

11 November 2025

Expert Consenting Panel

C/- Environmental Protection Authority

By email: stephanie.bougen@epa.govt.nz

RE: Response to Request for Information No.3 – Rangitootuni, Fast-track Approvals Act 2024

We refer to the Request for Information No. 3 (RFI) from the Expert Consenting Panel in relation to the Rangitootuni fast-track application (7 November 2025). Our response to the matters raised are provided below:

1. *Please provide an assessment of the Rangitootuni application against the provisions of Proposed Plan Change 120 to the Auckland Unitary Plan (PPC120). Specifically, the Panel wish to understand whether there are any additional reasons for consent or assessment requirements relevant to the Rangitootuni application which arise because of PPC120.*

Response:

The applicant has reviewed PC120 notification documentation in relation to whether it has any impact on the subject site and triggers any additional reasons for consent and subsequent assessment.

It is noted that land with a zoning outside the urban environment is excluded from rezoning aspects of PC120 and therefore, no changes to the sites zoning is proposed.

In relation to the overlays and controls applicable to the site, no additional reasons for consent have been identified above what has already been applied for by the application.

However, in relation to the Auckland-wide provisions as proposed by PC120 are considered to generate additional reasons for consent, which are outlined below. We note that the proposed land stability rules are complex. The permitted activity standards require, in addition to a supporting geotechnical investigation, that an evaluation is undertaken in

accordance with a particular methodology set out in the standard. The applicant's comprehensive geotechnical assessments have not been prepared utilising this format, and it is not practical or useful to amend them into the required format at this stage of the process. As such, and for the avoidance of doubt, the applicant seeks consent under the relevant proposed rules adopting the most restrictive activity category notwithstanding that a more detailed analysis might confirm that the proposal complies with the permitted activity standards or may fall under a less restrictive activity category.

Chapter E36 Natural Hazards and Flooding

- (A88) Construction of private roads, roads intended to be vested, and accessways in flood hazard areas – **restricted discretionary**
- (A89) On-site septic tanks, onsite wastewater treatment and disposal systems and effluent disposal fields in the 1 per cent annual exceedance probability (AEP) floodplain and flood prone areas – **restricted discretionary**
- (A92) Construction of other land drainage works, stormwater management devices or flood mitigation works in the 1 per cent annual exceedance probability (AEP) floodplain and flood prone areas – **restricted discretionary**
- (A89) All other structures and buildings (including retaining walls) in the 1 per cent annual exceedance probability (AEP) floodplain and flood prone areas – **restricted discretionary**
- (A102) Diverting the entry or exit point, piping or reducing the capacity of any part of an overland flow path – **restricted discretionary**
- (A113) On-site septic tanks, wastewater treatment and disposal systems, effluent disposal fields, underground storage tanks, water tanks (including rainwater tanks) or stormwater pipes or soakage fields, accessways, private roads and roads intended to be vested in landslide hazard risk areas that do not comply with Standard E36.6.A1 – **discretionary activity**
- (A121) New structures and buildings and external additions and alterations to existing structures and buildings (as existing at 03/11/25) with a gross floor area more than 20m² associated with activities less sensitive to natural hazards in medium (tolerable) and high (significant) landslide hazard risk areas that do not comply with Standard E36.6.A1 – **restricted discretionary**
- (A123) New structures and buildings and external additions and alterations to existing structures and buildings (as existing at 03/11/25) with a gross floor area

more than 20m² associated with activities potentially sensitive to natural hazards in medium (tolerable) and high (significant) landslide hazard risk areas that do not comply with Standard E36.6.A1 – **discretionary activity**

- (A125) New structures and buildings and external additions and alterations to existing structures and buildings (as existing at 03/11/25) with a gross floor area more than 20m² associated with activities sensitive to natural hazards in landslide hazard risk areas that do not comply with Standard E36.6.A1 – **non-complying activity**
- (A127) All other external additions and alterations to buildings and structures in landslide hazard risk areas that do not comply with Standard E36.6.A1 – **discretionary activity**
- (A129) All other buildings and structures, including retaining walls, in landslide hazard risk areas that do not comply with Standard E36.6.A1 – **discretionary activity**

Chapter E39 Subdivision – Rural

- (A8) Subdivision of land within flood hazard areas – **restricted discretionary**

NB: consent under (A78) '*Activities where natural hazard risk is significant in accordance with Table E36.3.1B.1 and E36.3.1B.2 in flood hazard areas*' is not considered to be triggered by the proposal as no activities sensitive to natural hazards (retirement village units) are located directly with the identified flood plains on the site.

The above identified consent triggers are not considered to introduce any new matters significantly different from what has already been provided as part of the application. Due to PC120 being notified on November 3, 2025, a considerable time after the application was lodged, the assessment provided to date has not been undertaken in the context of PC120. However, it is considered that PC120 does not introduce any matters significantly different to those that have already been considered and assessed. The information provided to date shows that the land is suitable for the proposed development and comprehensively addresses any adverse effects associated with natural hazards. It is also noted that in relation to geotechnical matters, that no significant issues have been raised.

Furthermore, whilst the identified provisions do have immediate legal effect, they are not yet operative and must be weighted accordingly alongside the operative provisions. It is possible that the PC120 provisions may be extensively modified and refined through the submission and hearing process. In this context, it is considered that more focus should be placed on the outcomes sought by PC120 through the objectives and policies rather than

on the specific wording and requirements of the rules and standards. It is also considered that the application has already demonstrated that matters relating to natural hazards can be sufficiently managed to ensure any adverse effects are mitigated to an acceptable level.

For completeness, the following assessment is provided for the proposed objectives and policies under Chapter E36 and E39 of the AUP:

- As demonstrated by the extensive assessment and modelling undertaken as part of the application, any adverse effects in relation to natural hazards can be suitably managed to an acceptable and will not have an adverse impact on downstream areas (E36.2 (3B) & (3C)).
- The proposed development will reduce the risk of flooding effects on Treaty Settlement Land over time by designing infrastructure to be resilient to natural hazards, such as lifting of Forestry Road and undertaking extensive planting and avoiding buildings within floodplains (E36.2 (3D)).
- Flood plains and overland flow paths are generally located within riparian margins and OLFP's maintained, with some redirected towards streams away from building platforms, and stormwater outfalls including erosion protection such as rip raps (E36.2 (4) & (5) and E36.3 (29)).
- Extensive replanting of the site is proposed, which will assist with managing flood effects and all modelling and assessments undertaken as part of the application considers the impacts of climate change (E36.2 (6) & (7) and E36.3 (24)).
- No activities sensitive to natural hazards are occurring directly with the flood hazard areas identified on the site and the assessment provided with the application shows that any adverse effects from natural hazards can be appropriately managed and mitigated. No buildings are directly located within floodplains, with floodplains concentrated to the riparian margins which will be replanted with native vegetation as part of the proposal (E36.3 (1A) & (1B)).
- The proposal provides for flood mitigation measures that ensure the development will not have an adverse impact on downstream areas and the proposed culverts located within the flood hazard areas have been suitably designed in accordance with the AUP (E36.3 (21) & (23)).
- The upgrade and lifting of Forestry Road alleviates existing flood hazards and creates a safe access to the site and for adjoining sites (E36.3 (26)).
- The proposed development is not considered to give rise to significant flood hazard risks as no activities sensitive to natural hazards are proposed directly within flood hazard areas identified on the site (E36.3 (30H)).

- The provided geotechnical assessments show that land instability effects can be appropriately mitigated or avoided by the proposed development (E36.3 (33A-H)).
- Floodplains and overland flow paths are generally located within riparian margins, and the proposed subdivision of the land is not considered to give rise to any adverse flooding effects that cannot be suitably mitigated or managed (E39.2(17)).

Yours sincerely,



Michelle Kemp
Partner/Principal Planner
Campbell Brown Planning Limited