

HOLLAND BECKETT

2 July 2026

Fast-track Referral Team
C/- Ministry of Cities, Environment, Regions and
Transport

BY EMAIL
referral@fasttrack.govt.nz

Mangahao Hydro-Electric Power Scheme Reconsenting Project

1. We **enclose** an application for referral of the Mangahao Hydro-Electric Power Scheme (**HEPS**) Reconsenting Project.

Reason for new referral application

2. The Mangahao HEPS has an existing referral decision in place dated 10 November 2025.
3. 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.
4. 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.

Additional changes from original referral application

5. We bring to your attention the additional changes from the original referral application:
 - (a) Amalgamation of companies:
 - (i) The referral decision dated 10 November 2025 is addressed to King Country Energy Limited (**King Country Energy**).
 - (ii) On 30 June 2026, King Country Energy companies were amalgamated into Manawa Energy Limited (**Manawa Energy**). A copy of the Certificate of Incorporation is included in the application. As a result, all of the assets, rights and liabilities of the King Country Energy companies, including ownership of the Mangahao HEPS, have been automatically transferred to Manawa Energy Limited.
 - (iii) King Country Energy undertook the consultation process for this referral application in accordance with the Fast-track Approvals Act 2024 (**FTAA**). Manawa Energy Limited (an amalgamated entity) is the applicant for the purpose of the FTAA, being the new owner and operator of the Scheme and the entity for which the approvals are being applied for.

- (iv) For this reason, the application is lodged by Manawa Energy, which is also the proposed holder of the approvals being applied for.
- (v) The substitution of Manawa Energy as the authorised person means that the compliance information required as part of the application has been updated to refer to Manawa Energy.
- (b) Freshwater fisheries activity:
 - (i) The inclusion of a standard or complex freshwater fisheries activity in the referral application is new.
 - (ii) The works in the bed of the No.1 reservoir involve the formation of temporary coffer dams to divert water as part of the instream maintenance desilting works that occur no more than once every five years. It is anticipated that freshwater fisheries activities are proposed, and an aquatic ecology report will confirm whether this is a standard or complex freshwater fisheries activity.
- (c) Potential land use activity:
 - (i) Horowhenua District Council (**HDC**) raised a query as to a “structure” in the bed of the river at No.1 Dam and how this relates to the Horowhenua District Plan overlays. Manawa Energy advised HDC that:
 - (1) The Outstanding Natural Feature overlay and its rules are not considered to be triggered for the proposed works, as the coffer dams are accumulations of sediment material and not structures. Additionally, the operation of the HEPS has existing use rights under s 10 of the RMA.
 - (2) Based on that, the proposed desilting works do not require consent under the Horowhenua District Plan.
 - (ii) This matter has not been agreed with HDC, and accordingly, this referral application includes the erection and placement of structures within the bed of waterbodies should this be required for the substantive application.

New information - State Owned Enterprises (Mangahao Power Station Limited Vesting Order No. 1) Order 1997

- 6. 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.
- 7. A copy of the vesting order is included with the referral application. This was not part of the prior referral application.

Information regarding national significance and economic benefits of the project

- 8. King Country Energy received a further information request in conjunction with the first referral application seeking “Further information and data to support the assertion in the application that

this project is of national significance and the economic benefits associated with this project in that context.”

9. In response to that information request, we filed a Memorandum dated 17 September 2025 which attached a report from NZIER.
10. That information remains relevant to this referral application and has been included accordingly as Attachment **Five**.

Pre-referral notification requirements of the FTAA and feedback

11. Given the timing of this application, Manawa Energy has complied with the notification requirements of the FTAA, as operative from 31 March 2026. Notification letters were sent by King Country Energy on 28 and 29 April 2026. Copies of relevant correspondence can be provided on request.
12. With respect to the relevant iwi authorities, hapū, and Treaty settlement entities notified pursuant to s 11 of the FTAA, as there was a s 18 report from the first referral application, King Country Energy notified the parties which had been identified through that process, being:
 - Tanenuiarangi Manawatū Charitable Trust representing:
 - Rangitāne o Manawatū;
 - Te Rūnanga o Raukawa Incorporated representing:
 - Ngāti Raukawa ki te Tonga;
 - Ngāti Whakatere;
 - Rangitāne o Tamaki nui-ā-Rua
 - Rangitāne Tū Mai Rā Trust, representing:
 - Rangitāne o Wairarapa; and
 - Rangitāne o Tāmaki-nui-ā-Rua;
 - Ngāti Kahungunu ki Tamaki-nui-ā-Rua
 - Tāmaki nui-ā-Rua Settlement Trust, representing:
 - Ngāti Kahungunu ki Wairarapa; and
 - Ngāti Kahungunu ki Tāmaki nui-ā-Rua;
 - Ngāti Kahungunu Iwi Inc, representing:
 - Ngāti Kahungunu.
13. King Country Energy also notified DOC and the relevant local authorities which is reported on in detail in the referral application form.
14. We look forward to progressing this referral application and assisting with any queries you may have.



Ngā mihi
HOLLAND BECKETT



Vanessa Hamm / Partner

DDI s 9(2)(a)

E s 9(2)(a)

encl.

Attachments:

- One: Authorisation Letter.
- Two: Scheme maps.
- Three: Relevant certificates of title.
- Four: State Owned Enterprises (Mangahao Power Station Limited Vesting Order No. 1) Order 1997.
- Five: Memorandum dated 17 September 2025 attaching NZIER report.
- Six: Certificate of amalgamation.
- Seven: Responses to referral application questions.
- Eight: Redacted version of referral application.

