

Referral application form to use for the fast-track process

Under the Fast-track Approvals Act 2024

About this referral application

This referral application form has been [approved](#) by the Secretary for the Environment in accordance with the [fast-track approvals process](#) of the Fast-track Approvals Act 2024 (the Act). All referral applications under the Act must be submitted using this form.

We recommend you discuss your referral application and the information requirements with us before you lodge the referral application. Please contact the Fast-track support team on 0800 327 875 or email info@fasttrack.govt.nz

Please provide a general level of detail in your application; sufficient to inform the Minister's decision on the referral application.

You must use this form to apply for referral applications and complete all relevant fields, even where you provide supporting attachments that are more detailed. Include attachment or appendix numbers in the relevant fields and list the attachments in section 5 of this form.

If the required information and relevant supporting material is not provided, the application will be returned to you as incomplete.

If your application is determined to be complete, and the Ministry for the Environment (MfE) considers that your project may be capable of satisfying the assessment criteria and does not appear to involve an ineligible activity, and you have paid all related fees, charges and/or levies, then we will provide it to the Minister for Infrastructure (the Minister).

Unless the Minister decides to decline the application before doing so, the Minister will invite comments on the application from relevant local authorities, Ministers, [administering agencies](#), identified Māori groups, owners of Māori land in the project area and any other person the Minister decides is appropriate. The Minister may also request further information from you, the relevant local authorities, or relevant administering agencies before making a decision on the referral application.

If the Minister accepts your referral application, then you may lodge a substantive application with the EPA and the substantive application may be considered by a decision-making panel.

Application fees and Cost recovery

Under the [Fast-track Approvals \(Cost Recovery\) Regulations 2025](#) (the Regulations), applicants lodging a referral application are required to pay a fee (deposit) of \$12,000 (plus GST), and a levy of \$6,700 (plus GST) to the Environmental Protection Authority (EPA). The fees are set in [Schedule 1 of the Regulations](#). These fees must be paid before lodgement of your referral application. If the required amount is not paid the application will be returned as incomplete.

Please note the final costs payable at the referral stage may exceed the referral application fee (deposit) paid. More information about cost recovery under the Fast-track Approvals Act 2024 is available from [Fast-track approvals cost recovery process](#).

Submitting your application

You will need to submit this form through our digital Fast-track portal. You will need to receive a link to register/access the portal.

If you need any help with the form, you can call or email us:

- 0800 327 875 (0800 FASTRK) (from within New Zealand)
- email: info@fasttrack.govt.nz

Ways you can send your completed form to us

By digital portal – you will need to receive a link to register/access: [Fast-track website](#)

By email – info@fasttrack.govt.nz

Your personal information

The Ministry for the Environment (MfE) is collecting your personal information for the purpose of administering your referral application under the Fast-track Approvals Act 2024. We will only use the information for the purposes of contacting you in relation to this application.

MfE may provide your application, or details from your application to other agencies or local authorities for the purpose of administering your referral application. If your application is accepted as complete and progresses through the referral process, the Minister may consult with other agencies and groups on your application. This will require the Minister to share the details of your application with the EPA, the Panel Convener, and those groups.

We will store your personal information securely. You have the right to access the personal information we hold about you and to ask for it to be corrected if it is wrong. If you would

like to access your personal information, or have it corrected, please contact us at referrals@fasttrack.govt.nz

Official information

All information you provide with this application is subject to the Official Information Act 1982 and may be released in accordance with that Act.

Publishing your application

We intend to publish your referral application on the Fast-track Approvals website.

Any personal contact details in application documents will not be made publicly available. Please provide a copy of the application with all personal contact details redacted.

MfE may also redact certain information from publication in accordance with the Official Information Act 1992. If you think your application contains information which should be withheld, please clearly identify it and provide an explanation as to why it should be withheld.

[Click or tap here to enter text.](#)

Section 1: Applicant details

A person or persons may apply to use the fast-track process for a project. Where there is more than one person, the referral application must be lodged jointly by all of the persons who are proposed to be authorised persons for the project.

If the referral application is accepted and referred by the Minister, the person or persons who lodged the referral application will be specified as the person who is, or the persons who are, authorised to lodge a substantive application for the project.

1.1 Applicant(s) – repeat for all applicants

1.1.1 Organisation name: Contact Energy Limited

1.1.2 NZBN (optional): 9429038549977

1.1.3 Contact name: Lisa Mead

1.1.4 Phone: s 9(2)(a)

1.1.5 Email address: s 9(2)(a)

1.1.6 Postal address (if preferred method of contact):

Additional Applicants: Manawa Energy Limited

1.2 Agent acting on behalf of applicant (if applicable)

1.2.1 Organisation name:

1.2.2 Contact name:

1.2.3 Phone:

1.2.4 Email address:

1.2.5 Postal address (if preferred method of contact):

1.3 Finance – Agent acting on behalf of applicant (if applicable)

1.3.1 Organisation name: Manawa Energy Limited

1.3.2 Contact name: Lisa Mead

1.3.3 Phone: s 9(2)(a)

1.3.4 Email address: s 9(2)(a)

1.3.5 Postal address (if preferred method of contact): s 9(2)(a)

If you are making this application on behalf of the applicant, please attach evidence that you are authorised to make this application.

1.3.6 Please direct all correspondence relating to this application (including correspondence from MfE) to:

If selecting Applicant and there is more than 1 person who lodged the referral application, please identify 1 person to receive all correspondence on behalf of all applicants.

1.4.1 Compliance and enforcement history – repeat for all applicants

1.4.1 Have there been any compliance or enforcement actions taken against the applicant (or if the referral application is lodged by more than one person, any of those persons) under a specified Act definition for either ‘compliance’ or ‘enforcement’?

Yes

1.4.2 If you answered yes above, please provide a summary of the relevant legislation and provisions, and any compliance or enforcement actions, and

the outcome of those actions taken under the [specified Act](#) against the applicant or applicants, if the referral is being lodged jointly.

Manawa Energy has had a positive record of compliance with its consents. Most non-compliances received have related to minor technical incidents that have been quickly addressed without formal compliance or enforcement action taken by the regulators. In the last 30 years Manawa Energy has received four abatement or infringement notices as described below. These lower-level enforcement actions have always been promptly addressed to a high standard and no further action has been taken by the regulators.

Manawa Energy has been prosecuted by a regulator once in 30 years. Otago Regional Council brought a prosecution against (then) Trustpower Limited (Trustpower) for a discharge of sediment from Beaumont Race at the Waipori Scheme into the Beaumont River.

Formal enforcement action against Manawa Energy can be summarised as follows:

Otago region – Trustpower pleaded guilty to one charge for breach of s 15(1)(b) RMA by discharging contaminants (that is soils, silts, gravels and other materials forming the Beaumont water race) onto land in circumstances where those contaminants may have entered water. This followed an event in late December 2017 when Trustpower was undertaking works on a section of the Beaumont water race, and a heavy rain event during the Christmas/New Year break caused water to accumulate and then breach the race wall, with the discharge flowing into the Beaumont River. Trustpower was fined \$38,250. See Otago Regional Council v Trustpower Limited [2019] NZDC 1990. There have been no further compliance incidents at Beaumont.

Taranaki region –

- The annual Lake Rotorangi visual lakeshore monitoring was not completed in 2018, resulting in an infringement notice being issued in April 2019. Annual lakeshore monitoring re-commenced in 2019. Since receiving this infringement notice Manawa has worked with a local consultant to complete the annual inspections. No further issues have occurred (Infringement Notice EAC-22627).

- Taranaki Regional Council was not satisfied that juvenile fish were being released at the locations specified within the existing management plan resulting in an abatement notice in December 2019. Following this abatement notice Manawa Energy reviewed the management plan and worked with the site team to address this issue. This has resulted in ongoing consent compliance (Abatement Notice EAC-23058).
- Taranaki Regional Council was not satisfied that sufficient information had been provided to demonstrate the efficacy of the eel diverter system that had been installed to provide non-lethal downstream passage for migrant eels at Pātea Dam, and that re-establishment of lamprey populations within the upstream catchment was occurring. Following an abatement notice in October 2021 Manawa completed additional studies to provide the requested information within the stipulated timeframes and a consent variation was completed to address an issue with the consent condition specific to lamprey. This has resulted in ongoing consent compliance (Abatement Notice EAC-24227).
- Following an eel mortality event downstream Pātea Dam on 27 April 2023, Taranaki Regional Council determined that non-lethal passage past the dam was not provided on that particular date, resulting in an infringement notice being issued. Following this infringement notice Manawa reviewed its procedures and implemented changes to enhance downstream passage past the dam. Monitoring of downstream migrants during subsequent seasons has shown non-lethal passage for migrant eels has been provided effectively and that ongoing consent compliance has been demonstrated (Infringement Notice EAC-25349).

Section 2: Referral application summary

2.1 Project name

This is the name by which the project will be known publicly. For example - avoid using street addresses, place names, company names.

Mangahao Hydro-Electric Power Scheme Reconsenting Project

2.2 Project description and location

2.2.1 Provide a description of the project and the activities it involves

The project description helps us with inviting comments from relevant parties on the application, and publishing information about the application.

The purpose of this application is to renew the consents for the continued operation and maintenance of the Mangahao Hydro-Electric Power Scheme (“Mangahao HEPS” or “Scheme”), so as to maintain the provision of renewable electricity generation in the Manawatū-Whanganui Region (Horizons). Renewing the consents for the Scheme will enhance energy security within the region and support the continued diversification of New Zealand’s energy portfolio.

The Mangahao HEPS was owned by KCE Mangahao Limited, a fully owned subsidiary of King Country Energy Limited (“King Country Energy”). King Country Energy obtained a prior referral for the reconsenting of the Scheme on 10 November 2025.

Although the referral decision dated 10 November 2025 captures the activities for which consent is sought, including sediment flushing from the dams and sediment management activities in the bed of rivers, the works in the bed of No.1 Reservoir will extend beyond the land owned by King Country Energy. This was not clearly identified in the original referral application, hence this new referral application to ensure that the existing maintenance works in the bed of the No.1 Reservoir (on Crown land administered by DOC) are included in the fast-track process.

On 28 April 2026, King Country Energy carried out pre-referral application notification for the purposes of this referral application, pursuant to section 11 of the Fast-track Approvals Act 2024 (FTAA).

On 30 June 2026, the King Country Energy companies were amalgamated into Manawa Energy Limited (“Manawa Energy”). Manawa Energy is a fully owned subsidiary of Contact Energy Limited (“Contact Energy”) and is also the Scheme operator. As a result, all of the assets, rights and liabilities of the King Country Energy companies, including ownership of the Scheme, have been automatically vested in Manawa Energy. The interests in land relating to the Scheme are still in the name of KCE Mangahao Limited, however it is intended that the records of title will be updated shortly to record a transmission following amalgamation to correct this.

Following the amalgamation, the application has been lodged by Manawa Energy. King Country Energy (the amalgamating entity) has undertaken the consultation and notification requirements prior to lodgement of the referral application in accordance with section 11 of the FTAA. Manawa Energy (the continuing amalgamated entity) is the applicant for the purpose of the substantive application, being the new owner and operator of the Scheme and proposed holder of the approvals being applied for.

The Mangahao HEPS was originally commissioned in 1924 and is located in the

northern Tararua Ranges. It generates up to 39.9 MW of electricity with an average annual output of 131 GWh, enough to power approximately 20,000 homes. The Scheme also makes a material contribution to greenhouse gas emission reductions of between 67,830 tCO₂-e (for gas) or 172,208 tCO₂-e (for coal).

Water for the Scheme is sourced mainly from the upper Mangahao River, which is a tributary of the Manawatū River. Two dams on the upper Mangahao River, and a tunnel, divert water from the Mangahao River into a reservoir formed by a third dam on the upper Tokomaru River. A second tunnel conveys water from the No.3 Reservoir to the Mangahao Power Station, via a surge chamber and steel penstocks. Water is then discharged into the Mangaore Stream via the tailrace of the Mangahao Power Station (approximately 8.7 km upstream of its confluence with the Manawatu River).

The application involves the following activities which require resource consent under the relevant statutory planning documents:

- The damming of water;
- The taking, diversion, and use of water;
- The discharge of water and contaminants (e.g. sediment) to water or land;
- The erection and placement of structures within the bed of waterbodies;
- The maintenance of structures in the bed of a stream or river;
- The excavation and disturbance of the bed of waterbodies; and
- The deposition of substances (e.g. gravel, silt and sediment) in the bed of waterbodies.

The erection and placement of structures within the bed of waterbodies has been included in this referral application as a precaution. A temporary coffer dam is proposed in the Mangahao No. 1 Reservoir to divert water for desilting works at the dam. This is not considered a “structure” under the definitions in the Resource Management Act 1991 that would trigger land use rules, however Manawa Energy has included it in the referral application to ensure it is fully covered by the decision.

The use of existing structures (i.e. the dams at the No.1, No.2, and No.3 Reservoirs) in the bed is a permitted activity in accordance with the rules of the Horizons One Plan. It is also considered that the maintenance of existing structures in the bed of rivers can be undertaken as a permitted activity under the Horizons One Plan. However, should this interpretation be incorrect then resource consent will be required for the maintenance of structures. Accordingly, Manawa Energy has included it in the referral application to ensure it is fully covered by the decision.

No change to the operating regime or to the project as previously accepted to the fast-track by the Minister for Infrastructure (“the Minister”) is proposed. This referral application is being made only to ensure all existing maintenance activities for the

effective and safe operation of the dams, and all land holdings, are accurately included.

2.2.2 Provide a description or map of the whole project area that identifies its boundaries in sufficient detail to enable consideration of the referral application.

For example, site address(es), certificate of title(s), shape files

The Scheme is sited at the northern end, and western side, of the Tararua Ranges – and is located approximately 15 km north-east of Levin and 28 km south-west of Palmerston North. The Scheme is within the Mangahao, Tokomaru, and Mangaore River catchments, in the Horowhenua District of the Manawātū-Wanganui Region. The Scheme is located approximately 15 km north-east of Levin and 28 km south-west of Palmerston North.

A scheme map showing the location and parcel boundaries is attached as Attachment Two.

The relevant certificates of title are attached to this application as Attachment Three.

A copy of the gazette notice and survey plans for the State Owned Enterprises (Mangahao Power Station Limited Vesting Order No. 1) Order 1997 is attached as Attachment Four.

2.3 Ineligible activity

Your referral application must demonstrate that the project does not involve any ineligible activities as defined in [Section 5](#) of the Act. Please consider each ineligible activity below and where relevant, provide the requested details.

*When providing your response below, where possible, **provide details of any parties involved, the extent of their holding and the activity relevant to their area.***

*Where a project involves an activity that may be the subject of a determination under sections [23](#) or [24](#), and you are intending to seek a Ministerial determination for that activity under either section, you must still complete this section in full. Determinations under, and information required in respect of, sections 23 and 24 are covered further under **2.5 Ministerial determinations under sections 23 and 24.***

If your application relates to certain mining activities below the surface of the land and meets the other relevant criteria under [section 5\(2\)](#) of the Act then an agreement under [section 5\(1\)\(a\), \(b\), \(j\) or \(k\)](#) may not be required. This should be identified under the relevant

questions below, and you must provide the additional information required in respect of [section 5\(2\)](#) under 2.3 Ineligible activity.

2.3.1 Does the project include an activity that would occur on identified [Māori land](#) as defined in section 4 of the Act?

No

a. If yes, please address the following:

- i. identify the land involved and the owner(s) of the land.
- ii. Confirm that the activity on the land has been agreed with the owners of the land and provide evidence of the written agreement; or
 - A. advise whether it is proposed to seek a determination under [section 23](#) and provide the information under 2.5 Ministerial determinations under sections 23 and 24 below; or
 - B. advise whether it is proposed to rely on [section 5\(2\)](#) of the Act and provide the information under 2.3 Ineligible activity below.

2.3.2 Does the project involve an activity that would occur in a customary marine title area?

No

a. Address the following:

- i. Identify the relevant customary marine title area, who the customary marine title group is;
- ii. Provide evidence that written agreement has been obtained from the customary marine title group and provide a copy of the same; **or**
 - A. advise whether it is proposed to rely on [section 5\(2\)](#) of the Act and provide the information under 2.3 Ineligible activity below.

2.3.3 Does the project involve an activity that would occur in a protected customary rights area?

No

a. Address the following:

- i. Identify the protected customary rights area, the group who holds these rights and the nature of the protected customary right(s)

- ii. Explain your proposed activity and identify whether you consider that it would have a less than minor adverse effect on the exercise of the protected customary right(s), and briefly explain why; **or**
- iii. Advise whether you consider that your proposed activity would have a more than minor effect on the exercise of the protected customary right(s), and if so, confirm that the activity has been agreed to in writing by the protected customary rights group and provide a copy of that agreement.

2.3.4 Does the project involve an activity that would occur on:
Māori customary land; OR land set apart as a Māori reservation as defined in section 4 of Te Ture Whenua Māori Act 1993.

No

2.3.5 Does the project involve an aquaculture activity or an activity that is incompatible with aquaculture activities that would occur within an aquaculture settlement area (under section 12 of the Māori Commercial Aquaculture Claims Settlement Act 2004); or an area reserved under another Treaty settlement for the aquaculture activities of a particular group?

No

2.3.6 Provide details of the aquaculture activity or the activity that is incompatible with aquaculture and the location

2.3.7 Provide details of the relevant aquaculture settlement area or Treaty settlement legislation reserving space for aquaculture and include details of the impacted parties or particular group.

2.3.8 Provide details on whether or not the applicant is authorised to apply for a coastal permit within the aquaculture settlement area, or area reserved under another Treaty settlement for aquaculture activities, including a copy of any such authorisation.

2.3.9 Does the project include an activity that would require an access arrangement under [section 61](#) or [61B](#) of the Crown Minerals Act 1991?

No

- a. Provide the following information:
 - i. what is the activity that would require the access arrangement; and

- ii. does the project include an activity that would occur on Crown owned land or internal waters and land of the common marine and coastal area described in Schedule 4 of that Act and provide details of the same.
- iii. If so describe how the activity meets the criteria in [section 61\(1A\)](#)(a-e) of the Crown Minerals Act 1991; **or**
- iv. Confirm and provide evidence that the project would not occur in an area for which a permit cannot be granted under that Act:

2.3.10 Does the project include an activity that would be prevented under any of sections [165J](#), [165M](#), [165Q](#), [165ZC](#), or [165ZDB](#) (regarding the management of occupation in common marine and coastal area) of the Resource Management Act 1991?

No

2.3.11 Provide details about which section the project does not comply with and, if relevant, the provisions of the regional coastal plan that are applicable.

2.3.12 Does the project include an activity (other than an activity that would require an access arrangement under the Crown Minerals Act 1991) that would occur on land that is listed in Schedule 4 of this Act?

No

a. Provide the following:

- i. identify the activity and which clause under Schedule 4 is applicable; and
- ii. confirm whether you are seeking that the Minister make a determination under [section 24](#), and if so, whether the determination sought relates to existing electricity infrastructure or new electricity lines and provide the information under 2.5 Ministerial determinations under sections 23 and 24 below.

2.3.13 Does the project involve an activity that would occur on a national reserve held under the Reserves Act 1977 and requires approval under that Act?

No

a. Address the following:

- i. identify the activity and type of national reserve under the Reserves Act
- ii. identify what approval(s) would be required under the Reserves Act.
- iii. Confirm whether you are seeking that the Minister make a determination under [section 24](#) and if so whether the determination sought relates to existing electricity infrastructure or new electricity

lines.? If so, provide the information under 2.5 Ministerial determinations under sections 23 and 24 below

2.3.14 Does the project involve an activity that would occur on a reserve held under the Reserves Act 1977 that is vested in someone other than the Crown or a local authority?

No

a. Address the following:

- i. identify the activity, the reserve type under the Reserves Act, and the person in whom it is vested.
- ii. provide evidence that written agreement has been obtained from the person in whom the reserve is vested and provide a copy of the same; or
- iii. advise whether it is proposed to rely on [section 5\(2\)](#) of the Act and provide the information under 2.3 Ineligible activity below.

2.3.15 Does the project involve an activity that would occur on a reserve held under the Reserves Act 1977 that is managed by someone other than the Department of Conservation or a local authority?

No

a. Address the following:

- i. identify the activity, the reserve type under the Reserves Act, and the person or body who manages the reserve.
- ii. Provide evidence that written agreement has been obtained from the person or body responsible for managing the reserve and provide a copy of the same; **or**
- iii. advise whether it is proposed to rely on [section 5\(2\)](#) of the Act and provide the information under 2.3 Ineligible activity below; **or**
- iv. advise whether you consider the activity falls within the scope of [section 5\(5\)](#) of the Act, and provide the information under 2.3 Ineligible activity below.

2.3.16 Does the project involve an activity that is:

- a. a prohibited activity under the Exclusive Economic Zone and Continental Shelf (Environmental Effects) Act 2012 or regulations made under that Act?

- b. described in [section 15B](#) (Discharge of harmful substances from ships or offshore installations) of the Resource Management Act 1991 and is a prohibited activity under that Act or regulations made under it;
No
- c. prohibited by [section 15C](#) (Prohibitions in relation to radioactive waste or other radioactive matter and other waste in coastal marine area) of the Resource Management Act 1991
No

2.3.17 Does the project involve a decommissioning-related activity as described in section 38(3) of the Exclusive Economic Zone and Continental Shelf (Environmental Effects) Act 2012:
No

2.3.18 Does the project involve an activity undertaken for the purposes of an offshore renewable energy project?
No

2.4 Exemptions from requirement to provide agreement

2.4.1 Mining activities under section 5(2)

The agreement of the relevant groups referred to under 3.5 Persons affected is not required for certain mining activities under [section 5\(2\)](#). If you think this might apply to your application, answer the questions below.

2.4.1.2 Is your application for an activity that is prospecting, exploration, mining or mining operations of Crown-owned minerals undertaken below the surface of any land or area?

No

2.4.1.3 Provide details of the activity and identify the owner and occupier of the land and any relevant details concerning the land or area (such as whether it is identified Māori land)

2.4.1.4 Explain the extent, if any to which your activity may be likely to cause any damage to the surface of the land or any loss or damage to the owner or occupier of the land.

2.4.1.5 Explain the extent, if any to which your activity will be likely to have any prejudicial effect in respect of the use and enjoyment of the land by the owner or occupier of the land.

2.4.1.6 Explain the extent, if any to which your activity will be likely to have any prejudicial effect in respect of any possible future use of the surface of the land, and if no such effects are anticipated, please explain why.

2.4.2 Activities on land proposed to be the subject of a land exchange

The agreement of relevant groups referred to in (subsection 5(1)(a) of the Act) is not required if section 5(5) applies. If you consider this section may be relevant to your application, complete the below.

2.4.2.1 Is the reserve on which the activity is to occur proposed to be the subject of a land exchange?

N/A

2.4.2.2 Is the reserve a Crown-owned reserve?

2.4.2.3 Are the person or persons responsible for managing the reserve in place because of a Treaty settlement?

2.4.2.4 Provide any supporting details which may be relevant for your responses to the above questions.

2.5 Ministerial determinations under sections 23 and 24

Complete this section if you are wish to seek a ministerial determination under section 23 or section 24 that your project is not an ineligible activity.

2.5.1 Determination in relation to linear infrastructure on Māori land under section 23

2.5.1.1 Is your application seeking a determination under [section 23](#) (linear infrastructure on certain identified Māori land)

No

Provide the following information:

2.5.1.2 Confirmation that the activity is the construction of electricity lines or land transport infrastructure (and identify which it is)

2.5.1.3 Confirmation that the above construction (or operation of) will be undertaken by a network utility operator that is a requiring authority, and that that same party is the applicant for the necessary approvals, providing details of the same.

2.5.1.4 Confirmation that the activity would occur on identified Māori land that is Māori freehold land or General land owned by Māori that was previously Māori freehold land (and identify that land)

2.5.1.5 Provide information on the rights and interests of Māori in that land

2.5.1.6 Provide an assessment of the effects of the activity on those Māori rights and interests and on the relevant land.

2.5.2 Determination in relation to existing electricity infrastructure under section 24(2)

2.5.2.1 Is your application seeking a Ministerial determination under [section 24\(2\)](#) (in relation to maintenance, upgrading, or continued operation of existing electricity infrastructure on certain Schedule 4 land or in a national reserve)

No

Provide the following information:

2.5.2.2 Confirmation that the activity is the maintenance, upgrading, or continued operation of existing electricity infrastructure.

2.5.2.3 Confirmation that the activity would occur on eligible land, as defined in section 24(3).

2.5.2.4 Advise whether the activity would materially increase the scale or adverse effects of the existing electricity infrastructure and provide an explanation of the same.

2.5.3 Determination in relation to new electricity lines under section 24(4)

2.5.3.1 Is your application seeking a determination under [section 24](#) (the construction and operation of new electricity lines on eligible land (as defined in [schedule 4](#) excluding land classified as a national park or listed in subsections 2, 4, 5(a), 7 or 8 of that schedule)?

No

Provide the following information:

2.5.3.2 Is the activity the construction and operation of new electricity lines? (provide any necessary details)

Would the activity occur on eligible land (and identify which category of eligible land);

2.5.3.3 Provide the requested information for each alternative site considered for the construction and operation of the new electricity lines:

2.5.3.4 A description of the alternative site.

2.5.3.5 A statement of the anticipated and known financial cost of undertaking the activity on the alternative site.

2.5.3.6 A description of the anticipated and known adverse effects of undertaking the activity on the alternative site.

2.5.3.7 A description of the anticipated and known financial cost and practicality of available measures to avoid, remedy, mitigate, offset, or compensate for the anticipated and known adverse effects of the activity on the alternative site.

2.5.3.8 A description of any issues (including financial cost) that would make it impractical to undertake the activity on the alternative site.

2.5.3.9 An assessment of whether it would be reasonable and practical to undertake the activity on the alternative site, considering the matters referred to above.

2.6 Appropriateness for fast-track approvals process

Here you must explain how the project meets the referral application criteria ([section 22](#)). Please consider and respond where relevant, to each question.

If the project is planned to proceed in stages, you must explain how each stage meets the referral application criteria.

If a part of the project is proposed as an alternative project, you must explain how each stage meets the referral application criteria,

2.6.1 The criteria for accepting a referral application is that the project is an infrastructure or development project that would have significant regional or national benefits. Explain how this project satisfies the criteria:

The Mangahao HEPS is considered regionally and nationally significant infrastructure because it supplies controlled renewable energy generation directly to the local region, and excess generation into the National Grid. The region (and New Zealand) has depended on this generation for over 100 years, and it is anticipated that this will continue based on the condition of the infrastructure and ongoing effective operation of the Scheme - provided the relevant approvals are obtained.

The provision of, and access to, secure and reliable renewable electricity is of critical importance to the social and economic wellbeing of the Horizons Region, and all New Zealanders. The generation from the Mangahao HEPS is equal to approximately 63-64% of the electricity load met by the Mangahao grid exit point (GXP) during the morning and evening peak loads. The Scheme will continue to contribute to the security of electricity supply in the Manawatū-Whanganui Region (given it is embedded into the local electricity network), as well as contribute to the Government's strategic targets for renewable electricity generation and the decarbonisation of the New Zealand economy.

Policy A of the National Policy Statement for Renewable Energy Generation (“NPSREG”) requires that decision-makers must recognise and provide for the national significance and the national, regional, and local benefits of renewable energy generation activities. It specifies that these benefits include avoiding and reducing greenhouse gas emissions, contributing to the resilience of electricity supply through diversity of renewable energy generation sources and storage, providing for social, cultural and economic wellbeing, using renewables over finite energy sources and fossil fuels, and reducing electricity losses by locating renewable electricity generation activities close to existing networks.

The above benefits are derived from the continued operation of the Mangahao HEPS and are recognised by the NPSREG.

The key regional and national benefits for New Zealand in summary include:

- Maintaining the portfolio of controllable and predictable renewable energy generation, improving security of generation to meet demand and meeting these requirements more efficiently than would be possible through other new renewable generation.
- Avoiding the substantial capital cost (around \$190.6 million) of constructing both new generation (probably wind outside the area at a cost of \$129.9 million) and new peaker (“on/off”) generation (probably gas fueled thermal at a cost of \$60.7 million) to address the mismatch between wind output and the Scheme. Grid scale batteries are not suitable for covering this mismatch.
- Avoiding the potential increase in cost of fuel used for generation for the thermal component of the replacement generation. We estimate this would be about \$5.8 million per year at recent gas prices but would rise over time.
- Avoiding the cost of transmission losses that would be required if electricity had to be imported from outside the region.
- Helping New Zealand meet its emission reduction targets under the Paris Agreement by continuing to displace greenhouse gas emissions from thermal generation for either baseload or peak demand. The supplementary thermal generation would increase emission by about 25,800 tonnes of carbon dioxide equivalent (tCO₂e) per year.
- Avoiding a slight increase in vulnerability of the Region to the loss of electricity supply through transmission failures.
- Providing hydro capacity in a different climatic region from the main storage lakes in the South Island; this reduces the risk of correlated dry periods across hydro capacity.
- Maintaining economic activities associated with operation of the scheme to the benefit of local suppliers of labour, goods and services.

2.6.2 Explain how referring the project to the fast-track approvals process:

2.6.2.1 Would facilitate the project, including by enabling it to be processed in a more timely and cost-effective way than under normal processes; and

Please see attachment seven.

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

2.6.2.3 Has the project been identified as a priority project in a central government, local government, or sector plan or strategy (for example, in a general policy statement or spatial strategy), or a central government infrastructure priority list?

For example – a sector plan that specifically identifies the project including details such as location.

Yes

a. Identify the plan, strategy or list (or any other relevant document).
Electrify NZ and the Horizons One Plan

While the Scheme itself has not been specifically identified, the policy document Electrify NZ notes that re-consenting for existing generation assets has become unnecessarily difficult. Granting a referral order for the re-consenting of this Scheme to go through the FTAA would be consistent with that policy document.

The Horizons One Plan also identifies hydroelectricity schemes as priorities through policies such as LF-FW-05(1)(b), which prioritizes takes and flow regimes for existing hydroelectricity schemes before other users, and has made the replacement of consents for hydroelectricity takes, uses, diversions and discharges, controlled activities (meaning consent must be granted).

2.6.2.4 Will the project deliver new regionally or nationally significant infrastructure or enable the continued functioning of existing regionally or nationally significant infrastructure?

Yes

a. Explain how the project will deliver this.
The Mangahao HEPS is a regionally and nationally significant infrastructure (as described above). Reconsenting will enable the continued functioning of this important source of renewable energy.

The project will deliver this by providing for the reconsenting of the Scheme to be considered under the FTAA, which appropriately prioritises infrastructure with regional or national benefits.

2.6.2.5 Will the project increase the supply of housing, address housing needs, or contribute to a well-functioning urban environment (within

the meaning of policy 1 of the National Policy Statement on Urban Development 2020). If yes, explain how the project will achieve this.

2.6.2.6 Will the project deliver significant economic benefits, and if so, how?

Please see attachment seven.

2.6.2.7 Will the project support primary industries, including aquaculture, and if so, how?

2.6.2.8 Will the project support development of natural resources, including minerals and petroleum, and if so, how?

2.6.2.9 Will the project support climate change mitigation, including the reduction or removal of greenhouse gas emissions, and if so, how?

The ongoing operation of the Mangahao HEPS contributes towards decarbonising New Zealand's economy.

The Mangahao HEPS has an important role in achieving New Zealand's 2050 targets in the Climate Change Response Act 2002. The Scheme will also play a role in substituting fossil fuel energy with renewable energy. That amounts to real emissions reduction, especially as New Zealand's electricity cannot be imported, and therefore it will contribute to reductions in the country's greenhouse gas inventory. Economic analysis by NZIER indicates greenhouse gas emission reductions at the Mangahao HEPS of approximately 67,830 tCO₂-e (for gas) or 172,208 tCO₂-e (for coal).

The NPSREG states that decision makers must recognise and provide for the national significance of renewable electricity generation activities that the benefits of renewable electricity generation activities, including avoiding, reducing or displacing greenhouse gas emissions (Policy A). The Mangahao HEPS is entirely consistent with that national direction.

2.6.2.10 Will the project support climate change adaptation, reduce risks arising from natural hazards, or support recovery from events caused by natural hazards, and if so, how?

As a generator of electricity, Manawa Energy is recognised as a lifeline utility under the Civil Defence Emergency Management Act 2002 (Schedule 1, Part B). Lifeline utilities play a vital role in recovery from natural hazards, and have statutory duties such as the need to ensure

the ability to function to the fullest possible extent, even though this may be at a reduced level, during and after an emergency. This includes the Mangahao HEPS.

As New Zealand de-carbonises and shifts its view to achieving a high percentage of energy generation coming from renewable sources, it is vital that existing renewable energy generation is preserved. The project seeks to re-consent the Scheme, which contributes towards New Zealand's current renewable electricity generation and in doing so supports the country's climate change adaptation.

2.6.2.11 Will the project address significant environmental issues, and if so, how?

The Mangahao HEPS has significance as a generator of renewable electricity, supporting the reduction of greenhouse gas emissions.

2.6.2.12 Is the project consistent with local or regional planning documents, including spatial strategies, and if so, how?

Mitchell Daysh has undertaken a preliminary planning assessment of the project against the relevant statutory and non-statutory planning documents (and a full assessment will be undertaken for the future substantive application). Based on this preliminary assessment, and subject to the final form of the mitigation packages proposed, it is considered that the re-consenting of the Mangahao HEPS will be consistent with the relevant regional and local planning documents for the reasons set out below.

The Regional Policy Statement (RPS) and the Regional Plan, included as part of the Horizons One Plan, are the relevant regional planning instruments for the Manawātū-Whanganui Region. Infrastructure activities with effects on freshwater, natural character values, biodiversity and/or public access must be managed to mitigate the effects. However, the RPS is clear in its express recognition of and provision for significant infrastructure with local effects but regional or national benefits – particularly where the infrastructure already exists. The RPS policy settings directly inform the Regional Plan provisions, which require environmental effects to be managed while enabling the continued operation of existing significant infrastructure. No relevant local planning instruments (including spatial strategies) have been identified, noting that no replacement consents are sought under the Horowhenua District Plan.

Section 3: Project details

Remember: at this stage only a general level of detail is required, enough to inform eligibility to use the fast-track approvals process.

For construction activities, please state the anticipated commencement and completion dates.

The Mangahao HEPS is an existing scheme and no new infrastructure or upgrades to existing infrastructure is proposed.

3.1 Approvals required

Applications must specify all of the proposed approvals sought but only need to provide a general level of detail about each proposed approval, sufficient to inform the Minister's decision on the referral application.

For each proposed approval an applicant must be eligible to apply for any corresponding approval under a specified Act. For example, if an approval is for a notice of requirement under the RMA, the applicant for that approval would need to be a requiring authority.

Applications for approvals under a specified Act, as required by in [section 13\(4\)\(y\)](#), are covered below in 3.8 Specific proposed approvals.

3.1.1 Outline the approvals sought under the Resource Management Act 1991.

The application involves the following activities which require resource consent under the relevant statutory planning documents:

- The damming of water;
- The taking, diversion, and use of water;
- The discharge of water and contaminants (e.g. sediment) to water or land;
- The erection and placement of structures within the bed of waterbodies;
- The excavation and disturbance of the bed of waterbodies; and
- The deposition of substances (e.g. gravel, silt and sediment) in the bed of waterbodies.

The erection and placement of structures within the bed of waterbodies has been included in this referral application as a precaution. A temporary coffer dam is proposed in the Mangahao No. 1 Reservoir to divert water for desilting works at the dam. This is not considered a “structure” under the definitions in the Resource Management Act 1991 that would trigger land use rules, however Manawa has included it in the referral application to ensure it is fully covered by the decision.

It is considered that the maintenance of structures in the bed of rivers (i.e. the dams at the No.1, No.2, and No.3 Reservoirs) can be undertaken as a permitted activity in accordance with the rules and conditions of the Horizons One Plan. However, should this interpretation be incorrect then resource consent will also be required for the

maintenance of structures also. Accordingly, Manawa has included it in the referral application to ensure it is fully covered by the decision.

No change to the operating regime or to the project as previously accepted to the fast-track by the Minister is proposed. This referral application is being made only to ensure all existing maintenance activities for the effective and safe operation of the dams, and all land holdings, are accurately included.

3.1.2 Outline the approvals sought under the Conservation Act 1987

N/A.

No concessions are being sought. Manawa Energy has existing concessions (easement instruments) that grant:

- a right of way for access to the Scheme via the Mangahao Access Road; and
- the right to maintain land for the purpose of storing and releasing water, which includes the area of land within the No.1 Reservoir and downstream of the No.1 Dam and No.2 Dam where periodic desilting work occurs.

3.1.3 Outline the approvals sought under the Reserves Act 1977

N/A

3.1.4 Outline the approvals sought under the Wildlife Act 1953

N/A

3.1.5 Outline the approvals sought under the National Parks Act 1980

N/A

3.1.6 Outline the approvals sought under the Heritage New Zealand Pouhere Taonga Act 2014

N/A

3.1.7 Outline the approvals sought under the Freshwater Fisheries Regulations 1983

The project will require an approval under the Freshwater Fisheries Regulations 1983. Whether the approval required is a standard or complex freshwater fisheries activity will be confirmed once further ecological advice is received regarding relevant fish spawning seasons in the Mangahao River.

3.1.8 Outline the approvals sought under the Exclusive Economic Zone and Continental Shelf (Environmental Effects) Act 2012

N/A

3.1.9 Outline the approvals sought under the Crown Minerals Act 1991

N/A

3.1.10 Outline the approvals sought under the Public Works Act 1981

N/A

3.1.11 *Only applicable if more than one applicant:* Provide a statement of which approvals are proposed to be held by which applicant.

N/A

3.1.12 Where there are any particular eligibility requirements to apply for an above approval; identify what they are, who the relevant applicant is, and confirm that the relevant applicant meets those requirements (including providing any necessary supporting information or documentation to evidence this).

N/A.

3.1.13 Are there any other types of consents, certificates, designations, concessions, and other legal authorisations (other than contractual authorisations or the proposed approvals) and you consider are needed to authorise the project (including any that may be needed by someone other than you as the applicant(s)). Provide details on whether these have been obtained.

N/A.

3.2 Project stages

3.2.1 If the project is planned to proceed in stages, provide: No

1. A statement of whether the project is planned to proceed in stages, including:
 - a. an outline of the nature, scale and timing of the stages; and
 - b. a statement of whether you intend to lodge a separate substantive application for each of the stages.
 - i. If a substantive application is intended to be lodged for each stage, address the questions under the section (Appropriateness for fast-track approvals process) for each stage of the project

3.3 Alternative project

3.3.1 If the project is proposed as an alternative project, provide: No

1. A statement of whether a part of the project is proposed as an alternative project in itself; and
 - a. Describe that part of the project; and
 - b. Explain how that part of the project proposed as an alternative project meets the referral assessment criteria in [section 22](#) of the Act.

3.4 Adverse effects

3.4.1 Describe any anticipated and known adverse effects of the project on the environment.

Please see attachment seven.

3.4.2 Provide a statement of any activities involved in the project that are prohibited activities under the Resource Management Act 1991, and identify the relevant prohibited activity provision.

N/A

3.5 Persons affected

3.5.1 Provide a list of the persons, groups and/or entities who you consider are likely to be affected by the project.

The list should include, as relevant, local authorities, relevant Māori groups (as set out at [section 13\(4\)\(j\)\(ii\)-\(vii\) of the Fast-track Approvals Act 2024](#)), persons with a registered interest in land that may need to be acquired under the Public Works Act 198; and if the project includes a land exchange, the holder of an interest in the land that is to be exchanged by the Crown (see [Consultation requirements for referral application](#)).

The following lists the Māori entities who are considered likely affected by the project:

- Rangitāne o Manawatū
- Ngāti Whakare
- Muaūpoko
- Ngāti Kahungunu
- Ngāti Kahungunu ki Tamaki-nui-ā-Rua
- Ngāti Kahungunu ki Wairarapa Tāmaki nui-ā-Rua
- Rangitāne Tamaki nui-ā-Rua
- Rangitāne Tū Mai Rā Trust
- Tanenuiarangi Manawatū Charitable Trust
- Te Rūnanga o Raukawa Incorporated

The following lists the other stakeholders who are considered likely affected by the project:

- Department of Conservation
- Horizons Regional Council
- Fish & Game
- Recreationalists
- Whitewater New Zealand
- Environmental White Water Park Trust
- Adjacent landowners (includes Horowhenua District Council)

The relevant administering agencies and local authorities were notified, being the Department of Conservation, Horizons Regional Council and Horowhenua District Council.

The project does not include any land exchange.

3.5.2 Provide a summary of any consultation undertaken with the above persons and/or groups who you consider are likely to be affected by the project, and any other groups required to be consulted with under [section 11](#) of the Act, **and** how the consultation has informed the project.

Please see attachment seven.

3.5.3 List any Treaty settlements that apply to the project area and provide a summary of the relevant principles and provisions in those settlements.

Rangitāne o Manawatū Claims Settlement Act 2016, Deed of Settlement of Historical Claims (Rangitāne o Manawatu) – 14 November 2015

The Mangahao HEPS is within the Rangitāne o Manawatū area of interest. The Settlement acknowledges and apologizes for historic grievances which undermined the ability of Rangitāne o Manawatū to access many of their traditional resources, including rivers, lakes, forests, and wetlands. The historic grievances do not specifically relate to the Mangahao HEPS or the project area.

The Settlement is clear that the statutory acknowledgement only applies to the flowing body of fresh water within rivers and streams in the acknowledgement area. The statutory acknowledgement applies to the beds of navigable rivers owned by the Crown. Consent authorities must have regard to the statutory acknowledgement and must provide a copy of the application and a summary of the application to the Rangitāne o Manawatū governance entity.

The Settlement provides for the establishment of Manawatū River Catchment Advisory Board. The Board may provide advice to the Horizons Regional Council in relation to Manawatū River and the catchments freshwater management issues. The Council must have regard to any advice provided by the Board and must report back to the Board on how it considered any advice.

The Settlement includes a Deed of Recognition over the following features which are of relevance to the Scheme:

- Manawatū River (OTS-182-20) and tributaries. This includes the Mangahao River, which flows northeast and feeds into the Manawatū.
- Mangahao River (OTS-182-24)
- Tararua Forest Park (OTS-182-19)

This requires the Minister of Conservation and the Director General of Conservation, or the Commissioner of Crown Lands, to consult the Rangitāne o Manawatū governance entity and have regard to its views if it is undertaking certain conservation management strategies and plans within the deed area. The deed of recognition only includes parts of those areas that are owned and managed by the Crown.

The settlement also provides for a conservation and taonga tūturu protocol with the governance entity. Other cultural, property and financial redress are not relevant to the

project or project area.

Rangitāne Tu Mai Ra (Wairarapa Tamaki nui-a-Rua) Claims Settlement Act 2017, Deed of Settlement of Historical Claims (Rangitāne o Wairarapa and Rangitāne o Tamaki nui-ā-Rua) - 6 August 2016

Ngāti Kahungunu ki Tamaki Wairarapa nui-ā-rua Claims Settlement Act 2022, Deed of Settlement of Historical Claims (Ngāti Kahungunu ki Tamaki Wairarapa nui-ā-Rua) – 29 October 2021 and amended 24 February 2023

Rangitāne o Wairarapa and Rangitāne o Tamaki nui-ā-Rua, and Ngāti Kahungunu ki Tamaki Wairarapa nui-ā-Rua, have statutory acknowledgements that apply to the Manawatū River and its tributaries (one of which is the Mangahao River). However, the statutory acknowledgements are limited to the Rangitāne o Wairarapa and Rangitāne o Tamaki nui-ā-Rua, and Ngāti Kahungunu ki Tamaki Wairarapa nui-ā-Rua areas of interest, which do not cover the Scheme area.

3.5.4 If relevant, detail any principles or provisions in the Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019 that would be invoked by the project and identify which aspects of the application trigger or otherwise invoke these requirements.

N/A

3.5.5 Will the project be located on land returned under a Treaty settlement?

No

3.5.6 Provide evidence of written agreement by the owners of the land returned.

3.5.7 Describe any processes already undertaken under the Public Works Act 1981 in relation to the project:

N/A

3.5.8 Provide information identifying any parcels of Māori land, marae, or identified wāhi tapu within the project area:

N/A

3.6 Legal interests

3.6.1 Provide a description of any legal interests you or any others applying, have in the land on which the project will occur, including a statement of how that affects your ability to undertake the work.

As a result of the amalgamation of the King Country Energy companies into Manawa Energy, all of the assets, rights and liabilities of the King Country Energy companies, including ownership of the Scheme, have been automatically vested in Manawa Energy. The interests in Land relating to the Scheme are still in the name of KCE Mangahao Limited, however it is intended that the records of title will be updated shortly to record a transmission following amalgamation to correct this.

In addition, the Crown owns the riverbed wherein some desilting work is proposed to occur. The relevant land parcels are identified below (referenced as: 'title or parcel ID / legal description'):

KCE Mangahao Limited

- WN52A/813 / Section 5 SO 37758, Section 4 SO 37752, Section 1 SO 37753, and Sections 2 and 3 SO 37754.
- WN52A/811 / Section 1 SO 37751, and Part Section 11 Block XVI Mt Robinson SD.
- WN52A/812 / Part Section 17 Block WVI Mt Robinson SD, Section 1 SO 37062, and Part Section 8 Block WVI Mt Robinson SD.
- WN50D/571 / Lot 1 DP83716.

Crown (managed by DOC)

- 3892055 / Part Manawatu-Kukutauaki 2E Block.
- 3815560 / Part Section 2 Block IV Waiopahu SD.
- 4012164 / Part Manawatu-Kukutauaki 2E Block.
- 4021424 / Part Mangahao River Bed Survey Office Plan 37758.
- WN168/80 / Part Manawatu-Kukutauaki 2E2 Block.
- 3820159 / Part Section 3 Block IV Waiopahu SD.
- WN189/92 / Part Section 4 Block IV Waiopahu SD.
- 4006702 / Part Mangahao River Bed Survey Office Plan 37757.
- 3939234 / Part Section 1 Block IV Waiopahu SD.
- 3757653 / Part Section 10 Block XVI Mt Robinson SD.
- 3747640 / Part Section 12 Block XI Arawaru SD.
- 3869668 / Part Section 12 Block XI Arawaru SD.
- 4062946 / Part Section 12 Block XI Arawaru SD.
- 3826701 / Part Mangahao River Bed Survey Office Plan 37757.
- 3885415 / Part Section 10 Block XVI Mt Robinson SD.
- 3768743 / Part Section 10 Block XVI Mt Robinson SD.
- 3789582 / Part Manawatu-Kukutauaki 2D Block.
- 3899771 / Part Tokomaru River Bed Survey Office Plan 37754.
- 4000905 / Part Tokomaru River Bed Survey Office Plan 37754.

The above parcels of land are shown on the Scheme Map attached as Attachment Two.

The relevant certificates of title are attached to this application as Attachment Three. As noted above, the interests in Land relating to the Scheme are still in the name of KCE Mangahao Limited, however it is intended that the records of title will be updated shortly to record a transmission following amalgamation to correct this.

Manawa Energy does not require any concessions from DOC for its activities, as these have

been provided for through the State Owned Enterprises (Mangahao Power Station Limited Vesting Order No. 1) Order 1997. A copy of the vesting order, with the SO plans relating to the “Operating Easement Land” over the Crown parcels of land listed above, is attached as Attachment Four.

It is noted that the Scheme also includes two tunnels not located on Manawa Energy owned land (as above this land is currently registered in the name of KCE Mangahao Limited but these will be updated to record Manawa Energy as the registered owner shortly). However, approvals are not sought for the tunnels (as they are existing infrastructure), approval is sought for the takes and discharges which occur on Manawa Energy owned land identified above. This is the same approach that Manawa Energy took in respect of the reconsenting of the Kaimai HEPS under the FTAA.

3.7 Other matters

3.7.1 Have any activities included in the project, or any that are substantially the same as those involved in the project, previously been the subject of an application or a decision under a specified Act?

Please note the term ‘application’ includes a notice of requirement and any other means by which a decision may be sought under a specified Act.

No

3.7.2 If an application has been made, provide details of the application.

3.7.3 If a decision has been made, also provide the outcome of the decision and the reasons for it.

3.7.4 Provide a description of whether and how the project would be affected by climate change and natural hazards:

Climate Change – Climate change impacts on the Scheme are being assessed by Tonkin & Taylor as part of its Hydrological Assessment. Natural variability in the climate may impact the behaviour of the Scheme and its effects on the flow regime of the waterbodies associated with the Scheme. The changes in temperatures, rainfall, drought conditions from predicted climate change has the potential to:

- reduce the mean flows in summer and autumn;
- increase the mean flows in winter;
- increase the frequency and duration of low flow events; and
- increase peak flood discharges due to increased rainfall in storm events.

However, at this stage it is not anticipated that climate change will have any material impact on the way in which the scheme operates.

Natural Hazards – The Scheme could be affected by potential earthquakes and floods. However, key structures of the Scheme are inspected and maintained to ensure that they

are able to perform as intended during natural hazards. Flood risks are mitigated throughout the Scheme through structural features, and operational, maintenance and safety procedures.

Provide the additional details requested below as relevant to your application.

3.8 Specific proposed approvals

3.8.1 Approvals under the Resource Management Act 1991

3.8.1.1 *Resource consents*

If your application is seeking a consent for an activity that would otherwise be applied for under the Resource Management Act 1991, including an activity that is prohibited under the Act, provide the information below:

- An assessment of the project against any relevant national policy statement, any relevant national environmental standards and, if relevant, the New Zealand Coastal Policy Statement.

Mitchell Daysh are carrying out a comprehensive planning assessment in relation to the Scheme.

The New Zealand Coastal Policy Statement is not considered relevant as the Mangahao HEPS is not located in, or near, the coastal environment.

Similarly, the National Policy Statement on Indigenous Biodiversity (NPSIB) is not considered relevant as clause 1.3(3) of the NPSIB states that “nothing in this National Policy Statement applies to the development, operation, maintenance or upgrade of renewable electricity generation assets and activities and electricity transmission network assets and activities”. For the avoidance of doubt, renewable electricity generation assets and activities, and electricity transmission network assets and activities, are not “specified infrastructure” for the purposes of the NPSIB.

The relevant national policy statements and national environmental standards are:

- NPSREG;
- NPSFM; and
- NESF.

NPSREG - The NPSREG was amended in December 2025 and the objectives expanded to enable renewable energy generation (“REG”) to ensure

- national, regional and local benefits of REG are provided for;

- REG capacity and output significantly increases;
- the social, economic, cultural wellbeing of people and communities are supported;
- greater security of energy supply is provided;
- emissions reductions are supported; and
- REG is developed and operated in a safe, efficient, effective manner managing adverse effects.

The NPSREG policies also recognise the national significance, and the national, regional and local benefits of REG activities (Policy A), the importance of avoiding losses to the REG capacity of existing REG assets (Policy B), requires decision makers to enable REG assets and activities in all locations and environments (Policy F) and in particular the efficient operation and maintenance of existing REG assets and activities (Policy G). Policy H also sets out that for the consenting of existing REG assets and activities, such as the Mangahao HEPS, decision makers must recognise that existing assets form part of the existing environment, and consider the proposal against the effects of the existing REG assets and activities and the efficiencies and benefits of enabling the upgrade or increase of capacity within existing REG sites. As such, it is considered that the project is entirely consistent with the objectives and policies of the NPSREG, noting in particular the more than 100-year history of the Scheme at this location and the efficiency of continuing to operate the Mangahao HEPS, retaining the benefits provided by the Scheme (such as generation and storage capacity and greenhouse emission reductions) while incorporating operational adaptations to better manage adverse effects.

NPSFM - The NPSFM includes an effects management hierarchy which requires adverse effects of a project on the specific values of freshwater bodies to be analysed and addressed through a cascade of different actions. Initial assessments obtained by Manawa Energy have confirmed that all adverse effects associated with the Scheme can be appropriately managed in accordance with the effects management hierarchy in the NPS-FM. More broadly, the NPSFM is relevant to fish passage, residual flows, water quality, the management of adverse effects on aquatic ecosystems, and the management of the effects of the Scheme on the relationship of tangata whenua with the site and waterbodies. Based on the initial expert assessments obtained, and the engagement with mana whenua to date, it is

considered that the continued operation, use and maintenance of the Scheme can occur in a manner that is consistent with the NPSFM.

NESF – The NESF regulations for fish passage do not apply to existing structures (nor are the structures considered ‘weirs’ for the purpose of the NESF). The take, use, damming, diversion or discharge of water for the maintenance and operation of specified infrastructure is also provided for as a permitted activity (Regulation 46). If the permitted activity conditions cannot be complied with, resource consent will be applied for in accordance with the NESF (and in accordance with sections 14 and 15 of the RMA).

- Information on whether, to the best of your knowledge, there are any existing resource consents relevant to the project site to which RMA [section 124C\(1\)\(c\)](#) (existing consent would need to expire to enable the approval to be exercised) or RMA [section 165ZI](#) (space already occupied by the holder of an aquaculture permit) would apply if the approval were to be applied for as a resource consent under that Act

To the best of its knowledge, Manawa Energy is not aware of any resource consents relevant to the site to which sections 124C(1)(c) or 165ZI of the RMA would apply.

3.8.1.2 *Resource consents where the project includes standard freshwater fisheries activities*

If your application is seeking a resource consent and your project includes a [standard freshwater fisheries activity](#), provide the information requested below:

- If an in-stream structure is proposed (including formal notification of any dam or diversion structure), provide a description of the extent to which this may impede fish passage.
No new in-stream structures are proposed.

Temporary coffer dams are formed using sediment and gravel within the Mangahao No.1 Reservoir to divert water as part of the instream maintenance desilting works that occur no more than once every five years at the No.1 Dam. The coffer dams are not considered structures under the Resource Management Act 1991 as they are not affixed to land. Further information will be provided with the substantive application.

An aquatic ecology report is being prepared and will confirm the effects on fish and fish passage, including identifying relevant fish spawning seasons.

- Indicate whether any fish salvage activities or other complex freshwater fisheries activities are proposed.
Fish salvage is proposed at the No.1 and No.2 Dams. More detail will be provided in the substantive application.

An aquatic ecology report is being prepared, and a complex freshwater fisheries activity may be applied for depending on advice received regarding relevant fish spawning seasons in the Mangahao River.

3.8.1.3 *Designations*

If your application is seeking a designation or an alteration to an existing designation for which a notice of requirement would otherwise be lodged under the Resource Management Act 1991, provide the information below:

- An assessment of the project against any relevant national policy statement, any relevant national environmental standards, or, if relevant, the New Zealand Coastal Policy Statement.

N/A

3.8.1.4 *Designations where the project includes a standard freshwater fisheries activity*

If your application is seeking a designation or an alteration to an existing designation and your project includes a [standard freshwater fisheries activity](#), provide the information requested below:

- If an in-stream structure is proposed (including formal notification of any dam or diversion structure), provide a description of the extent to which this may impede fish passage.

N/A (no designation sought).

- Indicate whether any fish salvage activities or other complex freshwater fisheries activities are proposed.

N/A (no designation sought).

3.8.1.5 *Change or cancellation of conditions*

If your application is seeking a change or cancellation of resource consent condition that would otherwise be applied for under the Resource Management Act 1991, provide:

- Information about whether the change or cancellation of the condition is material to the implementation or delivery of the project.

N/A

3.8.1.6 *Certificates of compliance*

If your application is seeking a certificate of compliance that would otherwise be applied for under the Resource Management Act 1991, provide:

information that demonstrates the activity that the certificate of compliance is intended to cover can be done lawfully in the location without a resource consent.

N/A

3.8.2 Approvals relating to [Conservation Act 1987](#), [Reserves Act 1977](#), [Wildlife Act 1953](#), and [National Parks Act 1980](#)

3.8.2.1 *Concessions*

For applications seeking a [concession](#) that include a lease, answer the following:

- Will the lease be for a term (including any renewals that will, or is likely to, be more than 50 years?
No
- Will the granting of the lease trigger a right of first refusal or a right of offer or return?
 - If you answered yes to both a. and b. above, provide evidence that the applicant has written agreement from the holder(s) of the right of first refusal or [right of offer or return](#) to waive that right for the purposes of the proposed lease.

3.8.2.2 *Land exchanges*

For applications seeking an approval for a land exchange involving conservation land, provide the details below:

No

- A description of both land areas proposed for exchange (for example, maps showing areas and location, addresses and legal descriptions where possible)
- The financial value of the land proposed to be acquired by the Crown
- A brief description of the conservation values of both pieces of land, including an explanation of why the exchange would benefit the conservation estate.
- If the land exchange would trigger a right of first refusal or a right of offer or return, provide evidence that the applicant has written agreement from the holder of the right of first refusal or right of offer or return to waive that right for the purpose of the land exchange

- Provide sufficient detail in respect of both land areas to confirm that no part of any land to be exchanged by the Crown is land listed in [Schedule 4](#) or a reserve declared to be a national reserve under [section 13](#) of the Reserves Act 1977.

3.8.3 Approvals relating to complex Freshwater Fisheries activities

If your application is seeking an approval or dispensation that would otherwise be applied for under regulation [42](#) or [43](#) of the Freshwater Fisheries Regulations 1983 in respect of a [complex freshwater fisheries activity](#) provide the information requested below:

- Whether an in-stream structure is proposed (including formal notification of any dam or diversion structure), and a description of the extent to which this may impede fish passage.

No new in-stream structures are proposed.

Temporary coffer dams are formed using sediment and gravel within the Mangahao No.1 Reservoir to divert water as part of the instream maintenance desilting works that occur no more than once every five years at the No.1 Dam. The coffer dams are not considered structures under the Resource Management Act 1991 as they are not affixed to land. Further information will be provided with the substantive application.

An aquatic ecology report is being prepared and will confirm the effects on fish and fish passage, including identifying relevant fish spawning seasons.

- Whether any fish salvage activities or other complex freshwater fisheries activities are proposed.

Fish salvage is proposed at the No.1 and No.2 Dams. More detail will be provided in the substantive application.

An aquatic ecology report is being prepared, and a complex freshwater fisheries activity may be applied for depending on advice received regarding relevant fish spawning seasons in the Mangahao River.

3.8.4 Approvals relating to [Exclusive Economic Zone and Continental Shelf \(Environmental Effects\) Act 2012](#)

If your application is seeking a marine consent that would otherwise be applied for under the Exclusive Economic Zone and Continental Shelf Act 2012, provide the information requested below:

- Any information relating to whether the Minister for Conservation is an affected person.

N/A

- If the applicant or the proposed holder of the marine consent has already applied for a consent under the EEZ Act in relation to the project, provide:
 - Details of any application made;
 - An explanation of any decisions made on that application; and
 - Any information that Minister may consider under [section 22\(6\)](#) (comparison of activity against current or likely use of the area).

N/A

- Additional information (in a summary form) about compliance or enforcement action taken against the applicant or the person who is identified in the application as the proposed holder of the marine consent by the EPA under the EEZ Act.

N/A

3.8.5 [Approvals relating to Crown Minerals Act 1991](#)

3.8.5.1 *Access arrangements*

For an approval for an access arrangement that would otherwise be applied for under section 61 or 61B of the Crown Minerals Act 1991, provide:

- Information that confirms the applicant or the person identified in the application as the proposed holder of the access arrangement complies with [section 59\(1\)](#) and (2) of the Crown Minerals Act 1991 (which applies as if a reference to an access arrangement under that Act were a reference to an access arrangement under this Act) including;
 - Evidence that the applicant or person has provided each owner and occupier of the relevant land a notice in writing of their intention to obtain an access arrangement; and
 - Evidence that the notice complies with the requirements in [section 59\(2\)](#) of the Crown Minerals Act, and any matters required by regulations. =

N/A

3.8.5.2 *Mining permits*

For an approval for a mining permit that would otherwise be applied for under [section 23A](#) of the Crown Minerals Act 1991, provide the information requested below:

- A copy of the relevant exploration permit or existing privilege to be exchanged for a mining permit that entitles the holder to mine a Crown-owned mineral.

N/A

- The name and contact details of the proposed permit participants and the proposed permit operator.

N/A

- A proposed work programme for the proposed permit, which may comprise committed work, committed or contingent work, or both.

N/A

- Evidence of the technical or financial capability of the proposed permit holder to comply with and give proper effect to the work programme.

N/A

- Information about the proposed permit holder's history of compliance with mining or similar permits and their conditions.

N/A

- The proposed date on which the substantive application is intended to be lodged (if your referral application is accepted) in accordance with [section 42\(11\)](#).

N/A

- If the authorised person proposes to provide information under [section 37](#) (to the relevant chief executive), the date on which the person intends to provide that information.

N/A

- The proposed duration of the permit.

N/A

3.8.5.3 *Mining permits for petroleum*

If the proposed approvals include a mining permit for petroleum, provide:

- A map of the area over which the mining permit application is intended to be made, the area in which the surrender of an exploration permit or existing privileges is proposed (which must be the same area as the area over which the mining permit application is intended to be made), and the extent of the resource and reserves to which the development plan relates.

N/A

- The resources and reserves relating to the project, estimated in accordance with the Petroleum Resources Management System.

N/A

- A high-level overview of the following:
 - the proposed field development plan;
 - the proposed date for the commencement of petroleum production;
 - the economic model for the project;
 - the proposed duration of the proposed mining permit and;
 - decommissioning plans.

N/A

3.8.5.4 *Mining permits for minerals other than petroleum*

If the proposed approvals include a mining permit for minerals other than petroleum, provide:

- A map of the area over which the mining permit application is intended to be made, the area in which the surrender of an exploration permit or existing privileges is proposed (which must be the same area as the area over which the mining permit application is intended to be made), and the extent of the resource and reserves to which the development plan relates.

N/A

- For minerals other than gold or silver, a report or statement confirming the ownership of the minerals targeted

N/A

- Information on whether the application will be for a [Tier 1 or Tier 2 permit](#).

N/A

- An estimate of the mineral resources and reserves relating to the project, including a summary on acquisition of the data and the data underpinning the estimate (such as information on sample locations, grade, and geology). For a Tier 1 permit application the resources and reserves relating to the project are to be estimated in accordance with a recognised reporting code such as JORC or NI 43-101.

N/A

- An indicative mine plan.

N/A

- A high-level overview of the following:
 - the proposed mining method;
 - the proposed date for the commencement of mining and estimated annual production;
 - the economic model for the project;
 - the status of or anticipated timing for completing any pre-feasibility or feasibility studies;
 - the proposed methods for processing mined material and handling and treating waste and;
 - anticipated plans for mine closure and rehabilitation.

N/A

Section 4: Authorisation

To the best of my knowledge, the information contained in this application is true and correct.

I confirm that I am authorised to make this application - Yes

I have provided a copy of the application with all contact details redacted - Yes

I understand that all actual and reasonable costs incurred in relation to this application by MfE, EPA and other central and local government agencies will be recovered from me in accordance with [section 104](#) of the Act, and the [Fast-track Approvals Cost Recovery Regulations 2025](#) - Yes

Signature: C L L

Date: 7/2/2026

Name: Holland Beckett

Section 5: Attachments

List any documents submitted with the application.

- Remember: include a copy of your application with all contact details redacted.

Attachment number	Document name	Author	Document version

Referral application checklist

Use this checklist to confirm you have completed all sections of the referral application form.

Section 1: Applicant details	No
1.2 & 1.3 Agent's evidence of authority to represent the applicant(s) - if applicable	No
1.4 Compliance and enforcement history	No

Section 2: Referral application summary	No
2.1 Project name	No
2.2 Project description and location	No
2.3 Ineligible activity	No
2.4 Exemptions from requirement to provide agreement	No
2.5 Ministerial determinations under sections 23 and 24	No
2.6 Appropriateness for fast-track approvals process	No
Section 3: Project details	No
3.1 Approvals required	No
3.2 Project stages	No
3.3 Alternative project	No
3.4 Adverse effects	No
3.5 Persons affected	No
3.6 Legal interest	No
3.7 Other matters	No
3.8 Specific proposed approvals	No
Section 4: Authorisation	No
Section 5: Attachments	No