Response:
We do not anticipate that approvals under the Fisheries Act 1996 will be required. If approvals of this nature are required for the project, they will be sought outside of the fast-track approvals process.

5. ***Anticipated construction timeframe – section 13(4)(e)***

Context: Section 13(4)(e) of the Act requires the referral application to include the anticipated commencement and completion dates for construction activities. While the application specifies an anticipated completion date (2048), it does not specify an anticipated commencement date.

Request: Please provide an anticipated commencement date for construction activities, expressed as a specific year.

Response:
Should the application be referred and subsequently granted fast-track approval, the applicant intends to commence construction as soon as practicable following the receipt of all necessary approvals. Construction is anticipated to commence in late 2027 or early 2028.

6. ***Project staging – section 13(4)(f)***

Context: Section 13(4)(f) of the Act requires the referral application to state whether the project is planned to proceed in stages and, if so, to include: (i) an outline of the nature and timing of the stages; (ii) a statement of whether a separate substantive application is to be lodged for each stage; and (iii) an explanation of how each stage meets the criteria in section 22. The application states that the project will be delivered across eight stages over an extended timeframe (to 2048), but that a single substantive application will be lodged to cover all stages.

Request: Please confirm whether one substantive application for the whole project remains the intended approach, or whether the project is proposed to proceed through separate substantive applications for one or more stages. If the project is instead proposed to proceed through separate substantive applications for one or more stages, please provide the information required under section 13(4)(f), including the nature and timing of the stages, whether separate substantive applications will be lodged, and how each stage meets the criteria in section 22.

Response:
One substantive application will be sought for the whole project.

7. ***Significance of adverse effects – section 13(4)(h)***

Context: Section 13(4)(h) of the Act requires the referral application to include a description of the anticipated and known adverse effects of the project on the environment and the significance of those adverse effects. The application includes a description of adverse effects in section 9 of the 'Planning Assessment to support a referral application' document. While some commentary on the significance of these effects is included, this is not consistently provided across all identified effects and is not always clearly expressed.

Request: Please provide a clear description of the significance of each adverse effect identified in section 9 of the 'Planning Assessment to support a referral application' document. If you wish to provide the information requested, please respond within 5 working days of the date of this request (refer to the due date above). The Secretary must then decide whether the referral application is complete and within scope.

Response:
A clear description of the significance of each adverse effect identified in Section 9 of the Planning Assessment is provided in the table below:

Effects	**Significance of Effects**
Cultural Effects	Less than minor adverse effects, not significant.
Economic Effects	No significant adverse effects.
Ecological Effects	Minor to moderate adverse effects, not significant.
Urban Design	Minor adverse effects, not significant.
Servicing and Infrastructure Effects	Less than minor adverse effects, not significant.
Stormwater Discharge and Water Quality Effects	Minor adverse effects during construction and establishment, reducing to less than minor following mitigation. Not significant.
Flood Management	Less than minor adverse effects. No significant flooding effects are anticipated.
Transportation Effects	Minor adverse effects, not significant.

Earthworks and Construction Effects	Minor to moderate temporary adverse effects, not significant
Geotechnical Effects	Less than minor adverse effects, not significant.
Contamination Effects	Less than minor adverse effects, not significant.

While the Project will result in some adverse environmental effects typical of a development of this scale, none of the identified effects are anticipated to be significant. Technical assessments demonstrate that adverse effects can be appropriately avoided, remedied or mitigated through detailed design, management plans and consent conditions. In many instances, the Project is expected to deliver substantial long-term environmental, cultural, social and economic benefits that outweigh the identified adverse effects.

Yours sincerely,



Michelle Kemp
Partner/Principal Planner
Campbell Brown Planning Limited