



## FTAA–2507–1086: Application received for referral of the project under the Fast-track Approvals Act 2024 – Stage 1 decisions

### Project Name: Mangahao Hydro-Electric Power Scheme

Date submitted:	7 August 2025	Tracking #: BRF–6571	
Security level:	In-Confidence	MfE priority:	Urgent

	<b>Action sought:</b>	<b>Response by:</b>
To Hon Chris Bishop, Minister for Infrastructure	Decisions on recommendations in Table A	11 August 2025

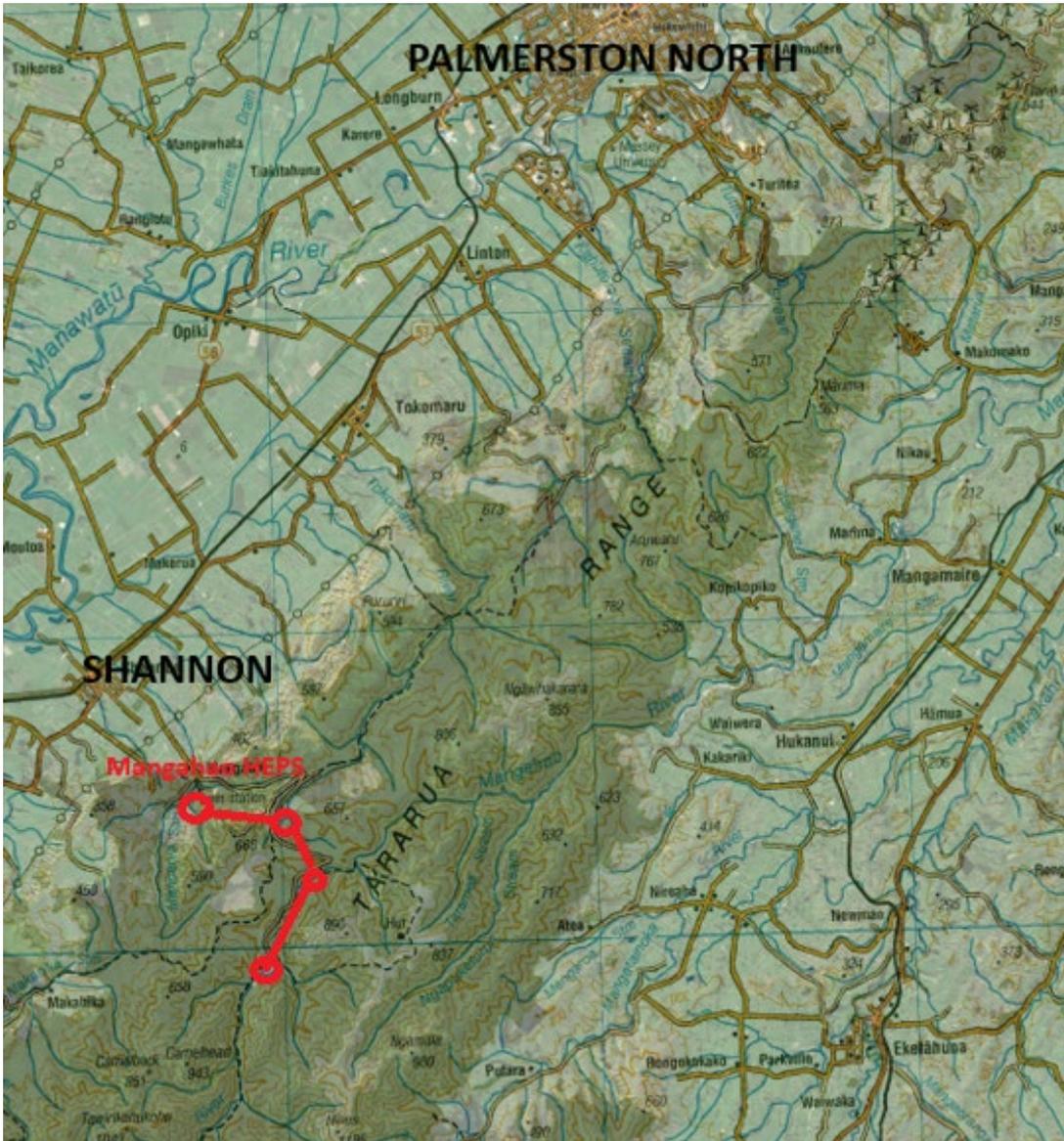
Actions for Minister's Office staff	<b>Return</b> the signed briefing to MfE <a href="mailto:FTAreferrals@mfe.govt.nz">FTAreferrals@mfe.govt.nz</a> <b>Send</b> email to Ministers to invite comment
Number of appendices 3	Appendices: 1. Statutory framework summary 2. Application documents for Mangahao Hydro-Electric Scheme (in File Exchange) 3. List of the Māori groups referred to in section 18(2))

### Ministry for the Environment contacts:

Position	Name	Cell phone	1 <sup>st</sup> contact
Principal Author(s)	Antonia Croft and Julian Jackson		
Acting Manager	Max Gander-Cooper	s 9(2)(a)	✓
General Manager	Ilana Miller	s 9(2)(a)	

## Project location

---



## Key messages

---

1. This briefing seeks your initial decisions on an application from King Country Energy Limited to refer the Mangahao Hydro-Electric Power Scheme project (the project) under the Fast-track Approvals Act 2024 (the Act) to the fast-track approvals process. At this stage you can either decline an application for the reasons set out section 21, or provide the application to, and invite comments from, the parties identified in section 17. If you do not decline the application, you will receive a further briefing following receipt of comments, to support your final decision on whether to refer the project.
2. The project is to renew the consents for the existing Mangahao Hydro-Electric Power Scheme, located in the northern section of the Tararua Ranges approximately 28 kilometres (km) southwest of Palmerston North and 10km, at the farthest point, east of Shannon. The Scheme draws from the Mangahao River and generates up to 39.9

megawatts (MW) of electricity with an average annual output of 131 gigawatt (GW) hours - enough to power approximately 20,000 homes. The activities associated with this generation of renewable energy include:

- a. the damming and diversion of water, involving the damming of the Mangahao River at No.1 and No.2 Dam sites and the Tokomaru River at No.3 Dam site, and the diversion of Mangaore Stream for erosion control and water between reservoirs
  - b. the discharge of water to water associated with all 3 reservoirs and from Mangahao Power Station to the Mangaore and Mangatangi streams
  - c. the discharge of contaminants to water associated with drain valves associated with turbines, cooling water from Mangatangi Stream, stormwater runoff from the Power Station area, and sediment flushing
  - d. the use of structures in the bed of a stream or river including the existing dams and associated infrastructure in the Mangahao and Tokomaru Rivers.
3. The project will require the proposed approvals:
- a. resource consents under the Resource Management Act 1991.
4. We have undertaken initial analysis of the referral application, and this is presented along with our considerations and recommendations in Table A.
5. We have decided the application is complete and complies with section 14 of the Act, as the application complies with section 13 requirements, may be capable of satisfying the criteria in section 22 and does not appear to involve an ineligible activity. The applicable fee and levy has been paid.
6. We recommend you progress consideration of the referral application to the next stage of analysis (Stage 2) and invite written comments from the parties prescribed in section 17(1) of the Act being: local authorities, the Minister for the Environment and relevant portfolio Ministers, relevant administering agencies, the owners of Māori land within the project area and identified Māori groups from section 18(2) of the Act. The parties are listed in Attachment 3.
7. In addition to the above we recommend that you invite written comments from Electra Lines Company Limited (local electricity distribution company), Transpower NZ Limited, Department of Conservation, the Minister for Economic Growth and the Minister for Regional Development as additional parties under section 17(5) of the Act.

## Action sought

---

8. Please indicate your decisions on the recommendations in Table A.

## Signature

---



Ilana Miller  
**General Manager – Delivery and Operations**

**Table A: Stage 1 analysis**

Project details	Project Name	Applicant	Project Location			
	Mangahao Hydro-Electric Power Scheme	King Country Energy Limited c/- Holland Beckett The applicant is eligible to apply for resource consents.	The Mangahao River at the northern section of the Tararua Ranges approximately 28 kilometres southwest of Palmerston North and 10 kilometres, at the farthest point, east of Shannon.			
Project description	<p>To renew the consents for the existing Mangahao Hydro-Electric Power Scheme (HEPS). The Scheme which draws from the Mangahao River, generates up to a maximum 39.9 megaWatts (MW) of electricity with an average annual output of 131 Giga-Watt-hours (GWh) which is enough to power approximately 20,000 homes. The activities associated with this generation of renewable energy include:</p> <ul style="list-style-type: none"> <li>the damming and diversion of water, involving the damming of the Mangahao River at No.1 and No.2 Dam sites and the Tokomaru River at No.3 Dam site, and the diversion of Mangaore Stream for erosion control and water between reservoirs.</li> <li>the discharge of water to water associated with all 3 reservoirs and from Mangahao Power Station to the Mangaore and Mangatangi streams</li> <li>the discharge of contaminants to water associated with drain valves associated with turbines, cooling water from Mangatangi Stream, stormwater runoff from the Power Station area, and sediment flushing.</li> <li>the use of structures in the bed of a stream or river including the existing dams and associated infrastructure in the Mangahao and Tokomaru Rivers</li> </ul> <p>The project will require the proposed approvals:</p> <ul style="list-style-type: none"> <li>Resource consents under the Resource Management Act 1991.</li> </ul>					
Consultation undertaken	As required by s11, the applicant has consulted with:					
	Relevant local authorities	Relevant iwi authorities, hapu and Treaty settlement entities:	Relevant MACA groups	Ngā hapū o Ngāti Porou]	Relevant administering agencies	Holder of land to be exchanged
<ul style="list-style-type: none"> <li>Horizons Regional Council</li> <li>Horowhenua District Council</li> </ul>	<ul style="list-style-type: none"> <li>Ngāti Whakare</li> <li>Rangitāne o Manawatū</li> <li>Muaūpoko</li> <li>Ngāti Whakare</li> <li>Ngāti Kahungunu ki Tamaki-nui-ā-Rua</li> <li>Rangitāne Tamaki nui-ā-Rua</li> <li>Rangitāne o Wairarapa</li> <li>Ngāti Raukawa ki te Tonga</li> </ul>	N/A	N/A		Ministry for the Environment	N/A
Section 22 assessment criteria						
The project is an infrastructure or development project that would have significant regional or national benefits [section 22(1)(a)]	<p>The Minister may consider any of the following matters, or any other matters the Minister considers relevant.</p> <p><i>Assess the factors that are relevant to the application. How is the factor relevant and is it being met by the project?</i></p> <p><i>Will deliver new regionally or nationally significant infrastructure or enable the continued functioning of existing regionally or nationally significant infrastructure [s22(2)(a)(ii)]</i> The Mangahao HEPS is considered regionally significant as it supplies 63–64% of electricity demand at the Mangahao grid exit point during peak morning and evening hours and has a generation capacity of 39.9MW and an annual output of approximately 131 GWh powering approximately 20,000 homes annually in the Horizons Region (which includes Whanganui, Rangitikei, and Manawatū). Any surplus power generation is fed into the national grid and the applicant states that this facility is also considered nationally significant infrastructure.</p> <p>There is no data in the application to support how much surplus goes into the national grid annually, the applicant will be asked to provide information regarding the project's national significance as a further information request.</p> <p><i>Will deliver significant economic benefits [s22(2)(a)(iv)]</i> The applicant considers the project will have significant economic benefits; in summary they are quantified as:</p> <ul style="list-style-type: none"> <li>direct cost savings of approximately \$4–6 million by avoiding traditional consenting costs, with savings ultimately passed on to consumers.</li> <li>preserving generation output, avoiding up to 7% loss in electricity generation (worth \$190 million to replace) and maintaining supply for approximately 20,000 homes in Horowhenua</li> <li>supporting the regional economy through local employment and over \$1 million in annual economic contribution.</li> <li>strengthening national energy security by providing controllable, renewable energy during peak demand and reducing reliance on more costly and polluting thermal generation.</li> <li>avoiding additional infrastructure costs (for example \$130 million in wind generation and \$60 million in thermal peaker plants or avoids \$5.8 million/year in fuel costs and 25,800 tCO<sub>2</sub>e in emissions).</li> <li>improving grid efficiency and resilience by reducing transmission losses and regional supply vulnerability.</li> </ul>					

	<p><i>Will support climate change mitigation, including the reduction or removal of greenhouse gas emissions [s22(2)(a)(vii)]</i>  The applicant states that the ongoing operation of the Mangahao HEPS contributes towards decarbonising New Zealand's economy. It will also contribute to achieving the 90% renewable energy target by 2025 set out in the National Policy Statement for Renewable Electricity Generation (NPS-REG) and the aspiration to achieve 100% renewable energy by 2030. The Mangahao HEPS has an important role in achieving New Zealand's 2050 targets in the Climate Change Response Act 2022.  The applicant also notes that the Mangahao HEPS will play a role in substituting fossil fuel energy with renewable energy. That amounts to real emissions reduction, especially as New Zealand's electricity cannot be imported, and therefore it will contribute to reductions in the country's greenhouse gas inventory. Economic analysis by NZEIR indicates the greenhouse gas emission equivalent of the renewable energy produced at the Mangahao HEPS would be approximately 67,830 tCO<sub>2</sub>-e (for gas) or 172,208 tCO<sub>2</sub>-e (for coal).  The NPS-REG provides for renewable electricity generation, including its benefit of maintaining or increasing electricity generation capacity while avoiding, reducing or displacing greenhouse gas emissions, as a matter of national significance (Policy A). The preamble to the NPS-REG notes "the contribution of renewable electricity generation, regardless of scale, towards addressing the effects of climate change plays a vital role in the wellbeing of New Zealand, its people and the environment". The applicant asserts that Mangahao HEPS is entirely consistent with that national direction.  We note that this is an estimate of avoided emissions, based on what would have been produced if the same energy came from gas or coal, rather than a direct reduction from the project itself.</p> <p><i>Will support climate change adaptation, reduce risks arising from natural hazards, or support recovery from events caused by natural hazards [s22(2)(a)(viii)]</i>  The applicant states, as a generator of electricity, KCE is recognised as a lifeline utility under the Civil Defence Emergency Management Act 2002 (Schedule 1, Part B). Lifeline utilities play a vital role in recovery from natural hazards and have statutory duties such as the need to ensure the ability to function to the fullest possible extent, even though this may be at a reduced level, during and after an emergency. This includes the Mangahao HEPS. As New Zealand de-carbonises and shifts its view to achieving a high percentage of energy generation coming from renewable sources it is vital that existing renewable energy generation is preserved. The project seeks to reconstent the Scheme, which contributes towards New Zealand's current renewable electricity generation and in doing so supports the country's climate change adaption.</p> <p><i>Will address significant environmental issues [s22(2)(a)(ix)]</i>  Although the Mangahao HEPS has not been assessed as causing any significant environmental issues, it is noted that the Scheme has significance as a generator of renewable electricity, supporting the reduction of greenhouse gas emissions.</p> <p><i>Is consistent with local or regional planning documents, including spatial strategies [s22(2)(a)(x)]</i>  Based on an initial assessment, the Mangahao HEPS is consistent with the relevant regional planning documents as follows: The Regional Policy Statement (RPS) and the Regional Plan, included as part of the Horizons One Plan, are the relevant regional planning instruments for the Manawatu-Wanganui Region. Infrastructure activities with effects on freshwater, natural character values, biodiversity and/or public access must be managed to mitigate the effects. However, the RPS is clear in its express recognition of and provision for significant infrastructure with local effects but regional or national benefits – particularly where the infrastructure already exists. The RPS policy settings directly inform the Regional Plan provisions, which require environmental effects to be managed while enabling the continued operation of existing significant infrastructure. No relevant local planning instruments (including spatial strategies) have been identified, noting that no replacement consents are sought under the Horowhenua District Plan.</p>		
<b>referring the project to the fast-track approvals process [section 22(1)(b)]</b>	<p><i>Would facilitate the project, including by enabling it to be processed in a more timely and cost-effective way than under normal processes [s22(1)(b)(i)]</i>  The applicant states that the Fast-track process offers faster, cheaper, and more predictable reconstenting than the RMA, which is slow, costly, and complex—even for controlled activities. It avoids appeals, supports long-term investment, and suits stable, existing schemes like Mangahao HEPS. Compared to the RMA process, the Fast track process allows for time savings of up to three to four years and millions of dollars in administrative and professional services costs from expanded council processing, regional council hearings and Environment Court appeals. Additionally, a decision often seeks to create a 'compromise' with higher minimum flows and expensive mitigation are set to appease interested parties and often net no value add to the environment. These types of restrictions have the potential to result in a significant loss of energy production. The experience of KCE and Manawa is that the normal RMA process for reconstenting is lengthy, costly and more onerous. Reconstenting processes are taking upwards of five years and resulting in more complex conditions. This has a cost in terms of process costs, compliance costs, and usually a risk of lost generation.</p> <p><i>Is unlikely to materially affect the efficient operation of the fast-track approvals process [s22(1)(b)(ii)]</i>  The applicant states if the project is referred, an application could be lodged within short order. Therefore, referring this project will not affect the efficient operation of the fast-track process.</p>		
<b>Minister invites comments</b>	<p><i>You must copy the application to, and invite written comments from [s17(1)]:</i></p> <ol style="list-style-type: none"> <li>Horizons Regional Council and Horowhenua District Council</li> <li>Minister for the Environment</li> <li>Relevant portfolio Ministers: Minister for Energy, Minister for Climate Change <ul style="list-style-type: none"> <li>We consider the Minister of Energy and the Minister for Climate Change to be relevant portfolio Ministers because the project includes large-scale electricity generation using renewable energy. They will be able to provide advice on whether the project is regionally significant.</li> </ul> </li> <li>Relevant administering agency: Ministry for the Environment.</li> <li>The Māori groups identified in Attachment 3</li> </ol>	<p><i>The Minister may also copy the application to, and invite written comments from, any other person[s17(5)].</i></p> <ol style="list-style-type: none"> <li>The Minister for Regional Development</li> <li>The Minister for Economic Growth <ul style="list-style-type: none"> <li>We recommend that the Minister for Regional Development, and the Minister for Economic Growth be invited to comment on whether the benefits of the project are regionally or nationally significant.</li> </ul> </li> <li>Department of Conservation to confirm if the application involves the maintenance, upgrading or continued operation of existing electricity infrastructure or the construction and operation of new electricity lines on 'eligible land' as defined in s 24(3).</li> <li>Chief Executive of Transpower New Zealand Limited who administers the national grid.</li> <li>Chief Executive of Electra Lines company Limited as the local electricity distribution company that the Scheme connects to.</li> </ol>	<p><i>The Minister may request further information about a referral application from the applicant, the relevant local authorities, or the relevant administering agencies to be provided within the time frame specified in the request.</i></p> <p>Horizons Regional Council - on whether they anticipate any challenges or delays associated with the reconstenting process for the project.</p> <p>The applicant-to provide further information and data to support their claim that this project is of national significance and the economic benefits associated with this project in that context.</p>
<b>Recommendations</b>		<b>Minister's decision</b>	
<ol style="list-style-type: none"> <li>Note that section 25 of the Act permits you to decline the referral application without inviting comments from the relevant local authorities and any relevant Ministers.</li> </ol>		Noted	

b. <b>Note</b> that you have not yet provided the application to, nor sought any comments on it from, the parties listed in section 17(1) but that you are required to do so if you do not decline the application under section 21 of the Act.	Noted
c. <b>Note</b> that section 17(5) of the Act permits you to forward an application to, and invite written comments from, any other person.	Noted
d. <b>Note</b> that if comments have been sought and provided within the required time frame you are required to consider it, along with the referral application, before deciding to decline the application.	Noted
e. <b>Note</b> that section 20 of the Act permits you to request further information from the applicant or relevant local authorities or relevant administering agencies at any time before you decide whether to accept or decline an application.	Noted
f. <b>Agree</b> to progress the Mangahao Hydro-Electric Power Scheme Project to our Stage 2 analysis (invitation to comment and s 18 report stage).	Yes/No
g. <b>Agree</b> to provide the application to, and invite comments from: <ul style="list-style-type: none"> <li>i. <b>Relevant Local Authorities:</b> <ul style="list-style-type: none"> <li>• Horizons Regional Council</li> <li>• Horowhenua District Council</li> </ul> </li> <li>ii. <b>Minister for the Environment</b></li> <li>iii. <b>Relevant portfolio Ministers:</b> <ul style="list-style-type: none"> <li>• Minister for Energy</li> <li>• Minister for Climate Change.</li> </ul> </li> <li>iv. <b>Relevant Administering Agency:</b> <ul style="list-style-type: none"> <li>• Ministry for the Environment</li> </ul> </li> <li>v. <b>The Māori groups identified in Attachment 3</b> <ul style="list-style-type: none"> <li>• Any parties you are required to invite comments from under section 17(1)(d) and (e) who may be subsequently identified</li> </ul> </li> </ul>	Yes/No Yes/No  Yes/No  Yes/No Yes/No  Yes/No  Yes/No
h. <b>Agree</b> to provide the application to and invite comments from the following additional entities/persons under section 17(5): <ul style="list-style-type: none"> <li>i. Minister for Regional Development</li> <li>ii. Minister for Economic Growth</li> <li>iii. The Chief Executive of Transpower New Zealand Limited</li> <li>iv. The Chief Executive of Electra Lines Company Limited</li> <li>v. Department of Conservation</li> </ul>	Yes/No
i. <b>Agree</b> to seek further information from: <ul style="list-style-type: none"> <li>i. the applicant on information and data to support their claim that this project is of national significance and the economic benefits associated with this project in that context</li> <li>ii. Horizons Regional Council on whether they anticipate any challenges or delays associated with the consenting process for the Scheme.</li> </ul>	Yes/No Yes/No
j. <b>Note</b> that you have agreed to delegate to the Secretary for the Environment your responsibility to send all correspondence other than to Ministers	Noted
k. <b>Send</b> email inviting Ministers to comment	Yes/No

**Signed:**

Hon Chris Bishop  
Minister for Infrastructure

**Date:**

## Appendix 1:

### Statutory framework summary

---

1. You are the sole decision maker for referral applications. If you accept a referral application then the whole or part of the project will be referred to the fast-track approvals process.
2. If a Treaty settlement, the Marine and Coastal Area (Takutai Moana) Act 2011, the Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019, a Mana Whakahono ā Rohe or a joint management agreement provides for consideration of any document or procedural requirements, you must, where relevant:
  - a. Give the document the same or equivalent effect through this process as it would have under any specified Act; and
  - b. Comply with any applicable procedural requirements.
3. You must decline a referral application if:
  - a. you are satisfied the project does not meet the referral criteria in s22
  - b. you are satisfied the project involves an ineligible activity (s5)
  - c. you consider you do not have adequate information to inform your decision.
4. You may decline an application for any other reason, including those set out in s21(5) and even if the application meets the s22 referral criteria.
5. You can decline an application before or after inviting comments under s 17(1). However, if comments have been sought and provided within the required time frame, you must consider them, along with the referral application, before deciding to decline the application.
6. If you do not decline a referral application at this initial stage you must copy the application to, and invite written comments from:
  - a. the relevant local authorities,
  - b. the Minister for the Environment and relevant portfolio Ministers
  - c. the relevant administering agencies
  - d. the Māori groups identified by the responsible agency
  - e. the owners of Māori land in the project area:
  - f. you may provide the application to and invite comments from any other person.
7. You can request further information from an applicant, any relevant local authority or any relevant administering agency at any time before you decide to decline or accept a referral application (see section 20 of the Act).
8. However, if further information has been sought and provided within the required time frame you must consider it, along with the referral application, before deciding to decline the application.

**Appendix 2: Application documents for Mangahao Hydro-Electric Power Scheme Project: (in File Exchange)**

### Appendix 3: List of the Māori groups referred to in section 18(2)

Name of group	Type of group (section of Act)	Contact persons	Contact email
<b>Rangitāne o Manawatū Settlement Trust (PSGE)</b>	Treaty settlement entity (s18(2)(a) – <a href="#">Rangitāne o Manawatū Claims Settlement Act 2016</a> )	George Davis, Chair Debbie Te Puni, CEO	<a href="mailto:info@romst.iwi.nz">info@romst.iwi.nz</a> s 9(2)(a)
<b>Rangitāne Tū Mai Rā Trust (PSGE)</b>	Treaty settlement entity (s18(2)(a) – <a href="#">Rangitāne Tū Mai Rā (Wairarapa Tāmaki nui-ā-Rua) Claims Settlement Act 2017</a> )	Sonya Rimene, Chair Elaine Durie, CEO	s 9(2)(a) s 9(2)(a)
<b>Ngāti Kahungunu ki Wairarapa - Tāmaki nui-ā-Rua Settlement Trust (PSGE)</b>	iwi authority (s18(2)(a)), Treaty settlement entity (s18(2)(a) – Ngāti Kahungunu ki Wairarapa - Tāmaki Nui ā Rua Claims Settlement Act 2022)	Paora Ammunson, Chair Ray Hall, CE	s 9(2)(a) s 9(2)(a)
<b>Muaūpoko Tribal Authority Inc</b>	iwi authority (s18(2)(a)), mandated entity (s18(2)(d))	Di Rump, CEO Dean Wilson, Environmental Mgr	<a href="mailto:ceo@muaupoko.iwi.nz">ceo@muaupoko.iwi.nz</a> s 9(2)(a)
<b>Te Rūnanga o Raukawa Incorporated</b>	iwi authority (s18(2)(a))	Freeman Paul, GM	<a href="mailto:ceo@rauikawa.iwi.nz">ceo@rauikawa.iwi.nz</a> <a href="mailto:office@rauikawa.iwi.nz">office@rauikawa.iwi.nz</a>
<b>Ngāti Kahungunu ki Tāmaki-nui-a-Rua</b>	iwi authority (s18(2)(a))	Stacey Hape, GM Christina Marshall Env projects facilitator	s 9(2)(a) s 9(2)(a)
<b>Ngāti Kahungunu Iwi Inc</b>	iwi authority (s18(2)(a))	Ngaio Tiuka, Environmental Director Shade Smith	s 9(2)(a) s 9(2)(a)
<b>Tanenuiarangi Manawatū Charitable Trust</b>	iwi authority (s18(2)(a))	Alana Nuku, Mgr Te Ao Tūroa	s 9(2)(a)
<b>Rangitāne o Tāmaki nui-ā-Rua</b>	iwi authority (s18(2)(a))	Shaun Lines, GM Mariah Petera, Taiao Administrator	s 9(2)(a) <a href="mailto:taiao@twr.rangitane.co.nz">taiao@twr.rangitane.co.nz</a>