

Your written comments on a project under the Fast Track Approvals Act 2024

Project name	Mangahao Hydro-Electric Power Scheme
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Before the due date, for assistance on how to respond or about this template or with using the portal, please email contact@fasttrack.govt.nz or phone 0800 FASTRK (0800 327 875).

All sections of this form with an asterisk (*) must be completed.

1. Contact Details		
Please ensure that you have authority to comment on the application on behalf of those named on this form.		
Organisation name (if relevant)	Horowhenua District Council	
*First name		
*Last name		
Postal address		
*Contact phone number		Alternative
*Email		

2. Please provide your comments on this application
<p>Thank you for inviting Horowhenua District Council (HDC) to provide comment with respect to Country Energy's Limited application for the Mangahao Hydro-Electric Power Scheme to be referred to the Fast Track Approval Act process.</p> <p>HDC is not opposed to the project being considered under the Fast Track Approvals Act.</p> <p>HDC's comments are provided below in respect of three separate statutory functions undertaken by HDC.</p> <p>Comment as Resource Management Act consent authority</p> <p>HDC, in its regulatory function under the RMA confirms:</p> <ol style="list-style-type: none"> 1. It has not received any applications which would be considered competing applications if a substantive application for the project were to be lodged.

Insert Fast-track logo

2. There are no existing resource consents issued by HDC where sections 124C(1)(c) or 165ZI of the Resource Management Act 1991 (RMA) could apply.

For completeness, HDC advises that the following have been granted with respect to the overall activity for which the Fast Track referral application relates to.

- LUC/501/2019/125 - Resource consent for soil disturbance affecting a piece of land within a HAIL site at Mangahao Substation.
- 504/2019/30 – Alteration to Designation.

Comments as Water Supplier under Water Services Act 2021

HDC is Water Supplier for the Shannon water supply which is of critical importance in supporting the health and wellbeing of the Shannon community. The supply sources water from the Mangaore Stream a short distance upstream of the Mangahao Power Station discharge. HDC is currently in a resource consent renewal process for the water take for this supply. The existing resource consent is expired, and the scheme is operating on the basis of s124 RMA rights to continue to exercise the expired consent. A key factor in the consenting process that has resulted in significant delays and additional costs to HDC has been the absence of any hydrological monitoring of, or agreed flow regime for, the stream. The technical assessments undertaken by HDC's advisors as well as Regional Council's advisors agree that fluctuations in flow due to the power station are likely to dominate effects on the hydrology downstream of the power station.

HDC therefore has a direct interest in the discharge regime from the Power Station as it is the dominant factor in the Stream's hydrological regime and is a key factor which influences the effects associated with the Council's water supply abstraction.

In addition to the water take, HDC is also seeking to renew consents for discharges from the Shannon Water Treatment Plant associated with reservoir cleaning and overflow. These discharges are to a roadside drain which connects to the Mangaore Stream downstream of the power station discharge. Regional Council has indicated it will likely be imposing conditions of consent which will require HDC to undertake discharges from its WTP only when the power station is discharging (as far as practicable). This is another reason for HDC's interest in the discharge regime.

HDC acknowledges the work the applicant is doing to determine the hydrological regime of the Stream, and that they have engaged Tonkin and Taylor Ltd to undertake this assessment. Regional Council has advised HDC that it does not and is not intending to undertake hydrological monitoring or investigations on the Stream and that this is required to be determined by consent applicants. HDC is keen to share its hydrological assessments with the Applicant and ensure that there is a common understanding of the hydrology across all permits determined for the Stream so that all discharge and water permits can be assessed on the same basis.

Comment as Local Government provider of Community Services

The Mangahao Hydro-Electric Scheme operates within a community that experiences higher levels of socio-economic challenge, with an average adult income of \$30,000 compared to the national average of \$41,500 (2023 Census). While the scheme makes a very significant contribution to New Zealand's renewable energy network, and has a high value over the lifetime of the consent, the local community has not always had the opportunity to share fully in these benefits. As the provider of community services and open spaces, HDC is mindful of the importance of ensuring that the scheme's operation can also create positive outcomes for Shannon and the wider Horowhenua community.

A key example of this is the Mangahao WhiteWater Park, a community-led initiative located immediately below the Mangahao Power Station. The Trust has transformed a 300-metre section of river into a world-class kayaking facility and nature reserve, complemented by picnic areas, native planting, and links to mountain biking and tramping tracks. The park currently operates under an agreement that allows only a limited number of water release days. Given the strong wellbeing, recreational, and tourism outcomes the park delivers for the community, there is a clear opportunity through the consenting process to explore ways of increasing the number and reliability of release days.

More broadly, HDC sees potential for initiatives that could complement the scheme's operation and leave a legacy of long-term community benefit. These might include improvements to public facilities and reserve land, more flexible water release schedules that support local tourism and recreation enterprises, and periodic releases that enable community events such as kayaking, multisport, or festivals. Opportunities for investment in community infrastructure, education, and recreation – such as a community hub, cycleways, and pedestrian connections – would also strengthen resilience, wellbeing, and local identity. HDC would welcome further discussion with the applicant on how such measures could be advanced in a way that balances national energy objectives with community aspirations

Note: All comments will be made available to the public and the applicant when the Ministry for the Environment proactively releases advice provided to the Minister for the Environment.

Managers signoff



Monique Davidson

Date: 17/09/2025

Your written comments on a project under the Fast Track Approvals Act 2024

Project name	Mangahao Hydro-Electric Power Scheme
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1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
*Portfolio	Climate Change		
*First name	Rebecca		
*Last name	Clements		
Contact person (if different from above)			
*Contact phone number	s 9(2)(a)	Alternative	
*Email	s 9(2)(a)		

2. Officials advise you provide a comment on this application for referral
Officials recommend that the Minister for Climate Change should provide a comment on this application.

3. If recommended, please provide your comments on this application
<p>The Minister of Climate Change considers that the project will support climate change mitigation and adaptation, and that this factor should be taken into account in your consideration of whether the project is an infrastructure or development project that would have significant regional or national benefits.</p> <p>On mitigation: the application is regionally and nationally significant as it supplies controlled renewable energy generation directly to the local region and excess into the national grid.</p> <p>On adaptation: the application is regionally significant from an adaptation perspective as King Country Energy Ltd is recognised as a lifeline utility under the Civil Defence Emergency Management Act 2002.</p>

Minister's signoff



Hon Simon Watts
Minister for Climate Change

Date

15 SEP 2025



09 SEP 2025

Hon Chris Bishop
Minister for Infrastructure
Parliament Buildings
Wellington

REQ-0020242

Dear Chris

Thank you for the opportunity to comment on the following three applications for referral under the Fast-track Approvals Act (FTAA):

- Mangahao Hydro-Electric Power Scheme, FTAA-2507-1086
Out of Scope

I am providing comments in my capacity as Minister for Economic Growth, focusing on whether these applications are likely to have significant economic benefits under section 22(2)(a)(iv) of the FTAA, based on the information provided. I defer to you and other relevant Ministers to assess the remaining criteria.

Mangahao Hydro-Electric Power Scheme, FTAA-2507-1086

This proposal is for the renewal of consents for the existing Mangahao Hydro-Electric Power Scheme (Mangahao HEPS). The scheme draws from the Mangahao river and generates up to 39.9 megawatts of electricity per hour, with an average annual output of 131 gigawatts per hour which can support the energy use of 20,000 households. Its continued operation would allow use of existing infrastructure to support regional energy resilience and avoid the costly capital investments of building a new power scheme.

The scheme currently supports local businesses and contributes approximately \$1 million annually to the local economy, along with six full-time equivalent jobs. The primary benefit of this project is maintaining the supply of renewable electricity it currently provides. It will provide no additional economic benefits.

As the project enables the use of renewable electricity, it is estimated it could prevent emissions of around 67,832 tonnes CO₂e (from gas use) or 172,208 tonnes CO₂e (from coal use). Given this, the project may also be evaluated under supporting climate change mitigation and reduction or removal of greenhouse gas emissions (under s22(2)(a)(vii) of the FTAA).

Out of Scope

Out of Scope

Out of Scope

Yours sincerely



Hon Nicola Willis
Minister for Economic Growth

From: [Infrastructure Portfolio](#)
To: [FTAreferrals](#)
Subject: FW: FTAA-2507-1086 Invitation to comment on Fast-track referral application for the Mangahao Hydro-Electric Power Scheme - Stage 1 project under the Fast-track Approvals Act 2024
Date: Monday, 8 September 2025 12:06:43 pm
Attachments: [image002.png](#)

FYI

From: Environment Portfolio <Environment.Portfolio@parliament.govt.nz>
Sent: Monday, 8 September 2025 11:57 AM
To: Infrastructure Portfolio <Infrastructure.Portfolio@parliament.govt.nz>
Subject: RE: FTAA-2507-1086 Invitation to comment on Fast-track referral application for the Mangahao Hydro-Electric Power Scheme - Stage 1 project under the Fast-track Approvals Act 2024

Good day,

Thank you for the below invitation to comment.

Please be advised that Hon Penny Simmonds, Minister for the Environment has reviewed this application and does not wish to provide comment.

Kind regards,



Office of Hon Penny Simmonds

Environment Portfolio

Minister for the Environment | Minister for Vocational Education
Associate Minister for Social Development | MP for Invercargill

Website: www.beehive.govt.nz

Private Bag 18041, Parliament Buildings, Wellington 6160, New Zealand

From: Infrastructure Portfolio <Infrastructure.Portfolio@parliament.govt.nz>
Sent: Wednesday, 20 August 2025 7:58 AM
To: Nicola Willis (MIN) <N.Willis@ministers.govt.nz>; Shane Jones (MIN) <S.Jones@ministers.govt.nz>; Simon Watts (MIN) <S.Watts@ministers.govt.nz>; Penny Simmonds (MIN) <P.Simmonds@ministers.govt.nz>
Cc: FTAreferrals <ftareferrals@mfe.govt.nz>
Subject: Invitation to comment on Fast-track referral application for the Mangahao Hydro-Electric Power Scheme - Stage 1 project under the Fast-track Approvals Act 2024 – FTAA-2507-1086

To:

Minister for Economic Growth
Minister for Regional Development
Minister for Climate Change
Minister of Energy
Minister for the Environment

Dear Ministers,

Hon Chris Bishop, the Minister for Infrastructure (the Minister), has asked for me to write to you on his behalf.

The Minister has received an application from King Country Energy Limited for referral of the Mangahao Hydro-Electric Power Scheme – Stage 1 project under the Fast-track Approvals Act 2024 (the Act) to the fast-track process (application reference FTAA-2507-1086).

The purpose of the Act is to facilitate the delivery of infrastructure and development projects with significant regional or national benefits.

Invitation to comment on referral application

I write in accordance with section 17 of the Act to invite you to provide written comments on the referral application. I have provided summary details of the project below.

If you wish to provide written comments, these must be received by **return email** within **20 working days** of receipt of this

email. The Minister is not required to consider information received outside of this time frame. Any comments submitted will contribute to the Minister's decision on whether to accept the referral application and to refer the project.

If you do not wish to provide comments, please let us know as soon as possible so we can proceed with processing the application without delay.

If the Minister decides to accept the application and to refer the project, the Applicant will need to complete any preliminary steps required under the Act and then lodge their substantive application for the approvals needed for the project. An expert panel will be appointed to decide the substantive application.

Process

The application documents are accessible through the Fast-track portal. Please note that application documents may contain commercially sensitivity information and should not be shared widely. If you haven't used the portal before, you can request access by emailing ftareferrals@mfe.govt.nz. Once you are registered and have accepted the terms and conditions, you will receive a link to view the documents. Existing users will be able to see application documents via the request when logging into the portal. Should you need for your agency to provide any supplementary information, a nominated person can be provided access to the portal, access can be requested by emailing ftareferrals@mfe.govt.nz.

To submit your comments on the application, you can either provide a letter or complete the attached template for written comments and return it by replying to this email, infrastructure.portfolio@parliament.govt.nz.

Before the due date, if you have any queries about this email or need assistance with using the portal, please email contact@fasttrack.govt.nz. Further information is available at <https://www.fasttrack.govt.nz/>.

Important Information

Please note that all comments received from Ministers invited to comment will be subject to the Official Information Act 1982. Comments received will be proactively released at the time the Minister for Infrastructure makes a referral decision, unless the Minister providing comments advises the Minister for Infrastructure's office they are to be withheld, at the time they are submitted.

If a Conflict of Interest is identified by the Minister providing comments at any stage of providing comments, please inform my office and the Cabinet Office immediately. The Cabinet Office will provide advice and, if appropriate, initiate a request to the Prime Minister to agree to a transfer of the project/portfolio invite to another Minister (a request to transfer a COI from one Minister to another can take 1-7 days).

Project summary

Project name	Mangahao Hydro-Electric Power Scheme
Applicant	King Country Energy Limited
Location	Tararua Ranges – South of Palmerston North
Project description	<p>The project is to renew the consents for the existing Mangahao Hydro-Electric Power Scheme, located in the northern section of the Tararua Ranges approximately 28 kilometres (km) southwest of Palmerston North and 10km, at the farthest point, east of Shannon. The Scheme draws from the Mangahao River and generates up to 39.9 megawatts (MW) of electricity with an average annual output of 131 gigawatt (GW) hours - enough to power approximately 20,000 homes. The activities associated with this generation of renewable energy include:</p> <ul style="list-style-type: none">a. the damming and diversion of water, involving the damming of the Mangahao River at No.1 and No.2 Dam sites and the Tokomaru River at No.3 Dam site, and the diversion of Mangaore Stream for erosion control and water between reservoirsb. the discharge of water to water associated with all 3

reservoirs and from Mangahao Power Station to the
Mangaore and Mangatangi streams

- c. the discharge of contaminants to water associated with drain valves associated with turbines, cooling water from Mangatangi Stream, stormwater runoff from the Power Station area, and sediment flushing
- d. the use of structures in the bed of a stream or river including the existing dams and associated infrastructure in the Mangahao and Tokomaru Rivers.

Yours sincerely

Hon Chris Bishop

Minister for Infrastructure



Office of Hon Chris Bishop

Minister of Housing | Minister for Infrastructure | Minister Responsible for RMA Reform | Minister of Transport | Associate Minister of Finance | Associate Minister for Sport & Recreation | Leader of the House | MP for Hutt South

Office: 04 817 6802 | EW 6.3
Email: c.bishop@ministers.govt.nz Website: www.Beehive.govt.nz
Private Bag 18041, Parliament Buildings, Wellington 6160, New Zealand

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Hon Shane Jones

Minister for Oceans and Fisheries
Minister for Regional Development
Minister for Resources
Associate Minister of Finance
Associate Minister for Energy



9 September 2025

Hon Chris Bishop
Minister for Infrastructure
Parliament Buildings
Wellington

Fast-track Approvals Act substantive application – Mangahao Hydro-Electric Power Scheme, FTAA-2507-1086

Dear Chris

Thank you for the opportunity to comment on the Mangahao Hydro-Electric Power Scheme referral application under the Fast-track Approvals Act (FTAA 2024).

The FTAA 2024 has been established to provide a regime that makes it easier and quicker for regionally and nationally significant infrastructure projects to gain the approvals needed for development, in support of this Government's economic growth objectives.

I have considered the referral application for the Mangahao Hydro-Electric Power Scheme and its alignment with the priorities of my Regional Development portfolio. My comments are attached as Annex One.

Yours sincerely

A handwritten signature in blue ink, appearing to be 'S. Jones'.

Hon Shane Jones
Minister for Regional Development

Annex One – Regional Development comments

Project overview

1. King Country Energy Limited (KCEL) has applied for Fast-track approval to replace resource consents for the Mangahao Hydro-Electric Power Scheme (the scheme). No changes to the currently authorised operating regime are sought.
2. The scheme generates an average annual output of 131 gigawatt-hours, enough to power approximately 20,000 homes, supplying energy directly into the Manawatū region and excess into the national grid. The scheme also materially contributes to greenhouse gas emission reductions of between 67,830 tonnes CO₂-equivalent (for gas generation) or 172,208 tonnes CO₂-equivalent (for coal generation).
3. The application notes that constructing new wind and thermal generation assets to replace the scheme's generation would cost around \$190.6 million.

Comments

4. The direct regional economic impacts of the proposal are not quantified in the application.
5. The application appears to primarily have implications for New Zealand's energy system, and commentary from the Energy portfolio will be more relevant in assessing the strategic importance of the project.

Comments on a project under the Fast-track Approvals Act 2024

Project name	FTAA-2507-1086 Mangahao Hydro-Electric Power Scheme
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All sections of this form with an asterisk (*) must be completed.

1. Contact Details

Please ensure that you have authority to comment on the application on behalf of those named on this form.

Organisation name (if relevant)	Department of Conservation		
*First name	Liz		
*Last name	Williams		
Postal address			
*Contact phone number	s 9(2)(a)	Alternative	
*Email	Fast-track@doc.govt.nz; s 9(2)(a)		

2. Please provide your comments on this application

If you need more space, please attach additional pages. Please include your name, page numbers and the project name on the additional pages.

PTO

Note: All comments will be made available to the public and the applicant when the Ministry for the Environment proactively releases advice provided to the Minister for the Environment.

Director-General of Conservation s 17 comments

Project name	Mangahao Hydro-Electric Power Scheme
Applicant name	King Country Energy Limited
Application number	FTAA-2507-1086
Project summary details	The project is to renew the resource consents for the existing Mangahao Hydro-Electric Power Scheme, located in the northern section of the Tararua Ranges approximately 28 kilometres (km) southwest of Palmerston North and 10 km, at the farthest point, east of Shannon.

1 General comment

1.1 In accordance with section 17(5) of the Act, the Director-General of Conservation has been invited to comment on the referral application, including on the following matter:

To confirm if the application involves the maintenance, upgrading or continued operation of existing electricity infrastructure or the construction and operation of new electricity lines on 'eligible land' as defined in s 24(3).

1.2 DOC provides the following comments on behalf of the Director-General.

1.3 DOC understands the application does not include an approval under a specified Act for which DOC is the administering agency (rather is seeking RMA consents only), however, DOC notes that King Country Energy Limited does not currently have a concession authorising its use of Public Conservation Land (PCL) for roading and access.

1.4 While the level of information provided in the referral application does not provide DOC with sufficient information to determine the level of any actual and potential environmental effects DOC considers it likely that with appropriate design and conditions, effects can be managed to appropriate levels.

1.5 DOC is not aware of any other reason the project should not be referred.

2 Determination of whether the activity is on 'eligible land' (Section 24(3))

2.1 Pursuant to section 24(2), the Minister may determine that electricity infrastructure on PCL is not an ineligible activity, if:

- The activity is the maintenance, upgrading, or continued operation of existing electricity infrastructure; and
- The activity would occur on eligible land; and
- The Minister is satisfied that the activity would not materially increase the scale or adverse effects of the existing electricity infrastructure.

- 2.2 For the purposes of this determination, s 24(3) describes “eligible land” as meaning land that is listed in Schedule 4 (excluding marine reserves); or within a national reserve held under the Reserves Act 1977.
- 2.3 Part of the existing scheme and part of the Mangahao Dams access road is located within PCL including the:
- Mangahao Conservation Area (Conservation Act, s 25 Stewardship Area);
 - Tararua Forest Park (Conservation Act, s 19 Conservation Park); and
 - Tokomaru Valley Road Conservation Area (Conservation Act, s 25 Stewardship Area).
- 2.4 DOC can confirm that the above areas of PCL do not fall within any of the types of land listed in Schedule 4, nor within a national reserve held under the Reserves Act. As such, the activity does not meet the definition of an ineligible activity in section 5(1)(h) or (i); and section 24 does not apply.

3 General comments

- 3.1 The project is seeking resource consents under the Resource Management Act 1991 only.
- 3.2 DOC notes that once a referral decision is made, the scope of any subsequent substantive application is confined by that of the referral application. DOC has provided input to a number of fast-track projects to-date where additional conservation approvals that would have been available under the FTAA have not been included in an application. In some of these cases it has been necessary for applicants to seek additional approvals under the specified Acts via normal processing. This can result in inefficiencies, additional costs and undermining of the benefits of the ‘one stop shop’ approach the FTAA was designed to deliver.
- 3.3 As noted above, part of the access road to the scheme is on PCL. King Country Energy Limited does not currently have a concession authorising its use of that land for roading and access. The applicant may wish to consider whether to seek a concession to use PCL for access to the scheme, as part of the fast-track application process.
- 3.4 In relation to the potential need for a concession(s), DOC recommends that any referral notice for this project is broad enough that, if a concession is required, this is in-scope for a substantive application.
- 3.5 In relation to this application, the applicant has taken steps to consult with DOC. An initial meeting with Manawa Energy and King Country Energy Limited has occurred and an overview of the existing electric hydro scheme and the project timeline has been provided. DOC considers it would be highly beneficial for the applicant to continue engaging with DOC on conservation matters subject to RMA consideration prior to making any substantive application. Benefits include ensuring information necessary to support decision-making; supporting the management of any actual and potential adverse effects on the environment; and early identification and resolution of any issues.
- 3.6 DOC notes that freshwater values in the area include a number of threatened species, including:

- Shortjaw kokopu *Galaxias postvectis* - Nationally Vulnerable
- Giant kōkopu - *Galaxias argenteus*, At Risk - Declining
- Kōaro *Galaxias brevipinnis* - At Risk – Declining
- Dwarf galaxias *Galaxias divergens* - At Risk – Declining

4 Matters for the Minister to specify (s27)

- 4.1 DOC notes that there is no obligation on the applicant to undertake pre-lodgement consultation with DOC in respect of their substantive application. Given the values present and use of PCL, DOC considers it would be highly beneficial for the applicant to engage further with DOC prior to making any substantive application.
- 4.2 To this end, DOC suggests the Minister consider specifying that evidence of further pre-lodgement engagement with DOC be submitted with the substantive application, should the decision be to accept the referral application.



Jenni Fitzgerald
Fast-Track Applications Manager

Acting pursuant to delegated authority on behalf of the Director-General of Conservation.

Date: 11 September 2025

Note: A copy of the Instrument of Delegation may be inspected at the Director-General's office at Conservation House Whare Kaupapa Atawhai, 18/32 Manners Street, Wellington 6011

Your written comments on a project under the Fast Track Approvals Act 2024

17 September 2025

Project name	Mangahao Hydro-Electric Power Scheme (Project) – King Country Energy Limited
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1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
Organisation name (if relevant)	Transpower New Zealand Limited (Transpower)		
*First name	Jo		
*Last name	Mooar		
Postal address	PO Box 1021 Wellington 6011		
*Contact phone number	s 9(2)(a)	Alternative	
*Email	s 9(2)(a)		

2. Please provide your comments on this application
<p>Transpower has been identified as an “other person” for the purpose of section 17(5) of the Fast-track Approvals Act 2024 (Act). Thank you for the opportunity to provide comments about the Project, and its potential impact on National Grid assets.</p> <p>The Project relates to consent renewals for the Mangahao Hydro-Electric Power Scheme (Scheme). The Scheme connects to The Lines Company (the electricity distribution business in the area), but was connected to the National Grid prior to 2010 (referral application, section 2.6.2.6). The referral application states that there will be no changes to operation of the scheme proposed (section 2.6.2). As a result, the Project will maintain the status quo.</p> <p>Transpower supports the Project as it relates to renewable electricity generation and will support climate mitigation (section 22(2)(a)(vii) of the Act). The Project will also deliver new regionally or nationally significant infrastructure (section 22(2)(a)(ii) of the Act).</p>

Transpower's recent Security of Supply Assessment (**SOSA**) highlights that, as a country, we need to pick up the pace and move planned projects through consenting to build and commissioning phases. A summary of this need is contained at the following link: [Building the renewable generation we need to deliver New Zealand's energy future - a discussion document for consenting authorities.pdf](#). Importantly, the SOSA is predicated on retaining the hydro generation that is currently consented, that require consent renewals.

Note: All comments will be made available to the public and the applicant when the Ministry for the Environment proactively releases advice provided to the Minister for the Environment.

Your written comments on a project under the Fast Track Approvals Act 2024

Project name	Mangahao Hydro-Electric Power Scheme (Mangahao HEPS)
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1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
Organisation name (if relevant)	Manawatū-Whanganui Regional Council (Horizons Regional Council)		
*First name	Sara		
*Last name	Westcott		
Postal address	Private Bag 11025, Manawatu Mail Centre, Palmerston North 4442		
*Contact phone number	s 9(2)(a)	Alternative	s 9(2)(a)
*Email	s 9(2)(a)		

2. Please provide your comments on this application
Thank you for the opportunity to provide comment on this referral application.
<u>Applications located that would be competing if a substantive application for the project was lodged:</u>
The proposal is located within the following Water Management Sub-Areas:
<ul style="list-style-type: none"> - Upper Gorge Water Management Area, Upper Mangahao Water Management Sub-Area (Mana_9d) - Coastal Manawatu Water Management Area, Upper Tokomaru Water Management Sub-Area (Mana_13b) - Coastal Manawatu Water Management Area, Mangaore Water Management Sub-Area (Mana_13d)
With respect to identifying any competing applications to the consents to be sought, we have checked the applications located in these Water Management Sub-Areas. The following applies:
<ol style="list-style-type: none"> 1. Taking, damming and diversion of water:

Insert Fast-track logo

- a. Taking of water: Horizons One Plan provides an individual set of rules, policies to existing hydroelectricity schemes, including consideration of existing hydroelectricity schemes prior to setting minimum flow and allocation regimes for other uses (Objective LF-FW-O5 and Policies LF-FW-P17 and LF-FW-P18 of the Regional Policy Statement (RPS)). This means that the takes for hydroelectricity are not included in the water allocation framework set out in Schedule 3 of the One Plan and are not required to cease abstracting at the One Plan minimum flow but must adhere to any minimum flow restrictions in their resource consent conditions. As a result of this, there are no competing Water Permits for surface water abstraction for any activity in relation to the Mangahao HEPS.
- b. Damming and diversion of water: No competing applications.
2. Discharge of water to water: No competing applications in these Water Management Sub-Zones.
3. Discharge of contaminants to water: No competing applications in these Water Management Sub-Areas. We note that the One Plan utilises targets set out in Schedule 5 to manage water quality, which manages water management zones as a whole as well as site specific considerations.
4. Use of structures in the bed of a river: No competing applications in these Water Management Sub-Zones.

Any existing resource consents of the kind referred to in s30(3)(a):

With respect to the consents to be sought we have reviewed the Water Management Sub-Areas as set out above. The following applies:

1. Taking, damming and diversion of water: No consents subject to s124C(1)(c)
2. Discharge of water to water: No consents subject to s124C(1)(c)
3. Discharge of contaminants to water: No consents subject to s124C(1)(c)
4. Use of structures in the bed of a river: No consents subject to s124C(1)(c)

Challenges or delays associated with the re consenting process for the project:

If the application was to proceed through a Council led consenting process, this would follow the RMA consenting process with its associated timeframes. In terms of delays, requests for further information under s92 are typically the main cause of delays to consent applications. The length of time that the consenting process takes is also dependent on the notification decision, and if notified whether a hearing would be required.

Challenges identified for this particular consent process could include:

- Consideration of the impact of effects of fish passage, instream ecology and hydraulic impacts on the waterways would require comprehensive assessment. While noting the dams are existing, consideration of the on-going effects of their operation, while balancing the benefits with respect to national and regionally significant infrastructure and renewable energy could be complex.

- Consideration of impacts on cultural values may also be complex depending on the information provided by the applicant after engagement with iwi and hapu. The project is located within the rohe (area of interest) of a number of iwi and hapu groups (see below) and involves diverting waters from one catchment to another.
- The white-water rafting group is an interested party that rely on specific flows through this waterway to enable their recreation use. Consideration of competing uses in this catchment would need to be considered.

General comment – potential benefits:

The scheme is considered to be regionally and nationally significant infrastructure and therefore provides important benefits to both the region and nationally. The scheme also contributes to renewable energy generation for New Zealand.

Like any development there will be an element of economic benefit associated with the project including the continuation of existing jobs with the continued operation of the HEPS.

General comment – significant issues:

Actual and potential impacts on:

- the hydrology of the waterways impacts on freshwater habitat including flora and fauna and impacts on flood management and erosion from the continued damming, diversion and taking of water,
- impacts on water quality and instream ecology from the discharge of sediment associated with these activities; and
- Impacts on cultural values and the mauri of the waterways.

Appropriateness of utilising Fast Track:

Horizons view on this matter is neutral. Horizons accepts that the projects status as both renewal energy and regionally and nationally significant infrastructure is of importance, but due consideration is needed to ensure that the environmental effects of the HEPS is appropriately managed.

General Comment – consents sought

In reviewing the application for referral, it is noted that there are a number of consents that have not been included in the application and may need to be applied for. Some of these relate to historic construction activities or activities no longer occurring, but there are a number not being re-applied for (bolded, underlined and italic in the table below) and it is unclear if these are required or not. In the event that the application is accepted for being processed through the Fast Track legislation, Horizons view is that explanation around whether the below consents are being renewed would be helpful.

The below table sets out those existing consents not listed as being sought for renewal:

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Resource Consent	Situation
ATH-1995004379.00	Historical construction of monitoring equipment
ATH-1993005035.02	Historical construction of mini hydro station
ATH-1993005039.01	Water take consent for dredging operation. Not being used
ATH-1993005040.01	Discharge consent for dredging operation. Not being used
ATH-1993005041.00	Discharge consent for septic tank effluent. No longer occurring
ATH-1993005042.00	Resource Consent for use of the bed of the Mangahao River to site the No. 2 Dam - appears they plan to operate under Permitted Activity
<u>ATH-1993005052.00</u>	<u>Discharge consent for specific tank effluent for DOC House</u>
<u>ATH-1993005053.00</u>	<u>Discharge consent for specific tank effluent for DOC House</u>
<u>ATH-1993005054.00</u>	<u>Discharge consent for specific tank effluent for DOC House</u>
ATH-1993005055.00	Discharge consent for septic tank effluent. No longer occurring
ATH-1993005056.00	Resource Consent for use of the bed of the Tokomaru River to site the No. 3 Dam - appears they plan to operate under Permitted Activity
<u>ATH-1993005067.00</u>	<u>To discharge 0.03m³ of water from penstock pipes. We are unsure why this is not being re-applied for.</u>
<u>ATH-1993005073.00</u>	<u>To discharge up to 0.1m³ of water from the oil interceptor system. We are unsure why this is not being re-applied for.</u>
ATH-1992006831.00	Historical demolition of a bridge and replacement
ATH-1992006833.00	Same as above
ATH-1992006834.00	Same as above

In addition to the above, in the 'Activity Summary Table' in the referral application, there is an activity named 'Reservoir No.2 Ancillary Water Discharge'. We have been unable to link this to an existing resource consent, so it would be helpful if the Applicant could also clarify this activity.

Environmental compliance history:

A summary of the Applicants overall compliance ratings (as per previous Compliance Reports) for this project is as follows:

2024-2025 – low risk non-compliance (non-compliance with consent conditions that are low risk

2022-2024 – low risk non-compliance

2021-2022 – medium risk non-compliance (non-compliance with consent conditions that are of a medium risk)

2020-2021 – medium risk non-compliance

2018-2020 – medium risk non-compliance

No formal enforcement action has been taken against the Applicant for this proposal.

Reports and assessments normally required in a substantive application:

With respect to the substantive application, we would normally expect this to include the following:

- A detailed planning assessment against the relevant regional and national planning documents (e.g. NESFW, NPSFW etc);
- a comprehensive AEE that would include:
 - o Hydrology assessment;
 - o Water quality and instream ecology assessment;
 - o Impacts on terrestrial ecology/wetlands (if relevant);
 - o Fish passage and habitat assessment;
 - o Recreational impacts; and
 - o Cultural effects (informed by feedback or engagement with the relevant iwi and hapu.
- The provision of any required management plans relating to the above effects; and
- Proposed draft consent conditions.

The application should also have regard to the following Statutory Acknowledgements:

1. Rangitane o Manawatu: [Rangitāne o Manawatu Statutory Acknowledgements - 14 January 2021](#)
2. Rangitane o Wairarapa and Rangitane o Tamaki nui-a-Rua: [Statutory-Acknowledgements-FINAL.pdf](#)

Iwi and iwi authorities:

Rangitāne o Manawatū:

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- Taneuiarangi Manawatu Charitable Trust is the 'iwi authority' for the purposes of the RMA; and
- Rangitane o Manawatu Settlement Trust who manage the statutory acknowledgment.

Rangitāne o Tamaki Nui a Rua

Ngāti Ruakawa ki te Tonga

Ngāti Kahungunu ki Tamaki nui-a-Rua

Ngāti Whakatere

Muaūpoko Tribal Authority

Note: All comments will be made available to the public and the applicant when the Ministry for the Environment proactively releases advice provided to the Minister for the Environment.

Managers signoff



Greg Bevin

Regulatory Manager

Horizons Regional Council

17 September 2025