

Memorandum

To: Wi Pere Trust

From: Mitchell Daysh Limited

Date: 30 April 2026

Re: Fast Track Referral Application – Planning Framework Assessment for the
Pouarua Water Storage Project

1. PURPOSE OF THIS MEMO

This memorandum provides an assessment of the Project against relevant national policy statements (including the New Zealand Coastal Policy Statement), national environmental standards and local and regional planning documents. This assessment relates to section 3.9.1 and 2.7.2.13 of the Fast Track Referral Application Form for the Pouarua Water Storage Scheme (referred to hereafter as “PWSS” or “the Scheme” or “the Project”).

The Memorandum:

- > Gives a high-level overview of the Project and the planning context within which this is located to inform this Referral Application (refer to Section 2);
- > Provides the required high-level assessment of the Project against relevant national statutory documents (refer to Section 4);
- > Provides the required high-level assessment of the Project against the regional and local statutory documents (refer to Sections 5 and 6); and
- > Outlines the rules of the TRMP which would likely be relevant to a consent application for this Project (refer to Section 7).

A detailed assessment of the Planning Instruments will be included in any future Substantive Application.

2. PLANNING CONTEXT

2.1 PROJECT COMPONENT SUMMARY

Wi Pere Trust seek Fast Track approval to construct and operate a regionally significant new water storage scheme located at and adjacent to their Tangihanga Station in Tairāwhiti,

Gisborne. The scheme, known as the Pouarua Water Storage Scheme, would meet irrigation and other water demands across the Poverty Bay flats.

The Scheme would involve the construction of a dam to form a new large-capacity reservoir on the Pouarua Stream. The reservoir would store water collected from both naturally occurring runoff from the local catchment, and from water sourced by pumping water currently available for allocation from the nearby Waipaoa River during high river flow periods. Stored water would then be released when demand is high or during dry-year water restrictions to a downstream water reticulation system for a range of potential uses.

Initial supply and demand modelling has shown that the Scheme could meet multiple water demands, including irrigation for new high-value land use and balancing shortfalls in existing water allocations potentially up to 11,000 hectares of land, and to improve supply security for Gisborne District Council's potable water requirements. This Scheme therefore has the scale and the potential to provide significant economic growth across the Tairāwhiti Region.

2.2 SCHEME LOCATION

The Pouarua Dam is to be located on the Pouarua Stream within the Tangihanga Station in Gisborne. Tangihanga Station is owned and managed by WPT and comprises a rural property located at 811 Lavenham Road, near Patutahi. The site is approximately 30 km inland from central Gisborne.

The land area surrounding the Pouarua Dam site is owned and managed by WPT and is currently utilised as a sheep and beef farm, with a portion of land utilised for forestry. The land is undulating and contains farm dwellings and buildings, including a woolshed.

The adjoining landowners to the south and south-west of the Pouarua Dam site, in the reservoir area are similarly rural in nature, comprising of sheep and/or beef farms on rolling hill country, with gullies.

The Waipaoa River lies approximately 3km away from the Pouarua Dam site to the east, beyond which lies State Highway 2. Around the Waipaoa River on the flats is the rural settlement of Ormond and expanses of horticultural land. Lake Repongaere is located approximately 1.8km to the south of the site.

A location plan of the Scheme components in and around Tangihanga Station are shown in **Attachment 2** of the Referral Application Form.

The indicative water distribution pipeline network will follow local road corridors and state highway corridors (SH2 and SH35) as demonstrated in **Attachment 6 of the Referral Application form**, covering an area of approximately 11,000 hectares of the Poverty Bay flats.



2.3 TAIRAWHITI RESOURCE MANAGEMENT PLAN

The Project is entirely located within Gisborne District Council (“GDC”) jurisdiction as a unitary authority.

The Tairawhiti Resource Management Plan (“TRMP”) is the combined unitary plan under section 80 of the RMA. The TRMP integrates provisions that would typically be found in separate regional policy statements, regional plans (including regional coastal plans), and district plans, into one document.

2.3.1 TRMP Review Process

The TRMP (and associated catchment plans) have been under review since 2021. Of relevance to this Scheme are the Phase 1 revisions to the TRMP which include a review of the Regional Policy Statement provisions and the continued implementation of regional freshwater planning provisions and catchment plans required under the National Policy Statement for Freshwater Management 2020 (“NPS-FM”).

The Waipaoa Advisory Group has been working on the Waipaoa Catchment Plan and drafting provisions were underway. These changes include alterations to minimum flows in the Waipaoa River. The review of the TRMP including the Waipaoa Catchment Plan was due for public notification by the end of 2026.

The Government has recently announced a temporary halt to RMA plan changes and reviews, preventing councils from notifying these plan changes. These changes are part of a broader transition to a new resource management system expected to be in place from 2027.

GDC can’t notify any of the plan changes under the TRMP review unless they are granted an exemption from the Minister.

Given the new science available, it is almost certain that the minimum flow will alter when the new water allocation plan is finally progressed.

2.4 ZONING AND OVERLAYS

2.4.1 Tairawhiti Resource Management Plan Zoning

Under the Tairawhiti Resource Management Plan (“TRMP”) the water storage components of the Scheme (including the dam wall, reservoir, rising main, ponds and associated works) are located within the Rural General Zone (the water storage components lie within the red boundaries on **Figure 1**).

The high flow intake infrastructure will be located within the bed of the Waipaoa River at one of two potential locations.



The pipelines that distribute water will extend across parts of the Poverty Bay flats as shown in purple lines within **Figure 1**. All water distribution lines will be located within sections of local Road Reserve Zone 1 and designated State Highway SH2 and SH35 corridors. It is noted that there is an alternative option to use parts of the Waipaoa River for this conveyance.

The indicative command area for irrigation will service the Rural General, Rural Production, Rural Residential, Rural Lifestyle, Rural Industrial A, Rural Industrial B Zones and extends to the outskirts of the General Residential Zone.

1 Any land designated for roading purposes, (including service lanes); or any land owned by a roading authority that is vested as road.



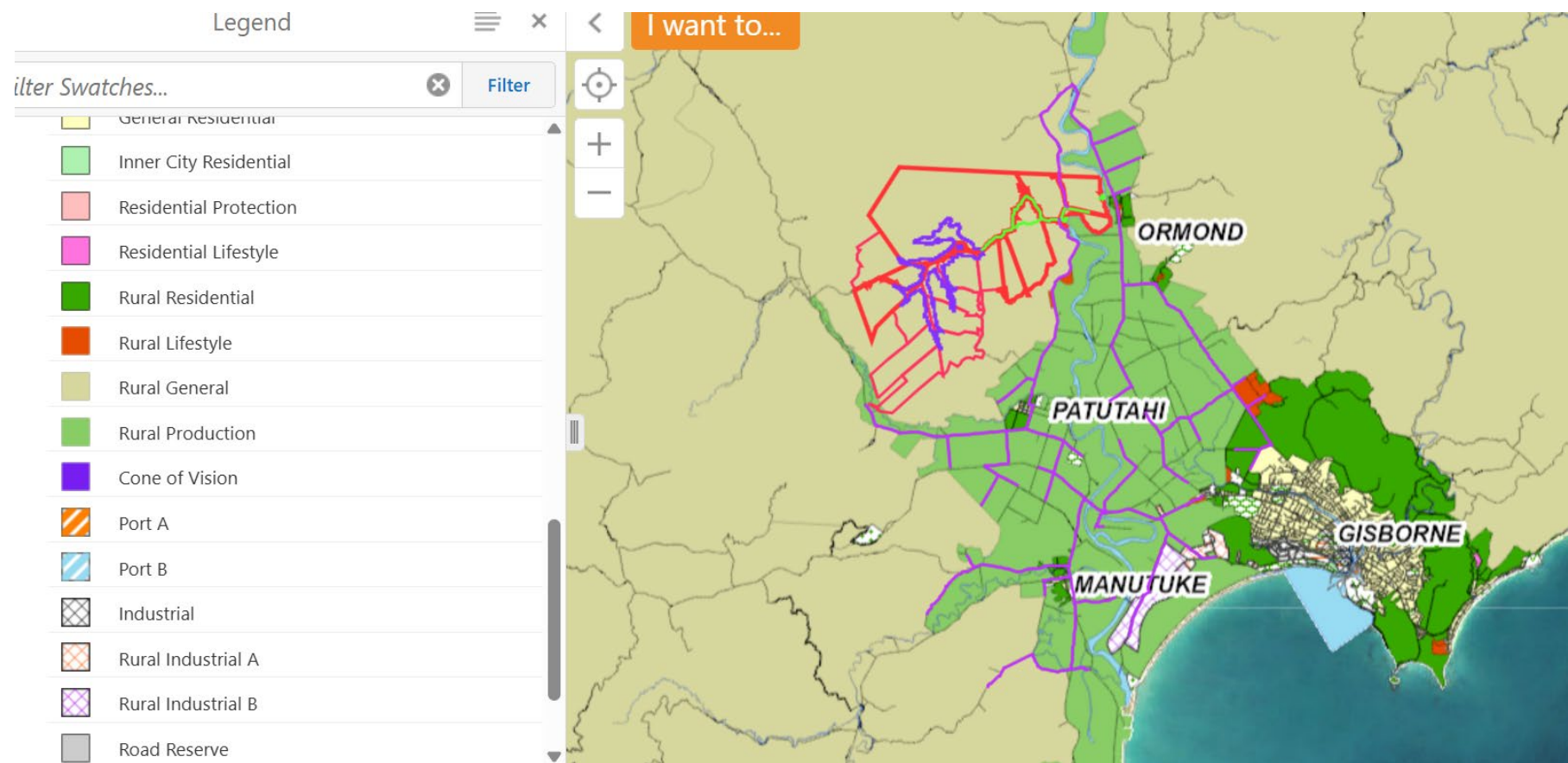


Figure 1: Zoning Map with Scheme Overlay

2.4.2 Tairāwhiti Resource Management Plan Overlays

There are a number of TRMP overlays in and around Tangihanga Station that are relevant for the consideration of this Project. These are noted below:

- > The Pouarua Dam site would fall within Land Overlay 2. Land Overlays 2 (shown in blue), 3 (shown in dark orange) and 3A (shown in light orange) in **Figure 2** are areas susceptible to soil erosion;
- > To the east of the site is the Lower Waipaoa River which is a scheduled river under the TRMP (Schedule G15B) as illustrated in **Figure 4**. Schedule G15B contains the additional key habitats for Long Finned Eel – a nationally threatened native species which the Gisborne region is recognised as providing a national stronghold for populations;
- > Within the footprint of the Project, there are no known Waahi Tapu sites or known archaeological sites identified on the TRMP planning map overlays. It is noted that the Heritage Alert Layer overlay is present at the east of the site as illustrated in **Figure 5**;
- > The eastern side of the site is subject to flood hazard overlays. Part of the WPT land is shown as a High Hazard Area (F2) and part of the site is shown as Area Liable to Flooding (F4), as illustrated in **Figure 6**;
- > Parts of the site have aquifers present. The shallow Waipaoa Gravel Aquifer and the deep Makauri Gravel Aquifer are present, with Potential Groundwater areas shown in grey on **Figure 10**; and
- > Parts of the site have low to moderate liquefaction and some active faults are also present. These are illustrated in **Figure 11**.

While not considered to be directly affected by the Project, the technical assessments are cognisant of the following overlays and features in the surrounding environment as shown on **Figure 3 and 4**:

- > Approximately 1.8km to the south of the Pouarua Dam Site is Lake Repongaere (which includes the Littoral Wetland) identified as Schedule G18 under the TRMP as an Outstanding Waterbody. This is the largest natural lake in the region with a range of ecological and cultural values. Part of this area is also covered by the Protection Management Areas (“PMAs”) overlay. Lake Repongaere is also identified as Schedule G15C under the TRMP which recognises this site as having Habitats of Threatened Indigenous Flora and Fauna for Bittern and the New Zealand Dabchick; and
- > To the east of Lake Repongaere is a site Dod Pond identified as Schedule G15C under the TRMP which recognises this site as having Habitats of Threatened Indigenous Flora and Fauna of Bittern, the New Zealand Dabchick and the New Zealand Shoveler.



There are also a number of TRMP overlays in and around the indicative water distribution network of pipelines that are relevant for the consideration of this Project. These are noted below:

- > The majority of the indicative pipeline distribution network falls within the Heritage Alert Overlay of the TRMP as illustrated in **Figure 5**. The network (while proposed within road reserve/highway designation) is in close proximity to some heritage sites and in some cases within the buffer of known Wahi Tapu sites identified in the TRMP overlays (refer to the Archaeological Assessment in Attachment 7 of the Referral Application Form);
- > Parts of the indicative pipeline distribution network will be located within Flood Hazard areas, including High Hazard Area (F2) as illustrated in **Figure 6**;
- > A small section of the indicative pipeline distribution network is within the Coastal Hazard Overlay as illustrated in **Figure 7**;
- > A small section of the indicative pipeline distribution network is within the Coastal Environment - General Management Area as illustrated in **Figure 8**.

There are no identified contaminated sites in the TRMP affected by this Project as illustrated in **Figure 9**.

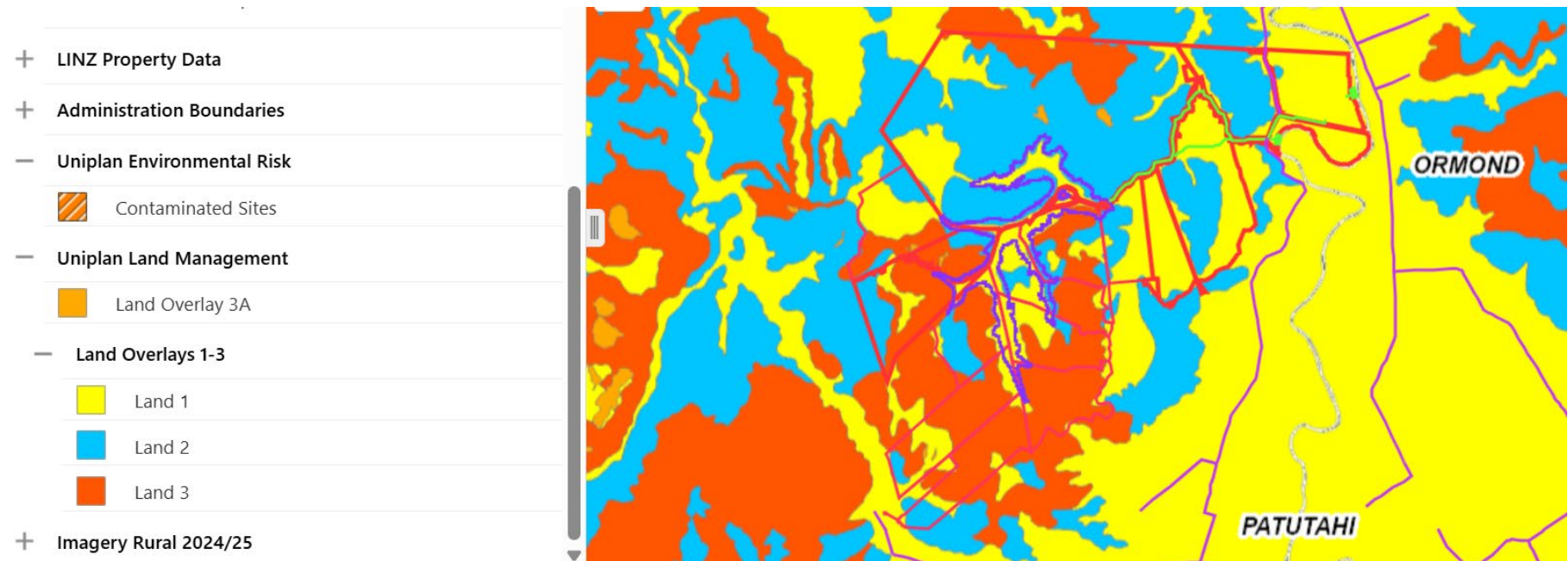


Figure 2: Land Management Overlays 1-3

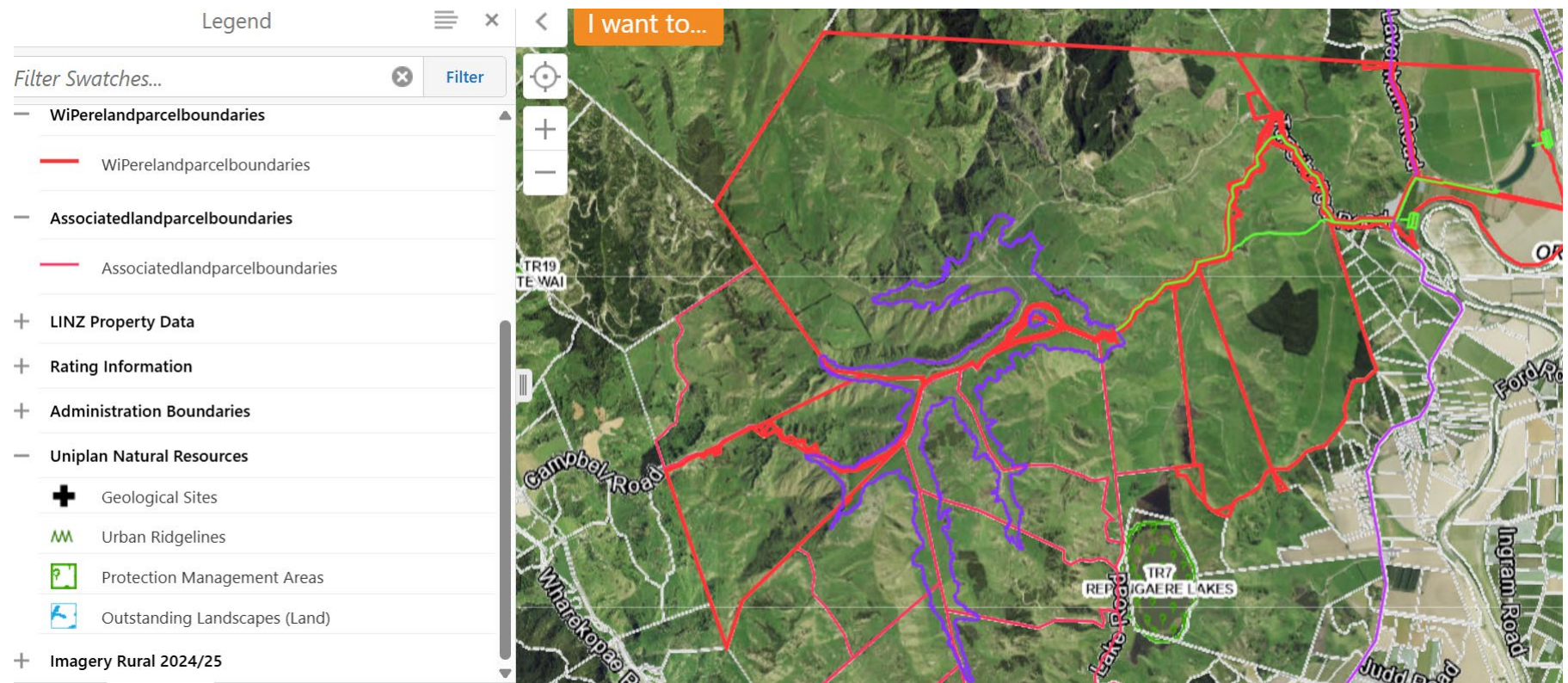


Figure 3: Protection Management Area (Repongaere Lakes -TR7) to the south and east of the reservoir

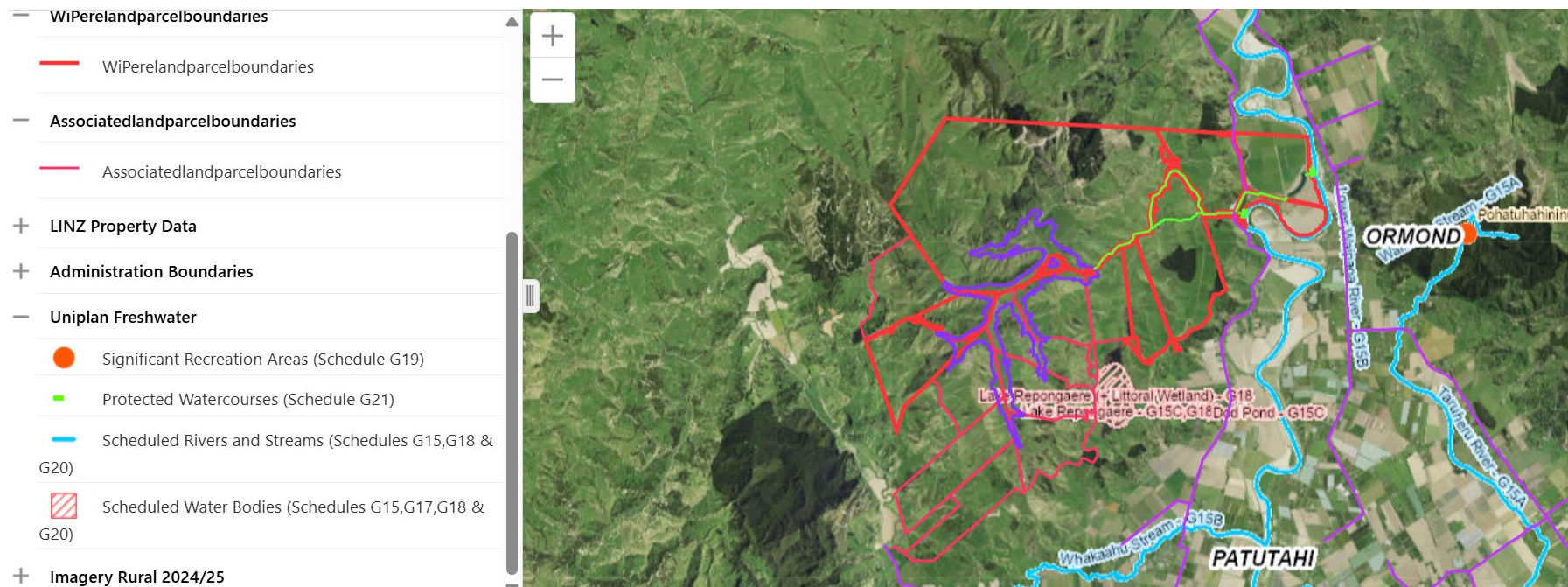


Figure 4 Scheduled Rivers and Waterbodies



Figure 5: Heritage Alert Overlays

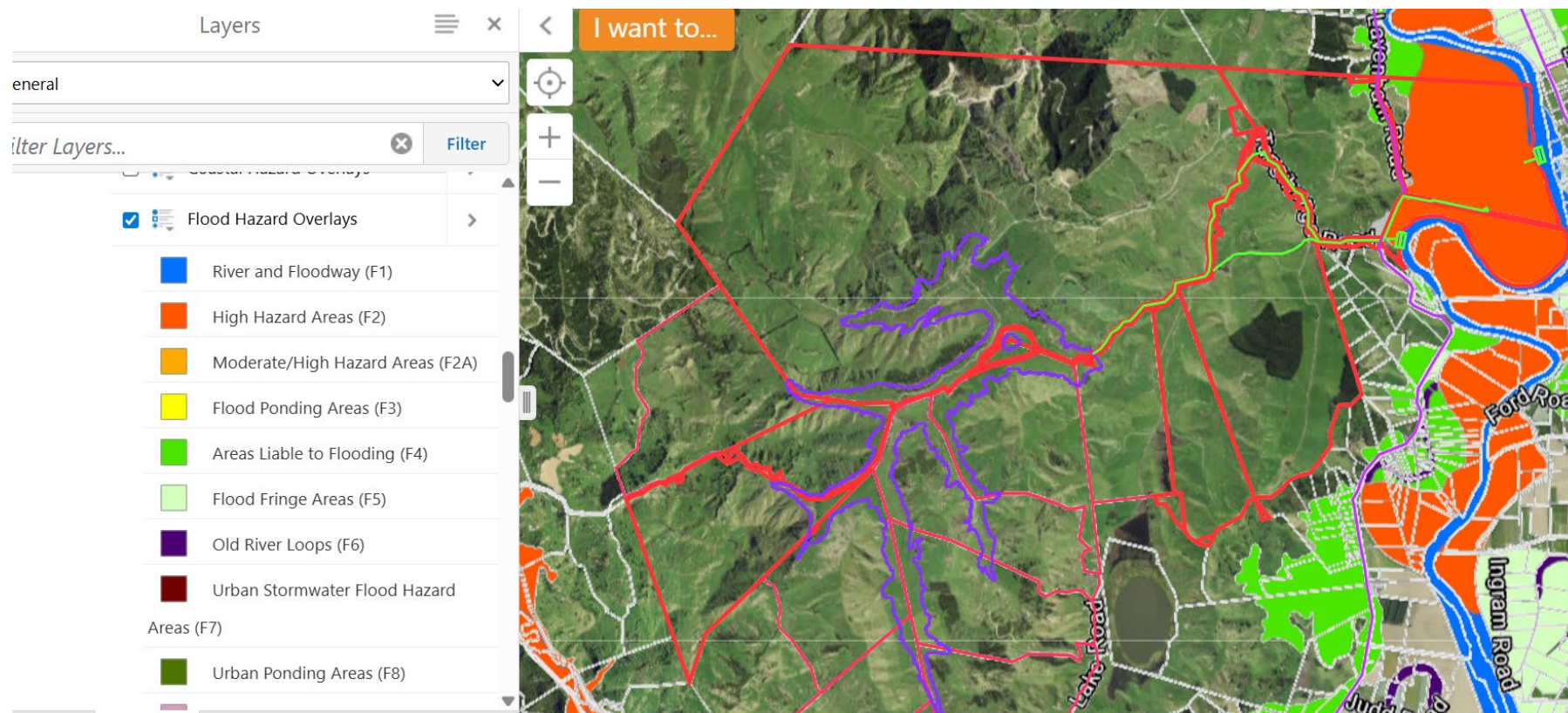


Figure 6: Flood Hazard Overlays

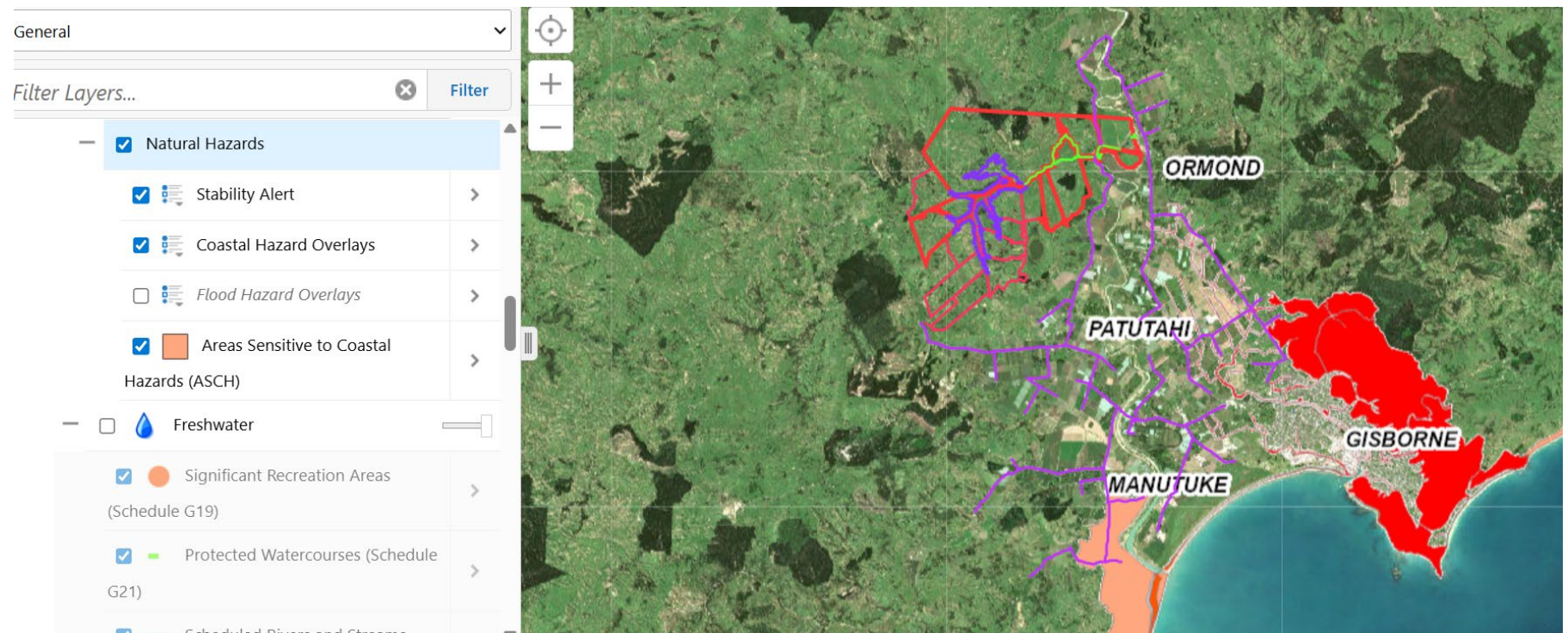


Figure 7: Stability Alert and Coastal Hazards

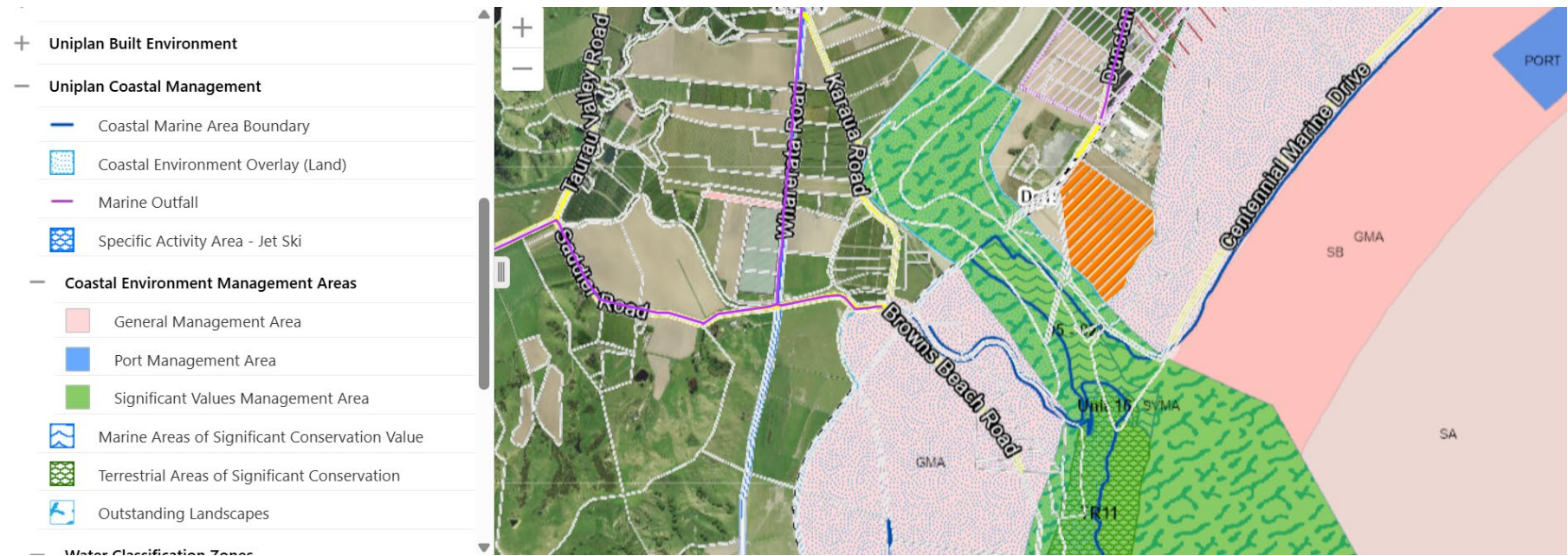


Figure 8: Coastal Environment General Management Area

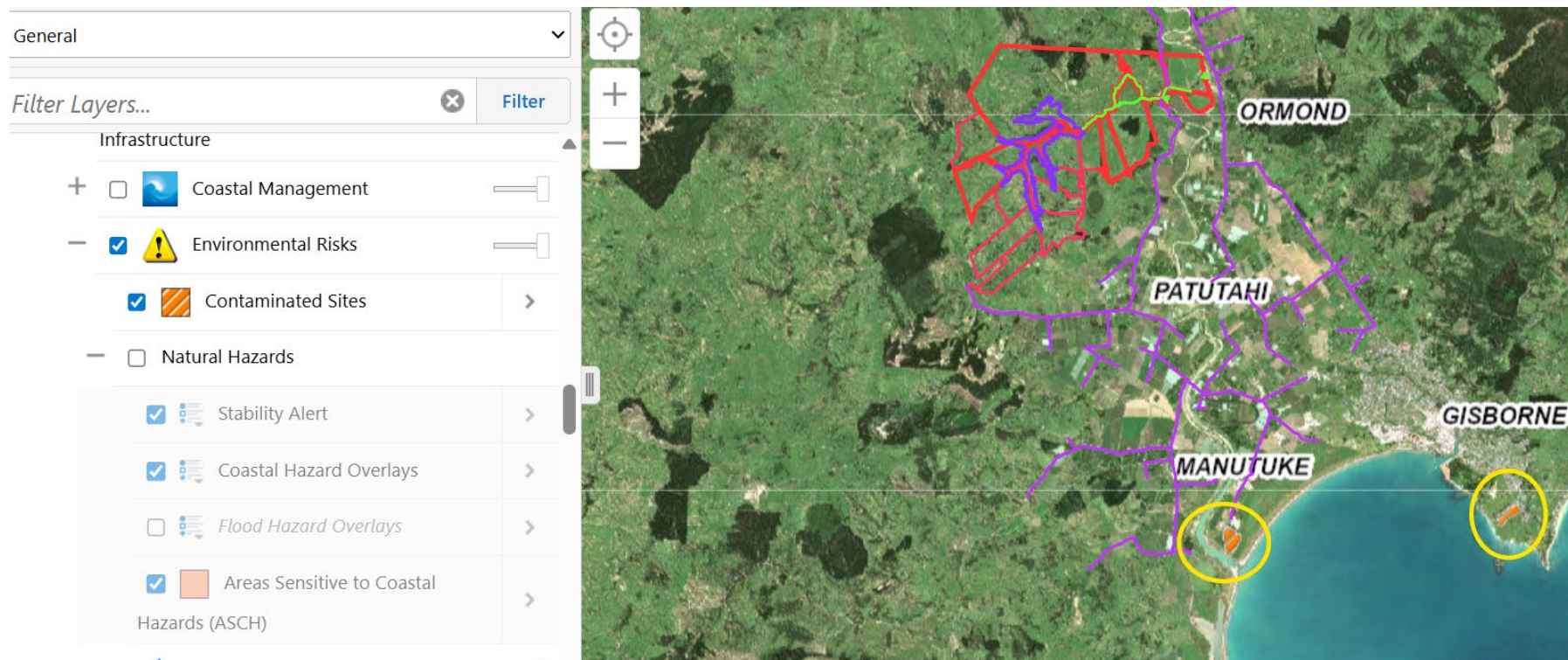


Figure 9: Contaminated Sites (shown in orange within the circled yellow areas)

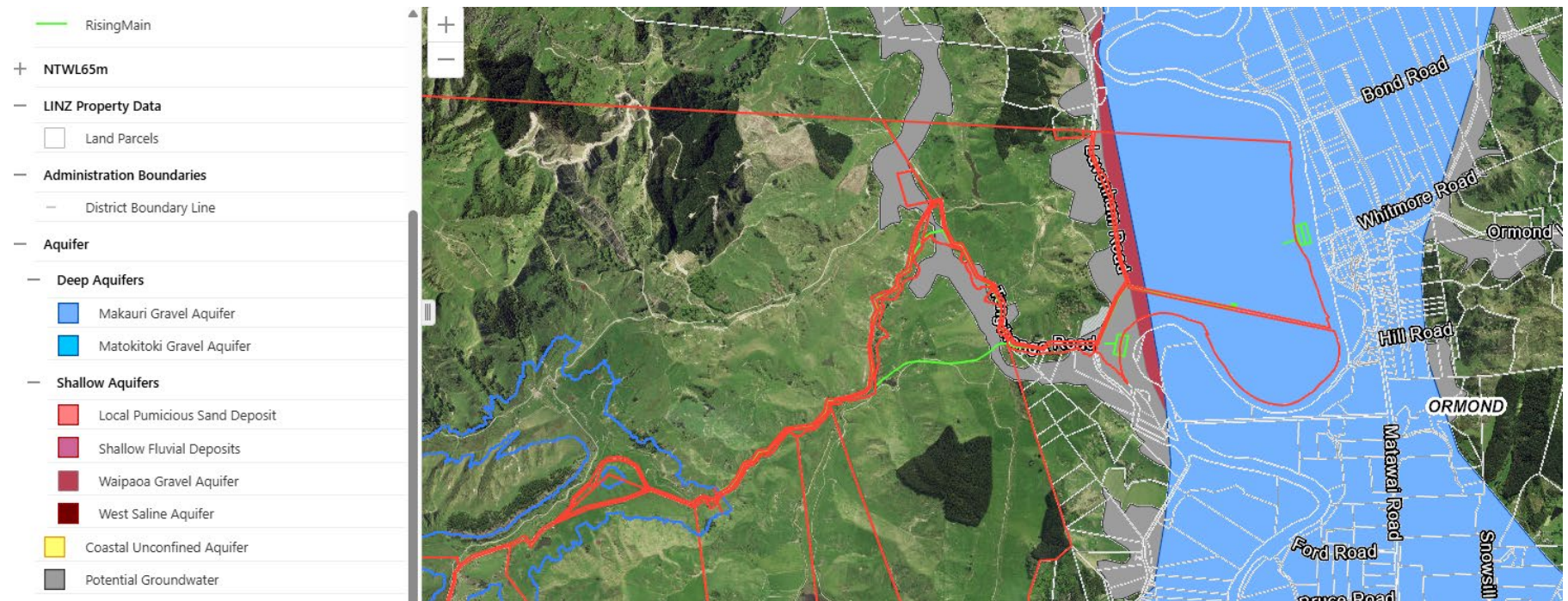


Figure 10: Aquifers

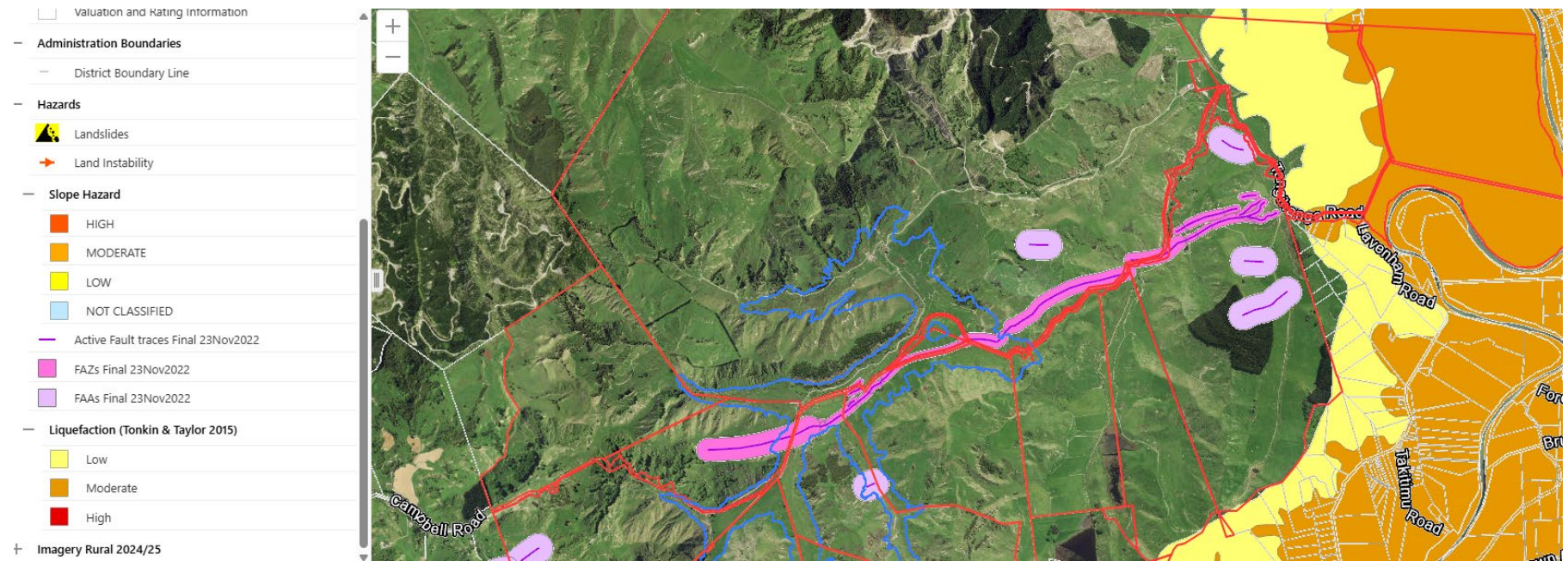


Figure 11: Active Fault Traces and Liquefaction

3. STATUTORY ACKNOWLEDGMENTS

A Statutory Acknowledgement is a formal recognition by the Crown of the mana of tangata whenua over a specified area or resource. It recognises the particular cultural, spiritual, historical and traditional association of an iwi with the site. Statements of statutory acknowledgements are set out in Treaty of Waitangi settlement legislation.

The land where the reservoir, dam and associated infrastructure and works (including the network distribution) will be located are in “areas of interest” but are not located within identified statutory acknowledgement areas.

However, the following notable statutory acknowledgements located downstream in the lower Waipaoa River.

- > Rongowhakaata Statutory Acknowledgement:
 - > Waipaoa River (including Karaua Stream) within Rongowhakaata area of interest OTS-005-036 (**Figure 12**).
- > Ngai Tamanuhiri Statutory Acknowledgement:
 - > Part Waipaoa River (including Karaua Stream) OTS-005-006 (**Figure 13**).
 - > Ngai Tāmanuhiri Coastal Marine Area OTS-005-005 (**Figure 14**).



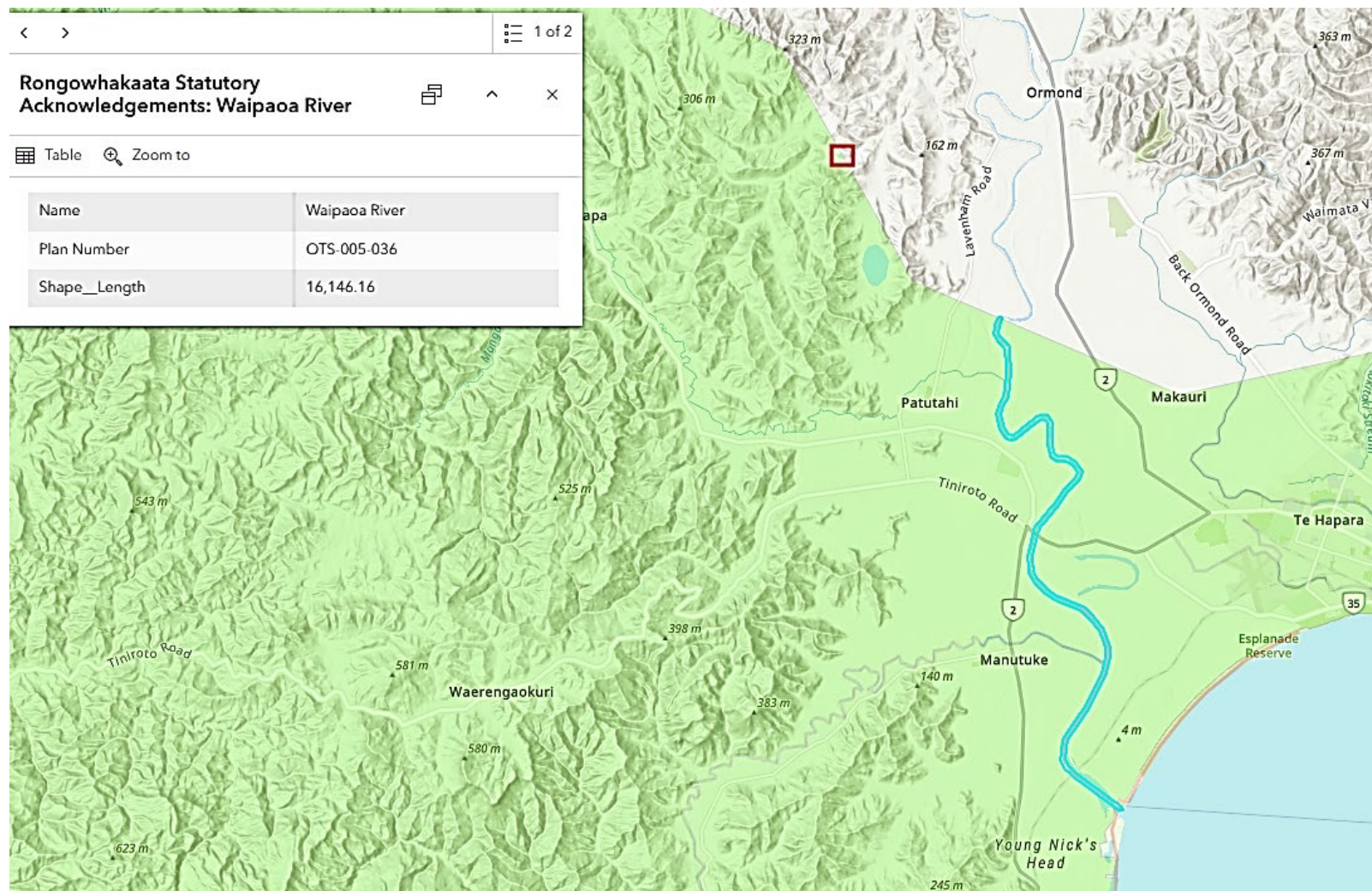


Figure 12: General location of Pouarua Dam Wall (red box) and Rongowhakaata Area of Interest (green) and Statutory Acknowledgement Area on the lower Waipaoa River (blue)



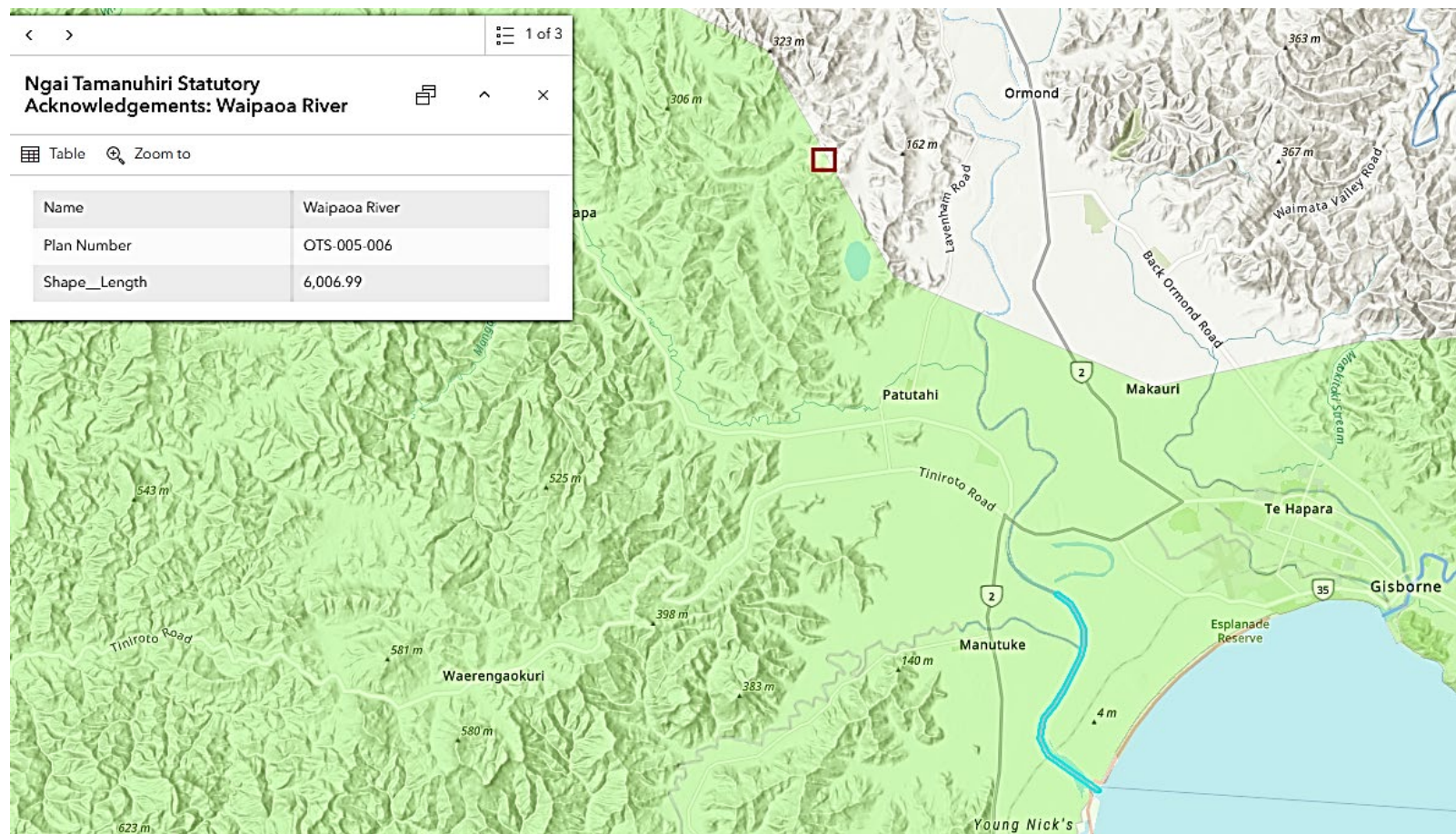


Figure 13: General location of Pouarua Dam Wall (red box) and Ngai Tamanuhiri Statutory Acknowledgement on the lower Waipaoa River (blue)

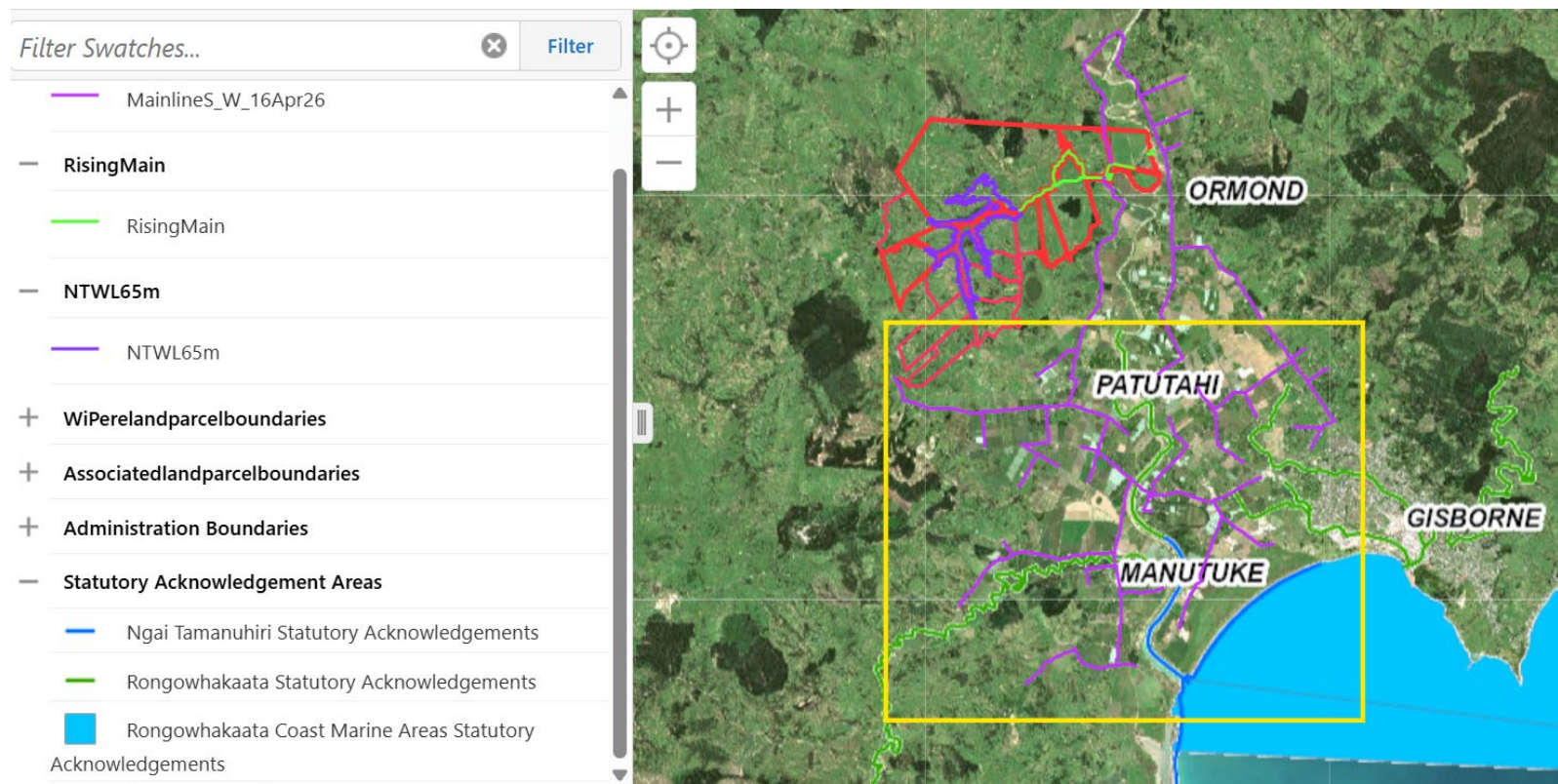


Figure 14: Statutory Acknowledgements (within yellow square) in relation to the water distribution network (purple lines)

4. NATIONAL PLANNING FRAMEWORK

This section of the memo sets out the required information to answer section 3.9.1 of the Fast Track Referral Application Form, which states:

“Resource consents

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

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

Table 1: Assessment of the PWSS against the relevant National Planning Framework of the RMA

Potentially Relevant National Policy Statement/Environmental Standards	Consistent?	High level assessment of how consistency is achieved <i>NB: A more detailed assessment of each relevant document would be prepared and submitted as part of any substantive application.</i>
National Policy Statement for Infrastructure 2025 (“NPS-I”)	Yes	The NPS-I came into effect on 15 January 2025. The objective of the NPS-I is to: a) ensure the national, regional and local benefits of infrastructure are provided for; b) enable infrastructure to support the social, economic and cultural wellbeing of people and communities and their health and safety; c) enable infrastructure to support the development and change of urban and rural environments to meet the diverse and changing needs of present and future generations; d) ensure infrastructure is well-functioning, resilient and compatible, as far as practicable, with other activities; and



Potentially Relevant National Policy Statement/Environmental Standards	Consistent?	High level assessment of how consistency is achieved <i>NB: A more detailed assessment of each relevant document would be prepared and submitted as part of any substantive application.</i>
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- e) ensure infrastructure is delivered in a timely and efficient manner while managing adverse effects from or on infrastructure.

Water supply distribution systems, including a system for irrigation, is defined as infrastructure under Section 2 of the RMA.

The Project is considered to achieve strong consistency with the objective of the NPS-I by supporting the social, economic, and cultural wellbeing of people across both the rural and urban areas of Tairāwhiti in a manner that future-proofs the supply of water for a growing community and actively responds to the impacts of a changing climate.

The key policies of the NPS-I that are relevant to the Project seek that:

- > The benefits of infrastructure are provided for (Policy 1);
- > The operational need or functional need of infrastructure to be in or traverse particular locations and environments is recognised (Policy 2);
- > The efficient and timely operation and delivery of infrastructure activities is enabled (Policy 4);
- > The importance of infrastructure supporting activities are recognised and provided for (Policy 5);
- > Māori interests are recognised and provided for (Policy 6);
- > The effects of proposed new or upgraded infrastructure are assessed and managed (Policies 7 & 9); and
- > The interface and compatibility of infrastructure with other activities is assessed and managed (Policies 10 & 11).



Potentially Relevant National Policy Statement/Environmental Standards	Consistent?	High level assessment of how consistency is achieved <i>NB: A more detailed assessment of each relevant document would be prepared and submitted as part of any substantive application.</i>
		The Applicant has engaged a range of experts to assess the benefits and effects of the Project and their assessment reports are provided in Attachment 7.
National Policy Statement for Natural Hazards 2025 (“NPS-NH”).	N/A	The NPS-NH came into effect on 15 January 2025 and applies to all activities managed under the RMA, except for infrastructure (as defined in the Act) and primary production (as defined in the National Planning Standards). As the Project is defined as infrastructure under Section 2 of the RMA, the NPS-NH does not apply in this instance.
National Policy Statement for Freshwater Management 2020 amended 2025 (“NPS-FM”)	Yes	The NPS-FM came into force on 3 September 2020 and provides direction to local authorities and resource users regarding activities that affect the health of freshwater and sets out a national objective and various supporting policies for freshwater management under the RMA. The NPS-FM has been amended several times, most recently in December 2025. The clause 2.1 objective of this National Policy Statement is to ensure that natural and physical resources are managed in a way that prioritises: <i>(a) first, the health and well-being of water bodies and freshwater ecosystems</i> <i>(b) second, the health needs of people (such as drinking water)</i> <i>(c) third, the ability of people and communities to provide for their social, economic, and cultural well-being, now and in the future.</i> It is noted however that section 104(2F) of the RMA states that “[w]hen considering an application and any submissions received, a consent authority must not have regard to clause 1.3(5) or 2.1 of the NPSFM 2020 (which relates to the hierarchy of obligations in the NPSFM 2020)”.



Potentially Relevant National Policy Statement/Environmental Standards	Consistent?	High level assessment of how consistency is achieved <i>NB: A more detailed assessment of each relevant document would be prepared and submitted as part of any substantive application.</i>
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The policies in the NPS-FM applicable to the PWSS are considered to be:

- > *Policy 1: Freshwater is managed in a way that gives effect to Te Mana o te Wai.*

Te Mana o te Wai is a concept that refers to the fundamental importance of water and recognises that protecting the health of freshwater protects the health and well-being of the wider environment. The applicant is mana whenua and has undertaken early engagement with iwi, which will be ongoing. Detailed freshwater ecological assessments and management measures will be applied through the substantive application to ensure alignment with this policy.

- > *Policy 2: Tāngata whenua are actively involved in freshwater management (including decision making processes), and Māori freshwater values are identified and provided for.*

Policy 2 is primarily for regional councils to implement. However early and ongoing engagement with mana whenua will achieve alignment with this policy.

- > *Policy 3: Freshwater is managed in an integrated way that considers the effects of the use and development of land on a whole-of-catchment basis, including the effects on receiving environments.*

The Scheme provides for an integrated assessment of the activities with the potential to affect freshwater and consideration of how potential management measures relate to the wider environment.

- > *Policy 4: Freshwater is managed as part of New Zealand's integrated response to climate change.*

The Scheme is a unique opportunity to manage New Zealand's integrated response to climate change by providing water security in times of drought.

- > *Policy 5: Freshwater is managed through a National Objectives Framework to ensure that the health and well-being of degraded water bodies and freshwater ecosystems is improved, and the health and well-*



Potentially Relevant National Policy Statement/Environmental Standards	Consistent?	High level assessment of how consistency is achieved
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NB: A more detailed assessment of each relevant document would be prepared and submitted as part of any substantive application.

being of all other water bodies and freshwater ecosystems is maintained and (if communities choose) improved.

While it is for the GDC to establish an objectives framework for waterbodies in the Gisborne Region, the Scheme will ensure that the condition framework for the management of freshwater during the construction and operation of the Project addresses the potential for adverse effects in these waterbodies – and maintains their overall health and wellbeing. This could include measures to avoid direct discharges of construction stormwater to water and the implementation of appropriate erosion and sediment controls.

- > *Policy 6: There is no further loss of extent of natural inland wetlands, their values are protected, and their restoration is promoted.*

The loss of extent of natural inland wetlands will be managed in accordance with the policy direction regarding the effects management hierarchy set out in section 3.22 of the NPS-FM.

- > *Policy 7: The loss of river extent and values is avoided to the extent practicable.*

It is not practicable to avoid all loss of river extent as this Scheme involves placing a dam wall in the Pouarua Stream and establishing a reservoir. Specific management of effects will be in place, including best practice construction methodologies. The permanent loss of stream length will be managed in accordance with the policy direction regarding the effects management hierarchy set out in section 3.24 of the NPS-FM.

- > *Policy 9: The habitats of indigenous freshwater species are protected.*

Preliminary ecological assessments consider that effects on freshwater ecology can be appropriately managed. A fulsome ecological assessment of indigenous freshwater species as part of the substantive



Potentially Relevant National Policy Statement/Environmental Standards	Consistent?	High level assessment of how consistency is achieved <i>NB: A more detailed assessment of each relevant document would be prepared and submitted as part of any substantive application.</i>
		application will ensure that appropriate mitigation and management of specific effects are in place to protect the habitats of indigenous freshwater species. > <i>Policy 11: Freshwater is allocated and used efficiently, all existing over-allocation is phased out, and future over-allocation is avoided.</i> The Scheme will help to resolve water demand and allocation pressures currently experienced by irrigators on the Poverty Bay flats. > <i>Policy 15: Communities are enabled to provide for their social, economic, and cultural well-being in a way that is consistent with this National Policy Statement.</i> The utilisation of freshwater as part of the Scheme is critical to delivering the social and economic wellbeing the project will provide to the wider community. This will occur in a manner that seeks to protect and enhance the key values of wetlands and waterbodies. Summary of Consistency with the NPS-FM Overall, preliminary investigations indicate that the construction and operation of the PWSS can achieve consistency with the relevant policy directives of the NPS-FM.
National Policy Statement on Urban Development 2020 (“NPS-UD”)	Yes	The National Policy Statement on Urban Development 2020 (“NPS-UD”) recognises the national significance of: > Having well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural well-being, and for their health and safety, now and into the future;

Potentially Relevant National Policy Statement/Environmental Standards	Consistent?	High level assessment of how consistency is achieved <i>NB: A more detailed assessment of each relevant document would be prepared and submitted as part of any substantive application.</i>
		> Providing sufficient development capacity to meet the different needs of people and communities; and > Ensure urban environments support reductions in greenhouse gas emissions and are resilient to the current and future effects of climate change. A water storage project of this nature would play a key role in supporting and enhancing the resilience of water supply to industry and urban environments located in the Gisborne region, in the face of climate change associated droughts. This enables people and communities to provide for their social, economic, and cultural well-being, and to improve their health, safety and overall well-being. While it is not an urban development in an urban environment, the wider benefits of the Project would be in alignment and in support of the NPS-UD.
National Policy Statement for Indigenous Biodiversity 2023 updated 2025 (“NPS-IB”)	Yes	The NPS-IB contains a single objective which is: a. <i>to maintain indigenous biodiversity across Aotearoa New Zealand so that there is at least no overall loss in indigenous biodiversity after the commencement date; and</i> b. <i>to achieve this:</i> i. <i>through recognising the mana of tangata whenua as kaitiaki of indigenous biodiversity; and</i> ii. <i>by recognising people and communities, including landowners, as stewards of indigenous biodiversity; and</i> iii. <i>by protecting and restoring indigenous biodiversity as necessary to achieve the overall maintenance of indigenous biodiversity; and</i>



Potentially Relevant National Policy Statement/Environmental Standards	Consistent?	High level assessment of how consistency is achieved
		<i>NB: A more detailed assessment of each relevant document would be prepared and submitted as part of any substantive application.</i>

- iv. while providing for the social, economic, and cultural wellbeing of people and communities now and in the future.

The relevant policies are:

- > *Policy 1: Indigenous biodiversity is managed in a way that gives effect to the decision-making principles and takes into account the principles of the Treaty of Waitangi.*
- > *Policy 2: Tangata whenua exercise kaitiakitanga for indigenous biodiversity in their rohe, including through: (a) managing indigenous biodiversity on their land; and (b) identifying and protecting indigenous species, populations and ecosystems that are taonga; and (c) actively participating in other decision-making about indigenous biodiversity.*
- > *Policy 3: A precautionary approach is adopted when considering adverse effects on indigenous biodiversity.*
- > *Policy 8: The importance of maintaining indigenous biodiversity outside SNAs is recognised and provided for.*
- > *Policy 10: Activities that contribute to New Zealand's social, economic, cultural, and environmental wellbeing are recognised and provided for as set out in this National Policy Statement.*
- > *Policy 13: Restoration of indigenous biodiversity is promoted and provided for.*
- > *Policy 14: Increased indigenous vegetation cover is promoted in both urban and nonurban environments.*

The NPS-IB applies to terrestrial ecology. There are no Significant Natural Areas identified within the footprint of the Project. The preliminary ecological assessment states that the main adverse effect of the Project on



Potentially Relevant National Policy Statement/Environmental Standards	Consistent?	High level assessment of how consistency is achieved <i>NB: A more detailed assessment of each relevant document would be prepared and submitted as part of any substantive application.</i>
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vegetation would be a loss of currently low botanical values due to reservoir inundation. A positive effect would include the planting of reservoir edges.

The Project will have potential adverse effects on terrestrial habitats, including habitat for bats, birds and lizards. As detailed in the preliminary ecology assessment in Attachment 7, potential adverse effects on terrestrial ecology can be appropriately managed and a Wildlife Authority will be sought.

For the reasons provided above, the Project can align with Policy 3, 8, 13 and 14.

The trustees of WPT are mana whenua with a long track record of restoration projects. Current and ongoing engagement with Iwi and appropriate management as outlined above will ensure alignment is achieved with Policy 1 and 2.

There is strong alignment with Policy 10 in that the Project is considered regionally and nationally significant with a positive contribution to wellbeing.

Overall, the Project is considered consistent with the NPS-IB.

National Policy Statement for Highly Productive Land 2022 (“NPS-HPL”) (consolidated with December 2025 amendments).	Yes	The objective of the National Policy Statement for Highly Productive Land 2022 (“NPS-HPL”) states: “<i>Highly productive land is protected for use in land-based primary production, both now and for future generations</i>”. Policy 8 is particularly relevant to this project and states “<i>Highly productive land is protected from inappropriate use and development</i>”. There is LUC 1 in proximity to the Waipaoa River flats, where the rising main and high flow intake infrastructure will be located. There is also LUC 3 land where the dam wall is indicatively proposed and within the extent of the reservoir.
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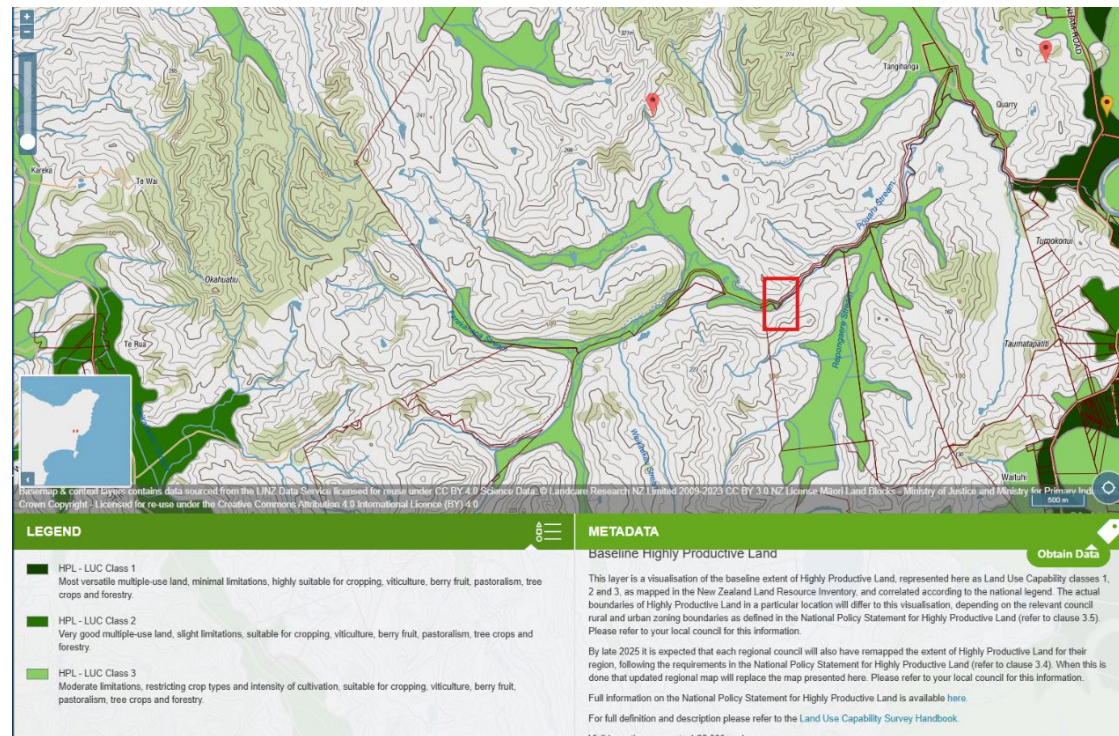


Figure 15: Highly Productive Land Mapped in the NZ Land Resource Inventory (approximate location of the dam wall in the red box)

As it stands, the PWSS would fall into the definition of ‘specified infrastructure’² as it is regionally or nationally significant. Infrastructure as defined in the RMA (which includes a “water supply distribution system, including a system for irrigation”) is considered to be nationally significant under the NPS-I. As there is a functional and operational need for the use and development of land for the Scheme, the Project would not be considered inappropriate under clause 3.9(2)(j)(i) of the NPS-HPL.

For this reason, the Scheme is not considered inconsistent with the relevant provisions of the NPS-HPL.



Potentially Relevant National Policy Statement/Environmental Standards	Consistent?	High level assessment of how consistency is achieved <i>NB: A more detailed assessment of each relevant document would be prepared and submitted as part of any substantive application.</i>
National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health 2011 (“NES-CS”)	Yes	The NES-CS requires landowners to identify, assess, and if necessary, remediate or contain soil contaminants to ensure land is safe for human use before it is redeveloped or changed. The proposed site (including the distribution network) has not been identified as containing any known “hazardous activities and industries”. The land at Tangihanga station has been a working farm for many years. A woolshed is present, where a sheep dip may have been historically located. Sheep dips are listed on the Hazardous Activities or Industries List (“HAIL”), making them a site of potential contamination. However, given the distance between the woolshed location and the Pouarua Dam site (and any earthworks that may be associated with this activity, including the construction of the rising main), contaminated soils are highly unlikely to be encountered. Historic aerial photos from Retrolens do not show the site hosting any other activities that are “more likely than not” to have been on the HAIL. The pipeline distribution network is proposed to be located only in local road reserve and State Highway corridors. Roads are considered potential HAIL sites (i.e. PAHs (polycyclic aromatic hydrocarbons) often found in coal tar-containing roading materials). On a conservative basis, it is assumed resource consent under the NES-CS (Regulation 9, 10 or 11) be required for soil disturbance in relation to the pipeline distribution.

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- 2 Specified infrastructure under the NPS-HPL includes infrastructure that is recognised as regionally or nationally significant in a National Policy Statement, New Zealand Coastal Policy Statement, regional policy statement or regional plan.



Potentially Relevant National Policy Statement/Environmental Standards	Consistent?	High level assessment of how consistency is achieved <i>NB: A more detailed assessment of each relevant document would be prepared and submitted as part of any substantive application.</i>
National Environmental Standard for Freshwater Management 2020 (“NES-F”)	Yes	The NES-F prescribes standards for activities that pose risks to freshwater and freshwater ecosystems. The Scheme is considered ‘specified infrastructure’ for the purposes of consideration under the NES-F. To understand how the regulations of the NES-F apply, a detailed ecological assessment is required, informed by field work during preparation of the substantive application. Natural inland wetlands are present across the Project site and works will be in proximity to them. Approval will be sought under Regulation 45 of the NES-F in this regard, as necessary. Information requirements relating to the dam under Regulation 66 will be addressed in the substantive application. The Project will provide national and/or regional benefits, and there is a functional and operational need for the Project to be in the proposed location. Any potential adverse effects are anticipated to be managed in accordance with the effects management hierarchy. The design of the scheme and a suite of appropriate conditions, management and monitoring plans will incorporate expert ecological recommendations in relation to the requirements of the NES-F. Where mitigation, offsetting or compensation is required, this will be provided. For these reasons, consistency can be achieved with the NES-F.
National Environmental Standards for Sources of Human Drinking Water 2007	Yes	The NES-DW sets requirements for protecting sources of human drinking water from becoming contaminated and unsafe for drinking. Regulations 7 and 8 of the NES-DW must be considered when assessing any water or discharge permit application that may affect a registered drinking water supply providing 501 or more people with drinking water for 60 or more calendar days each year.



Potentially Relevant National Policy Statement/Environmental Standards	Consistent?	High level assessment of how consistency is achieved
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NB: A more detailed assessment of each relevant document would be prepared and submitted as part of any substantive application.

The water services authority Taumata Arowai maintains a list of registered drinking water sources to assist with implementation of the NES-DW.

The closest registered drinking water supply (to over 501 people) to the Pouarua Dam Site are the Te Karaka Community Supplementary Supply (serving a population of approximately 550-700) and the Waipaoa Water Treatment Plant (serving a population of approximately 39,000) as identified in **Figure 16** below. Both supplies are treated before consumption by the public.



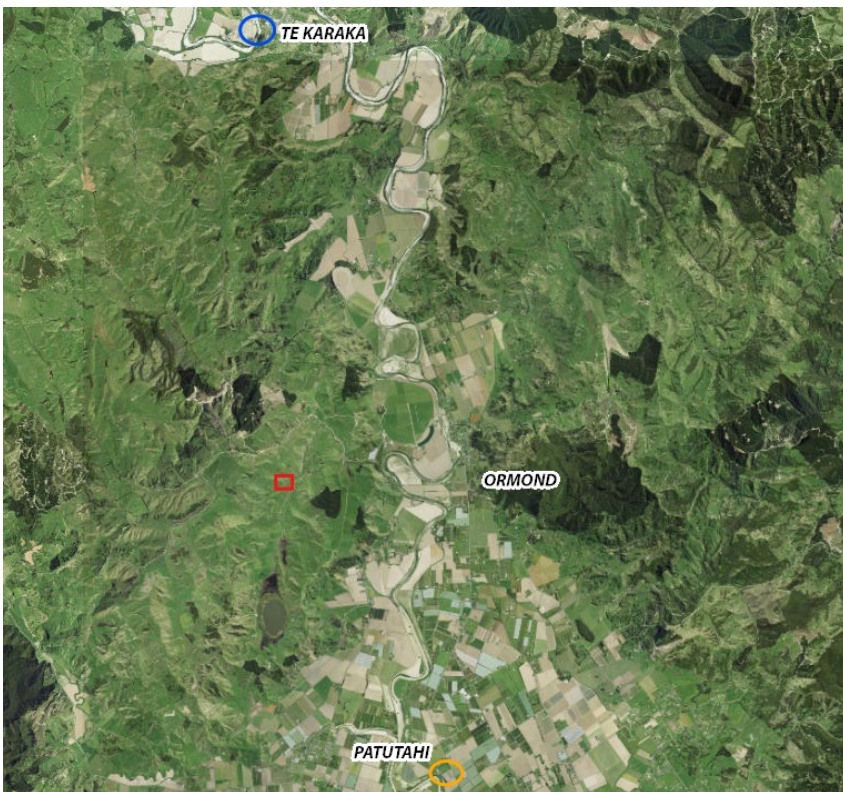


Figure 16: Map of approximate location of municipal water supply and community water supply at Te Karaka (blue circle) and Waipaoa Water Treatment Plant (orange circle), with Pouarua Dam site (red square).

In spring and summer when peak demand exceeds the available supply, water is sourced from the Waipaoa River (and treated at the Waipaoa Water Treatment Plant) to augment the municipal water supply.



Potentially Relevant National Policy Statement/Environmental Standards	Consistent?	High level assessment of how consistency is achieved <i>NB: A more detailed assessment of each relevant document would be prepared and submitted as part of any substantive application.</i>
		For Te Karaka, the source water is groundwater abstracted from the Waipaoa Gravel Aquifer through shallow bores adjacent to the Waipaoa River. The water is then treated at the Te Karaka Treatment Plant, before directly piped (under low pressure) into the rainwater tank on each property connected to the reticulation network. Regulation 7 of the NES-DW states: A regional council must not grant a water permit or discharge permit for an activity that will occur upstream of an abstraction point where the drinking water concerned meets the health quality criteria if the activity is likely to— a) introduce or increase the concentration of any determinands in the drinking water, so that, after existing treatment, it no longer meets the health quality criteria; or b) introduce or increase the concentration of any aesthetic determinands in the drinking water so that, after existing treatment, it contains aesthetic determinands at values exceeding the guideline values. The only community water supply downstream of the site (being the Waipaoa Water Treatment Plant) is treated to meet health quality criteria as required by Regulation 7(a). The Drinking Water Standards for New Zealand (“DWSNZ”) are prepared by the Ministry of Health and aim to protect public health. The standards set out requirements for safe drinking water and apply only to water that has been treated. Water treatment plants must comply with these standards. NES-DW is not anticipated to present an impediment to the granting approvals sought for the project.
Resource Management (Measurement and Reporting of Water Takes) Regulations 2010	Yes	These regulations were amended in 2020 to introduce stricter regular measuring and reporting requirements for holders of water permits. The stricter measures were introduced in a staged manner, with water takes of over 20 l/s subject to the requirements from 3 September 2022.



Potentially Relevant National Policy Statement/Environmental Standards	Consistent?	High level assessment of how consistency is achieved <i>NB: A more detailed assessment of each relevant document would be prepared and submitted as part of any substantive application.</i>
		With regard to the high flow water take proposed from the Waipaoa River, it is proposed that records of the volume of water taken each week be provided to GDC in accordance with these regulations (specifically regulation 6 to 9). With appropriate conditions in place, the project would remain consistent with the requirements of these relevant regulations.
New Zealand Coastal Policy Statement amended 2025	NA	The New Zealand Coastal Policy Statement (“NZCPS”) is a national policy statement under the RMA. The purpose of the NZCPS is to state policies in order to achieve the purpose of the RMA in relation to the coastal environment of New Zealand. The only component of the Project that has the potential to be located in a small portion of the identified coastal environment under the TRMP is the network distribution pipelines, which will be located entirely within local road reserve. The minor extent to which these pipelines will encroach into the coastal environment are considered highly unlikely to give rise to adverse effects on the coastal environment. Given pipelines will be trenched underground and within land that is already in use for roading purposes, the project is not considered inconsistent with any provisions of the NZCPS. It is further note that they would remain aligned with Policy 6(1)(a) which states: “<i>recognise that the provision of infrastructure...may be required for the social, economic and cultural well-being of people and communities</i>”.

5. REGIONAL AND LOCAL PLANNING FRAMEWORK

This section of the memo sets out the required information to answer Section 2.7.2.13 of the Fast Track Referral Application Form, which states:



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

Table 2: Consistency of the project with local or regional planning documents.

Regional and Local Planning Documents, including Iwi Management Plans	Consistency Achieved?	High level assessment of how consistency is achieved <i>NB: A more detailed assessment of each relevant document would be prepared and submitted as part of any substantive application.</i>
Regional Policy Statement within the TRMP	Yes, with appropriate environmental management.	The Regional Policy Statement (“RPS”) sits within the TRMP and provides high-level direction through policies and objectives setting the framework for the rest of the TRMP. The key objectives and policies of relevant RPS sections are discussed generally, noting that a thorough assessment of the full suite of these provisions would be undertaken at the time of a substantive application, when preliminary design details are known and final technical assessments are available. Relevant chapters of the RPS include: B1 Tangata Whenua The Objectives and Policies in this section require that the principles of the Treaty are exercised, regard is given to their role as Kaitiakitanga and their cultural relationship with the environment is recognised. It is recognised that freshwater has a cultural, historic and spiritual importance to iwi and hapū of the region. As outlined in the referral application form, the trustees of WPT are mana whenua and extensive consultation has commenced and will continue with iwi and hapu who may be interested or impacted by the proposal. To date, the feedback has been supportive and encouraging. Statutory Acknowledgements in the area, and alignment with iwi plans and documents of relevance have also been considered. It is recognised that there are direct cultural benefits for whenua Māori in the region that will result from this Project. However, acknowledgement of the importance of avoiding, remedying and mitigating any potential for adverse effect on cultural wellbeing as far as practicable is also necessary.



Through ongoing consultation and appropriate conditions, management and monitoring plans prepared, it is considered that consistency can be achieved with the provisions of B1.

B6 Freshwater

With appropriate mitigation measures in place through conditions, management and monitoring plans, the Project would not be contrary to the objectives within B6.2.1.

Allocation – Water Quantity

Objective B6.2.1 (5): *“Freshwater is available, within limits, to meet the present and future needs of communities to support the social, cultural and economic wellbeing of the region”.*

This Scheme would provide a much-needed water supply to support this objective and potentially ease the over-allocation of water that is present in Waipaoa A Block.

Water Quality

Objective B6.2.1 (1): *Land and freshwater is sustainably managed in a way that safeguards the life-supporting capacity of freshwater, including ecosystem processes and indigenous species, and the health of people and communities.*

Objective B6.2.1 (2) The quality of freshwater is maintained and is improved where it is degraded or does not meet the relevant objectives for the freshwater unit.

The Project will include detailed assessments provided by land nutrient specialists and terrestrial and freshwater ecologists (through the substantive application process) to guide appropriate mitigation that aligns with this objective. Preliminary assessments provided with this referral application outline that appropriate mitigation measures are possible to respond to the potential adverse effects.

Values and Amenity of Water Bodies

Objective B6.2.1 (3): *“Lakes, rivers, wetlands and their margins are managed in a way that: a) Preserves their natural character and protects them from inappropriate subdivision, use and development; and b) Maintains or enhances their amenity values”.*



Objective B6.2.1 (4): “Scheduled waterbodies and their margins, and the significant values of both outstanding waterbodies and wetlands, are protected or enhanced to provide for their values”.

There are no outstanding waterbodies and wetlands in the footprint of the Project, however waterbodies and wetlands will be managed through the effects management hierarchy and ecological mitigation provided as appropriate.

Collaboration and Mana Whenua Values

Objective B6.2.1 (10): “The mauri of waterbodies is recognised and provided for and action is taken to sustain and restore the mauri of degraded waters”. Freshwater has a cultural, historic and spiritual importance to iwi and hapū of the region. Consultation has commenced with Tangata Whenua to understand the importance of water.

The stewardship role of landowners, water users communities and mana whenua is recognised and provided for through a collaborative approach to freshwater planning, management and monitoring. Early and ongoing consultation with Tangata Whenua, GDC and key stakeholders demonstrates the collaborative approach to freshwater planning. In so doing, alignment with Objective B6.2.1 (12) which states “The stewardship role of landowners, water users communities and mana whenua is recognised and provided for through a collaborative approach to freshwater planning, management and monitoring.” is achieved.

B5 Environmental Risk Including Natural Hazards

The objectives and policies of B5 are relevant to this scheme, given the seismic context of this area. The dam will not be located within an avoidance zone around any active fault. Through dam design, the risk to infrastructure and other property from seismic hazards can be appropriately mitigated.

Landslips and erosion risk can be appropriately mitigated through avoidance of susceptible areas and ensuring erosion and sediment controls are in place.

Summary



For these reasons, with ongoing consultation and appropriate ecological and construction mitigation measures in place, the Project is unlikely to be inconsistent with any relevant objective or policy of the RPS and supports an additional water supply to ease allocation pressures into the future.

TRMP	Yes, with appropriate environmental management	The TRMP provides specific policies and objectives which give effect to the RPS. The key objectives and policies of these sections are discussed generally below, noting that a thorough assessment of these provisions would be undertaken through the substantive application, when preliminary design details are known and full technical assessments available. Relevant chapters of the TRMP to this Project include those set out below. C2.1 – Infrastructure, Works and Services Objective C2.1.3 (1) encourages infrastructure that enables people and communities to provide for and enhance their environmental, social, cultural and economic well-being. Objective C2.1.3(2) requires that adverse effects of infrastructure are avoided, remedied and mitigated. Objective C2.1.3(3) requires that infrastructure in an integrated and coordinated manner. The Project is considered consistent with these relevant Objectives in that water storage and supply would provide benefits, particularly to the economic wellbeing of the region. Technical specialists have provided preliminary assessments which confirm that actual and potential adverse effects could be either avoided, remedied, mitigated (or offset and compensated for) through appropriate conditions, monitoring and management plans. Stakeholder engagement has commenced to discuss integration of water supply with existing irrigation and the potential to supplement existing GDC potable water supplies. Policy C2.1.4(1) is to “provide for the ongoing operation, maintenance, replacement and upgrading of network utilities and for the future development and operational requirements of new network utilities”. Policy C2.1.4(4) is to “enable network utility activities in the road reserve that have minor adverse environmental effects”. The network distribution pipelines within existing local road reserve are anticipated to have minor adverse environmental effects. C3.14 - Coastal Environment Overlay
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Policy C3.14.2 is “To enable subdivision, use or development in the Coastal Environment which avoids adverse effects on natural heritage values as far as practicable”. Policy C3.14.2 (j) provides “Recognition that in order to achieve sustainable management given the technical and physical constraints which may be experienced by network utility operations including those associated with their scale, location, design and operation, a compromise of the natural and physical environment may occur”. The network distribution pipelines in the coastal environment overlay will remain consistent with this Policy.

C4.1 – Cultural and Historic Heritage

In relation to cultural heritage and archaeology protection as required by objectives and policies within C4.1, engagement with mana whenua and NZHPT has commenced to ensure all values are understood and considered.

The project footprint has been mapped over the known archaeological information for the area (refer to the initial archaeological assessment in Attachment 7). While there are no known or identified archaeological sites or waahi tapu within the site of the main Scheme components at Tangihanga, the proposed alignment of the rising main, main high flow river intake, pump station and alternative high flow river intake are within the TRMP Alert Layer Overlay 1.

The indicative location of the distribution network follows road corridors which are located within TRMP Alert Layer Overlay 1 and in places cross the buffer of archaeological and waahi tapu sites. Given that the network will be trenched, it is likely that subsurface archaeological remains could be exposed and potentially affected.

An archaeological field survey will be carried out as part of the substantive application and a General Archaeological Authority sought. Any effects of the project on archaeology can be mitigated in a variety of ways including construction methodologies and these will be clarified through the General Archaeological Authority sought.

With mitigation in place, consistency with all provisions of this section of the TRMP can be achieved.

C6.1 – Water Quantity and Allocation



In relation to water quantity and allocation, the Project would be considered consistent with Policy C6.1.1() which states:

“When considering any application, the consent authority must have regard to the following matters:

a) the extent to which the change would adversely affect safeguarding the life-supporting capacity of fresh water and of any associated ecosystem; and

b) the extent to which it is feasible and dependable that any adverse effect on the life-supporting capacity of fresh water and of any associated ecosystem resulting from the change would be avoided.”

A high flow take (for water harvesting/supplementation of the reservoir) is required as part of this Project. The purpose of high flow takes is to balance water use with the needs of instream ecosystems by only diverting water when flows are naturally high. High flow take limits are designed to preserve the natural variation in river flows, which is crucial for the health of the river's ecosystem. The high flow take will remain within the allocation allowances of the TRMP. Through water storage provided by the Project, the pressure on overallocated water supply within Waipaoa A Block will be eased.

The assessment criteria outlined in Policy C6.1.11(15) require the consideration of prevention of fish from entering the intake structure. This will be considered in the design of the intake to ensure consistency. It is considered there are no adverse effects associated with the proposed high flow take on any other authorised takes and uses on the Waipaoa River. Because the high flow take is anticipated by the planning framework, the environmental effects are considered in general alignment with all other assessment criteria.

C6.2 – Water Quality and Discharges to Land and Water

General Policy C6.2.1(1) states:

“When considering any application for a discharge the consent authority must have regard to the following matters:

a) The extent to which the discharge would avoid contamination that will have an adverse effect on the life-supporting capacity of fresh water including on any ecosystem associated with fresh water and



b) The extent to which it is feasible and dependable that any more than minor adverse effect on fresh water, and on any ecosystem associated with fresh water, resulting from the discharge would be avoided.”

High flow water discharges to Reservoir

The high flow water take from the Waipaoa River will be discharged into the reservoir. Given that this discharge relates to freshwater, there is not expected to be adverse effects on any ecosystem associated with the discharge.

Construction Discharges to Land and Water

During dam (and associated infrastructure) construction, potential discharges to water include diverted flows, accidental spills, and construction water, which may contain sediment and contaminants. To manage these effects on land and land where it may enter water, construction plans must include measures to prevent erosion and manage sediment.

It is considered that consistency will be achieved with the general water quality policies in C6.2 (including C6.2.2 in relation to downstream community water supply), through construction management practices.

C6.3 – Activities in the Beds of Rivers and Lakes

C6.3.1 policies relate to structures in the beds of rivers and lakes.

As part of this proposal, a dam wall and associated reservoir will be located in the bed of the Pouarua Stream. In addition, a high flow water intake structure will be required within the bed of the Waipaoa River. There is a functional need for the structures to be in these locations.

Sediment generation related to construction works within the beds of the river or stream will be minimised through best practice erosion and sediment control measures.

Fish salvage at the dam site is expected, with approvals under the Freshwater Fisheries Regulations 1983 to be sought in this regard. Fish passage will be maintained during the construction of the intake on the Waipaoa River.



Policy C6.3.4 for Vegetation Clearance and Disturbance have been considered and ecological management can provide consistency with these. There will be no vegetation clearance and disturbance of the beds of Outstanding Waterbodies as a result of this Project.

With effective construction and ecological management, the effects resulting from works and structures in the beds of river and stream can be avoided, remedied and mitigated and consistency with the policies within C6.3.1 and C6.3.4 can be achieved.

C6.4 – Riparian Margins, Wetlands

The policies set out in C6.4 relate to the protection of any significant values of wetlands and their margins, including the significant values of small wetlands, from the inappropriate effects of land and water use.

Any potential effects on identified wetlands and riparian margins (around the Pouarua Stream and Waipaoa River) in and around the scheme will be a key consideration by the project ecologist during the substantive application to ensure consistency with these policies and the requirements of the NES-F and NPS-FW.

From the preliminary ecological investigations, it is likely that appropriate ecological management will be achieved to mitigate any potential for adverse effects.

C6.5 – Watercourses

C6.5 states that no person shall, without the written consent of GDC, obstruct or damage any watercourse, or obstruct the flow of flood waters therein, or impede the maintenance of the watercourse or floodway. Approvals under the FTAA would be sought for the Project and as such, necessary approvals would be sought for the dam structure and high flow take structure.

C7.1 – Soil Conservation

Earthworks required to construct the dam would need to take into account the objectives and policies of C7.1. Erosion in areas covered by Land Overlays 2 and 3 (including 3A) is particularly sensitive to land use and the management of the adverse effects of land use activities. While some Land Overlay 2 and 3 will require earthworks for future dam construction, appropriate erosion control and land rehabilitation and



stabilisation methodologies will be employed where necessary to ensure consistency with the objectives and policies of C7.1.

C8.1 – Natural Hazards

The dam will not be located within an avoidance zone around any active fault. Through dam design requirements, the risk to infrastructure and other property from seismic hazards can be appropriately mitigated. Landslips and erosion risks are managed through avoidance of areas at risk and erosion and sediment controls.

For these reasons, the scheme is unlikely to be inconsistent with any relevant objective or policy of C8.1.

C11.2 Noise and Vibration

Consideration has been given to the provisions of C11.2 and in particular the following two objectives:

“C11.2.4 Objectives for Noise and Vibrations:

- 1. To enable noise and vibration at levels which do not have an adverse effect on human health.*
- 2. An acoustic environment within each zone that is compatible with the character of the area.”*

“C11.2.8 Objectives for Transport Noise

- 1. Mitigation of the adverse effects on residential sites of traffic noise generated by vehicles using the roading network.”*

Noise and vibration effects will be temporary during construction works and are guided by the New Zealand Standard NZS6803P:1984 "The "Measurement and Assessment of Noise from Construction, Maintenance and Demolition Work".

It is likely that construction noise will exceed the limitations on construction days set within the TRMP, however given the distance of the site from sensitive receptors (i.e. residential dwellings), effects are anticipated to be low, without adverse effects on human health. A construction noise and vibration assessment will be provided with the substantive application and if considered necessary, mitigation will be provided through conditions and management plans.



Operationally, the Scheme will not generate noise or vibration and the character of the Rural General Zone will be maintained.

C11.3 Lighting and Glare

While there are no objectives and policies relating to lighting and glare, the general standards are expected to be complied with.

DD4.3 - Rural Zone

Objectives outline that Council provides for use and development provided adverse environmental effects can be avoided, remedied or mitigated and that rural amenity values are maintained.

The relevant Rural Zone policies require that regard is had to:

- > The effect of the activity on the natural landform characteristics;
- > The effect on significant indigenous vegetation and significant habitats of indigenous fauna;
- > The effect on biodiversity, water quality, land stability and erosion;
- > The location, scale and nature of the proposed activity and its effect on the balance of the land and on adjoining properties;
- > Alternative methods and locations available to carry out the works or activities;
- > Physical constraints to the site such as separation by rivers or roads, site configuration and layout;
- > Any adverse effect that the activity may have on existing rural activities;
- > Whether covenants, buffer zones or separation distances between activities would assist in mitigating adverse environmental effects; and
- > When managing effects on rural character, particular regard should be had to traffic generation, noise and visual impact.



A suite of preliminary technical assessments provided with this referral application identify actual and potential effects and appropriate ways to avoid, remedy and mitigate those effects. Detailed assessments will be provided with the substantive application.

The site is not identified as an area of significance for amenity or landscapes and will not be highly visible from any area used by the public during operation. Preliminary assessment of natural character, visual and landscape effects are considered low to very low.

Construction effects including noise, will be temporary and suitably separated from sensitive receivers.

Adjoining neighbours (who will require parts of their rural land to be used for the reservoir or dam infrastructure and works) have been consulted in regard to the scale, nature and location of the scheme and the impacts of the scheme on their landholdings.

The site has been reviewed geotechnically and seismically by Damwatch and is considered appropriate for dam construction. With appropriate engineering and construction methods, the Project is not anticipated to increase risks relating to natural hazards.

Water quality could be effectively mitigated during construction using best practice methodologies including erosion and sediment controls. Supplementary surface water takes would occur at high flow, limiting impacts on biodiversity within waterbodies.

While further investigation will be undertaken during the substantive application preparation, it is likely that the scheme could remain consistent with the relevant objectives and policies of the Rural Zone, with appropriate conditions, management and/or monitoring plans in place.

DF1.4.2.2 - Water Quantity Objectives

The water quantity objectives for the Waipaoa River are as follows:

1. *Summer low flows in the Waipaoa River provide for a moderate level of ecological health, based on the flow requirements of adult long finned eels.*
2. *The B block allocation during higher flows provides for water storage and irrigation needs without affecting freshes and flushing flows within the Waipaoa River.*



3. *The Waipaoa River continues to be both a key source of water for the Gisborne municipal water supply and a major source of water for irrigation uses.*
4. *Allocations of water made through resource consents in the Poverty Bay Flats reflect the reasonable use test.*
5. *The Matokitoki and Makauri Aquifers are allocated at a level which does not result in significant decline.*
6. *The Te Hapara Sands Aquifer is allocated at a level which does not result in salt water intrusion.*
7. *A survival water allocation block and minimum flow is provided for rootstock of permanent horticultural and viticultural crops.*

These objectives are key considerations in relation to this Project. The Project would support many of these objectives (particularly Objective 1,2, 3, 4 and 7) and could assist with MAR in regard to Objective 5.

DF1.4.2.1 Water Quality Objectives

Water quality objectives for the Waipaoa River can be summarised as follows:

1. *Periphyton - Occasional blooms occur reflecting low enrichment and/or alteration of the natural flow regime or habitat.*
2. *Macroinvertebrate Community Index - Maintain a healthy macro-invertebrate community.*
3. *Dissolved Oxygen - No stress caused by low dissolved oxygen on any aquatic organisms that are present at reference (near-pristine) sites.*
4. *Nitrate toxicity - High conservation value system. Unlikely to be toxicity effects on even the most sensitive organisms.*
5. *Amonia toxicity - 95% species protection level. Starts impacting on the 5% most sensitive species.*



6. *E.Coli - People are exposed to a low risk of infection (less than 1% risk) from contact with water during activities with occasional immersion and some ingestion of water (such as wading and boating).*
7. *Physical habitat - Physical habitat, riparian margins and flow are modified but provide areas for some invertebrates and birds, and for some native fish species to spawn and live. Habitat primarily provides for less sensitive species such as shortfin and longfin eel (tuna) and inanga, including inanga spawning habitat...cont.*
8. *Clarity - In the Waipaoa River mainstem (as for its tributaries Waingaromia and Mangatu) improve current water clarity over the long term.*
9. *Fish - A range of generally less sensitive native fish species live in the lowland waterways. The river remains a national stronghold for longfin eel (tuna). The protection or restoration of inanga spawning habitat can provide an important component to the regional whitebait fishery, and the ecological functioning of the Waipaoa, Te Arai and other lowland waterways in Turanganui a Kiwa.*

These objectives will need to be considered in further detail once finalised technical assessment of the Project has been completed. From preliminary ecological assessment and the management methods available (refer to Attachment 7), it is not anticipated that there would be any inconsistency with these objectives.

DC2 General Coastal Management Area

Objective 1: Sustainable management of the coastal environment does not preclude appropriate development and this is made clear in the NZCPS.

The Project is aligned with Objective 1 and supporting policy 1 in that the installation of pipelines underground is not inappropriate in this area, given that the network is considered a Permitted Activity.



6. IWI MANAGEMENT PLANS AND DOCUMENTS

The following Iwi Management Plans are recognised:

- > Nga Ariki Kaiputahi Hapu/Iwi Management Plan; and
- > Te Aitanga a Mahaki Iwi Environmental Inventory.

In addition, the following documents prepared by or on behalf of Trust Tairāwhiti are considered relevant:

- > Trust Tairāwhiti: He Huarahi Whai Oranga – Tairāwhiti Economic Plan; and
- > Water for the Economy – Unlocking the economic potential of irrigation water in Tairāwhiti, 2025.

The consistency of this project with each of these plans and documents is provided below.

6.1 NGA ARIKI KAIPUTAHĪ HAPU/IWI MANAGEMENT PLAN

This Iwi Management Plan is a legal document that recognises records and authenticates the legal right of Nga Ariki Kaiputahi as tangata/mana whenua to exercise their vision for the descendants of Nga Ariki Kaiputahi. It is relevant to the Pouarua Dam Site within the Tangihanga Station.

As Kaitiaki,³ the health and wellbeing of the natural environment is paramount to Nga Ariki Kaiputahi. The Piwakawaka bird and Kowhai tree are important kaitiaki of Nga Ariki Kaiputahi.

Nga Ariki Kaiputahi yearns to restore the Mangatu ngahere back to its pre-colonised condition to be preserved for mokopuna and the future of native wildlife that are endemic to the natural habitats of this ecosystem.

3 The term 'kaitiakitanga' is defined in the RMA as meaning the exercise or guardianship by the tangata whenua of an area in accordance with Tikanga Maori in relation to natural and physical resources.

Table 3: Consistency with the Nga Ariki Kaiputahi Hapu/Iwi Management Plan

Key considerations from the Management Plan	How to achieve consistency?
It is best practice for resource consent applicants to consult with Nga Ariki Kaiputahi where proposals might affect matters as set out in sections 2(b), 6€, 6(f), 7(a), 7(e) and 8 of the RMA.	Ongoing engagement will be required with mana whenua throughout the preparation of the substantive application.
Cumulative effects and disturbances, removal or indirect removal of habitat and the impact on wildlife are to be monitored on a regular basis. Sustainable best management practices are to be upheld and documented in disturbed areas.	An ecological report will be required for the substantive application that considers all effects on wildlife, including cumulative effects and recommends appropriate management measures.
The prevention of exploitation in native flora and fauna use requires a reduction in access so that ground cover is disturbed as little as possible.	An ecological report will be required for the substantive application that considers all effects on native flora and fauna, avoiding where practicable to do so and recommends appropriate management measures.
Monitoring mechanisms must be in place to avoid and limit the introduction of non-native species into the area.	An ecological report will be required for the substantive application that considers the potential for introduction of non-native species to the area and recommends appropriate management measures.
Nga Ariki Kaiputahi encourages natural re-vegetation by indigenous flora and fauna and avoids the removal of vegetation, topsoil and seed source unless it is for Te Ao Maori and Te Ao Wairua purposes.	Any need for indigenous vegetation removal will be considered in the ecological assessment, with appropriate management measures.
Erosion of the hillsides is some of the worst in the country. To counteract this effect, it is the expectation of the Hapu/Iwi that native trees such as Totara and Manuka be planted on these slopes by any users of the land old and new.	Land rehabilitation plans will be prepared where needed, where effects of earthworks may warrant them.
It is essential that water quality control is kept at a high standard and water levels do not fall below the accepted level that our native freshwater species require to	High flow takes to supplement the reservoir will be required. Taking at high flow will avoid ecological impacts on habitats within and around watercourses. An

Key considerations from the Management Plan	How to achieve consistency?
survive such as the Tuna and Inanga. Nga Ariki Kaiputahi objects to the polluting of their sacred rivers and streams. Nga Ariki Kaiputahi also objects to the disposal and release of contaminated waters within their tribal boundaries.	ecological assessment will be provided as part of the substantive application that considers any potential adverse effects associated with the high take and any necessary management required.
The Hapu/Iwi objects to permits issued by local bodies where adequate safety measures are not in place such as emergency Iwi plans to protect areas outlined as customary land and culturally significant sites by the Hapu/Iwi of Nga Ariki Kaiputahi. Permits to extract water from the Mangatu, Waipaoa and Waingaromia Rivers must be done so in close consultation with consideration to the Iwi/Hapu's cultural concerns which are recognised as paramount.	Ongoing consultation with mana whenua is paramount through the substantive application process to ensure any cultural effects are recognised and addressed as far as practicable.
All Waahi tapu and heritage sites are to remain untouched. These sites are sacred to Nga Ariki Kaiputahi	There are no known or identified Waahi tapu or heritage sites within the site of the dam and reservoir. A general authority is proposed as part of the substantive application approvals sought.

6.2 TE AITANGA A MAHAKI IWI ENVIRONMENTAL INVENTORY

The overall objective is to ratify an Environmental Inventory that provides a framework that will allow Te Aitanga a Mahaki iwi along with local and central governments to evaluate and enhance local rivers and waterways whilst educating and empowering its people. It provides a framework to build upon with future initiatives that will establish and implement strategies for environmental restoration thus fulfilling the aspirations of the iwi as kaitiaki of the area. This is another step towards realising the vision of restoring the mauri (life essence) of the Waipaoa River.



Table 4: Consistency with the Te Aitanga a Mahaki Iwi Environmental Inventory

Key considerations from the Environmental Inventory	How to achieve consistency
Te Aitanga a Mahaki has always had an affinity and an obligation to the land, rivers and sea.	Consultation has commenced with mana whenua and is ongoing in regard to their role as Kaitiaki.
There is a series of maps to identify a number of Te Aitanga a Mahaki's environmental resources by providing spatial and pictorial examples of environmental detail that are significant to Te Aitanga a Mahaki.	There does not appear to be any features identified within these maps that are within the Pouarua Dam site. Effects on the Waipaoa river as a result of the high flow take, structure and construction discharges will be considered through the technical assessments provided with the substantive application.
Significant Regional Water Issues for Iwi include: 1. Kaitiakitanga - limited input into plans and implementation 2. Cultural landscapes - restoring mauri, protecting wahi tapu	Consultation has commenced with mana whenua and is ongoing in regard to their role as Kaitiaki. and is ongoing in regard to their role as Kaitiaki. There are no identified waahi tapu identified within the Pouarua Dam site or within the location of the distribution network. A general authority is proposed as part of the substantive application approvals sought.
The East Coast region represents 7 percent of the land area of the North Island, but it contributes 50 percent of the worst soil erosion. The Waipaoa River enters the sea at the southern end of Turanganui a Kiwa. It is a high sediment-yielding river, annually depositing 15 million tonnes of sediment into Poverty Bay.	Soil erosion is noted as a key issue in the area of the Project and any earthworks required to facilitate this project will have to consider this through their methodologies.
It experiences low summer flows which can result in elevated temperatures above 30 degrees.	The Scheme would take supplementary water from the Waipaoa River for the dam in high flow conditions only.
The region has very few wetlands and only a few minor lakes. Historically around 90% were drained when the land was converted to pasture. Those that remain	There are wetlands identified within the project site. A detailed ecological assessment will be required as part of the substantive application to manage



Key considerations from the Environmental Inventory	How to achieve consistency
comprise small farm ponds and dams, however collectively these are significant. Repongaere Lakes is a significant wetland and habitat for waterbirds.	effects on wetlands, having regard to the National Environmental Standard for Freshwater and the National Policy Statement on Freshwater Management.
Further work into freshwater ecology is required for waters draining into Poverty Bay. A range of species of significance to iwi (Koura (freshwater crayfish), Inanga (Whitebait), Morehana (cockabully), Moruru, and Korokoro (Lamprey) in the rivers. Tuna (eels)) were by far the most important river species to Te Aitanga a Mahaki. Lake Repongaere was famous for providing plentiful amounts of eels and always having kai for the people. Lake Repongaere provided an important eel fishery that still exists today.	An ecological assessment will be provided as part of the substantive application to identify any potential for effects on ecology and the appropriate management measures required to avoid, remedy and mitigate those effects.
Pa and Marae sites surrounding Lake Repongaere.	It is noted that Lake Repongaere is a site of cultural significance and is 1.8km to the south of the Pouarua Dam site. An ecological assessment will consider this and outline methods to avoid adverse effects.



6.3 TRUST TAIRĀWHITI: HE HUARAHĪ WHAI ORANGA - TAIRĀWHITI ECONOMIC PLAN

Trust Tairāwhiti is the regional wellbeing trust, with a strategic focus on community initiatives, economic development and providing for future generations in Tairāwhiti.

The Tairāwhiti Economic Strategy Steering Group is a collective of regional leaders made up of the Chief Executives from Rongowhakaata Iwi Trust, Te Aitanga a Mahaki, Te Rūnanganui o Ngāti Porou, Tāmanuhiri Tūtū Poroporo Trust, GDC, and Trust Tairāwhiti.

The Tairāwhiti Economic Plan prepared by Trust Tairāwhiti outlines the need to adopt a water for the economy approach by investing in water infrastructure systems to provide access to commercial water unlocking the productivity potential of whenua, with PWSS identified in the programme of investment.

6.4 WATER FOR THE ECONOMY - UNLOCKING THE ECONOMIC POTENTIAL OF IRRIGATION WATER IN TAIRĀWHITI, 2025

Trust Tairāwhiti commissioned an independent study to understand how irrigation water could strengthen the region's economy, create jobs and help landowners get more value from their whenua.

The report, delivered by the AgriBusiness Group and Aqualinc, supports a key goal of the Tairāwhiti Economic Plan. The aim is to grow regional GDP by supporting high-value crops, unlocking whenua Māori, and encouraging investment in resilient water systems.

The study shows that improved irrigation systems, such as water storage dams and managed aquifer recharge, and a shift towards high-value horticulture could:

- > Increase regional GDP by over \$400 million a year
- > Create nearly 2000 jobs
- > Lift household income by \$70 million.

It also modelled that the full potential of all land that is suitable for irrigation, regardless of current water availability, would be an increase to GDP of \$4.9 billion.

This Project is consistent with the finding of this report and the goals of Trust Tairāwhiti outlined above.

7. ACTIVITY STATUS UNDER THE RELEVANT PLANNING DOCUMENTS

Based on preliminary Project information, the following resource consents are *likely* to be sought in accordance with the RMA (including those under National Environmental Standards and the Tairāwhiti Resource Management Plan) as set out in **Table 5**. The activity status will be confirmed once further details of each activity are known through the substantive application process.

Table 5: Potential consents that would otherwise be applied for under the RMA

Activity	Potentially Relevant Rule/s	Likely Activity Status (to be confirmed at the Substantive Stage)	Reason
NES-F			
Construction of specified infrastructure	Regulation 45	Discretionary	The NPS-FW defines specified infrastructure. The definition includes “<i>any water storage infrastructure</i>”. The construction of specified infrastructure would classify as a discretionary activity if: > Vegetation clearance within, or within a 10 m setback from a natural inland wetland; > Earthworks or land disturbance within, or within a 10 m setback from a natural inland wetland; > Earthworks or land disturbance outside a 10 m, but within a 100 m, setback from a natural inland wetland; > The taking, use, damming, or diversion of water within, or within a 100 m setback from, a natural inland wetland; > The discharge of water into water within, or within a 100 m setback from, a natural inland wetland. The Project is anticipated to require a Discretionary Consent in relation to proximity of works from natural inland wetlands.

Activity	Potentially Relevant Rule/s	Likely Activity Status (to be confirmed at the Substantive Stage)	Reason
Maintenance and operation of specified infrastructure and other infrastructure	Regulation 46	Permitted Activity	The operation and maintenance of the Dam is likely to meet the conditions of Regulation 46.
Reclamation of a length of the Pouarua Stream	Regulation 57	Discretionary	There is a functional need for reclamation of the bed to construct the dam and reservoir. The effects management hierarchy will be applied in relation to stream length lost.
NES-CS			
Disturbance of Soils	Regulation 9-11	Controlled or Restricted Discretionary or Discretionary	These regulations relate to the trenching of water pipelines in road reserves. Activity status to be confirmed at substantive application phase.
Works within Designated Land (NZTA as Requiring Authority)			
Any other party who wishes to do work or activities in the designation, or in a proposed designation, requires written consent from NZTA if the activity would 'prevent or hinder' the designated work.	176(1)(b) and 178(2) RMA	NA	Where a pipeline is required in a State Highway designation, separate written approval will be required from NZTA.
Tairāwhiti Resource Management Plan (TRMP)			



Activity	Potentially Relevant Rule/s	Likely Activity Status (to be confirmed at the Substantive Stage)	Reason
Freshwater – Region Wide Provisions			
Damming, diversion and drainage of water in the bed of a river or stream which does not comply with permitted activity standards	C6.3.13(4)	Discretionary	A dam wall is proposed for construction on the Pouarua Stream. GDC may consider this high flow take to be a from of diversion of the Waipaoa river and if so, that diversion would also be considered under this rule.
Water intake structure	C6.3.2(18)	Discretionary	A water intake structure will be constructed in the bed of the Waipaoa River (in one of two potential locations)
Water outfall structures	C6.3.2(18)	Discretionary	Only relevant if the water intake structure is also used as a water outfall structure for water to be conveyed down the Waipaoa River.
Discharges of potable water into fresh water or to land from a water storage reservoir or water supply pipeline, where this is from a Council municipal water supply	C6.2.3(6)	Permitted <i>NB: Any discharge from a water storage reservoir or water supply pipeline where this is not from a Council municipal water supply defaults to 6.2.3 (14).</i>	N/A – defaults to 6.2.3(14).
The point source discharge of liquids to land or waterbodies and their margins where the discharge is to a waterbody or to land in a way that directly enters water above a	C6.2.3(14)	Non-Complying	Discharge of high flow take from the Waipaoa River to settling ponds and the reservoir are proposed. This will be distributed by pipeline.



Activity	Potentially Relevant Rule/s	Likely Activity Status (to be confirmed at the Substantive Stage)	Reason
community drinking water supply intake point. <i>NB: Liquids include water.</i>			There is an option to use a downstream section of the Waipaoa River as conveyance for water takes and if this option is pursued, this rule would apply. <i>NB: Whether this rule will be triggered is to be determined during the substantive application phase.</i>
Making, altering or installing bores for groundwater abstraction and associated discharges	C6.2.6(3)	Restricted Discretionary	Bores for dewatering if required.
Diffuse discharges that do not meet the permitted activity standards for the rules in section C6.2 or is not provided for by another rule in this Plan.	C.6.2.9(8)	Discretionary	There is the potential for discharge of diffuse construction stormwater which may contain erosion and sediment to the Pouarua stream and Waipaoa River, despite best practice erosion and sediment controls being in place. As a precaution, consent would be sought under this rule.
Pipe networks for the conveyance of water, and any ancillary equipment (where suspended over a river)	C6.3.2(8)	Permitted NB: The use, erection, reconstruction, placement, alteration and extension of structures, including bridges, cables, lines, pipelines and suspended fences, which are suspended over the bed of a lake or river which do not have any contact with the bed of the river where structures	The water distribution network pipelines will suspend over water (i.e. on bridge structures) in some instances. <i>There is one location where a pipeline may be established within the bed of the Waipaoa River and this is addressed in C6.3.2(19).</i>



Activity	Potentially Relevant Rule/s	Likely Activity Status (to be confirmed at the Substantive Stage)	Reason
		are suspended at least 500mm above the 2% AEP flood level (50 year flood) at the lowest point of the structure.	
Take and use of surface water during high flows (water harvesting)	C6.1.2(8)	Restricted Discretionary	High flow water take is required from the Waipaoa River under the Waipaoa B Block allocation.
The take and use of surface water or groundwater not lawfully established before the date of notification of this Plan.	C6.1.2(6)	Restricted Discretionary	Any dewatering or water take for construction purposes.
The erection or placement of a dam or other barrier structure in, on, under or over the bed of a river.	C6.3.2(18)	Discretionary	A dam wall is proposed in the Pouarua Stream.
Excavation of the bed of a lake, river or stream.	C6.3.2(19)	Discretionary	A high flow water intake structure is proposed in the Waipaoa River bed. A dam wall is proposed in the Pouarua Stream bed. A water distribution pipeline may be established in the bed of the Waipaoa River.



Activity	Potentially Relevant Rule/s	Likely Activity Status (to be confirmed at the Substantive Stage)	Reason
Deposition of any substance in on or under the bed of a lake, river or stream.	C6.3.2(20)	Discretionary	A high flow water intake structure is proposed in the Waipaoa River bed. A dam wall is proposed in the Pouarua Stream bed. A water distribution pipeline may be established in the bed of the Waipaoa River. It is likely that as part of the construction of these structures, this rule would be triggered.
Disturbance, removal, damage or destruction to any plant, or part of any plant (whether exotic or indigenous) in, on or under the bed of any lake, river or stream, not provided for as a permitted activity	6.3.5(3)	Discretionary	Any removal of vegetation associated with structures in the bed of the Pouarua Stream and Waipaoa River.
Activities that do not comply with the permitted activity standards or any other solid or fertiliser discharges not provided for in another rule in this plan.	C6.2.12(7)	Discretionary	NA
Riparian Margins, Wetlands <i>NB: Some activities may occur in both the Riparian Management Area and the Bed of a River or Lake. Please refer to Section C6.3 for rules related to activities in the Beds of Rivers and Lakes.</i>			



Activity	Potentially Relevant Rule/s	Likely Activity Status (to be confirmed at the Substantive Stage)	Reason
Any activity that results in the modification of a wetland not provided for in another Rule in the Plan that it is not a Regionally Significant Wetland identified in Schedule G17.	C6.4.2(6)	Discretionary	NB: Consent sought under the NES-F in relation to wetlands.
Land disturbance that exposes or disturbs more than 10m ² of earth per contiguous 100m of Riparian Management Area and/or exposes or disturbs more than 10m ² of earth over any 24-month period.	C6.4.5(20)	Restricted Discretionary	Earthworks for the high flow intake structure in the Waipaoa River and earthworks for the dam structure in the Pouarua Stream.
Erection of new structures or alteration or additions to existing structures.	C6.4.5(21)	Restricted Discretionary	Erection of new structures (high flow intake structure, pipe under the Waipaoa River and dam structure in Pouarua Stream) in riparian management areas.
Vegetation clearance not provided for in another Rule within the Riparian Management Area of an Aquatic Ecosystem	C6.4.5(16)	Restricted Discretionary	Vegetation clearance in riparian management areas.



Activity	Potentially Relevant Rule/s	Likely Activity Status (to be confirmed at the Substantive Stage)	Reason
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Waterbody identified in Schedule G15.

Land Management – Region Wide Provisions

Land Overlay 2 - Land disturbance and vegetation clearance activities which do not comply with the General Standards and are not provided for as Controlled or Restricted Discretionary activities.	C7.1.6(20)	Discretionary	Construction works and vegetation removal in Land Overlay 2 – particularly relevant for the construction of the dam wall in the Pouarua Stream.
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Noise and Vibration – Region Wide Provisions

Emissions of construction noise shall not exceed 168 calendar days in any 12-month period. The construction activity shall comply with the noise limits specified in Figure C.11.9.	C11.2.15.2 and C11.2.15.4	Reverts to DD4.6.1A(22)	Construction noise will exceed 168 calendar days in any 12-month period.
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Lighting and Glare – Region Wide Provisions



Activity	Potentially Relevant Rule/s	Likely Activity Status (to be confirmed at the Substantive Stage)	Reason
Construction lighting	11.3.1(1)	Permitted (where all general standards in C11.3.1.1 are met).	Likely that all general standards can be met during construction.
All Rural Zones			
Activities which are not provided for as Restricted Discretionary or Prohibited activities.	DD4.6.1A (22)	Discretionary	Construction of a dam, reservoir and associated infrastructure in the rural zone.
Freshwater Limits and Targets			
Water Quantity Limits: Permitted take is 4000l/s Minimum Flow B Block and 2000l/s Allocation Cap B Block	DF1.4.3.2	Permitted	Water harvesting will remain within these limits.
Suspended sediment, dissolved inorganic nitrogen, dissolved reactive phosphorus target are to be defined when sufficient monitoring data becomes available.	DF.4.3.1	N/A at this stage	There are no targets available yet.



Activity	Potentially Relevant Rule/s	Likely Activity Status (to be confirmed at the Substantive Stage)	Reason
Infrastructure – Region Wide Provisions			
Installing underground water pipes (which meet the definition of a Network Utility Operation/Activity)	C2.1.6(1)	Permitted <i>NB: relevant only to pipes located outside any heritage reserve or amenity reserve zone.</i>	The distribution pipe network is located in local Road Reserve and State Highway corridors which is permitted. <i>NB: The pipes do not cross a heritage reserve or amenity reserve zone.</i>
Natural Hazards – Region Wide Provisions			
Construction or installation of pipeline distribution network in Flood Area (F2 and F2A)	C8.2.3(21)	Restricted Discretionary	Applicable if part of the rising main and network distribution pipelines will be within Flood Area F2.
Construction or relocation of, additions to or alterations of buildings	C8.2.3(15)	Restricted Discretionary	Pump Station within Flood Area F2.
Earthworks which alter the existing ground level	C8.2.3(16)	Restricted Discretionary	Construction of a new settlement pond/s within Flood Area F2 (if required)
Construction or installation of new structures associated with network utility activities	C.2.3(7)	Restricted discretionary	Construction of a pipeline (if required) under the Waipaoa River and high flow intake structure in the bed of the Waipaoa River within Flood Area F1.



Summary

The Project would be considered a **Non-Complying Activity** under the relevant rules of the Tairāwhiti Resource Management Plan (“TRMP”) if sections of the Waipaoa river are used as conveyance for downstream water takes. This option remains and will be determined during the substantive application phase. If distribution pipelines are used as an alternative to this, the Project would be considered a **Discretionary Activity** under the TRMP.

Under the relevant regulations of the NES-FW, the proposal is likely to require consent as a **Discretionary Activity** under Regulation 45.

Under the relevant regulations of the NES-CS, the proposal may require consent as a **Discretionary Activity** under Regulation 11.

Therefore, the application is bundled as a **Non-Complying Activity** overall.

It is noted that under the fast-track consenting process, the Non-Complying Activity status does not have the same consideration as it would under the RMA, because s104D of the RMA does not apply to Substantive Applications made under the Fast-track Approvals Act 2024 (“FTAA”)⁴. This means that an application does not have to pass either of the ‘gateway tests’ and demonstrate its effects are “no more than minor” or that it is not contrary to the objectives and policies in the relevant plans.

Should a Substantive Application for the Project progress, greater weight is placed on the purpose of the FTAA⁵ and tempers the weight that is afforded to National Policy Statements and Environmental Standards. The purpose of the FTAA is:

“to facilitate the delivery of infrastructure and development projects with significant regional or national benefits.” (Section 3 of the FTAA)

4 Schedule 5; Cl17(1)(b) Fast-track Approvals Act 2024

5 Schedule 5; Cl17(1)(a) Fast-track Approvals Act 2024