

September 2026

Use of Public Conservation Land Report (section 19)

For the referral application for Mangapapa Wind Farm FTAA-2605-1231



Department of
Conservation
Te Papa Atawhai

**Te Kāwanatanga
o Aotearoa**
New Zealand Government

Contents

Introduction	2
The Referral Application	2
Figure 1 - Referral Application Map of Project Area	0
Figure 2 - Project Area with DOC Managed Public Conservation Area.....	0
Summary of advice	0
Existing arrangements for the public conservation land	0
Risks and potential liabilities to the Crown	1
Electricity Infrastructure	1
Outcomes of consultation	1
Any other relevant information	2

Introduction

The Director-General of Conservation is required to provide a report under section 19 of the Fast-track Approvals Act 2024 (the FTAA). Statutory delegations are in place for the Department of Conservation (DOC) to prepare this report. It provides information for the Minister for Infrastructure (the Minister) in relation to the use of public conservation land (PCL) as part of the consideration of the referral application for Mangapapa Wind Farm by Mamaku Renewables Limited.

The FTAA defines “public conservation land” (PCL) as land to which either or both of the following apply:

- (a) *The land is held, managed, or administered under the Conservation Act 1987, the National Parks Act 1980, the Reserves Act 1977, or the Wildlife Act 1953:*
- (b) *The land is listed in Schedule 4*

This report addresses the information that must be contained in a report in relation to PCL as set out in s19(2)(a) and (b) of the Act and outlines any consultation undertaken as required by s19(3), as outlined in the sections below.

The information required under s19(2)(c) is not required in this report because Mamaku Renewables Limited does not require a ministerial determination under section 24(2) or (4) for new electricity lines as part of the Mangapapa Wind Farm project and the referral application is not required to provide information under sections 13(4)(q) or (r).

The Referral Application

The Mangapapa Wind Farm project encompasses the construction and operation of a wind farm covering approximately 3,800 hectares of land on the Mamaku Plateau in the Bay of Plenty.

It includes:

- approximately 70 turbines, substations, an on-site battery energy storage system, internal roading, crane pads, turbine foundations, both overhead and underground cabling including grid connection infrastructure;
- ancillary works consisting of laydown areas, batching plants, vegetation clearance, earthworks, and water takes; and
- the ongoing operation and maintenance of the turbines and associated infrastructure

The referral application records that approvals sought includes resource consents, Wildlife Act 1953 approvals, and an archaeological authority under the Heritage New Zealand Pouhere Taonga Act 2019.

The project maps provided as part of the application show the turbines located in several clusters in separate areas (refer Figure 1). At the centre of these clusters is the Gammons Block Conservation Area (refer Figure 2). This is a DOC managed Stewardship Area held under section 25 of the Conservation Act 1987. As such, it meets the definition of public conservation land outlined in the FTAA.

In the application, Mamaku Renewables Limited has indicated that they intend to use the existing easement attached to the title and that benefits the adjacent land (the proposed project area) for access and (potentially) a transmission line. As discussed in the s20 response to a Request for Further Information, DOC considers that Mamaku Renewables Limited will need to seek an easement to specifically authorise the proposed activity within the Gammons Block Conservation Area.

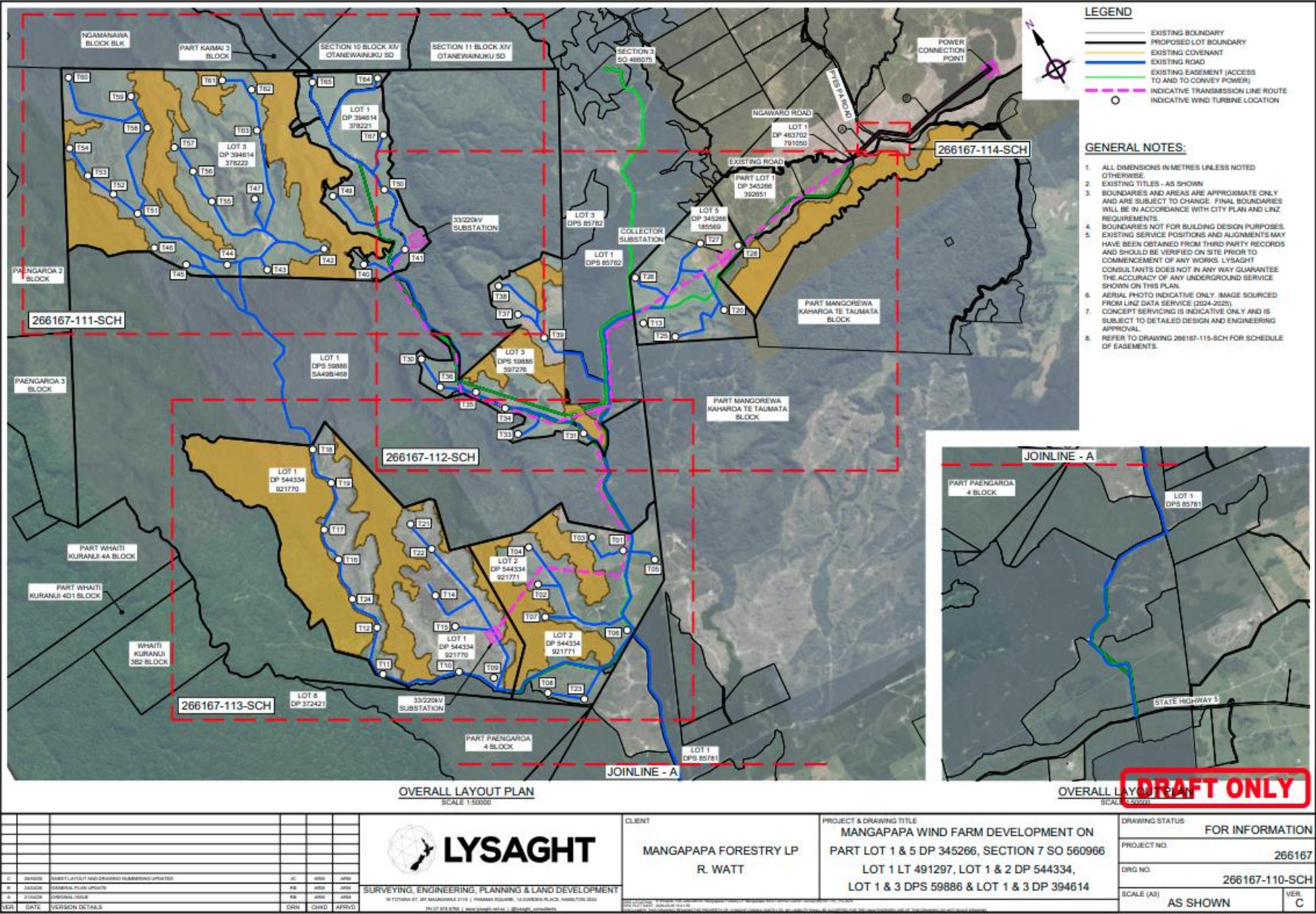


Figure 1 - Referral Application Map of Project Area

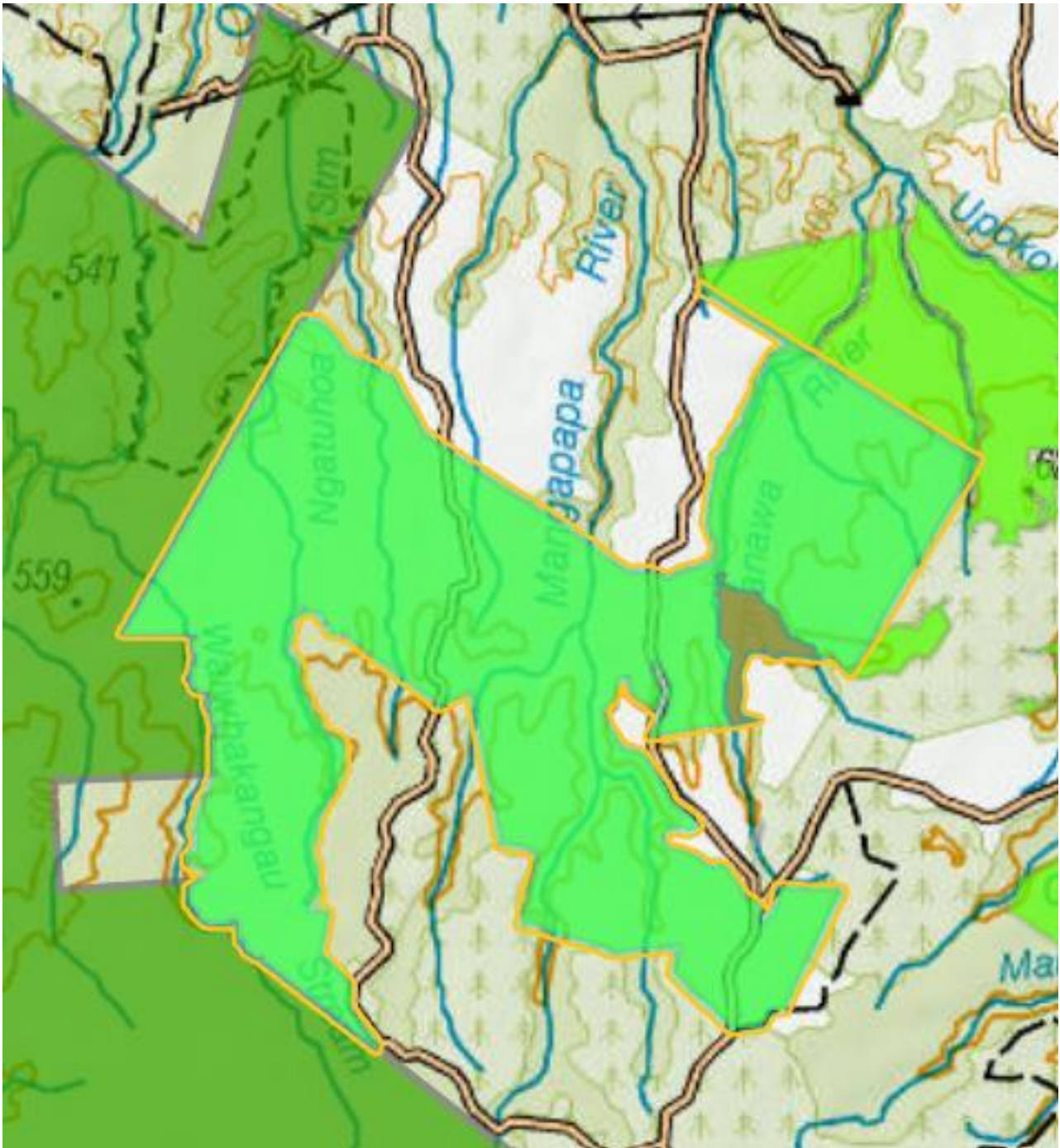


Figure 2 - Project Area with DOC Managed Public Conservation Area – Gammon Block Conservation Area outlined in yellow, Puwhenua Forest Conservation Area in light green and Kaimai Mamaku Forest Park in dark green.

Summary of advice

The detailed assessment is set out below, but in summary:

- DOC is the sole administrator of Gammons Block Conservation Area;
- The risks and potential liabilities to the Crown include those normally associated with the development of infrastructure of this nature;
- The proposed use of the existing easements for activities which DOC considers were not anticipated by the easements invites new risks and potential liabilities for the Crown in relation to this project.
- It is recommended that the scope of any referral notice enables a concession to be sought as part of a substantive application.

Existing arrangements for the public conservation land

Administration:

DOC is the sole administrator of Gammons Block Conservation Area.

Access:

There is no immediate access from any public roads to Gammons Block Conservation Area. Access is either via agreement with private landowners, or via the neighbouring Department-managed public conservation land (Kaimai Mamaku Conservation Park & Puwhenua Forest Conservation Area). The neighbouring Ngatuhua Lodge users would also be able to access the Conservation Area on foot.

There are registered reciprocal easements between DOC and the neighbouring landowners. These enable DOC access to the Conservation Area, and private landowner access and power transmission through the Conservation Area.

A whenua rāhui is in place over the Opoutihi section of the Conservation Area as a result of the Tapuika Claims Settlement Act 2014. This is shown in Figure 2 as the dark red area. The proposed location in the application plans does not overlap with the area subject to the whenua rāhui.

Uses:

DOC Approvals:

There are currently three active DOC approvals (granted under the Conservation Act 1987 or the Wildlife Act 1953) for the Gammons Block Conservation Area:

Permission Number	Holder	Approval Type	Activity	Expiry Date
48660-OTH	Omanawa Farms Limited	Conservation Act - Easement	Right to convey water & right to convey electricity	28/02/2046
93356-GEO	Bay of Plenty Regional Council	Conservation Act - Research or Collection Permit	Soil sampling for BOPRC state of the environment regional monitoring	31/12/2026
64146-FAU	Ospiri New Zealand Limited	Wildlife Act – Collect, capture, handle release or kill	National authorisation for trapping ferrets and possums on all DOC managed PCL	10/05/2028

Other Interests:

Gammons Block Conservation Area is an open hunting area.

Registered Easements:

There are several easements registered against the Gammons Block Conservation Area title. The Applicant has indicated their intention to utilise these for the project. DOC considers specific easements for the proposed activity are required; this is discussed further in the section 20 Request for Further Information response DOC has provided.

Risks and potential liabilities to the Crown

Risk of non-completion, failure, inability to remediate land:

Partial non-completion or failure of activities (roading access and transmission lines) on public conservation land (Gammons Block Conservation Area) resulting in land disturbance, contamination, hazards, stranded assets and infrastructure can create significant financial, legal, health and safety and reputational risk for the Crown. It can also create significant demand on DOC resources in terms of staff time and operating budget. If the project fails, the Crown will have to manage Gammons Block Conservation Area in accordance with the statutory purpose for which it is held, which may require remediation of the land.

There may be reputational risk to the Crown, and for the fast-track process as a whole, if a granted proposal is not technically feasible or there is an inability to progress the proposal or any part of it; particularly if those parts constitute offsetting or compensation for effects. There may also be a reputational risk for the fast-track process if the process is abused, for example if there was no intention to progress the development but approval is used to, for example, inflate land value.

Appropriate Approvals:

The use of easements for purposes that, in DOC's view, are not within the scope of those easements raise risks that would not arise if new easements were to be sought and granted. These include health and safety liabilities for the Crown as land administrator, risks of additional costs linked with monitoring and management of the easement which would normally be covered by the concessionaire in similar activities, and additional impacts on the land which have not been considered by the original decision maker.

A transmission line and right of way easement:

In the context of a new easement approval for the proposed activities on Gammons Block Conservation Area, DOC considers both types of easements to be low risk due to the limited rights established through these types of approvals, and the limited interaction with public conservation land. Therefore, the risks and potential liabilities to the Crown when the activity is appropriately concessioned are also considered to be minor.

Electricity Infrastructure

Gammons Block Conservation Area is not ineligible land and as such the applicant is not required to provide information under section 13(4)(q) or (r) of the FTAA.

Outcomes of consultation

There are no other owners, administrators or managers of the PCL. As such DOC has undertaken no consultation in the preparation of this report.

Any other relevant information

DOC notes that in the available plans provided by the applicant, several of the turbine are located close to Gammons Block Conservation Area. The current maps make it difficult to determine with any certainty, however, should the clear space required for the safe operation of the turbines extend into Gammons Block Conservation Area, an additional concession will be required for vegetation management.