Memorandum on Completeness and Scope

File	FTAA-2606-1254
Application	State Highway 29 Tauriko Network Connections (including Omanawa Bridge replacement)
To	Daya Thomson, Team Leader LOA
From	[redacted], Application Lead
Date	27 August 2026
Subject	Assessment whether the application complies with section 46(2) of the Fast-track Approvals Act 2024

Purpose

1. The purpose of this memo is to assist you in making your decision on whether the State Highway 29 Tauriko Network Connections (including Omanawa Bridge replacement) application (the Application) lodged by New Zealand Transport Agency Waka Kotahi (the Applicant), received by the Fast-track Team on 31 July, complies with the requirements of section 46(2) of the Fast-track Approvals Act 2024 (**the Act**).

Decision-maker

2. You have delegated authority to make the decision under section 46 of the Act under the instrument of delegation dated 30 March 2026.

Conflict of interest

3. I confirm that I do not have any conflict of interest in this matter that would prevent me making this assessment.

The application

4. For projects listed in Schedule 2 of the Act and referred projects, authorised persons may lodge a substantive application for approvals available under the Act.
5. The Application is a listed project.

6. The Application was lodged on 31 July 2026. The EPA must, in consultation with the relevant administering agencies and relevant consent authorities, decide whether this substantive application complies with section 46 of the Act within 15 working days of the lodgement of the application (but may be longer where the EPA has requested further information from the applicant under section 46(2B)). This application was subject to a further information request, therefore the date by which the EPA must make a decision under section 46 is 27 August 2026.
7. As set out in more detail below, the EPA must decide whether the application is complete and either:
   - Notify the Panel Convener they can set up an expert consenting panel to make a decision on the application (if complete and within scope); or
   - return it to the person who lodged it (if incomplete and/or not within scope).

Project and Scope

8. The project is described in Schedule 2 of the Act as:

> *"Upgrade existing, and construct new, roading corridor between the vicinity of the Omanawa Road/State Highway 29 intersection and the Takitimu Northern Link interchange, together with upgrades to connections between State Highway 29 and State Highway 36 at the intersection with Taurikura Drive and State Highway 29A, through to the Oropi Road–State Highway 29A roundabout, including associated infrastructure and connections or 1 or more sections of new or existing road between the points."*

9. The approximate geographical location is identified in Schedule 2 of the Act as:

> "*State Highway 29 and State Highway 29A area.*"

10. The substantive application, described in the Main Report (Volume A), involves the construction, operation and maintenance of:
    - A new offline four-lane SH29 corridor between the Ōmanawa Bridge project and the Takitimu North Link Interchange, prioritising inter-regional freight movement;
    - A new offline SH29A corridor providing a high-standard regional connection that relieves pressure on the existing urban-constrained alignment;
    - Upgrades to key intersections, including the Ōmanawa Road intersection, together with grade separated interchanges at Redwood Lane, Takitimu Drive and Barkes Corner, and local road overbridges to maintain connectivity and walking and cycling links;
    - Widening of Takitimu Drive (to four lanes) up to the Takitimu North Link intersection; and
    - Project-wide works, including stormwater and drainage works, stream realignments, landscaping, ecological and noise mitigation, and relocation of utilities.
11. The application relates solely to the listed project.

12. The Western Corridor encompasses the SH29, SH29A and SH36 networks. The Project is located within that wider corridor and supports connections between Tauriko West, Pyes Pā, Tauriko Business Estate, Tauranga, the Port of Tauranga, Waikato and the Upper North Island. Barkes Corner is the junction of SH29, Pyes Pā Road and Cameron Road, which is in the same general area as the SH29A/Oropi Road network referenced in the listed project description (Schedule 2).

13. The Main Report (Volume A) describes a project extent that includes SH29 from the Ōmanawa Road intersection eastward, Takitimu Drive, SH29A, SH36, and the associated local roads including Redwood Lane, Cambridge Road, Cameron Road, Pyes Pā Road and Ōmanawa Road. Although more detailed, this is consistent with the description provided in the listed project description (Schedule 2).

14. Overall, the construction, operation, and maintenance activities at these locations, as described in the Main Report (Volume A), broadly align with the scope of upgrading existing infrastructure, constructing new infrastructure, and providing associated infrastructure and connections at the identified locations, as described in the listed project description.

Fast-track consenting application process

Legislative context

15. The EPA must decide, in consultation with relevant administering agencies and consent authorities, whether the substantive application complies with section 46(2) of the Act. A substantive application complies with section 46(2) of the Act, if the application:
    - complies with sections 42, 43 and 44;
    - relates solely to a listed project or a referred project;
    - the EPA considers that, on the face of the application, the project does not appear to involve an ineligible activity; and
    - any fee, charge, or levy payable under the Fast-track Approvals (Cost Recovery) Regulations 2025 (the Regulations) in respect of the application is paid.

16. The EPA may request further information from the applicant under section 46(2A) for the purposes of determining whether the application is complete and within scope.

Section 42 Requirements

17. Section 42 of the Act states that an authorised person may lodge a substantive application for the project, or 1 substantive application for each stage of a project if the Minister has determined that the project may proceed in stages (either under s 21(1)(a) or s 37A). Section 42(4) lists the approvals that may be sought under the Act.

18. This application has been lodged by the New Zealand Transport Agency Waka Kotahi. This person is an authorised person under the Act.

19. The approvals being sought are:
    - an approval described in section 42(4)(a), (c) or (d) (resource consent, certificate of compliance or designation);
    - A resource consent, change to or cancellation of a resource consent: **checklist A;**
    - A designation or an alteration to an existing designation: **checklist C**;
    - an approval described in section 42(4)(h) (wildlife approval), **checklist E**;
    - an approval described in section 42(4)(i) (archaeological authority), **checklist F**;
    - an approval described in section 42(4)(j) (complex freshwater fisheries approval), **checklist G**;
    - All of the above listed approvals are of the type set out in section 42(4) of the Act.
20. For each of the approvals sought, the applicant is eligible to apply for any corresponding approval under a specified Act.

Section 43 Requirements

21. Section 43 of the Act sets out the requirements for a substantive application. The substantive application was lodged in the form and manner approved by the EPA. Assessment of section 43 requirements is included at Appendix 1.

Section 44 Requirements

22. Section 44 of the Act requires that the information provided by the applicant under section 43 must be specified in sufficient detail to satisfy the purpose for which it is required. Assessment of section 44 sufficiency is included at Appendix 1.
23. In assessing the sufficiency of information provided by the applicant, we rely on the information provided to us through consultation with each relevant administering agency and consent authority, as summarised in Appendix 2.
24. As set out in more detail in Appendix 2, the agencies consulted have advised that the information required by section 44 is provided in **sufficient** detail to satisfy the purpose for which it is required.

Ineligibility

25. The EPA needs to decide whether it considers that, on the face of the application, the project does not appear to involve an ineligible activity, as defined in section 5 of the Act. As the EPA must consider this on the face of the application, the EPA is only able to consider information contained in the application materials.
26. The list of ineligible activities includes activities:
    - on land returned under a Treaty settlement, on identified Māori Land, on Māori customary land, on land set apart as Māori reservation, or in a customary marine title or protected customary rights area without written permission from the rights holder;

- on Māori customary land, or land set apart as Māori reservation under Part 17 of Te Ture Whenua Māori Act 1993;
- in a customary marine or protected customary rights area without written agreement from the rights holder/group;
- within an aquaculture settlement area without the required authorisation;
- activities that would be prevented under section 165J, 165M, 165Q, 165ZC, or 165ZDB of the RMA (which deal with occupation of space in the common marine and coastal area); or
- that require permissions on national reserves (or reserves vest in another person) held under the Reserves Act 1977 ; or
- on land listed under clauses 1 to 11 or 14 of Schedule 4 of the Crown Minerals Act 1991 (and clauses 12 and 13 for mining activities).
- That are prohibited under the Exclusive Economic Zone and Continental Shelf (Environmental Effects) Act 2012, or section 15B or 15C the Resource Management Act 1991.
- That relate to decommissioning under the Exclusive Economic Zone and Continental Shelf (Environmental Effects) Act 2012
- That are undertaken for the purposes of an offshore renewable energy project.

27. I consider that, on the face of the application, the project does not appear to involve an ineligible activity.

Notification by applicant

28. Pre-lodgement requirements for a listed project require the applicant to notify in writing the persons and groups referred to in section 29(1)(aa). The persons and groups notified have 20 working days to respond from the date of the notice. The applicant must not lodge their substantive application until each 20 working day period has elapsed.

29. I have checked and reviewed the dates of notification sent to the persons or groups in section 29(1)(aa) and confirmed that the application has lodged their application only after each 20 working day period has elapsed.

Fees and levies

30. The EPA has received all fees, charges and levies payable by the applicant under the Regulations for the substantive application as follows:
    - Application fee in the sum of $250,000 plus GST;
    - Levy in the sum of $140,000 plus GST.

Consultation

31. I have consulted with and considered consultation responses from the following relevant administering agencies and relevant consent authorities:
    - Bay of Plenty Regional Council for:

- an approval described in section 42(4)(a) (resource consent)
- Western Bay of Plenty District Council for:
- an approval described in section 42(4)(d) (designation)
- Tauranga City Council for:
- an approval described in section 42(4)(a) (resource consent)
- an approval described in section 42(4)(d) (designation)
- The Department of Conservation for:
- an approval described in section 42(4)(h) (Wildlife Act wildlife approval)
- an approval described in section 42(4)(j) (complex freshwater fisheries approval)
- Heritage New Zealand Pouhere Taonga for an approval described in section 42(4)(i) (archaeological authority).

32. A summary of the consultation is included as **Appendix 2**.

Requests for further information

33. I requested further information from the applicant under section 46(2A) on 14 August 2026 in relation to climate change and natural hazards, and to inform the assessments of the archaeological authorities and complex freshwater fisheries approval.
34. The applicant responded with the information on 21 August within the 20- working timeframe afforded by section 46(2B). A full copy of the request and response can be found in **Appendix 3**.

Assessment of compliance for each section of each application form

35. I have assessed the application materials against the relevant checklists in the prescribed application form. Each assessment is contained within the appropriate approval checklist. These are included in **Appendix 1** for ease of reference.
36. My view is that the application does comply with section 46 and the EPA may now notify the applicant of its decision.
37. The EPA must now decide whether the substantive application has a competing application under section 47A(1) (under delegation from the Minister for Infrastructure under section 47C) within 10 working days from the date of the completeness decision.
38. Once the EPA has made the decision under section 47A(1), the EPA must notify the panel convener that an expert consenting panel can be set up to commence consideration and decision of the application.

Appendix 1: Assessment of section 44 sufficiency

My assessment of the application materials is set out in the relevant checklists below:

CHECKLIST A – Resource consent, change to or cancellation of a resource consent

Clause, Schedule 5	Information required for an approval described in section 42(4)(a) (resource consent) and/or section 42(4)(b) (change or cancellation of resource consent), Clauses 5-8 of Schedule 5	Application Reference	EPA
5(1)(a)	A description of the proposed activity	**Section 3 of Volume A of the SAR at page 35.**	Addressed, as referenced.
5(1)(b)	A description and map of the site at which the activity is to occur, including whether the site is within or adjacent to— (i) a statutory area (as defined in the relevant Treaty settlement Act); or (ii) ngā rohe moana o ngā hapū o Ngāti Porou (as defined in section 11 of the Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019); or (iii) a protected customary rights area under the Marine and Coastal Area (Takutai Moana) Act 2011	**Appendix C of Volume A of the SAR.** **Section 3.2 of Volume A of the SAR at page 35.** **Section 4.3 of Volume A of the SAR at page 45.** **Section 4.5 of Volume A of the SAR at page 46.** **Section 4.6 of Volume A of the SAR at page 47.**	Addressed, as referenced. Note documents Vol.A – Appendix C – C1 to C7 include plans.

5(1)(c)	Confirmation that the consent application complies with section 46(2)(a), (b), and (d); being: • section 42; and • sections 43 and 44; and • relates solely to a listed project or a referred project; and • any fee, charge, or levy payable under regulations in respect of the application is paid.	**Section 1.1 of Volume A of the SAR at page 9. NZTA has made payment to the EPA.**	Addressed, as referenced.
5(1)(d) and 5(6)	The full name and address of— (i) each owner of the site and of land adjacent to the site; and (ii) each occupier of the site and of land adjacent to the site whom the applicant is able to identify after reasonable inquiry; If the applicant is not able to supply the name and address of the owner and each occupier of the site and of land adjacent to the site because the land is Māori land in multiple ownership, the applicant must include a statement to that effect (clause 5(6)).	**Appendix D of Volume A of the SAR.**	Addressed, as referenced.
5(1)(e)	A description of any other activities that are part of the proposal to which the consent application relates	**Section 1.9 of Volume A of the SAR at page 16.**	Addressed, as referenced. Note, other approvals are listed at section 1.10 of Volume A.

5(1)(f)	A description of any other resource consents, notices of requirement for designations, or alterations to designations required for the project to which the consent application relates	**Section 1.9 of Volume A of the SAR at page 16.**	Addressed, as referenced.
5(1)(g)	An assessment of the activity against sections 5, 6 and 7 of the Resource Management Act 1991	**Section 1.8 of Volume B of the SAR at page 32.**	Addressed, as referenced. Section 1.8 extends from pages 32 to 34.
5(1)(h) (and also Clauses 5(2) and 5(3))	An assessment of the activity against any relevant provisions in any of the following documents: • a national environmental standard: • other regulations made under the Resource Management Act 1991: • a national policy statement: • a New Zealand coastal policy statement: • a regional policy statement or proposed regional policy statement: • a plan or proposed plan: • a planning document recognised by a relevant iwi authority and lodged with a local authority. This assessment must include an assessment of the activity against the requirements set out in clause 5(3) of Schedule 5 being: • any relevant objectives, policies or rules in the documents listed; and	**Section 1.3 of Volume B of the SAR at page 7.** **Section 1.4 of Volume B of the SAR at page 14.** **Section 1.5 of Volume B of the SAR at page 22.** **Appendix A of Volume B of the SAR.** **Appendix B of Volume B of the SAR.** **Appendix C of Volume B of the SAR.**	Addressed, as referenced.

	• any requirement, condition, or permission in any rules in any of those documents; and • any other requirements in any of those documents		
5(1)(i)	Information about any Treaty settlements that apply in the area covered by the consent application, including— (i) identification of the relevant provisions in those Treaty settlements; and (ii) a summary of any redress provided by those settlements that affects natural and physical resources relevant to the project or project area	**Section 1.5 of Volume B of the SAR at page 22. Appendix C of Volume B of the SAR.**	Addressed, as referenced.
5(1)(j)	A list of any relevant customary marine title groups, protected customary rights groups, ngā hapū o Ngāti Porou (where an application is within, adjacent to or directly affecting ngā rohe moana o ngā hapū o Ngāti Porou), or applicants under the Marine and Coastal Area (Takutai Moana) Act 2011;	**Section 4.3 of Volume A of the SAR at page 45. Section 4.6 of Volume A of the SAR at page 47.**	Addressed, as referenced.
5(1)(k)	Any conditions that the applicant proposes for the resource consent.	**Appendix E of Volume B of the SAR. Appendix R of Volume B of the SAR.**	Addressed, as referenced. Note, conditions are also included in section 1.10 of Volume B, section 1.16 of Volume C, section 1.11 of Volume D, section 1.11 of Volume E, and various additional appendices to these.

5(1)(l)	if a notice under section 30(3)(b) or (5) has been received,— (i) a copy of that notice showing that it was received within the time frame specified in section 30(6)(b); and (ii) if a notice has been received under section 30(5), any more up-to-date information that the applicant is aware of about the existing resource consent referred to in the notice.	**Section 2.1.3 of Volume A of the SAR at page 21. Appendix B of Volume A of the SAR.**	Addressed, as referenced.
5(4)(a)	An assessment of the activity's effects on the environment that includes the information required by clause 6.	**Section 1.9 of Volume B of the SAR at page 39. Section 1.10 of Volume B of the SAR at page 56. Appendices E - R of Volume B of the SAR.**	Addressed. Section 1.9 spans pages 34 to 56 of Volume B. Section 1.10 on pages 56-57. Also addressed at section 1.8.2 on page 33.
5(4)(b)	An assessment of the activity's effects on the environment that covers the matters specified in clause 7.	**Section 1.9 of Volume B of the SAR at page 39. Section 1.10 of Volume B of the SAR at page 56. Appendices E - R of Volume B of the SAR.**	Addressed. Section 1.9 spans pages 34 to 56 of Volume B. Section 1.10 on pages 56-57. Also addressed at section 1.8.3 on page 34.

6	(1) The assessment of an activity's effects on the environment must include the following information: (a) an assessment of the actual or potential effects on the environment: (b) if the activity includes the use of hazardous installations, an assessment of any risks to the environment that are likely to arise from such use: (c) if the activity includes the discharge of any contaminant, a description of— (i) the nature of the discharge and the sensitivity of the receiving environment to adverse effects; and (ii) any possible alternative methods of discharge, including discharge into any other receiving environment: (d) a description of the mitigation measures (including safeguards and contingency plans where relevant) to be undertaken to help prevent or reduce the actual or potential effect of the activity: (e) identification of persons who may be affected by	**Section 1.9 of Volume B of the SAR at page 39. Section 1.10 of Volume B of the SAR at page 56. Appendices E - R of Volume B of the SAR.**	Addressed. Section 1.9 spans pages 34 to 56 of Volume B. Section 1.10 on pages 56-57.

	the activity and any response to the views of any persons consulted, including the views of iwi or hapū that have been consulted in relation to the proposal: (f) if iwi or hapū elect not to respond when consulted on the proposal, any reasons that they have specified for that decision: (g) if the scale and significance of the activity's effects are such that monitoring is required, a description of how the effects will be monitored and by whom, if the activity is approved: (h) an assessment of any effects of the activity on the exercise of a protected customary right.		
7	The assessment of an activity's effects on the environment must cover the following matters: (a) any effect on the people in the neighbourhood and, if relevant, the wider community, including any social, economic, or cultural effects: (b) any physical effect on the locality, including landscape and visual effects: (c) any effect on ecosystems, including effects on plants or animals and physical disturbance of habitats in the vicinity:	**Section 1.9 of Volume B of the SAR at page 39. Section 1.10 of Volume B of the SAR at page 56. Appendices E - R of Volume B of the SAR.**	Addressed. Section 1.9 spans pages 34 to 56 of Volume B. Section 1.10 on pages 56-57.

	(d) any effect on natural and physical resources that have aesthetic, recreational, scientific, historical, spiritual, or cultural value, or other special value, for present or future generations: (e) any discharge of contaminants into the environment and options for the treatment and disposal of contaminants: (f) any unreasonable emission of noise: (g) any risk to the neighbourhood, the wider community, or the environment through natural hazards or hazardous installations.		
5(5)(a)	If a permitted activity is part of the proposal to which the consent application relates, a description that demonstrates that the activity complies with the requirements, conditions, and permissions for the permitted activity (so that a resource consent is not required for that activity under section 87A(1) of the Resource Management Act 1991)	**Section 1.3.4 of Volume B of the SAR at page 13.**	Addressed, as referenced.
5(5)(b)	If the activity is to occur in an area that is within the scope of a planning document prepared by a customary marine title group under section 85 of the Marine and Coastal Area (Takutai Moana) Act 2011 or the environmental covenant prepared by ngā hapū o Ngāti Porou under section 19 of the Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019, an assessment of the activity against any resource management matters set	**N/A**	n/a

	out in that document		
5(5)(c)	If the activity is to occur in an area that is taiāpure-local fishery, a mātaitai reserve, or an area that is subject to bylaws made under Part 9 of the Fisheries Act 1996, an assessment of the effects of the activity on the use or management of the area.	**N/A**	n/a

CHECKLIST C – Designation or alteration of existing designation

Clause, Schedule 5	Information required for an approval described in section 42(4)(d) of the Act, Clause 12 of Schedule 5	Application Reference	EPA
12(1)(a)	a description and map of the site to which the notice of requirement applies, including whether the site is within or adjacent to a statutory area (as defined in a relevant Treaty settlement Act)	**Appendix C of Volume A of the SAR. Section 1.5 of Volume B of the SAR at page 22.**	Addressed, as referenced.
12(1)(b)	information on the effects of the proposed project or work on the environment, together with a description of how any adverse effects will be mitigated	**Section 1.9 of Volume B of the SAR at page 35-39. Section 1.10 of Volume B of the SAR at page 56-57. Appendices E - R of Volume B of the SAR.**	Addressed, as referenced. Pages 35-39 cover the summary of effects. The appendices go in depth by topic area.

12(1)(c)	confirmation that the notice of requirement complies with section 46(2)(a), (b), and (d), being; • section 42; and • sections 43 and 44; and • relates solely to a listed project or a referred project; • any fee, charge, or levy payable under regulations in respect of the application is paid.	**Section 1.1 of Volume A of the SAR at page 10. NZTA has made payment to the EPA.**	Addressed. Section 1.1 is on page 9.
12(1)(d) (i)	an assessment of the project or work against sections 5, 6, and 7 of the Resource Management Act 1991	**Section 1.8 of Volume B of the SAR at page 32-34.**	Addressed, as referenced.
12(1)(d) (ii) and 12(2)	an assessment of the project or work against any relevant provisions in any of the documents listed in subclause (2) being: (a) a national policy statement: (b) a New Zealand coastal policy statement: (c) a regional policy statement or proposed regional policy statement: (d) a plan or proposed plan: (e) a planning document recognised by a relevant iwi authority and lodged with a local authority.	**Section 1.3 of Volume B of the SAR at page 7-13. Section 1.4 of Volume B of the SAR at page 14-21. Section 1.5 of Volume B of the SAR at page 22-23. Appendix A of Volume B of the SAR. Appendix B of**	Addressed, as referenced.

		Volume B of the SAR. Appendix C of Volume B of the SAR.	
12(1)(e)	information about any Treaty settlements that apply in the area to which the substantive application relates, including— (i) identification of the relevant provisions in those Treaty settlements; and (ii) a summary of any redress provided by those settlements that affects natural and physical resources relevant to the area to which the substantive application relates	**Section 1.5 of Volume B of the SAR at page 22-23. Appendix C of Volume B of the SAR.**	Addressed, as referenced.
12(1)(f), 12(3) and 12(4)	the full name and address of— (i) each owner of the land to which the notice of requirement relates and of the land adjacent to that land; and (ii) each occupier of the land to which the notice of requirement relates and of land adjacent to that land whom the requiring authority is able to identify after reasonable inquiry; and If the applicant is not able to supply the name and address of the owner and each occupier of the site and of land adjacent to the site because the land is Māori land in	**Appendix D of Volume A of the SAR.**	Addressed, as referenced.

	multiple ownership, the applicant must include a statement to that effect (clause 12(3)).		
12(1)(g)	an assessment of whether the project or work and the designation sought are reasonably necessary for achieving the objectives of the requiring authority	**Section 1.6.2 of Volume B of the SAR at page 23-24.**	Addressed, as referenced.
12(1)(h)	any consideration of alternative sites, routes, or methods of undertaking the project or work	**Section 1.6.3 of Volume B of the SAR at page 24-30.**	Addressed, as referenced.
12(1)(i)	a list of the resource consents needed for the project or work and whether they have been applied for	**Section 1.3 of Volume B of the SAR at page 7-12.**	Addressed, as referenced.
12(1)(j)	a description of any consultation undertaken with parties likely to be affected by the project or work and the designation	**Section 4 of Volume A of the SAR at page 44.**	Addressed, as referenced. Also, in Vol. A – Appendix E (Record of Consultation and Engagement).
12(1)(k)	any conditions that the requiring authority proposes for the designation.	**Appendix D of Volume B of the SAR.**	Addressed, as referenced.

CHECKLIST E – Wildlife approval

Clause, Schedule 7	Information required for an approval described in section 42(4)(h) (Wildlife Act approval), clause 2 of Schedule 7	Application Reference	EPA
2(1)(a)	Specify the purpose of the proposed activity	**Section 1.3 of Volume C of the SAR at pages 4-5.**	Addressed, as referenced.
2(1)(b)	Identify the actions the applicant wishes to carry out involving protected wildlife and where they will be carried out (whether on or off public conservation land)	**Section 1.2 of Volume C of the SAR at page 4. Section 1.4 of Volume C of the SAR at page 5.**	Addressed, as referenced. Also, Vol. A- Appendix C-C2 Proposed designation plans.
2(1)(c)	An assessment of the activity and its impacts against the purpose of the Wildlife Act	**Section 1.5 of Volume C of the SAR at page 5.**	Addressed, as referenced.

2(1)(d)	List protected wildlife species known or predicted to be in the area and, where possible, the numbers of wildlife present and numbers likely to be impacted	**Section 1.6 of Volume C of the SAR at pages 5-6.**	Addressed, as referenced. Also, Section 2.9 Volume A – Main report and Vol. B – Appendix K – Ecological Impact Assessment.
2(1)(e)	An outline of impacts on threatened, data deficient, and at- risk wildlife species (as defined in the New Zealand Threat Classification System)	**Section 1.6 of Volume C of the SAR at pages 5-6.**	Addressed, as referenced. Also, Section 2.9 Volume A – Main report and Vol. B – Appendix K – Ecological Impact Assessment.
2(1)(f)	A statement of how the methods proposed to be used to conduct the actions involving protected wildlife will ensure that best practice standards are met	**Section 1.7 of Volume C of the SAR at page 6.**	Addressed, as referenced.
2(1)(g)	A description of the methods to be used to safely, efficiently, and humanely catch, hold, or kill the animals and identify relevant animal ethics processes:	**Section 1.8 of Volume C of the SAR at pages 6-7.**	Addressed, as referenced.
2(1)(h)	A statement of the location or locations in which the activity will be carried out, including a map (and GPS co-ordinates if available)	**Section 1.9 of Volume C of the SAR at pages 7-8.**	Addressed, as referenced (release site is labelled "P").
2(1)(i)	A statement of whether authorisation is sought to temporarily hold or relocate wildlife	**Section 1.2 of Volume C of the SAR**	Addressed, as referenced.

		at page 4.	
2(1)(j)	A list of all actual and potential wildlife effects (adverse or positive) of the proposed activity, including effects on the target species, other indigenous species, and the ecosystems at the site	**Section 1.10 of Volume C of the SAR at pages 8.**	Addressed, as referenced. Also, Volume C- Appendix A – Lizard Management Plan, and Volume B – Appendix K.
2(1)(k)	Where adverse effects are identified, state what methods will be used to avoid and minimise those effects, and any offsetting or compensation proposed to address unmitigated adverse effects (including steps taken before the project begins, such as surveying, salvaging, and relocating protected wildlife)	**Section 1.11 of Volume C of the SAR at page 8.**	Addressed, as referenced.
2(1)(l)	A statement of whether the applicant or any company director, trustee, partner, or anyone else involved with the application has been convicted of any offence under the Wildlife Act	**Section 1.12 of Volume C of the SAR at page 9.**	Addressed, as referenced.
2(1)(m)	A statement of whether the applicant or any company director, trustee, partner, or anyone else involved with the application has any current criminal charges under the Wildlife Act pending before a court	**Section 1.12 of Volume C of the SAR at page 9.**	Addressed, as referenced.

2(1)(n)	Provision of proof and details of all consultation, including with hapū or iwi, on the application specific to wildlife impacts	**Section 4.4 of Volume A of the SAR at pages 45-46.**	Addressed. Also, in Vol. A – Appendix E (Record of Consultation and Engagement). It does not appear that consultation specific to wildlife impacts was undertaken with hapū or iwi based on the description in section 4.4 of Volume A of the SAR. Section 4.4.2 of Volume A of the SAR provides "The partnership [with Ngāi Tamarāwaho, Ngāti Hangarau and Ngāti Kahu] has focused on ensuring that mātauranga Māori and hapū values inform the Project design, assessment of effects and proposed management framework. Key themes have included the treatment of water as a taonga, maintaining and enhancing the mauri and ecological health of waterways, restoring wetland and riparian environments, recognising the cultural landscape and relationships with the Kōpūrererua Valley and Wairoa River, managing effects on archaeological and culturally significant places, and providing for continuing hapū involvement during detailed design, construction, restoration and monitoring." Consultation specific to wildlife impacts was undertaken with DOC, as detailed in section 4.2.1 of Volume A of the SAR, and in Vol. A - Appendix E: "Numerous meetings as part of the CAF, and also separate meetings with a focus on Wildlife and Freshwater Fisheries approvals." DOC found this sufficient, however note: "Vol A Appendix E that outlines that letters were sent in December 2025 and at monthly project hui were undertaken to discuss matters including a range of matters including wider cultural outcomes and environmental monitoring. There is no specific mention of the wildlife matters and no details of any feedback received or copies of the letter

			sent is provided.”
2(1)(o)	Provision of any additional written expert views, advice, or opinions the applicant has obtained concerning their proposal	**Appendix K of Volume B of the SAR. Appendix A of Volume C of the SAR.**	Addressed, as referenced (reports prepared by Boffa Miskell Limtied). Also, Vol. C – Appendix A (Lizard Management Plan).

CHECKLIST F – Archaeological authority

Clause, Schedule 8	Information required for an approval described in section 43(3)(i) Archaeological Authority	Application Reference	EPA
2(1)(a)	a legal description of the land or, if one is not available, a description that is sufficient to identify the land to which the application relates	**Appendix C of Volume D of the SAR at pages 1-5.**	Addressed (visual description).

2(1)(b)	the name of the owner of the relevant land, if the applicant is not the owner of the land	**n/a - NZTA is to acquire the land within the designation. See Appendix D of Volume A of the SAR at pages 2-14.**	Addressed in Vol. A - Appendix D.
2(1)(c)	proof of consent, if the owner of the relevant land has consented to the proposed activity	**n/a - NZTA is to acquire the land within the designation. See Appendix D of Volume A of the SAR at pages 2-14.**	n/a
2(1)(d)	confirmation that the application complies with section 42, 43, and 44 of the Act	**Section 1.1 of Volume A of the SAR at page 9.**	Addressed, as referenced.
	confirmation that the application relates solely to a listed project or a referred project	**Section 1.1 of Volume A of the SAR at**	Addressed, as referenced

		page 9.	
	any fee, charge, or levy payable under regulations in respect of the application is paid.	**NZTA has made payment to the EPA.**	Addressed, as referenced
2(1)(e)	a description of each archaeological site to which the application relates and the location of each site	**Section 3.3 of Appendix A of Volume D of the SAR at pages 14-15.**	Addressed, as referenced. The applicant has not physically surveyed every property but they: • identify all properties containing recorded archaeological sites. • explain which sites were visited and which were not. • explain that only one property (9 Nature Place) could not be accessed because landowner permission was not granted. • discuss both recorded sites on that property and rely on previous investigations and records.
2(1)(f)	a description of the activity for which the authority is sought	**Section 1.2 of Volume D of the SAR at pages 4-5. Section 1.7 of Volume D of the SAR at page 7.**	Addressed, as referenced. In the RFI response, the applicant has clarified that: • Archaeological Authority 1 applies to all 17 recorded archaeological sites. • Authorities 2 and 3 apply to potential unrecorded subsurface sites.

			• The Archaeological Management Plan (Vol. D – Appendix B) has been updated to make this distinction explicit.
2(1)(g)	a description of how the proposed activity will modify or destroy each archaeological site	**Section 1.8 of Volume D of the SAR at pages 7-8.**	Addressed, as referenced (read together with Section 2.6 of Volume A and Section 1.9.6 of Volume B).
2(1)(h)	except in the case of an approval described in section 44(b) of the HNZPT Act, an assessment of— (i) the archaeological, Māori, and other relevant values of the archaeological site in the detail that is appropriate to the scale and significance of the proposed activity and the proposed modification or destruction of the archaeological site; and (ii) the effect of the proposed activity on those values	**Section 1.8 of Volume D of the SAR at pages 7-8.**	Addressed, as referenced (read together with Section 2.6 of Volume A and Section 1.9.6 of Volume B). Volume D - Appendix A.
2(1)(i)	a statement as to whether consultation with tangata whenua, the owner of the relevant land (if the applicant is not the owner), or any other person likely to be affected— (i) has taken place, with details of the consultation, including the names of the parties and the tenor of the views expressed; or	**Sections 3 of Appendix E of Volume A of the SAR at page 8.**	Addressed, as referenced. Also, Section 4 Volume A Main Report.

	(ii) has not taken place or been completed, with the reasons why consultation has not occurred or been completed (as applicable).		

CHECKLIST G – Complex freshwater fisheries approval

Clause, Schedule 9	Information required for an approval described in section 42(4)(j) (complex freshwater fisheries approval), clause 3 of Schedule 9	Application Reference	EPA

3(a)	in relation to the structure and any fish facility: (i) a description of the type of structure or fish facility: (ii) the dimensions of the structure or fish facility: (iii) the design of the structure or fish facility: (iv) the placement of the structure or fish facility: (v) the water flows: (vi) the operating regime	**Section 1.2 of Volume E of the SAR at page 4. Section 1.4 of Volume E of the SAR at page 5. Section 1.7 of Volume E of the SAR at page 8. Appendix R of Volume B of the SAR. Section 2.9.5 of Volume A of the SAR at page 31.**	Addressed, as referenced, and in the applicant's 21 August 2026 response to a Request for Further Information (see Appendix 3). Appendix R of Volume B is the Proposed NES-CS Consent Conditions. Should Appendix K of Volume B (Ecological Impact Assessment) be referenced instead? DOCs consultation feedback (pre the applicant's response to the RFI) re 3(a)(i)– the information provided is not in sufficient detail "Given much of the detailed design has yet to be undertaken, the applicant notes "The structures may include temporary bunds, cofferdams, pipes, flumes, pump-around systems, temporary diversion channels and temporary culverts." While not a definite description, this does provide the range of possible structure and facility types. However, this also does not preclude other structures. Additionally, there does not appear to information of the permanent structures or facilities." DOCs consultation feedback re 3(a)(ii)– the information provided is not in sufficient detail because "The applicant says: "The location, dimensions, form, design, operating period and flow management methodology for each temporary structure will be determined through detailed design and construction planning", i.e. it is not provided in existing documents." DOCs consultation feedback re 3(a)(iii)– the information provided is not in sufficient detail referencing the above comment for 3(a)(ii). DOCs consultation feedback re 3(a)(iv)– the information

			provided is not in sufficient detail referencing the above comment for 3(a)(ii) and "The applicant notes within its Checklist that information is provided in Appendix R. DOC were unable to locate any relevant information in this regard." DOCs consultation feedback re 3(a)(v)– the information provided is not in sufficient detail referencing the above comment for 3(a)(ii). DOCs consultation feedback re 3(a)(vi)– the information provided is not in sufficient detail referencing the above comment for 3(a)(ii).
3(b)	the freshwater species and values present (with particular focus on threatened, data-deficient, and at-risk species as defined in the New Zealand Threat Classification System)	**Section 1.5 of Volume E of the SAR at page 6. Appendix R of Volume B of the SAR**	Addressed, as referenced to section 1.5 of Volume E. Appendix R of Volume B is the Proposed NES-CS Consent Conditions. Should Appendix K of Volume B (Ecological Impact Assessment) be referenced instead?
3(c)	the water quality and quantity in the surrounding habitat (at the proposed structure location, upstream and downstream)	**Section 1.7 of Volume E of the SAR at page 8. Appendix R of Volume B of the SAR.**	Addressed, as referenced to section 1.7 of Volume E, and in the applicant's 21 August 2026 response to a Request for Further Information (see Appendix 3). Appendix R of Volume B is the Proposed NES-CS Consent Conditions. Should Appendix K of Volume B (Ecological Impact Assessment) be referenced instead? DOCs consultation feedback (pre the applicant's response to

			the RFI) - the information provided is not in sufficient detail because “No specific information on water quality is provided in the application nor in the Ecological Impact Assessment (Vol. B Appendix K) referred to in the application. In regard to water quantity, the application notes that some streams are permanent, some are intermittent and some are ephemeral. The amount of water flow, or physical dimensions of the wetted channel (e.g. water depth and width) are not provided in the application or referred to in another document.”
3(d)	how the passage of fish will be provided for or impeded	**Section 1.6 of Volume E of the SAR at page 7. Section 1.8 of Volume E of the SAR page 8.**	Addressed, as referenced. DOCs consultation feedback – Unsure whether the information provided is in sufficient detail because “A general description of how fish passage will be impeded is provided by identifying the types of temporary diversions and dams that may be placed within the target streams. Exactly how these structures will impede fish passage (whether fully or partially), or for how long, is not specified. The description of how fish passage will be provided for is provided by this statement: “fish passage will be managed through construction methodology and proposed conditions” followed by a list of objectives and guidelines for the methodology, for example: “Limiting the extent and duration of temporary damming, diversion and dewatering” and “Maintaining or conveying watercourse flows around or through active work areas.” It may not be possible at this stage to be more specific.”

CHECKLIST J – Listed project information requirements

Section, Fast-track Approvals Act	Information required for a substantive application under section 43(2) and section 13(4)	Application Reference	EPA
13(4)(a)	a description of the project and the activities it involves	**Section 3 of Volume A of the SAR at page 35.**	Addressed, as referenced.
13(4)(c)	information to demonstrate that the project does not involve any ineligible activities (other than activities that may be the subject of a determination under section 23 or 24)	**Section 1.1 of Volume A of the SAR at page 9.**	Addressed, as referenced.
13(4)(d)	a description or map of the whole project area that identifies its boundaries in sufficient detail to enable consideration of the referral application	**Appendix C of Volume A of the SAR.**	Addressed, as referenced.
13(4)(e)	the anticipated commencement and completion dates for construction activities (where relevant)	**N/A**	
13(4)(f)(i)	a statement of whether the project is planned to proceed in stages and, if so an outline of the nature and timing of the stages	**Section 3.3.1 of Volume A of the SAR at page 40.**	Addressed, as referenced.

13(4)(h)	a description of the anticipated and known adverse effects of the project on the environment and the significance of those adverse effects	**Section 1.9 of Volume B of the SAR at page 34. Appendices F - Q of Volume B of the SAR.**	Addressed, as referenced.
13(4)(i)	a statement of any activities involved in the project that are prohibited activities under the Resource Management Act 1991	**N/A**	n/a
13(4)(j)	a list of the persons and groups the applicant considers are likely to be affected by the project, including— (i) relevant local authorities: (ii) iwi authorities and groups that represent hapū that are parties to relevant Mana Whakahono ā Rohe or joint management agreements: (iii) other relevant iwi authorities: (iv) relevant Treaty settlement entities: (v) relevant protected customary rights groups and customary marine title groups: (vi) ngā hapū o Ngāti Porou, if the project area is within or adjacent to, or the	**Section 4 of Volume A of the SAR at page 44.**	Addressed, as referenced (pages 44-49).

	project would directly affect, ngā rohe moana o ngā hapū o Ngāti Porou: (vii) relevant applicant groups under the Marine and Coastal Area (Takutai Moana) Act 2011: (viii) persons with a registered interest in land that may need to be acquired under the Public Works Act 1981:		
13(4)(k)	a summary of— (i) the consultation undertaken for the purposes of section 29 and any other consultation undertaken on the project with the persons and groups referred to in paragraph (j); and (ii) how the consultation has informed the project:	**Section 4 of Volume A of the SAR at page 44. Appendix E of Volume A of the SAR.**	Addressed, as referenced.
13(4)(ka)	a summary of how any responses provided under section 29(1)(aa) have informed the project	**Section 4.9 of Volume A of the SAR at page 50.**	Addressed, as referenced.
13(4)(l)	a list of any Treaty settlements that apply to the project area, and a summary of the relevant principles and provisions in those settlements	**Section 1.5 of Volume B of the SAR at page 22. Appendix C of**	Addressed, as referenced.

		Volume B of the SAR.	
13(4)(m)	a description of any processes already undertaken under the Public Works Act 1981 in relation to the project	**Section 4.7 of Volume A of the SAR at page 47. Appendix D of Volume A of the SAR.**	Addressed, as referenced. Section 4.7 covers the owners and occupiers of land, including affected landowners/occupiers and adjacent landowners/occupiers.
13(4)(n)	a statement of any relevant principles or provisions in the Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019	**N/A**	n/a
13(4)(o)	information identifying the parcels of Māori land, marae, and identified wāhi tapu within the project area	**N/A**	n/a
13(4)(p)	a statement of whether the applicant is seeking a determination under section 23 and, if so, an assessment of the effects of the activity on the relevant land and on the rights and interests of Māori in that land	**Section 1.1 of Volume A of the SAR at page 9.**	Addressed, as referenced. Not seeking.
13(4)(q)	a statement of whether the applicant is seeking a determination under section 24(2) and, if so, a description of— (i) the scale and adverse effects of the existing electricity infrastructure; and	**Section 1.1 of Volume A of the SAR at page 9.**	Addressed, as referenced. Not seeking.

	(ii) how, if at all, that scale or those adverse effects are anticipated or known to change as a result of the maintenance, upgrading, or continued operation of the infrastructure		
13(4)(r)	a statement of whether the applicant is seeking a determination under section 24(4) and, if so,— (i) a description of every alternative site considered by the applicant (or, if the referral application is lodged by more than 1 person, any of those persons) for the construction and operation of the new electricity lines (the activity); and (ii) for each alternative site considered,— (A) a statement of the anticipated and known financial cost of undertaking the activity; and (B) a description of the anticipated and known adverse effects of undertaking the activity; and (C) a description of the anticipated and known financial cost and practicality of available measures to avoid, remedy, mitigate, offset, or compensate for the	**Section 1.1 of Volume A of the SAR at page 9.**	Addressed, as referenced. Not seeking.

	anticipated and known adverse effects of the activity; and (D) a description of any issues (including financial cost) that would make it impractical to undertake the activity on the site; and (E) an assessment of whether it would be reasonable and practical to undertake the activity on the site, taking into account the matters referred to in subparagraphs (A) to (D) and any other relevant matters		
13(4)(s)	a description of the applicant's legal interest (if any), or if the application is lodged by more than 1 person, the legal interest of any of those persons) (if any), in the land on which the project will occur, including a statement of how that affects the applicant's ability to undertake the work	**Section 1.12 of Volume A of the SAR at page 28.**	Addressed. Section 1.12 is at pages 18-19 of Volume A.
13(4)(t)	an outline of the types of consents, certificates, designations, concessions, and other legal authorisations (other than contractual authorisations or the proposed approvals) that the applicant considers are needed to authorise the project, including any that the applicant considers may be needed by someone other than the applicant	**Section 1.9 of Volume A of the SAR at page 16.**	Addressed, as referenced.

13(4)(u)	whether any activities that are involved in the project, or are substantially the same as those involved in the project, have been the subject of an application or a decision under a specified Act and,— (i) if an application has been made, details of the application: (ii) if a decision has been made, the outcome of the decision and the reasons for it:	**Section 1.9.1 of Volume A of the SAR at page 16.**	Addressed, as referenced.
13(4)(v)	a description of whether and how the project would be affected by climate change and natural hazards	**Section 1.8.3 of Volume A of the SAR at page 34.**	Addressed – see Appendix 3. Provided by the applicant on 21 August 2026 in response to a Request for Further Information (RFI). Note, there is no section 1.8.3 of Volume A. Page 34 of Volume A has a summary of ecological values.
13(4)(w)	if the application is lodged by more than 1 person, a statement of the proposed approval to be held by each of those persons	**N/A**	n/a
13(4)(x)	a summary of compliance or enforcement actions (if any), and the outcome of those actions, taken against the applicant (or if the application is lodged by more than 1 person, any of those persons) under a specified Act	**Section 1.11 of Volume A of the SAR at page 18.**	Addressed, as referenced. DOCs consultation feedback – The information is not provided in sufficient detail, but “Given the applicant owns and operate New Zealand’s highway network covering over 11,000km it is not practical to provide this information.”

13(4)(y)	Please provide the information specified below for the relevant approval(s) sought. This is the information specified in the relevant schedule.		
13(4)(y)(i), clause 2 of Schedule 5	**Resource consent or designation** (a) an assessment of the project against— (i) any relevant national policy statement; and (ii) any relevant national environmental standards; and (iii) if relevant, the New Zealand Coastal Policy Statement; and	**Section 1.3 of Volume B of the SAR at page 7. Section 1.4 of Volume A of the SAR at page 14.**	Addressed at section 1.3 of Volume B. Section 1.4 of Volume A is on pages 12-13 and provides "strategic context".
	(b) in relation to any proposed approval that is a resource consent, whether, to the best of the applicant's knowledge, there are any existing resource consents of the kind referred to in section 30(3)(a).	**Section 2.1.3 of Volume A of the SAR at page 21. Appendix B of Volume A of the SAR.**	Addressed, as referenced.
13(4)(y)(ii), clause 3 of Schedule 5	**Change or cancellation of resource consent condition** The information to be provided under section 13(4)(y)(ii) is information about whether and how the change or cancellation of the condition is material to the implementation or delivery of the project.	**N/A**	n/a

13(4)(y)(iii), clause 4 of Schedule 5	**Certificate of compliance** The information required to be provided under section 13(4)(y)(iii) is information that shows the activity that the certificate of compliance is intended to cover can be done lawfully in the particular location without a resource consent. Include information that shows that the activity that the certificate of compliance is intended to cover can be done lawfully in the particular location without a resource consent.	**N/A**	n/a
13(4)(y)(iv), clause 2 of Schedule 6	**Concession** (1) The information in subclause (2) is required to be provided under section 13(4)(y)(iv) if a proposed concession includes a lease and— (a) the lease would be for a term (including any renewals) that will or is likely to be more than 50 years; and (b) the granting of the lease would trigger a right of first refusal or a right of offer or return. (2) Confirmation 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 purposes of the proposed lease.	**N/A**	n/a

13(4)(y)(v), clause 23 of Schedule 6	**Land exchange** (1) The information required to be provided under section 13(4)(y)(b) is (a) - (e) below: (a) a description of both land areas proposed for exchange (for example, maps showing areas and location, addresses, and legal descriptions where possible:	**N/A**	n/a
	(b) the financial value of the land proposed to be acquired by the Crown:	**N/A**	n/a
	(c) a brief description of the conservation values of both pieces of land, including an explanation of why the exchange would benefit the conservation estate:	**N/A**	n/a
	(d) if the land exchange would trigger a right of first refusal or a right of offer or return, confirmation that the applicant has written agreement from the holder of the right of first refusal or right of offer or return that the holder has agreed to waive that right for the purpose of the land exchange:	**N/A**	n/a

	(e) confirmation by the applicant that no part of any land to be exchanged by the Crown is – (i) land listed in Schedule 4; or (ii) a reserve declared to be a national reserve under section 13 of the Reserves Act 1977	**N/A**	n/a
13(4)(y)(vi), clause 2 of Schedule 9	**Standard freshwater fisheries activity approval** (4A) The information required to be provided under section 13(4)(y)(vi) is the following: (a) whether an in-stream structure is proposed (including formal notification of any dam or diversion structure) and the extent to which the proposed structure may impede fish passage; and (b) whether any fish salvage activities are proposed.	**Section 1.2 of Volume E of the SAR at page 4.**	Addressed, as referenced.
13(4)(y)(via), clause 2 of Schedule 9	**Complex freshwater fisheries activity approval** (2) The information required to be provided under section 13(4)(y)(via) is the following: (a) whether an in-stream structure is proposed (including formal notification of any dam or diversion structure) and the extent to which this may impede fish passage; and	**Section 1.2 of Volume E of the SAR at page 4.**	Addressed, as referenced.

	(b) whether any other complex freshwater fisheries activities are proposed.		
13(4)(y)(vii), clause 2 of Schedule 10	**Marine consent** The information required to be provided under section 13(4)(y)(vii) is– (a) information about whether the Minister of Conservation is an affected person:	**N/A**	n/a
	(b) additional information about whether the applicant has already made an application for a consent under the EEZ Act in relation to the project, and, if so,— I. details of any application made; and II. the decisions made on that application; and III. information about the matters that the Minister may consider under section 22(6):	**N/A**	n/a
	(c) additional information (in a summary form) about compliance or enforcement action taken against the applicant by the EPA under the EEZ Act.	**N/A**	n/a
13(4)(y)(viii), clause 2 of	**Access arrangement** (1) Confirmation that the applicant has	**N/A**	n/a

Schedule 11	complied with section 29 (for the purposes of section 13(4)(y)(viii)).		
13(4)(y)(ix), clause 15 of Schedule 11	**Mining permit** (2) For the purposes of section 13(4)(y)(ix), the information is— (a) 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: (b) the name and contact details of the proposed permit participants and the proposed permit operator: (c) a proposed work programme for the proposed permit, which may comprise committed work, committed or contingent work, or both: (d) evidence of the technical or financial capability of the proposed permit holder to comply with and give proper effect to the work programme: (e) information about the proposed permit holder’s history of compliance with mining or similar permits and their conditions: (f) the proposed date on which the substantive	**N/A**	n/a

	application is intended to be lodged: (g) if the authorised person proposes to provide information under section 37, the date on which the person intends to provide that information: (h) The proposed duration of the permit: (i) if the proposed approvals include a mining permit for petroleum,— (i) 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 same area as the area over which the mining permit application is intended to be made), and the extent of the resource to which the development plan relates: (ii) the resources and reserves relating to the project, estimated in accordance with the Petroleum Resources Management System: (iii) a high-level overview of the following: (A) the proposed field development plan: (B) the proposed date for the commencement of petroleum production: (C) the economic model for the project:		

	(D) the proposed duration of the proposed mining permit: (E) decommissioning plans: (j) if the proposed approvals include a mining permit for minerals other than petroleum,— (i) 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 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: (ii) for minerals other than gold or silver, a report or statement confirming the ownership of the minerals targeted: (iii) whether the application will be for a Tier 1 or Tier 2 permit: (iv) 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): (v) an indicative mine plan: (vi) a high-level overview of the following: (A) the proposed mining method: (B) the proposed date for the commencement of mining and estimated annual production: (C) the economic model for the project: (D) the status of or anticipated timing for completing any prefeasibility or feasibility studies: (E) the proposed methods for processing mined material and handling and treating waste: (F) anticipated plans for mine closure and rehabilitation. (2) For the purpose of subclause (1)(j)(iv), 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		

43(2)(b)	if the project is planned to proceed in stages,— (i) an outline of the nature and timing of the stages; and (ii) a statement of whether a separate substantive application is to be lodged for each of the stages; and (iii) an explanation of how each stage meets the criteria in section 22:	**N/A**	Addressed at Section 3.3.1 of Volume A (page 40). DOCs consultation feedback - “The applicant states the project is not intended to proceed in stages. However, for such a large-scale project some staging will be inevitable. DOC was not able to locate information on the timing of the project.”
43(2)(c)	the information that the applicant provided to the Minister when applying to have the project listed as a listed project and an explanation of how the substantive application is within the scope of the listed project.	**Section 1.1 of Volume A of the SAR at page 9.**	Addressed. Referenced in section 1.1 – document name “Legal Submissions – Appendix A – Listing information lodged with MfE” DOCs consultation feedback – “The applicant states the listed project described in the ‘Listing information lodged with MfE’ is identical to this project. The listed project contained in Schedule 2 of the Act includes the Ōmanawa Bridge replacement) which no longer forms part of the project.”

Appendix 2: Consultation Summary

The following agencies were consulted with to inform the assessment of the application for completeness. Each agency was requested to confirm whether the application documentation provided by the EPA regarding the proposal as provided by the applicant meets the requirements of sections 42 and 43 of the Act and is provided in sufficient detail to satisfy the purpose of the Act in accordance with section 44 of the Act.

1. **Consultation with Bay of Plenty Regional Council, Tauranga City Council, and Western Bay of Plenty District Council** as the relevant consent authorities for the following approvals under the Resource Management Act 1991:

    - Resource consent (section 42(4)(a) of the Act)
    - Designation (section 42(4)(d) of the Act)

    Bay of Plenty Regional Council:

FTAA-2606-1254 – New Zealand Transport Agency State Highway 29 Tauriko Network Connections Application

Bay of Plenty Regional Council (BOPRC) Completeness Check

1 Consultation with BOPRC

As detailed in section 4.1 of the substantive application Volume A – Main Report, the Applicant has consulted with BOPRC through the following:

- Monthly Consenting Authorities Forum (established October 2025),
- Additional meetings specific to regional consenting matters such as flooding, stormwater management, and stream realignments, and consent condition structure approach; and
- Review of some draft technical documents pre-lodgement with the Environmental Protection Agency (EPA).

2 Section 30 Fast-Track Approvals Act (FTAA)

The written notice under section 30(3)(b)/30(5), dated 20 July (Vol. A – Appendix B), provided by BOPRC to the Applicant remains accurate and final at the time of providing this response.

3 Resource Consents Required

As summarised in Volume A – Main Report, section 1.9.2, and detailed in Volume B – RMA Approvals, section 1.3, all relevant consents have been applied for as detailed below.

<u>Resource Management Act 1991 (RMA):</u>

- Section 9 – earthworks,
- Section 13 – use of beds of rivers,
- Section 14 – water; and
- Section 15 – discharges to air, land and/or water.

<u>Bay of Plenty Regional Natural Resources Plan (RNRP)</u>

- Rule LM R4 – Earthworks,
- Rule LM R10 – Vegetation clearance,
- Rule WL R9 – Wetland modification,
- Rule 40A* – Drilling of land where it may intercept groundwater,
- Rule DW R25 – Disturbance and remediation of contaminated land, as the associated discharges to land and/or land that may enter water,
- Rule DW R8 – Temporary discharges to land where it may enter water being -
    - Sediment contaminated stormwater,
    - Chemical flocculants,
    - Dewatering fluids,
    - Cement to groundwater during piling; and
    - Chemical dust suppressants.

- Rule DW R8 – Permanent discharges to land where it may enter water being the disposal of contaminated material,
- Rule DW R21 and DW R23 – Permanent discharge of stormwater to water, and/or to land that may enter water,
- Rule AIR-R16** - Discharge of contaminants (being dust) to air,
- Rule BW 36 – Works in the beds of waterbodies –
  - Stream reclamation; and
  - Installation of structures (bridge, abutments and erosion protection infrastructure) in, on, over the bed of a waterbody,
- Rule WQ R21 – Damming and diversion of surface water,
- Rule 43*** - Water take-
  - Take of groundwater for dewatering; and
  - Take and use of groundwater for dust suppression.

** Volume B – RMA Approvals, Table 1 refers to this as WQ 40A. The RNRP reference is 40A as detailed above.*
*** Volume B – RMA Approvals, Table 1 refers to this as Rule 16. The RNRP reference is AIR-R16 as detailed above.*
**** Volume B – RMA Approvals, Table 1 refers to this as WQ 43. The RNRP reference is 43 as detailed above.*

<u>National Environmental Standards – Freshwater 2020 (NES-F)</u>

- Regulation 54(1) – Vegetation clearance within, o within a 10-metre setback from a natural inland wetland for the purpose of constructing specified infrastructure,
- Regulation 45(2) – Land disturbance within, or within a 10-metre setback from a natural inland wetland for the purpose of constructing specified infrastructure,
- Regulation 45(3) – Land disturbance outside a 10-metre, but within a 100-metre setback from a natural inland wetland for the purpose of constructing specified infrastructure
- Regulation 45(4) – Take, use, damming, diversion of water within, or within a 100-metre setback from a natural inland wetland for the purpose of constructing specified infrastructure,
- Regulation 45(5) – Discharge of water within, or within 100 metres of a natural inland wetland for the purpose of constructing specified infrastructure,
- Regulation 47(3) - Take, use, damming, or diversion of water within, or within a 100-metre setback from a natural inland wetland for the purpose of specified infrastructure maintenance,
- Regulation 47(3A) - Discharge of water within, or within a 100-metre setback from a natural inland wetland for the purpose of specified infrastructure maintenance; and
- Regulation 57 – Reclamation of the bed of a river.

4 Sections 42 and 43 and Schedule 5, Clauses 5-9, of the FTAA

The substantive application is for resource consents that would otherwise be applied for under the RMA, to enable the construction, operation and maintenance of the Tauriko West – Tupenga Project, consistent with Section 42(4)(a).

The application addresses all matters specified in Schedule 5, Clauses 5 to 9, including:

- Description of the proposed activities,
- Site details,
- Description of other activities (including permitted activities), resource consents, and designations relating to the application,
- Assessment of the proposal against the relevant provisions of the following documents:
  - National Policy Statements,

  - National Environmental Standards,
  - Bay of Plenty Regional Policy Statement,
  - RNRP; and
  - Relevant iwi and hapū management plans,
- Identification of applicable Treaty settlements covering the area of the application,
- Proposed consent conditions,
- Assessment of the actual and potential environmental effects,
- Details of the areas of stream reclamation and realignment; and
- Summary of the views of hapū who have been consulted with.

5 Iwi and hapū

As the Applicant has previously been advised, the following iwi and hapū have interests within the application area:

- Ngāti Kahu (hapū of Ngāti Ranginui),
- Ngāti Hangarau (hapū of Ngāti Ranginui),
- Ngāti Pango (hapū of Ngāti Ranginui),
- Ngāti Rangi (hapū of Ngāti Ranginui),
- Ngāti Pūkenga (iwi),
- Ngāti Ranginui (iwi); and
- Ngāi Te Rangi (iwi).

6 Consent Conditions

BOPRC have met with the Applicant to discuss the proposed consent condition's structure and broad approach. The set of consent conditions provided with the substantive application have not been agreed upon between the Applicant and BOPRC. BOPRC are committed to working with the Applicant on the set of conditions.

7 Summary

The application is considered to be complete, meeting the requirements of section 42 and 43 of the FTAA and provides sufficient detail to satisfy the purpose for which it is required.

Marcia Christian
Senior Consents Planner, BOPRC

Date: 7 August 2026

Tauranga City Council:

11 August 2026

Environmental Protection Agency
Attn: [redacted]

Tēnā koe [redacted]

State Highway 29 Tauriko Network Connections Project – Section 46 Completeness Check Comments of the Fast-track Approvals Act 2024

Thank you for providing Tauranga City Council (Council) with notification of substantive lodgement under the Fast Track Approvals Act 2024 (FTAA) for State Highway 29 Tauriko Network Connections Project (the Project).

Tauranga City Council has undertaken a high-level review of the application material lodged by NZ Transport Agency Waka Kotahi (NZTA) for the SH29/SH29A Tauriko West | Tupenga Project for the purposes of section 46 of the Fast-track Approvals Act 2024 (FTAA).

The review has focussed on whether sufficient information has been provided to understand the nature and scale of the proposal and enable a full assessment through the fast-track process. It is not intended to represent a position on the merits of the proposal or whether the approvals sought should ultimately be granted.

Council has reviewed the application and provided feedback in the attached appendices, as outlined below:

- Appendix A: Transport Strategy & Growth
- Appendix B: Structure Planning
- Appendix C: Landscape
- Appendix D: Acoustic
- Appendix E: Spaces & Places (Parks and Reserves)
- Appendix F: Environmental Planning

This review process has identified several key matters where additional information, clarification, or further assessment would assist to provide a more fulsome understanding of the proposal. These include:

- The application would benefit from a clear and consistent description of the urban growth and development that the project is intended to enable, including the relevant growth areas, anticipated population, dwelling numbers, employment growth, and development assumptions underpinning the transport, economic and strategic planning assessments. At present, different application documents refer to varying growth figures and development outcomes, making it difficult to clearly understand the rationale for the project and the basis of the supporting assessments active mode connections.

- Further information would be helpful to demonstrate that the proposed designation adequately provides for future network upgrades, is supported by current and robust transport modelling, accommodates a realistic construction methodology, and safeguards opportunities for future public transport and active mode infrastructure. In particular, clarification is sought regarding corridor futureproofing (including Ōmanawa Bridge, Redwood Lane and the Takitimu Interchange), the validity of modelling assumptions and outcomes, construction staging and traffic management at key tie-in points, and whether sufficient land has been designated for future bus/HOV lanes, shared paths and associated upgrades

- More information regarding the status of affected reserve land, consistency with the Tauranga Reserves Management Plan, and how any required Reserves Act approvals are proposed to be addressed. Further assessment of effects on reserve values, including recreation, public access, walking and cycling connections, landscape character, ecology, cultural heritage, and existing reserve infrastructure would also assist. An assessment against the Passive Open Space Zone objectives and policies of the Tauranga City Plan would provide a more complete planning framework assessment. Additional clarification regarding impacts on Puketoromiro Pā, the role of Council as both landowner and administering body, recognition of the higher ecological values of the Kōpūrererua Valley, and refinement of landscape mitigation and shared path design within the reserve would further strengthen the application. Overall, these matters represent opportunities for additional assessment and clarification rather than significant omissions preventing the application from progressing.

- The acoustics review identifies that further information could be provided regarding the likely construction noise and vibration effects, including the construction methodology, programme, plant, timing, duration and location of works relative to sensitive receivers. Additional detail is also sought on the expected noise and vibration levels at affected properties, the effectiveness of proposed mitigation measures, and the extent of effects that could be authorised through the proposed CNVMP and scheduling process. Overall, further information is requested to demonstrate that construction noise and vibration effects have been sufficiently assessed and that the effects ultimately authorised through the conditions are clearly understood.

Accordingly, while we acknowledge that the application is comprehensive, we do consider that further information is required in order to fully understand the nature and scale of the proposal, and its potential effects.

As noted in the respective appendices, Council recognises that there have been a number of conversations between Council and NZTA, and some of these issues have been communicated previously. Similarly, it is expected that these issues may be relatively simple to resolve, and staff are available to continue working with NZTA and EPA to assist as needed.

Council acknowledges that it has not been asked to provide comment on the merits of the application at lodgement stage, and therefore this should not be considered as a complete and full assessment of the proposal. Council looks forward to providing more detailed review and comments at the appropriate future stage in the process.

If you have any questions about the feedback provided, please do not hesitate to contact Richard Campion, Principal Planner (Richard.Campion@tauranga.govt.nz).

Ngā mihi

Alex Miller
Head of Environmental Planning

Tauranga City

Attention: **Richard Campion, Principal Planner**

Re: State Highway 29 Tauriko Network Connections Project – Section 46 Completeness Check Comments of the Fast-track Approvals Act 2024

Kia ora Richard

I have undertaken a high-level review of the SH29/29A Designation application documents for the purposes of Council's response to the EPA under section 46 of the Fast-track Approvals Act 2024.

My comments are limited to whether sufficient information has been provided to understand the proposal and enable a full assessment through the fast-track process, focussed on **Transport Planning and Transport Modelling,** and is also informed by several colleagues. These comments should not be interpreted as a position on the merits of the proposal.

<u>Topic 1: Futureproofing considerations</u>

Issue: There appears limited evidence that the designated land provides for sufficient futureproofing for the following three elements:

- 1) The Omanawa Bridge and the fly-over at the Redwood Lane Intersection are stated in the BBO Transport Assessment report (para 1) as "a new four-lane median divided SH29 corridor from the new Omanawa Bridge to Takitimu Drive" however the design (Figures 4-2 and 4.14) is shown as one lane in each direction, which contradicts the first statement; and
- 2) The Takitimu Drive Intersection design, which should encourage the 'around the harbour' route from a legibility, attractiveness, and convenience for users is absent from the BBO Transport Assessment (para 4.4.2.2).
- 3) Lack of information on how any 'surplus' land from the proposed designation as detailed design is progressed could either be disposed of or developed effectively, when adjacent urban development through subdivisions may have already occurred.

Request:

- 1 and 2) That further clarity of the four-laning and the 'around the harbour route' will be provided on the design that informed the designation, primarily near the Omanawa Bridge, over the Redwood Lane Intersection, as at the Takitimu Drive intersection.
- 3) That further information is provided on how future surplus land will be managed in order to maximise adjacent urban development.

Further information:

- The above comments have been raised earlier, for example, TCC has recommended to NZTA through endorsement of the 2023 DBC (refer: council report, Tauranga City Council, 27June 2023) that:
  - *i) The next stage of the Business case delivery, including Detailed Design development, identify solutions to improve the performance of identified future 'pinch points' at Cameron Road / Barkes corner, and Takitimu Drive/SH29/SH29a/SH36 to ensure satisfactory Levels of Service and futureproofing; and*
  - *ii) A 4-lane bridge over the Omanawa stream is constructed in Stage 2, rather than the proposed 2-lane replacement bridge, to integrate with 4-lane sections of state highway to be constructed either side of the bridge and to support the function of this inter-regional freight route.*

  Following this there has been communication between NZTA and TCC over the past few months regarding strategic concerns that need consideration.
- Whilst NZTA has indicated that a four-lane bridge over the Omanawa Stream is not precluded, the above concerns are still valid, as the Transport Modelling Report (BECA, 2026, as attached to Volume B, Appendix G, Transport Assessment) indicates that the SH29 near Omanawa Road (near the two-lane bridge over the Omanawa Stream) is showing LOS F (black) for Year 2063 in both the tolled and un-tolled-scenario. This raises a question whether futureproofing has sufficiently been undertaken.
- TCC is concerned that the 'around the harbour' recommendation (which aims to provide an alternative for general traffic utilising the Harbour Bridge and Hewlett's Road (as identified in the Taurikura Network Programme Business Case 2016)) has not sufficiently been investigated and futureproofed, particularly at the Takitimu Interchange, and potentially affecting the land to be designated. The 2063 model used in the BECA report ('do something') assumes upgrades to SH29A east of Barkes Corner (i.e. one general traffic lane + one HOV lane in each direction, and full diamond interchanges at the Oropi/SH29A and Poike Rd/SH29A intersections). These upgrades will make the 'around the harbour' route more attractive, yet drivers to/from SH29 will require navigating through several roundabouts in order to reach SH29A, which will encourage drivers using the 'Harbour Bridge' route rather than encouraging the 'around the harbour' route.

<u>Topic 2: Transport modelling</u>

Issue: A new strategic transport model has been released in June 2026 (TTSM25) with significant land-use assumptions in the Western Corridor, whilst TTSM23 has been used to inform the BECA study 'Tauriko RoNS Traffic Modelling for Consenting Design' and thus using outdated land-use assumptions. It is unclear whether the findings from the TTSM23 modelling are still representative to inform the design and the designation.

Request: Further clarification to inform whether the TTSM23 land-use forecasts remain representative, given the updated TTSM25 land-use assumptions for the Western Corridor. A comparison between TTSM23 and TTSM25, or a sensitivity test would help establish whether the forecast changes are material.

Further information

- We require further clarification regarding transport modelling on the following, not limited to:
  - Why re-opening Gargan Road is included only in the Project scenario. This makes it difficult to separate the effects of the local-road connection from the effects of the state highway project.
  - How the Ōmanawa Road upgrade has been assessed, as it is part of the project description but appears to be excluded from the strategic model.
  - Why Kaweroa Drive is:
    - 1) modelled as one lane in each direction (noting the road has been futureproofed for four lanes), and whether an alternative capacity assumption changes route choice or network performance.

- 2) assumed in the Do-Minimum scenarios, given the project hasn't been investigated through any business case investigations, stormwater assessments nor funding. If not realised, traffic diversion will influence the wider network, design and designation.
  - What the LOS E and F results mean operationally. Movement-level delays, queues and storage checks are needed to determine whether congestion extends onto TCC roads or between adjacent intersections.
  - How the 2048 and 2063 results should be compared, given that the wider-network assumptions are not the same in both years (*do minimum* for 2048 used, whilst *do something* has been used for 2063).
  - How the TTSM and SIDRA assessments have been linked, particularly the conversion of model demand into turning flows and the treatment of interacting queues.
  - What tolling would mean for the local network, because the sensitivity test indicates substantial diversion from the new corridor to the revoked SH29 and other local roads.

Topic 3: Construction methodology

Issue: The BBO Transport Assessment does not include sufficient information about the construction methodology. This is relevant for the designation as the design may be significantly influenced by the construction methodology, especially in the context of keeping some of the road network open during construction. This is less relevant for new Offline State Highways, but is vital for Barkes Corner, the Takitimu Drive Intersection and all tie-ins with existing infrastructure.

Request: That a thorough construction methodology will be provided to inform the future design and designation.

Further information: A key example to illustrate this point is the recently constructed Redwood Lane Roundabout with SH29. The design of the roundabout was heavily informed by the construction methodology and was therefore designed 'offline' of the current road to minimise impact to current road users. This is primarily a concern in areas where there are very limited options for detours, i.e. SH29A and Barkes Corner.

Topic 4: Provision for public transport and active modes

Issue: It is uncertain whether there is space allowance for a future design that includes bus / HOV lanes and shared paths as this is not included in the BBO Transport Assessment. Dedicated bus lanes and a shared path were recommended through the 2023 business case, but there is no confirmation that this still fits within the proposed land for designation, should this be constructed.

Request: More information to be provided to confirm that the designation allows for future design of active mode connections and bus / HOV lanes even if not delivered initially.

Further information:

- The original 2023 business case recommended a network of shared paths to be developed in the SH29 and SH29A area to enable people to have attractive alternatives to driving. This built further on the Recommended Programme from the 2016 Tauriko Network Connections Programme Business Case. However, since the project progressed from Business Case to Investment Case further to Road of National Significance, the scope has seen a removal of these shared paths and bus lanes. This matter remains important as there are no alterative east-west roads that could be used for walking, cycling or public transport priority in the vicinity of the project.

- The BBO Transport Assessment (para 1.1.6) notes the following:

  > **1.1.6 Support Transport Mode Shift**
  >
  > Mode shift will be supported by reducing through-traffic and heavy vehicle exposure on the existing SH29 and SH29A corridors, allowing those corridors to function more appropriately as local roads. Walking and cycling connectivity will be improved through local road upgrades and shared path provision, particularly at Barkes Corner, where the Project provides more legible connections across the corridor and to adjoining local paths.

  Whilst the statement is correct in assuming that the existing SH29 and SH29A corridors will become local roads over time, the traffic volumes in both the tolled and un-tolled scenarios are still significant. The connection between Pyes Pa and Greerton caters for numerous school trips. However, the design shown in Figure 4-20 showing a shared path and crossing from Cameron Road to Pyes Pa Road in three stages. This is a reduced level of service from the current overbridge without any at-grade crossings. As an example, a similar at-grade crossing was originally proposed at the Baylink project (B2B) in Tauranga, but due to community opposition a grade-separated crossing was provided at a later stage, leading to significant cost increases. There is also no information nor confirmation regarding the local road upgrades referred to in para 1.1.6. As the design doesn't include these matters, it can be questioned whether the designation will have sufficient space to accommodate this in future.
- Strategic Transport Modelling (TTSM23) assumes a reasonable uptake of mode-shift, however if the infrastructure is not provided, this may lead to an over-estimated mode shift, impacting the traffic flows anticipated on the wider road network.
- It is noted that even whilst the designation may accommodate developing these paths at a later stage, the construction costs of adding this infrastructure at a later stage (including cost for traffic management) will be many times higher than including at the outset.

Subject to the matters identified above, the application **does not** provide sufficient information to understand the nature and scale of the proposal and its potential effects. I **have not** identified any other significant omissions that would, in my view, prevent the application from proceeding beyond the completeness review stage under section 46 of the Fast-track Approvals Act 2024.

Ngā mihi,

Peter Siemensma
Principal Strategic Transport Planner (Strategy & Growth)
Tauranga City Council

Western Bay of Plenty District Council:

Western
Bay of Plenty
District Council

Western Bay of Plenty District Council
Private Bag 12803,
Tauranga Mail Centre,
Tauranga 3143
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E info@westernbay.govt.nz
westernbay.govt.nz

10 August 2026

[redacted]
Fast-track Application Team
Environmental Protection Authority

Tenā koe [redacted]

FTAA-2606-1254 - Tauriko Network Connections (including Omanawa Bridge replacement) – Fast Track Approvals Act 2024
Council Reference: RC14897V01FA

Thank you for notification of the substantive application recently submitted to the Environmental Protection Authority (EPA) under the Fast Track Approvals Act 2024 (the Act).

Western Bay of Plenty District Council (the Council) has been working closely with NZ Transport Agency Waka Kotahi, their agents and teams of specialists since the commencement of this project as outlined in the application.

In terms of jurisdiction and RMA approvals, the Council is the relevant consent authority for the following parts of the application:

- 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 (S.42(4)(d) of the Act).
- Potential resource consent required under the Resource Management (National Environmental Standards for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011.

We can advise that those relevant matters listed in clause 12 of Schedule 5 (information required in a Notice of Requirement application) have been addressed in sufficient detail.

In passing we note that there are some points of clarification that we have already advised the applicants of and will work through those prior to the request for comment under S.53 of the Act.

On that basis we have reviewed the documentation lodged by the applicant (via the portal) and are satisfied it meets the requirements of sections 42 and 43 of the Act and is provided in sufficient detail to satisfy the purpose for which it is required in accordance with section 44 of the Act.

If you have any questions please contact Chris Watt, Development Project Facilitator at chris.watt@westernbay.govt.nz

Ngā mihi nui

Chris Watt
Development Project Facilitator

2. **Consultation with the Department of Conservation** as the administering agency for the following Acts:

- An approval, a dispensation or an authorisation under Freshwater Fisheries Regulations 1983 or the Conservation Act 1987 in respect of a complex freshwater fisheries activity (section 42(4)(j) of the Act)

- A wildlife approval as defined in clause 1 of schedule 7 of the Act (section 42(4)(h) of the Act)

Department of Conservation advice for EPA compliance assessment

Overview

Project name	The State Highway 29 Tauriko Network Connections (including the Ōmanawa Bridge replacement)
Project applicant	NZTA
EPA unique ref. no	FTA2606-1254
EPA Request Number	
Conservation approvals sought	Wildlife Approval -Lizards Complex Freshwater Fisheries Approval
EPA request overview	To inform the EPA's completeness assessment of the application, could you please let us know, in your view, whether the documentation provided by the EPA regarding the above approvals as provided by the applicant meet the requirements of sections 42 and 43 of the Act and is provided in sufficient detail to satisfy the purpose for which it is required in accordance with section 44 of the Act.
Date due to EPA	11 August 2026

1. Introduction

On 4/08/2026 the Department of Conservation (DOC) received a request from the EPA seeking its views whether the application meets the requirements of sections 42 and 43 of the Fast-track Approvals Act 2024 (the Act) and whether the information is in sufficient detail to satisfy section 44 of the Act.

The purpose of this document is to provide advice to assist the EPA in making its decision whether the application lodged by NZTA on 31 July 2026 complies with the requirements of section 46(2) of the Act.

The advice covers compliance with the following:

- Information requirements for relevant approvals
- Notification requirements

The advice also includes further observations of relevance to further processing of the application, for example where further information could be needed for a decision by the panel.

DOC understands that this document will be passed on to the Applicant, the Panel Convener and the Panel.

2. Compliance with information requirements

Our detailed assessment of the information requirements for the relevant approvals is provided in the attached tables.

Wildlife Approval – Lizards

In summary, DOC's advice is that the application for a Wildlife Approval for lizards meets the requirements of sections 42, 43, and 44 of the Act.

Complex Freshwater Fisheries Approval

An application for a Complex Freshwater Fisheries Approval has been sought. Volume E of the substantive application para 1.2.1 outlines that NZTA seeks approval for the construction and use of temporary dams and diversion structures. Some potential options for temporary structures are outlined. DOC notes the sufficiency of this information in the table provided below.

In summary, DOC's advice is that this element of the application does NOT meet the requirements of sections 42, 43, and 44 of the Act.

DOC's view is that while no information requirements have been identified as entirely absent, a lack of detail impacts on the sufficiency of information provided and it will not enable DOC to report on all matters as required under Clause 3 of Schedule 9 of the Act.

The detailed design of the infrastructure and methodology that will be used during construction and longer term has not been undertaken at this stage. Although the Applicant has provided a rationale for this and mentions some options, the lack of detail means that the assessment required by Schedule 9 clause 3 cannot be undertaken and that all the information needed for a decision by the panel is not present in sufficient detail.

3. Notification

Section 29(1)(a) of the Act requires that, before lodging a substantive application for a listed project, the authorised person for the project must consult the persons and groups referred to in section 11(1)(a) of the Act. Relevant administering agencies must be notified.

DOC is a relevant administering agency for this application. DOC provides the following comments in relation to the pre lodgement notification in relation to the State Highway 29 Tauriko Network Connections by NZTA:

- In September 2025, the applicant sought pre lodgement consultation on the Tauriko SH29 project as listed in the Act, prior to the change to the legal requirements for consultation. DOC is satisfied that the applicant completed their pre-lodgement consultation as required.
- Despite the ongoing discussion and the open engagement with DOC, including invitations to meetings and regular consent authority forums, DOC was not supplied with any detailed ecological information nor details on the approvals sought prior to lodgement.
- High level comments were provided by DOC to the Applicant on 30 July 2026 regarding the draft Lizard Management Plan (received by DOC on 22 July) and various feedback on various discrete topics was supplied throughout the course of 2026.
- It is considered that this process, whilst long and informative on the details of the highways project, did not engage DOC as fully as DOC would have liked. The lack of information provided on wildlife, ecology and fisheries did not allow for any meaningful feedback from DOC prior to lodgement. Relevant matters will need to be addressed through the substantive application process.

4. Further observations

DOC makes the following observations:

Wildlife Approval – Lizards

There is further information that will be critical to determining the application. In particular:

- The Lizard Management Plan and Wildlife Approval report both discuss an off-site lizard relocation area. While the principle of using this off-site location is not opposed, DOC requires more detail as to how the applicant has secured the use of this site for lizard release and how that will be managed in the short and long term. DOC would like to understand the how the Council (as owners of the land) and the Applicant will manage the reserve to ensure of the objectives of the LMP are met.
- A draft list of Wildlife Approval Conditions has been supplied with the substantive application. DOC will provide a more fulsome set of comments on these during section 51 reporting, but notes several key measures are missing, including: lack of effects management for other indigenous lizard species that may be encountered; the identification of authorised personal; the absence of detailed lizard salvage areas and amount of vegetation clearance required, conditions relating to the salvage and relocation regarding timing of implementation and appropriateness of methods based on survey results, incomplete incidental discovery protocol and soft-release pen methodologies; the duration and timing of the approval, amongst

other standard and special conditions normally attached to Wildlife Approvals. DOC will also raise matters relating to minor amendments and certification.

Complex Freshwater Fisheries Approval

- It is unclear why an approval or dispensation is not being sought for the permanent structures, diversions or reclamations.
- The Act includes a definition of complex freshwater fisheries activity in section 4. That definition includes "*any activity that involves the construction of a permanent dam or diversion structure*." This is irrespective of fish passage. Therefore, there will be activities undertaken that have not been included within the application, which meet the definition of complex freshwater fisheries activities.
- The Applicant's Volume E in para 1.2.2 undertakes an assessment of the permanent culverts and confirms they will not impede fish passage and therefore does not need approval under Freshwater Fisheries Regulation 42. The Act does not make the distinction of 'complex' based on fish passage, and accordingly, DOC is of the opinion that the culvert/s and other permanent structures also should form part of the approvals sought.

Other matters

- For clarity and to avoid confusion, DOC considers it would be helpful if the name and scope of the proposal was clarified. The application documents refer to the proposal as Tauriko West – Tupenga, while the section 46 request from the EPA refers to the State Highway Tauriko Network Connections (including the Ōmanawa Bridge replacement). It is understood that the Ōmanawa Bridge does not form part of this application and indeed is already underway. Into the future, one consistent name for the project would be preferable.

5. Further information

DOC has had limited time to review the wider suite of substantive application documents. A more comprehensive review of all the relevant documents is undertaken, including the Landscape Assessment and Ecological Impact Assessment and wider set of resource consent matters and conditions, during DOC's s.51 and s.53 reports. At that point, further information may be identified as necessary for assessment of the application.

Listed project requirements under section 43(2)

The table below provides information to assist the EPA in relation to consideration of the matters required for listed projects for a substantive application under section 43(2) of the Act. This section requires additional information for listed projects that would otherwise have been required during the referral process. Where this information duplicates other requirements it will be addressed elsewhere.

Relevant section	Is the information present?	Application document reference	Is the information provided in sufficient detail?	Comments
13(4)(j): • relevant Treaty settlement entities • relevant protected customary rights groups and customary marine title groups • relevant applicant groups under the Marine and Coastal Area (Takutai Moana) Act 2011: • persons with a registered interest in land that may need to be acquired under the Public Works Act 1981	Y	Section 4 of Volume A of the SAR at page 44.	Y	
13(4)(ka) a summary of the responses to notification received for the purposes of section 11/ 29 and how any of the responses have informed the project. 13(4)(k) Any other consultation undertaken on the project with the persons and groups	Y	Section 4.9 of Volume A of the SAR at page 50. Section 4 of Volume A of the SAR at page 44. Appendix E of Volume A of the SAR.	Y Y	

referred to in paragraph (j) and how that consultation has informed the project				
13(4)(l) a list of any Treaty settlements that apply to the project area, and a summary of the relevant principles and provisions in those settlements 13(4)(n) a statement of any relevant principles or provisions in the Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019: 13(4)(o) information identifying the parcels of Māori land, marae, and identified wāhi tapu within the project area:	Y	Section 1.5 of Volume B of the SAR at page 22. Appendix C of Volume B of the SAR.	Y	
13(4)(m) a description of any processes already undertaken under the Public Works Act 1981 in relation to the project:	Y	Section 4.7 of Volume A of the SAR at page 47. Appendix D of Volume A of the SAR.	Y	
13(4)(u) whether any activities that are involved in the project, or are substantially the same as those involved in the project, have been the subject of an application or a decision under a specified Act and,— (i) if an application has been made, details of the application: (ii) if a decision has been made, the outcome of the decision and the reasons for it	Y	Section 1.9.1 of Volume A of the SAR at page 16.	Y	
13(4)(x) a summary of compliance or enforcement actions (if any), and the outcome of those actions, taken against the applicant (or if the referral application is lodged by more than 1 person, any of those persons) under a specified Act:	N	Section 1.11 of Volume A of the SAR at page 18	N	Given the applicant owns and operate New Zealand's highway network covering over 11,000km it is not practical to provide this information.
43(2) If a substantive application is for a listed project and if the project is planned to proceed in stages it must contain: - an outline of the nature and timing of the stages; and - a statement of whether a separate substantive application is to be lodged for each of the stages - an explanation of how each stage meets the criteria in section 22	Y	Section 3.3.1 of Volume A of the SAR at page 40.	Y	The applicant states the project is not intended to proceed in stages. However, for such a large-scale project some staging will be inevitable. DOC was not able to locate information on the timing of the project.
43(2) If a substantive application is for a listed project it must contain the information that the applicant provided to the Minister when applying to have the project listed as a listed project and an explanation of how the substantive application is within the scope of the listed project.	Y	Section 1.1 of Volume A of the SAR at page 9.	Y	The applicant states the listed project described in the 'Listing information lodged with MfE' is identical to this project. The listed project contained in Schedule 2 of the Act includes the Ōmanawa Bridge replacement) which no longer forms part of the project.

Applications for wildlife approvals

Clause 2 of Schedule 7 outlines the information required in an application for a wildlife approval.

Relevant section	Is the information present?	Application document reference	Is the information provided in sufficient detail?	Comments
Schedule 7 clause 2(1) - For the purposes of section 43(3)(h), an application for a wildlife approval must include the following information:				
(a) specify the purpose of the proposed activity:	Y	Section 1.3 Volume C of the SAR pages 4-5	Y	
(b) identify the actions the applicant wishes to carry out involving protected wildlife and where they will be carried out (whether on or off public conservation land):	Y	Section 1.2 of Volume C of the SAR at page 4. Section 1.4 of Volume C of the SAR at page 5.	Y	
(c) include an assessment of the activity and its impacts against the purpose of the Wildlife Act 1953:	Y	Section 1.5 of Volume C of the SAR at page 5.	Y	The assessment is considered complete; however, the preliminary lizard survey methods make it difficult to determine the actual lizard population present and the likely number to be impacted. It would be helpful to note the approximate amount of lizard habitat requiring clearance to accurately determine the effects on the local lizard populations The lizard release site appears appropriate being of sufficient size,

Relevant section	Is the information present?	Application document reference	Is the information provided in sufficient detail?	Comments
				proximity to impact sites and being protected under the Reserves Act. More information is required in relation to the applicant's approval to use this site in the way it proposes. Further detail is required on the soft-release pen methodology as well as enhancement measures (Pest plant and animal control, planting).
(d) list protected wildlife species known or predicted to be in the area and, where possible, the numbers of wildlife present and numbers likely to be impacted:	Y	Section 1.6 of Volume C of the SAR at pages 5-6	Y	The information provided is complete and accurately identifies the species most likely to be encountered (copper skink) and those which are unlikely to be encountered. Other species that could potentially be present are identified; however, no effects management is noted for any of these species e.g. striped skink. Estimates on the number of lizards to be impacted are not provided; and the preliminary lizard survey is considered insufficient to accurately determine the numbers of lizards present or likely to be impacted.

Relevant section	Is the information present?	Application document reference	Is the information provided in sufficient detail?	Comments
(e) outline impacts on threatened, data deficient, and at-risk wildlife species (as defined in the New Zealand Threat Classification System):	Y	Section 1.6 of Volume C of the SAR at pages 5-6.	Y	
(f) state how the methods proposed to be used to conduct the actions specified under paragraph (b) will ensure that best practice standards are met:	Y	Section 1.7 of Volume C of the SAR at page 6.	Y	The proposed lizard salvage methodology is considered to meet best practice. Pest animal control methods proposed for enhancement are considered appropriate and are considered to best practice or above standards for rat control.
(g) describe the methods to be used to safely, efficiently, and humanely catch, hold, or kill the animals and identify relevant animal ethics processes:	Y	Section 1.8 of Volume C of the SAR at pages 6-7.	Y	
(h) state the location or locations in which the activity will be carried out, including a map (and GPS co-ordinates if available):	Y	Section 1.9 of Volume C of the SAR at pages 7-8.	Y	No GPS coordinates have been supplied; however, the map includes both the project footprint and proposed relocation area.

Relevant section	Is the information present?	Application document reference	Is the information provided in sufficient detail?	Comments
(i) state whether authorisation is sought to temporarily hold or relocate wildlife:	Y	Section 1.2 of Volume C of the SAR at page 4.	Y	
(j) list all actual and potential wildlife effects (adverse or positive) of the proposed activity, including effects on the target species, other indigenous species, and the ecosystems at the site:	Y	Section 1.10 of Volume C of the SAR at pages 8.	Y	
(k) where adverse effects are identified, state what methods will be used to avoid and minimise those effects, and any offsetting or compensation proposed to address unmitigated adverse effects (including steps taken before the project begins, such as surveying, salvaging, and relocating protected wildlife):	Y	Section 1.11 of Volume C of the SAR at page 8.	Y	Methods are included to avoid and minimise the identified effects.
(l) state whether the applicant or any company director, trustee, partner, or anyone else involved with the application has been convicted of any offence under the Wildlife Act 1953:	Y	Section 1.12 of Volume C of the SAR at page 9.	Y	Volume C identifies that none of the applications or persons involved with the application has convictions or a currently facing charges for offences under the Wildlife Act.
(m) state whether the applicant or any company director, trustee, partner, or anyone else involved with the application has any current criminal charges under the Wildlife Act 1953 pending before a court:	Y	Section 1.12 of Volume C of the SAR at page 9.	Y	Volume C identifies that none of the applications or persons involved with the application has convictions or a currently facing charges for offences under the Wildlife Act.
(n) provide proof and details of all consultation, including with hapū or iwi, on the application specific to wildlife impacts:	Y	Section 4.4 of Volume A of the SAR at pages 45-46.	Y	DOC notes Vol A Appendix E that outlines that letters were sent in December 2025 and at monthly project hui were undertaken to discuss matters including a range of matters including wider cultural outcomes and environmental monitoring. There is no specific mention of the wildlife matters and no details of any feedback received or copies of the letter sent is provided.
(o) provide any additional written expert views, advice, or opinions the applicant has obtained concerning their proposal.	Y	Appendix K of Volume B of the SAR. Appendix A of Volume C of the SAR.	Y	Volume K does not seem relevant. Appendix A of Volume C is the Lizard Management Plan so the applicant has employed suitable qualified experts to help the preparation of the Wildlife Approval Application.

Applications for complex freshwater fisheries approvals

Clause 3 of Schedule 9 outlines the information required in an application for complex freshwater fisheries activity approval. Note that due to section 13(4)(y)(vi), for resource consent applications that include standard freshwater fisheries activities the information in clause 4A of Schedule 5 is required.

Relevant section	Is the information present?	Application document reference	Is the information provided in sufficient detail?	Comment
Clause 2 and 3 Schedule 9 - For the purpose of section 43(3)(j), an application for a complex freshwater fisheries activity approval must include the following information:				
Clause 3 of Schedule 9 for listed and referred projects				
(a) in relation to the structure and any fish facility:				
(i) a description of the type of structure or fish facility:	Y	Sections 1.2 and 1.4 of Volume E of the SAR at page 4 and page 5.	N	Given much of the detailed design has yet to be undertaken, the applicant notes *"The structures may include temporary bunds, cofferdams, pipes, flumes, pump-around systems, temporary diversion channels and temporary culverts."* While not a definite description, this does provide the range of possible structure and facility types. However, this also does not preclude other structures. Additionally, there does not appear to information of the permanent structures or facilities.
(ii) the dimensions of the structure or fish facility:	Y	Section 1.4 of Volume E of the SAR at page 5.	N	The applicant says: "*The location, dimensions, form, design, operating period and flow-management methodology for each temporary structure will be determined through detailed design and construction planning*", i.e. it is not provided in existing documents.
(iii) the design of the structure or fish facility:	Y	Sections 1.4 and 1.7 of Volume E of the SAR at pages 5 and 8.	N	See comment for (ii) above.
(iv) the placement of the structure or fish facility:	Y	Sections 1.4 and 1.7 of Volume E of the SAR at pages 5 and 8. Appendix R of Volume B of the SAR.	N	See comment for (ii) above. The applicant notes within its Checklist that information is provided in Appendix R. DOC were unable to locate any relevant information in this regard.
(v) the water flows:	Y	Section 2.9.5 of Volume A of the SAR at page 31.	N	See comment for (ii) above.
(vi) the operating regime:	Y	Sections 1.4 and 1.7 of Volume E of the SAR at pages 5 and 8.	N	See comment for (ii) above.
(b) the freshwater species and values present (with particular focus on threatened, data-deficient, and at-risk species as defined in the New Zealand Threat Classification System):	Y	Section 1.5 of Volume E of the SAR at page 6. Section 21, Tables 16-8, 16-9, 20-12, Section	Y	The application lists fish species expected to be present in each of the affected streams based on "*existing studies, assessments, records and associated datasets, together with field verification of watercourse condition, habitat and connectivity*." Note that

		22 in Appendix K of Volume B of the SAR		"*No targeted aquatic fauna surveys were undertaken specifically for the Project*." The threat status of each species expected to occur is provided. The applicant notes within its Checklist that information is provided in Appendix R. DOC were unable to locate any relevant information in this regard. DOC referred to Appendix K and other references provided in the column to the left.
(c) the water quality and quantity in the surrounding habitat (at the proposed structure location, upstream and downstream):	Y	Section 1.7 of Volume E of the SAR at page 8. Section 21 of Appendix K of Volume B of the SAR.	N	No specific information on water quality is provided in the application nor in the Ecological Impact Assessment (Vol. B Appendix K) referred to in the application. In regard to water quantity, the application notes that some streams are permanent, some are intermittent and some are ephemeral. The amount of water flow, or physical dimensions of the wetted channel (e.g. water depth and width) are not provided in the application or referred to in another document.
(d) how the passage of fish will be provided for or impeded.	Y	Section 1.6 of Volume E of the SAR at page 7. Section 1.8 of Volume E of the SAR page 8. Section 17.1.6 of Appendix K of Volume B.	Unsure	A general description of how fish passage will be impeded is provided by identifying the types of temporary diversions and dams that may be placed within the target streams. Exactly how these structures will impede fish passage (whether fully or partially), or for how long, is not specified. The description of how fish passage will be provided for is provided by this statement: "*fish passage will be managed through construction methodology and proposed conditions*" followed by a list of objectives and guidelines for the methodology, for example: "*Limiting the extent and duration of temporary damming, diversion and dewatering*" and "*Maintaining or conveying watercourse flows around or through active work areas*." It may not be possible at this stage to be more specific.

3. Consultation with the Heritage New Zealand Pouhere Taonga as the administering agency for an archaeological authority under the Heritage New Zealand Pouhere Taonga Act 2014 (section 42(4)(i)).

HERITAGE NEW ZEALAND POUHERE TAONGA

Competing Interests and Completeness check for Project under the Fast Track Approvals Act 2024

State Highway 29 Tauriko Network Connections (including Omanawa Bridge replacement), FTAA-2606-1254

Contact Details	
Organisation Name	Heritage New Zealand Pouhere Taonga (HNZPT)
Contact person	HNZPT Fast-track Team
Contact Number	(04) 470 8053
Email	fasttrack@heritage.org.nz

Introduction

1. New Zealand Transport Agency Waka Kotahi (the Applicant) has lodged a substantive application for State Highway 29 Tauriko Network Connections (including Omanawa Bridge replacement) (the Project) with the Environmental Protection Agency (EPA).
2. On 4 August 2026 the EPA requested feedback regarding completeness to determine whether the substantive application complies with section 46(2) of the FTA Act.
3. HNZPT has also undertaken a check for competing applications to assist in determining if there are any competing applications or existing resource consents under section 47 of the FTA Act.

Completeness Check

4. HNZPT does not consider the application to be complete, for the following reasons:
5. Clauses 2(1)(e) and 2(1)(h) of Schedule 8 of the FTA Act require 'a description of each archaeological site to which the application relates and the location of each site' and an accurate assessment of 'the archaeological, Māori, and other relevant values [and] the effects of the proposed activity' on these values. However:
    a. The Assessment (Vol. D – Appendix A – Archaeological Assessment) states that 'not all properties known to contain archaeological sites were able to be surveyed' due to lack of landowner permissions;
    b. As a result, the Assessment relies on descriptions in past site records to describe the recorded sites rather than an inspection of the sites. A number of these past site records were last updated in the 1980s;
    c. The application documents, including the Management Plan and Research Strategy (Vol.D - Appendix B - Archaeological Management Plan and Research Strategy) do not clearly state what archaeological sites are proposed to be modified or destroyed under the proposed authorities.

6. As such, HNZPT cannot determine the archaeological sites and values that might be affected by the proposed works, nor what conditions might be appropriate to mitigate the impact on these archaeological values.

7. To deem this a complete application which allows HNZPT to assess the archaeological values and impacts, HNZPT would require:
    a. All properties known to contain archaeological sites to be surveyed, and the sites assessed.
    b. The application documents, including the Management Plan and Research Strategy, should be updated to clearly state which archaeological sites are to be included in the authorities sought.

Competing Interests Check

8. HNZPT confirms that there are no current competing archaeological authority applications under the Heritage New Zealand Pouhere Taonga 2014 Act that relate to the same activity and site.

Appendix 3: Further information requests and responses

I sent a further information request to the applicant during under section 46(2B) of the Act. The request and response are set out below.

<u>Request for Further Information 1:</u>

- Date of request: 14 August 2026
- Topics: Climate change and natural hazards, archaeological authority approval, and complex freshwater fisheries approval.
- Date of response: 21 August 2026

Request:

Fast-track

Te Kāwanatanga o Aotearoa
New Zealand Government

File ref: FTAA-2606-1254

14 August 2026

Mike Wood
New Zealand Transport Agency Waka Kotahi
By Email: Mike.Wood@nzta.govt.nz

Tēnā koe,

Request for further information in relation to your application under the Fast-track Approvals Act 2024

You lodged a substantive application, State Highway 29 Tauriko Network Connections (including Omanawa Bridge replacement), under the Fast-track Approvals Act 2024 (the Act) on 31 July 2026.

Prior to referring a substantive application to an Expert Panel, the EPA must assess the completeness and scope of the application to ensure it complies with section 46(2) of the Act. To assist with making this assessment, under section 46(2A) of the Act the EPA may seek further information from you.

Request for Further Information

1. **To meet the requirements for a substantive application under section 43(2)(a) of the Act, including section 13(4)(v), please provide a description of whether and how the project would be affected by climate change and natural hazards.**

<u>Context</u>

Section 1.8.3 of Volume A of the Substantive Application Report (SAR) at page 34 was referenced in relation to this requirement. There is no section 1.8.3 of Volume A. A summary of ecological values is provided on page 34 of Volume A.

2. **To fully assess whether the requirements for an archaeological authority under clause 2 of Schedule 8 have been met, we request:**
    - **All properties known to contain archaeological sites to be surveyed, and the sites assessed.**
    - **The application documents, including the Management Plan and Research Strategy, should be updated to clearly state which archaeological sites are to be included in the authorities sought.**

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Private Bag 63002 | Wellington 6140, New Zealand | NZBN: 9429041901977

Context

Section 2.3 of Vol. D – Appendix A – Archaeological Assessment of the SAR states that 'not all properties known to contain archaeological sites were able to be surveyed' due to lack of landowner permissions.

In their consultation feedback, Heritage New Zealand Pouhere Taonga (HNZPT) states that:

- The Assessment relies on descriptions in past site records to describe the recorded sites rather than an inspection of the sites. A number of these past site records were last updated in the 1980s.
- The application documents, including the Management Plan and Research Strategy (Vol.D - Appendix B - Archaeological Management Plan and Research Strategy) do not clearly state what archaeological sites are proposed to be modified or destroyed under the proposed authorities.

The full consultation response from HNZPT is attached (see Appendix 1).

3. **To clarify the components of a complex freshwater fisheries approval required by clause 3 of Schedule 9 have been met, we request:**
   - **Further information about the permanent structures described under section 1.2.2 of Volume E of the SAR.**
   - **Further explanation of why an approval or dispensation is not being sought for these permanent structures, diversions or reclamations.**
   - **Further information about the location, dimensions, form, design, operating period and flow management methodology for each temporary structure as far as it can be provided.**
   - **Clarification about the reference to Appendix R of Volume B which is the Proposed NES-CS Consent Conditions. Should Appendix K of Volume B (Ecological Impact Assessment) be referenced instead?**
   - **Further information on water quality or reference to where this is provided in the SAR or in the Ecological Impact Assessment (Vol. B Appendix K).**
   - **Further information about the amount of water flow, or physical dimensions of the wetted channel (e.g. water depth and width) or reference to where this is provided in the SAR or supporting documents.**

Context

Section 1.2.2 of Volume E of the SAR provides that Regulation 42 concerns culverts or fords that impede fish passage, and the permanent culverts will not impede fish passage, therefore, no approval is required.

However, in their consultation feedback, the Department of Conservation (DOC) considered that the Fast-track Approvals Act definition of "complex freshwater fisheries activity" is broader than Regulation 42, with the definition (in section 4 of the Act) including any activity that involves the construction of "a permanent dam or diversion structure".

While not all approvals need to be requested under the Act, DOC's consultation feedback suggests that whether fish passage is impeded may not the determining factor in this definition. Therefore, some permanent structures may still require a Complex Freshwater Fisheries Approval even if they are fish-passage compliant.

The full consultation response from DOC is attached (see Appendix 2). Comments on other elements of DOCs consultation feedback may be provided but are not necessary as part of this further information request.

Additionally, we note that the application (section 1.2.1 of Volume E of the SAR) states that further information about the location, dimensions, form, design, operating period and flow management methodology for each temporary structure will be determined through detailed design and construction planning. Additionally, a range of potential structure and facility types are provided at section 1.2.1 of Volume E of the SAR: "The structures may include temporary bunds, cofferdams, pipes, flumes, pump-around systems, temporary diversion channels and temporary culverts." This does not preclude other structures.

Responding to the Request for Further Information

Under the Act, you have until the end of the 20th working day from the date of this letter to provide a response to the EPA, which is 11 September 2026.

From the date of this letter, the 15 working day timeframe for the EPA to decide on completeness and scope of the substantive application ceases to run. The 15 working day timeframe will recommence once your response is received or after 11 September 2026, whichever is sooner.

If you wish to clarify any matter relating to the request, and the request was generated from the EPA's consultation with an administering agency or local authority, we suggest that you contact that administering agency or local authority directly before providing your response to the EPA.

If you require information from the EPA in relation to the request for further information, you may request that information from the EPA under section 46(2C) of the Act. Please send your request to projects@fasttrack.govt.nz.

The EPA intends to publish the information received from you in full, including your responses in our completeness memorandum, on the Fast-track website.

Response:

Response to Request for Further Information

The following table provides a response to the questions raised by the EPA in relation to the completeness of the Substantive Application for the State Highway 29 Tauriko Network Connections Project. The responses provide clarification and additional information where requested and identify the relevant parts of the Application and supporting technical material where those matters are addressed.

Question	Response
1. ***To meet the requirements for a substantive application under section 43(2)(a) of the Act, including section 13(4)(v), please provide a description of whether and how the project would be affected by climate change and natural hazards.***	The principal natural hazards relevant to the Project are flooding, erosion and geotechnical hazards, including settlement, liquefaction and slope instability. Climate change is relevant primarily through increased rainfall intensity, flood flows and sea-level rise. These matters have been assessed through the technical assessments supporting the Application, principally: a) The **Flood Effects, Stormwater Management and Streams, Culverts and Bridges Assessment in Volume B – Appendix N**, which assesses flooding, stormwater and hydraulic effects and incorporates future climate change conditions; b) The **Preliminary Groundwater Assessment in Volume B – Appendix O**, which assesses groundwater conditions and potential interaction with Project cuts and structures; and c) The **Groundwater Take Assessment in Volume B – Appendix P**, which includes consideration of groundwater drawdown and ground settlement effects associated with the proposed construction water take. Parts of the Project are located within existing flood-prone environments, particularly within the Wairoa River and Kōpūrererua catchments. Project infrastructure in these areas, including road embankments, bridges, stream realignments and stormwater infrastructure, will therefore be exposed to flood events. Flooding has the potential to affect the Project through inundation of low-lying areas, scour and erosion around structures, and increased hydraulic loading on bridges, embankments and drainage infrastructure. The Flood Effects, Stormwater Management and Streams, Culverts and Bridges Assessment incorporates climate change allowances to 2130, including a 3.68°C increase in temperature, 1.59 m of sea-level rise and projected increases in rainfall intensity. These future conditions have informed the design approach for bridges, stream realignments, stormwater infrastructure and the indicative levels and form of the transport corridor. Detailed flood modelling has been undertaken across the Wairoa River, Kōpūrererua and Waimapu catchments. The proposed designation conditions also require detailed design flood modelling to confirm compliance with specified performance standards for the 100-year ARI flood event and 20-year storm tide event, including climate change allowances. The Project also traverses variable landform and ground conditions, which have been taken into consideration during development of the Indicative Design. Overall, while the Project will be subject to the effects of climate change and natural hazards over its operational life, these matters have been incorporated into the Project's assessment and design and will continue to be addressed through detailed design and construction.
2. ***To fully assess whether the requirements for an archaeological authority under clause 2 of Schedule 8 have been met, we request:*** • ***All properties known to contain archaeological sites to be surveyed, and the sites assessed.*** • ***The application documentation, including the Management Plan and Research Strategy, should be updated to clearly state which archaeological sites are to be included in the authorities sought.***	As set out in section 2.6 and Table 2 of Volume A, there are 17 recorded archaeological sites within the designation footprint. Of these, 12 fall under existing Archaeological Authorities for the Tauriko West Enabling Works and Ōmanawa Bridge replacement, or have previously been investigated as part of other authorities. The remaining five recorded sites are also identified in Table 2, together with their known status. The Archaeological Assessment (**Volume D – Appendix A**) included site visits across properties where landowner permission had been obtained. As Mr Campbell explains in section 4 of that assessment, the properties inspected were based on the likelihood of archaeology surviving. The table below identifies the properties containing recorded archaeological sites within the designation footprint, whether they were accessed as part of the current archaeological field assessment, and the known status of the recorded sites.

Property ID	Address	Legal Description	Title	Archaeological site	Site Visit Y/N	Comment
	n/a	Road Reserve (local and State highways) – SH29	n/a	U14/3401	N	Being investigated under authorities 2023/545, 2025/472, 2021/711
C5b	n/a	Lot 3 DP 480187	670625	U14/3976	N	Investigated and fully excavated under Authority 2023/545. Refer Summary Report 2023/545 – Tauriko West Enabling Works: Redwood Lane.
C6	4 Redwood Lane	Lot 2 DPS 70631	SA56B/112	U14/3977	N	Investigated under Authority 2023/545 and subsequently destroyed through the authorised enabling

						works. Refer Summary Report 2023/545 – Tauriko West Enabling Works: Redwood Lane.
F6	n/a	Lot 2 DPS 87023	SA68D/533	U14/2357	Y	Site not visible, earthworked for kiwifruit
O2	9 Nature Place	Lot 2 DPS 89978	SA71A/856	U14/2675 U14/2995	N	Landowner did not provide permission to access site
H8	3/579 Cambridge Road	Lot 1 DPS 53844	SA46D/898	U14/635	N	Investigated under authority 2024/245
D7	236 Kaweroa Drive	Lot 1002 DP 616167	1233031	U14/2361	N	Investigated by CFG under authority 2021/797
B6	4A Belk Road	Part Lot 6 DP 12853	SA4A/295	U14/2339 U14/2337 U14/2336 U14/2338	N	Investigated under authorities 2023/545, 2025/472, 2021/711
B5	30A Belk Road	Lot 4 DP 457710	593887	U14/2344	Y	Site not visible
B1	n/a	Lot 9 DP 12853	4292989	U14/4110 U14/2340	N	Investigated under authority 2025/472
A2	n/a	Lot 1 DPS 287	SA1026/268	U14/4108 U14/4109 U14/2192	N	Investigated under authority 2025/472

There is one property containing recorded archaeological sites that could not be accessed during field assessment work. This is Property O2 at 9 Nature Place (Lot 2 DPS 89978). Landowner permission to access that property was sought but was not provided. The property contains two recorded archaeological sites, U14/2675 and U14/2995. As set out in the Archaeological Assessment:

- U14/2995 is a pit/terrace site recorded in 1996 while it was being destroyed by earthworks associated with earlier development. The Archaeological Assessment identifies this site as having previously been investigated and records its status as presumed destroyed.
- U14/2675 is a midden originally recorded in 1985 as a sparse midden scatter in poor condition. The site was not relocated during a subsequent archaeological assessment in 2002 and is recorded by Mr Campbell as probably destroyed. As noted, its current physical status could not be verified through the 2026 field assessment.

Accordingly, the inability to access 9 Nature Place does not mean that the two recorded archaeological sites on that property have been omitted from the assessment. Both have been considered on the basis of the available archaeological record and previous investigations.

In relation to the other sites, further information on the Redwood Lane sites is provided in the *Summary Report 2023/545 – Tauriko West Enabling Works: Redwood Lane*, prepared by Sian Keith Archaeology Ltd in February 2025. That report records that U14/3976 has been fully excavated under Archaeological Authority 2023/545 and that U14/3977 has subsequently been destroyed through the authorised enabling works. It also records that U14/3401 has not yet been physically investigated and that any future works affecting that site will be monitored and reported through the final archaeological report for that authority. Other recorded sites within the northern part of the Project (associated with the Northern Access Tauriko Enabling Works) are also being investigated under existing archaeological authorities. Further information on the condition and status of those sites will be provided through the final archaeological reporting for those works once completed.

Neither Schedule 8 of the FTAA nor the Heritage New Zealand Pouhere Taonga Act 2014 requires every recorded archaeological site to be physically visited as part of an archaeological authority application. The relevant sites must be identified and sufficiently assessed to enable the authority sought and its effects on archaeological values to be considered, and that information is provided in the Archaeological Assessment. All 17 recorded archaeological sites within the designation footprint have been considered through the Archaeological Assessment and the supporting archaeological record, including previous and ongoing investigations under existing archaeological authorities.

The scope of the Archaeological Authorities sought is also confirmed in the proposed Archaeological Authority conditions in **Volume D – Appendix D**. Archaeological Authority 1 expressly identifies all 17 recorded archaeological sites within the Project footprint, with Schedule 1 identifying the relevant properties. Archaeological Authorities 2 and 3 relate to potential unrecorded subsurface archaeological sites within the respective areas identified in Schedules 2 and 3.

The **Archaeological Management Plan and Research Strategy in Volume D – Appendix B** have also been updated to make this distinction explicit. The updated AMP confirms that Archaeological Authority 1 applies to the recorded archaeological sites identified in Table 1 of the AMP, while Archaeological Authorities 2 and 3 apply to potential unrecorded subsurface archaeological sites within their respective areas.

3. To clarify the components of a complex freshwater fisheries approval required by clause 3 of Schedule 9 have been met, we request: • ***Further information about the permanent structures***	NZTA considers that sufficient information has been provided to satisfy clauses 2 and 3 of Schedule 9 and to enable the CFFA to be assessed against the matters in clause 5. The approval sought in Volume E is limited to temporary dams and diversion structures required during construction, under regulation 43 of the Freshwater Fisheries Regulations 1983 (FFR). No approval is sought under regulation 42 or for permanent works.

described under section 1.2.2 of Volume E of the SAR. • ***Further explanation of why an approval or dispensation is not being sought for these permanent structures, diversions or reclamations.*** • ***Further information about the location, dimensions, form, design, operating period and flow management methodology for each temporary structure as far as it can be provided.*** • ***Clarification about the reference to Appendix R of Volume B which is the Proposed NES-CS Consent Conditions. Should Appendix K of Volume B (Ecological Impact Assessment) be referenced instead?*** • ***Further information on water quality or reference to where this is provided in the SAR or in the Ecological Impact Assessment (Vol. B Appendix K).*** • ***Further information about the amount of water flow, or physical dimensions of the wetted channel (e.g.***	**<u>Permanent structures</u>** The Project includes permanent stream realignments, bridges, stormwater and drainage infrastructure and associated reclamation works. These works are explained and assessed in the wider designation and resource consent applications. The permanent crossings of the Kōpūrererua Stream, Nanako Stream and Stream 3 near Belk Road are all provided by bridges. No permanent culvert or ford is proposed within these streams. The bridges span the relevant watercourses and do not dam, redirect or control stream flows. The Project also includes permanent culverts for cross-drainage and flood conveyance. Three culverts are proposed within the Kōpūrererua Valley in association with the Takitimu Drive Interchange. None of these culverts is located within, or conveys, an existing stream. Two of the culverts convey cross-drainage intercepted by the proposed interchange. They are proposed to be fish passable because drains extend upstream of the interchange and there is potential for aquatic habitat connectivity. The third culvert is provided for flood conveyance and does not connect to an existing drainage feature. Smaller permanent culverts may also be required along the alignment for local cross-drainage and stormwater conveyance. These do not convey existing streams. The permanent stream realignments are not 'permanent diversion structures' for the purposes of regulation 43. The Kōpūrererua Stream, Nanako Stream and Stream 3 works establish replacement watercourses. Once construction is complete, water will flow within those replacement channels. No permanent diversion structure will remain with the function of diverting water from those channels. Associated works involve filling redundant sections of the existing channels following completion and connection of the replacement channels. These works are ancillary to the stream realignments and do not comprise the construction of a 'permanent dam or diversion structure'. Accordingly, no CFFA is sought for the permanent stream realignments, bridges, drainage culverts or associated reclamation works. It is recognised that the FTAA definition of a complex freshwater fisheries activity extends beyond culverts, fords, dams and diversion structures to include a broader range of works involving disturbance of water bodies. However, regulations 42 and 43 of the FFR are narrower in scope. The fact that an activity falls within the broader FTAA definition does not, of itself, mean that an approval is required under regulation 42 or 43. Whether an approval is required depends on whether the particular activity is captured by those Regulations.

water depth and width) or reference to where this is provided in the SAR or supporting documents.	**<u>Temporary structures</u>** The nature and purpose of temporary structures is set out in **sections 1.2.1 and 1.4 of Volume E**. The final location, dimensions, form, design, operating period and flow-management methodology for each temporary structure will depend on the construction methodology and sequencing, affected watercourse, flow conditions and site-specific ecological requirements. These details are therefore not fixed at this stage. The principal watercourses where temporary structures may be required are the Kōpūrererua Stream, Nanako Stream and Stream 3 near Belk Road. Sections 1.2.1 and 1.4 of Volume E identify the types of temporary structures that may be required and the circumstances in which they may be used. Sections 1.5 to 1.8 identify the freshwater values potentially affected, the approach to fish passage, potential effects, and the measures proposed to manage them. The proposed regional resource consent conditions provide the framework for the detailed design and implementation of the temporary works. In particular: • Works in Waterbodies Condition 6 requires temporary culverts to avoid creating barriers to fish passage where relevant, avoid more than minor scour, erosion or instability, provide for fish salvage in accordance with the Aquatic Fauna Management Plan (AFMP), and stabilise affected beds and banks following removal; • Works in Waterbodies Condition 8 requires any more than minor erosion, scour or damage to Watercourse beds or banks to be remediated, prevents works within Watercourses when flows exceed bankfull flow, and controls concrete-related discharges to Waterbodies; • Works in Waterbodies Condition 9.1 requires Watercourse realignments, bridges and other instream works to be constructed off-line wherever practicable, with works in flowing water and machinery time within the channel minimised; • Earthworks Conditions 6.1–6.5 require a stage-specific ESCP, including relevant construction methodologies for bridges, culverts and stream works, pumping procedures where dewatering is required, and BOPRC certification before the relevant stage commences; and • Earthworks Conditions 14.1–14.4 require an AFMP before relevant works commence, including site isolation, fish salvage and relocation, timing controls, release-site criteria and measures to minimise accidental harm or mortality; and • Earthworks Conditions 18.1–18.7 require the final Kōpūrererua Stream, Nanako Stream and Belk Road Watercourse realignment designs to achieve specified freshwater ecological outcomes, and require a Stream Realignment Plan addressing construction methodology, erosion and sediment control, aquatic habitat disturbance, establishment and monitoring before those works commence. These conditions provide the site-specific controls that will apply once the final temporary-works methodology is confirmed.

	NZTA considers that the nature and scale of the potential fisheries effects can be (and have been) properly assessed at this stage, and that the proposed conditions will secure effects outcomes once detailed design and construction planning are complete. **<u>Reference to Volume B – Appendix R</u>** The reference to Volume B – Appendix R is incorrect. The intended reference is **Volume B – Appendix K – Ecological Impact Assessment**. **<u>Water quality</u>** Information on the existing freshwater environment is contained in **Volume B – Appendix K – Ecological Impact Assessment, Part C: Freshwater Ecology**. In particular, **section 16.2 – Group B: Realigned streams** describes the existing condition of the Kōpūrererua Stream, Nānako Stream and Belk Road watercourses, including their physical habitat, degree of modification and aquatic ecological values. More detailed physico-chemical water-quality information for the Ōmanawa River receiving environment is provided in **Volume B – Appendix K – Ecological Impact Assessment, Appendix 6 – Freshwater Environment, section 21.1.2 – Ōmanawa River (receiving environment).** **<u>Water flow and wetted-channel dimensions</u>** Information on water flow and channel dimensions for the principal affected watercourses is contained in **Volume B – Appendix N – Flood Effects, Stormwater Management and Streams, Culverts and Bridges**. In particular, **section 5.2.1 – Design Flows and Table 5.1 – Stream Realignments Flow Characteristics** provide estimated base flow, 10% of the 2-year flow, bankfull flow, and 2-year, 10-year and 100-year ARI flows for the Kōpūrererua Stream, Nanako Stream and Stream 3 near Belk Road. The corresponding **Stream Realignment Detailed Design Drawings in Volume B – Appendix N – Annexure C** provide the channel geometry, long sections, baseflow and bankfull levels and typical cross-sections for those watercourses.