

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

Project name	Mangapapa Wind Farm
--------------	---------------------

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	Ellanor		
*Last name	Babbage		
Postal address			
*Contact phone number	s 9(2)(a)	Alternative	
*Email	Fast-track@doc.govt.nz s 9(2)(a)		

2. Please provide your comments on this application

If you need more space, please attach additional pages. Please include your name, page numbers and the project name on the additional pages.

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



Linda Kirk

24/09/2026

Stephanie Frame
Manager – Fast-track
Operations
Ministry for Cities,
Environment, Regions and
Transport

PO Box 82
Wellington 6140

24 September 2026

Conservation House
PO Box 10420
Wellington 6143
fast-track@doc.govt.nz
doc.govt.nz

Tēnā koe Stephanie

Re: Request for Further Information under the Fast-track Approvals Act 2024

On 27 August 2026, the Department of Conservation (DOC) received a request for further information from the Ministry for Cities, Environment, Regions and Transport (MCERT) in relation to the Mangapapa Wind Farm application (File ref FTAA-2605-1231) in accordance with section 20 of the Fast-track Approvals Act 2024 (FTAA).

This letter provides a response to the further information requested.

Request

Please expand on DOC's statement that you are not confident the applicant can rely on the existing rights of way, rights to convey electricity, and rights to convey telecommunications easements for the proposed project, including the reasons for this view and any statutory, legal, or practical constraints that you consider may limit the applicant's ability to utilise those easements.

Response

The Gammons Block Conservation Area is held by the Crown as Lot 1 DPS 59886. Multiple easements are registered on that title.

From DOC's current understanding of the proposal (and as recorded in the Schedule of Existing Easements, DRG No: 266167-115-SCH), the Applicant proposes to use a right to convey electricity and telecommunications created by Easement Instruments 13223456.1, 13223456.2 and 13223456.3. It is understood from the plans (eg DRG NO: 266167-110-SCH) that the easements are proposed to be used for roading access and (potentially) a transmission line (which is listed as being indicative).

However, it is not clear which easement/right of way is being relied upon for access. While there is a right of way marked A, B, C and D on DPS 59886 (Easement Certificate B045570.1) registered in 1991 (**1991 ROW**), that right of way does not appear to be listed in the Schedule of Existing Easements. From the information DOC has available and has considered in relation to the existing easements referred to in the Schedule of Existing Easements, those easements were granted in order to formalise reciprocal and mutual access and utility rights to support Omanawa Farms Ltd and Mangapapa Forestry Ltd and iwi, following the transfer of adjoining land to Post Settlement Governance Entities as a result of Treaty settlements.

The easements were granted in the context of those existing uses, i.e., forestry and farming activities, to enable access and utilities to those lots for those purposes. DOC's consideration of the

right to convey electricity did not contemplate uses of the rights of way at an industrial scale, including for transmission lines. In particular, there was no rental or fee required for the easement which might ordinarily be required for an industrial activity that would affect the values and public enjoyment of the public conservation land over which the easements cross.

DOC considers the proposed activity may not, therefore, be authorised by the existing easements (putting aside the question of which easement is being relied upon for access). The proposed use of the easements could substantially increase the burden on the Crown land managed by DOC as a Stewardship Area under the Conservation Act 1987.

It is common practice for new easements to be obtained where holders of DOC easements indicate that there will be substantial change in use. That is to ensure that the terms of the easement appropriately reflect the proposed use.

In any event, the conditions of the existing easements mean that the Minister's approval (not to be unreasonably withheld) would be likely be required to enable the project to proceed as currently proposed. For example:

- (a) plans and specifications must be prepared and submitted to the Minister for approval prior to installing any easement facility (such as wires, cables, towers, poles, etc) for electricity or telecommunications;
- (b) no notice or signage within Gammons Block Conservation Area must be approved by the Minister;
- (c) no structures are to be erected without the prior written consent of the Minister. Such approval does not fall within the meaning of "concessions" in clause 1 of Schedule 6, and cannot therefore be granted under the FTAA. Ministerial approval has not been sought for any of these activities at this stage. DOC also notes that:
 - (a) new easements would be required in any event if the location of access and transmission lines were to be altered from the current proposal (noting the plans suggest the transmission line route is indicative);
 - (b) it is unclear if the existing easement window is wide enough to protect the new lines from vegetation growth; and
 - (c) it is unclear whether there is sufficient area within the existing easements to accommodate additional electricity-related infrastructure.

If the 1991 ROW is being relied upon, DOC notes that this allows for the formation and maintenance of forestry standard roads. It is not clear what the right of way is proposed to be used for, at what frequency, or whether forestry standard is appropriate for the intended use. DOC considers that any upgrade beyond forestry use is not likely authorised by the 1991 ROW.

Request

Please identify any approvals or concessions that you consider the applicant may require under the Conservation Act 1987 to enable the project to proceed.

Response

An easement over Gammons Block Conservation Area to enable the following:

- Right of Way (to enable vehicle access)
- Right to Convey Electricity (to enable electricity lines)
- Right to Convey Telecommunications (if the project requires this).

Request

The applicant has previously advised that, if any approvals or concessions are identified as being required under the Conservation Act 1987 for the project, it intends to seek those approvals outside the fast-track approvals process. Please describe the typical process and indicative timeframe for obtaining any approvals or concessions identified in response to question 2 outside the fast-track approvals process, and how this compares to obtaining the same approvals or concessions through the fast-track approvals process.

Response

To seek a concession under the Conservation Act 1987, the Applicant must email permissions@doc.govt.nz a completed copy of the easement application form found here: <https://www.doc.govt.nz/globalassets/documents/about-doc/concessions-and-permits/concessions/easement-permissions-application-form.docx>. This will then be assessed by DOC under Part 3B of the Conservation Act, with a recommendation provided to the delegated DOC decision maker.

DOC aims to process 95% of easement applications within 7 months. The processing of such an application relies on all required information being provided in the application form.

Request

Please expand on DOC's comments that failure to obtain any required approvals may affect the viability of the project and/or delay implementation, including whether you consider the matters raised in your comments could materially affect the timing or delivery of the project.

Response

If the Applicant does not hold appropriate easements, the Applicant has no legal access through Gammons Block Conservation Area.

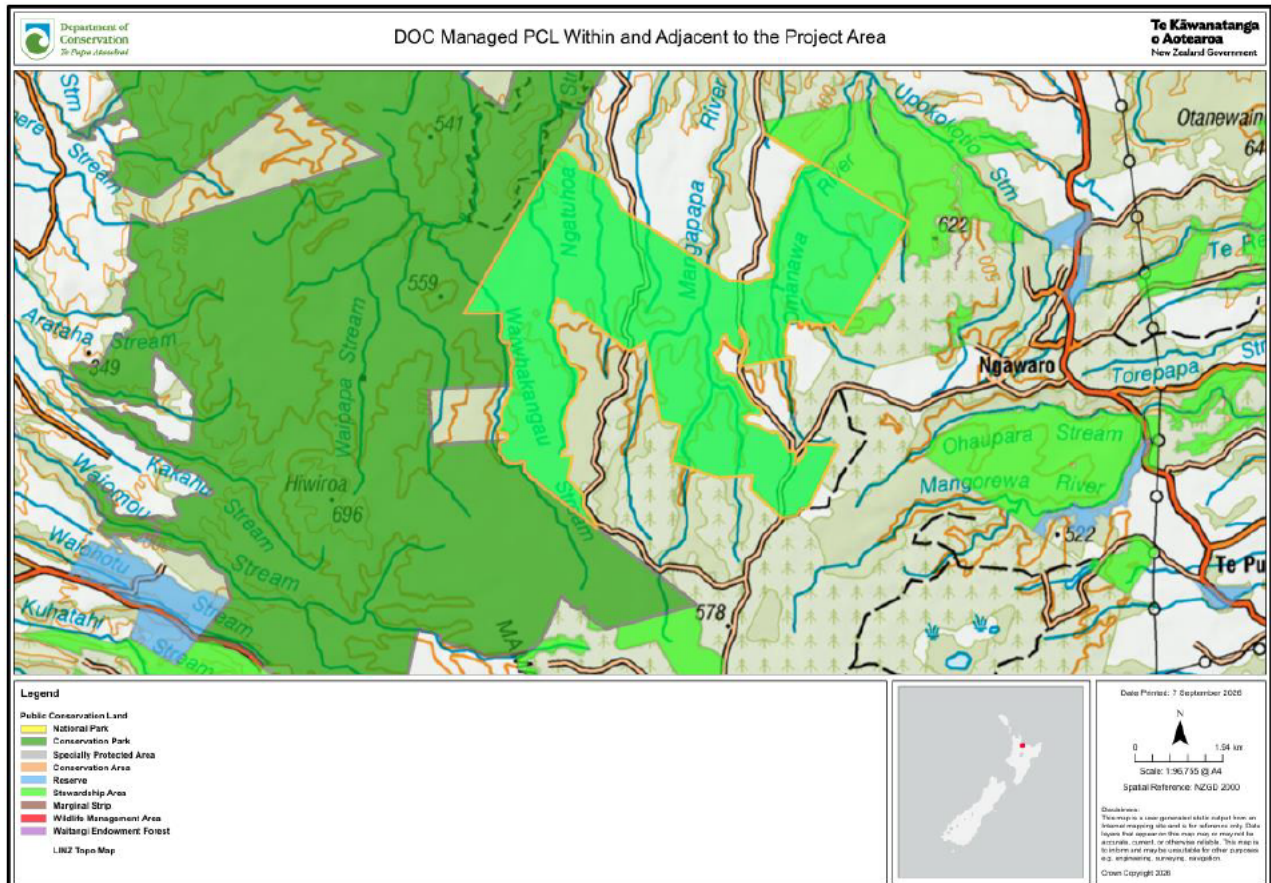


Figure 1 - Map of Gammons Block Conservation Area (outlined in yellow)

Access to the proposed wind farm site occurs over private property. DOC has not checked if the Applicant has approval across all three access points from the public roads (SH 5, SH 36 & Omanawa Road).

The access over Gammons Block Conservation Area enables the three areas separated by the Conservation Area to be linked to each other without needing to exit the area and return to public roads. This limits the distance needed to travel between the three areas, reducing time and mileage.

Additionally, the Applicant currently proposes that there is one connection point to the power grid. Without access through Gammons Block Conservation Area, there will need to be at least two points of connection, and the lines will need to be longer to avoid entering the Conservation Area.

Request

Please confirm whether DOC is the sole agency responsible for the management of the Gammons Block Conservation Area. If not, please identify any other party responsible for managing this land.

Response

As noted in our Section 19 report, DOC is the sole agency responsible for the management of Gammons Block Conservation Area.

We trust that the responses above adequately address the information requested. If there are further questions in relation to the responses provided, please contact Ellanor Babbage at

s 9(2)(a)

Nāku noa, nā



Linda Kirk

Fast Track Applications Manager



Department of
Conservation
Te Papa Atawhai

**Te Kāwanatanga
o Aotearoa**
New Zealand Government