

Memorandum

To: Ministry for the Environment

From: Mitchell Daysh

Date: 8 April 2025

Re: Fast Track Referral Application – Planning Framework Assessment for Taheke 8C
Hydroelectric Scheme

PURPOSE OF THIS MEMO

This paper addresses the information requirements of section 3.8.1.1 (refer to Table 1 of this memo) and 2.6.2.12 (refer to Table 2 of this memo) of the Fast Track Referral Application Form for the Taheke 8C Hydroelectric Scheme (“**Scheme**”).

The paper:

- a. Gives a brief overview of the planning context within which this Scheme sits to inform this Referral Application.
- b. Provides the required high-level assessment of the Scheme against relevant national, regional and local statutory documents as part of this application.

Finally, a further, more detailed assessment of the Planning Instruments will be included in any future Substantive Application.

1. PLANNING CONTEXT

1.1 COUNCIL JURISDICTION

The Scheme is located in the upper Ōkere/Kaituna River catchment to the north of Lake Rotoiti and west of State Highway 33 in the Bay of Plenty Region. The Scheme is entirely located within Rotorua Lakes Council (“**RLC**”) and Bay of Plenty Regional Council (“**BoPRC**”) jurisdictions.

1.2 ZONING AND OVERLAYS

The Rotorua Lakes District Plan (“**RLDP**”) determines the sites zoning and overlays for the scheme. The area of the Scheme is Rural Zone (“**RURZ1**”) with a Significant Natural Area (“**SNA**”) overlay relevant to areas within the Site.

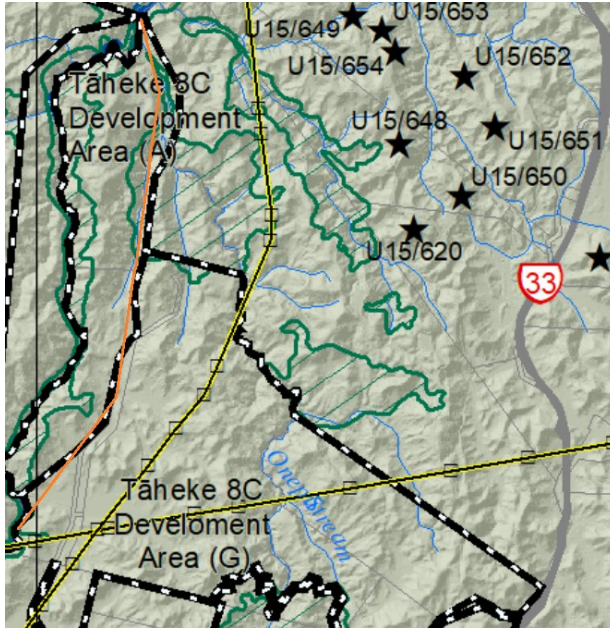


Figure 1: RLDP Zoning and Overlays (Source: RLDP Planning Maps)

1.3 CONSENT STATUS

The Scheme is considered a **Non-Complying Activity** under the relevant rules of the RLDP and a **Discretionary Activity** under the relevant rules of the BoPRP.

Under the relevant regulations of the National Environmental Standard for Freshwater (“**NES-FW**”), the proposal would require consent as a **Discretionary Activity**.

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

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**”)¹. 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 Scheme progress, greater weight is placed on the purpose of the FTAA² 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)

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

² Schedule 5; Cl17(1)(a) Fast-track Approvals Act 2024



1.4 STATUTORY ACKNOWLEDGEMENTS

The following statutory acknowledgements are relevant to the Scheme, as mapped within the Bay of Plenty Regional Council Statutory Acknowledgement Maps³:

- > Waitaha is identified as having statutory acknowledgement which recognises the association between Waitaha and part of the lower Kaituna River that meets the ocean under BoPRC Statutory Acknowledgement Map 1. The Scheme footprint is outside of this statutory acknowledgement area;
- > Tapuika is identified as having statutory acknowledgement over part of the Kaituna River under BoPRC Statutory Acknowledgment Map 2. The Scheme footprint is within the Tapuika area of interest;
- > Ngāti Rangiwewehi have a Statutory Acknowledgment over sections of the Kaituna River on BoPRC Statutory Acknowledgment Map 3. The Scheme footprint is outside of this statutory acknowledgement area;
- > Affiliate Te Arawa Iwi/hapu are shown to have a statutory acknowledgement over parts of the Kaituna River as shown on BoPRC Statutory Acknowledgment Map 4. The Scheme footprint is within the Affiliate Te Arawa area of interest; and
- > The Scheme footprint is within the Ngāti Makino area of interest, however it is not identified in a Statutory Acknowledgement under the Ngāti Makino settlement.

³ <https://www.boprc.govt.nz/your-council/working-with-iwi/statutory-acknowledgements/>



2. NATIONAL PLANNING FRAMEWORK

This section of the memo sets out the required information to answer section 3.8.1.1 of the Fast Track Referral Application Form, which states:

“3.8.1.1 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 scheme 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 Renewable Energy Generation 2011 (“ NPS-REG ”)	Yes	The need to develop, operate, maintain and upgrade renewable energy generation and the benefits of renewable energy generation are matters of National Significance. The Objective of the NPS-REG is to recognise the national significance of renewable energy generation activities so that New Zealand’s electricity generated from renewable energy increases to a level that meets or exceeds the New Zealand Government’s national target. Policy A of the NPS-REG recognises the benefits associated with renewable electricity generation activities, with the listed benefits in the policy being non-exclusive. The Scheme would be consistent with this in that it would: > Assist in maintaining New Zealand’s electricity generation capacity without resulting in the emission of greenhouse gas emissions;



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>
		> Use renewable natural resources rather than finite resources, or imported fuels, for the generation of electricity; and > Assist with the maintenance of the security of local electricity supply in the Bay of Plenty Region. The Scheme will provide the equivalent of the electricity needs of approximately 12,000 households. To put that into context that is the approximate number of residential households in Whakatane. Policy B of the NPS-REG requires decision-makers to have particular regard to the practical implications of achieving the national target for electricity generated from renewable energy sources. The proposal would enable the expansion of renewable energy generation capacity in the region and will positively contribute towards achieving New Zealand's target for electricity generation from renewable resources. Policies C1 and C2 of the NPS-REG require decision makers to have particular regard to the practical constraints associated with the development, operation, maintenance and upgrading of new and existing renewable energy generation activities. The Scheme is uniquely positioned at a location that provides consistent, clean and voluminous flows in with rapid elevation drops creating the potential energy necessary to efficiently generate renewable electricity. The applicant has prepared a calculated and comprehensive offsetting regime to mitigate the adverse effects attributed to activities required to establish and operate the Scheme.
National Policy Statement for Freshwater Management 2020 ("NPS-FM")	Yes	The objective of the NPS-FM is to ensure that natural and physical resources are managed in a way that prioritises: > First, the health and wellbeing of water bodies and freshwater ecosystems; > Second, the health needs of people; and



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.

- > Third, the ability of people and communities to provide for their social, economic and cultural wellbeing, now and in the future.

The use of water for renewable electricity generation falls within the first priority because it will assist in decarbonisation and electrification of New Zealand's economy and therefore mitigate the impacts of climate change, including on biodiversity.

The use of water for electricity generation also falls within the second priority because electricity is a fundamental requirement for modern homes and communities without which the public community well-being (i.e. health in a general sense) would be compromised. This approach is further supported by the Scheme falling within the “lifeline utility” definition under Part B of Schedule 1 of the Civil Defence Emergency Management Act 2002 (“**CDEMA**”).

The relevant policies include:

- > *Policy 1: Freshwater is managed in a way that gives effect to Te Mana o te Wai.*
- > *Policy 2: Tangata whenua are actively involved in freshwater management (including decision making processes), and Māori freshwater values are identified and provided for.*
- > *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.*
- > *Policy 4: Freshwater is managed as part of New Zealand's integrated response to climate change.*
- > *Policy 5: Freshwater is managed (including 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-being of all other water bodies and freshwater ecosystems is maintained and (if communities choose) improved.*
- > *Policy 6: There is no further loss of extent of natural inland wetlands, their values are protected, and their restoration is promoted.*
- > *Policy 7: The loss of river extent and values is avoided to the extent practicable.*



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>
		> <i>Policy 8: The significant values of outstanding water bodies are protected.</i> > <i>Policy 9: The habitats of indigenous freshwater species are protected.</i> > <i>Policy 10: The habitat of trout and salmon is protected, insofar as this is consistent with Policy 9.</i> > <i>Policy 11: Freshwater is allocated and used efficiently, all existing over-allocation is phased out, and future over-allocation is avoided.</i> > <i>Policy 13: The condition of water bodies and freshwater ecosystems is systematically monitored over time, and action is taken where freshwater is degraded, and to reverse deteriorating trends.</i> > <i>Policy 14: Information (including monitoring data) about the state of water bodies and freshwater ecosystems, and the challenges to their health and well-being, is regularly reported on and published.</i> > <i>Policy 15: Communities are enabled to provide for their social, economic, and cultural wellbeing in a way that is consistent with this National Policy Statement.</i> The design process has sought to avoid environmental effects as far as practicable. The findings of technical assessments undertaken in relation to freshwater demonstrate that the Scheme is generally consistent with these objectives and policies of the NPS-FM, with appropriate mitigation and offsetting measures in place. Central to the NPS-FM is the concept of Te Mana o Te Wai, which is described as: <i>“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. It protects the mauri of the wai. Te Mana o te Wai is about restoring and preserving the balance between the water, the wider environment, and the community.”</i> Mana whenua engagement has been critical in regard to achieving alignment with Te Mana o te Wai. The Scheme is to mitigate adverse effects, and ensure it remains consistent with cultural values, informed by Te Tiriti o Waitangi and Te Mana o te Wai. The Scheme is considered to be strongly aligned and consistent with Te Mana o te Wai as evidenced through the cultural impact assessment.



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 on Urban Development 2020 (“ NPS-UD ”)	Yes	While not directly relevant, the Scheme plays a key role in supporting consistency with this Policy Statement in that it will assist with enhancing the resilience and security of power supply to urban environments and reductions in greenhouse gas emissions. To the extent that this proposal provides electricity to support the ongoing construction, maintenance and upgrade of urban environment infrastructure, that enables people and communities to provide for their social, economic, and cultural wellbeing, and to improve their health, safety and overall well-being, it is considered that the Scheme aligns very closely with the objectives and policies of the NPS-UD.
National Policy Statement for Indigenous Biodiversity 2023 (“ NPS-IB ”)	NA	The NPS-IB excludes renewable energy generation assets and activities under sub clause 1.3(3), which states: <i>Nothing in this National Policy Statement applies to the development, operation, maintenance or upgrade of renewable electricity generation assets and activities and electricity transmission network assets and activities. For the avoidance of doubt, renewable electricity generation assets and activities, and electricity transmission network assets and activities, are not “specified infrastructure” for the purposes of this National Policy Statement.</i> As such no further consideration of the NPS-IB is necessary.
National Policy Statement for Highly Productive Land 2022 (“ NPS-HPL ”)	Yes	Reviewing the New Zealand Land Resource Inventory, an area of land classed as LUC 3 appears adjacent and partially overlapping part of the regulation pond area of the Scheme. The Objective of the NPS-HPL states: <i>Highly productive land is protected for use in land-based primary production, both now and for future generations. Policy 8 is particularly relevant and states: Highly productive land is protected from inappropriate use and development.</i> As the Scheme falls into the definition of ‘specified infrastructure’ and the land is considered ‘specified Māori land’ under the NPS-HPL. As such, the use or development of this land is not considered inappropriate under clause 3.9(2)(j)(i) and (d) 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>
		For this reason, the Scheme is not considered inconsistent with the relevant Objectives and Policies of the NPS-HPL.
National Policy Statement for Electricity Transmission Activities 2009	Yes	The National Policy Statement for Electricity Transmission (“NPS-ET”) recognises the need to operate, maintain, develop and upgrade the electricity transmission network, as a matter of national importance. The Scheme will directly result in an increase in renewable electricity being generated. The site contains transmission lines managed by Transpower as part of the National Grid. An additional 33kV transmission line is proposed, mostly overhead, from the station switchyard to the new 33/220kV GIP substation near the intake. The new substation will also service the consented Taheke Geothermal power station. The proposed transmission route is able to be developed in a manner that avoids, remedies or mitigates adverse effects on the environment, including avoiding areas of ecological value. The Applicant has engaged with Transpower, as owner of the National Grid. This engagement has not identified any impediment to the implementation of these aspects of the Scheme. Consequently, it is considered that the Scheme is consistent with the NPS-ET.
National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health 2011 (“ NES-CS ”)	NA	The site of the Scheme is not known to have any HAIL activities on it. A review of the historic aerial photos of the site does not identify any activities that are ‘more likely than not’ to have been a HAIL operating on the site. As such, the site is not considered a ‘piece of land’ and is not subject to the requirements of the NES-CS. No further consideration of the NES-CSHH is necessary.
National Environmental Standard for Freshwater Management 2020 (“ NES-FW ”)	Yes	The scheme is considered to be ‘specified infrastructure’ for the purpose of the rules in the NES-FW. In this regard, the scheme is:



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>
		> Infrastructure that delivers a service operated by a lifeline utility (as defined in the Civil Defence Emergency Management Act 2002); and > Regionally significant infrastructure as defined by the RPS. Overall, under the regulations of the NES-FW, consent is required as a Discretionary Activity pursuant to regulations 45 (earthworks) and 73 (weir).
Resource Management (Measurement and Reporting of Water Takes) Regulations 2010;	Yes	It is proposed that records of the volume of water taken each week be provided to the BoPRC in accordance with these regulations (specifically regulation 6 to 9). With these measures in place, the Scheme can remain consistent with the requirements of these relevant regulations.
New Zealand Coastal Policy Statement	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 site is not located within the coastal environment.



3. REGIONAL AND LOCAL PLANNING FRAMEWORK

This section of the memo sets out the required information to answer Section 2 of the Fast Track Referral Application Form, which states:

“2.6.2.12 - 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>
Bay of Plenty Regional Policy Statement (Operative 1 October 2014) <i>NB: With respect to this proposal, it is noted that the RPS, currently does not give effect to the NPS-FM or NPS-REG.</i>	Yes	The Scheme meets the definition of “regionally significant infrastructure” in the RPS as follows: <i>“Facilities for the generation and/or transmission of electricity where it is supplied to the national electricity grid and/or the local distribution network”.</i> The relevant sections of the RPS include: > Energy and Infrastructure > Integrated Resource Management > Iwi Resource Management > Matters of National Importance > Natural Hazards > Water Quality and Land Use > Water Quantity The Scheme is considered consistent with the provisions relating to energy and infrastructure in the RPS which seek to promote the use and development of renewable energy sources and to provide for regionally significant infrastructure and renewable energy. With respect to Policy EI 5B and its direction that priority be given to ensuring that development avoid adverse effects on natural and physical resources identified as matters of national importance (Policy MN



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>
		1B), the assessment of effects undertaken the Scheme identifies measures to appropriately avoid, remedy or mitigate any potential for adverse effects, including through offsetting. The objectives and policies in the RPS which relate to water quality and land use seek that the quality and mauri of water is maintained, or where necessary, enhanced. The Scheme will require the provision of sufficient residual flows to be achieved to assist with maintaining water quality and protect the health and functioning of the Kaituna River catchment. The water quantity objectives and policies of the RPS seek to ensure that the quantity of water availability within the region provides for a range of uses and values, is allocated and used efficiently, safeguards the mauri and life supporting capacity of waterbodies and meets the reasonably foreseeable needs of future generations. The proposed water abstraction (and return) does not impact the reliability of consented water-takes or the potential demand for water in the downstream catchment. Policy WQ 3B also seeks to have regard to the benefits to be derived from the use of water for electricity generation from renewable sources. The range of technical experts engaged to assess the potential effects of this Scheme have worked in a collaborative manner, to ensure the Scheme can be appropriately integrated into the environment with due consideration given to the management of potential cumulative effects. Policy IR 2B of the RPS seeks to recognise and provide for the predicted effects of climate change. The relevant technical experts have considered the impacts of climate change. Objectives 40 to 45 and their corresponding policies were introduced through Plan Change 5 and reflect the Kaituna River Document. Water quality, quantity, ecological and recreational effects have been addressed by technical specialists. Furthermore, ongoing engagement is occurring with mana whenua regarding key values and recognition of their resource management planning documents. The current process is considered to take account of the principles of the Treaty of Waitangi. Cultural Impact Assessments are being prepared for submission with any substantive application in this regard.



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>
		In regard to the Natural Hazard provisions of relevance, the key structures of the Scheme will need to be constructed and maintained in accordance with the New Zealand Dam Safety Guidelines (NZSOLD, 2023), to ensure that they are able to perform as intended during potential natural hazard event. <u>SUMMARY:</u> Based on the conclusions reached with respect to the actual and potential environmental effects of the Scheme, and the additional compensatory and offsetting measures that are to be proposed to address any unavoidable adverse effects identified, it is considered that the proposed construction, use and maintenance of the Scheme is consistent with all relevant objectives and policies of the RPS as identified through these sections.
Bay of Plenty Regional Natural Resources Plan (“RNRP”) (Operative 1 December 2008)	Yes	The chapters, objectives and policies in the RNRP cover a broad range of topics that are relevant to the Scheme, these include: > Chapter 3 - Kaitiakitanga > Chapter 4 – Integrated Management > Chapter 5 - Land Management > Chapter 6 - Discharges > Chapter 7 - Water Quantity and Allocation > Chapter 8 - Beds of Water Bodies. > Chapter 11 – Wetlands > Chapter 20 – Natural Hazards The relevant kaitiakitanga objectives and policies of the RNRP (KT O1-O7 and KTP1-P20) largely follow the same themes as the RPS, as discussed above. A mahinga kai report and cultural values assessment report



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>
		incorporate consultation feedback and outline the range of measures proposed for mitigation and offsetting to align with these provisions. The objectives and policies of the RPS with respect to integrated resource management are considered to be equally applicable to this subsection of the RNRP (and specifically IM O1-O7 and IM P1 -P8). However, it is also noted that Policy IM P1A of the RNRP seeks to avoid the loss of river extent and values, unless there is a functional need for the activity in that location and the effects are managed by applying the effects management hierarchy. This policy reflects the directives of the NPS-FM and it is noted that the Scheme is consistent with this Policy, given the functional need to be located in the waterway. Expert assessments undertaken have confirmed that any actual or potential adverse effects associated with the Scheme will be remedied and mitigated, with offsetting and compensation as/where required, to ensure the effects management hierarchy of the NPS-FM has been complied with. The integrated management of land and water (expressed through LM O1-O2 and LM P3) require the Scheme to avoid remedy or mitigate adverse effects on the life-supporting capacity of soil resources, the receiving environment and heritage values. With the mitigation and offsetting identified by technical specialists, alignment is achieved with these provisions. The ecological report specifies in which riparian margins can be appropriately managed. The objectives and policies of the RNRP seek to ensure that the adverse effects of discharges of water and contaminants to water (which in this circumstance is primarily sediment to water) on flooding, the stability of the beds and banks of receiving waterbodies and ecological values are avoided, remedied or mitigated. Erosion and sediment controls will be a requirement and part of the mitigation package for this Scheme to address DW O1, DW O7 and DWO15 and associated policies. It is also noted that bed load (sediment) within the river is already naturally low. DW P9, DW P12 and DW P15 specifically require that adverse effects of discharges are avoided, remedied or mitigated. The cultural and ecological reports have considered these provisions and propose mitigation and offsetting as appropriate to achieve consistency.



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>
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The broad suite of objectives and policies relating to the take and use of surface water seek that water resources are managed to maintain environmental and cultural values, instream flow variability is maintained, water is used efficiently, and that the allocation of water recognises hydroelectric electricity generation as a renewable energy source. Objective 41 and Policies 64 and 68 are particularly relevant in terms of maintaining minimum flows in streams and rivers. As detailed in the ecological assessment reports, minimum flows will be maintained to ensure the health of waterbodies.

In accordance with Objective 41, significant values have been identified by a range of relevant technical experts, with all potential effects on these values being addressed through appropriate mitigation and offsetting. In terms of efficiency, it is noted that the Scheme is a run of river scheme with significant storage and is typically operated to respond to the morning and evening peaks in electricity demand.

BW-O1 to O7 and associated policies (BW P1-P4 and P10-P14) address the beds of water bodies. Of particular relevance, is the consideration of fish passage, any impediment to water flows/flood flows, erosion, public access, contamination of water, effects on significant natural character and effects on ecological values.

The current provisions of the RNRP in relation to the management of effects on wetlands (WL O1-O4 and WL P1-P12) do not yet fully reflect the more directive provisions of the NES-FW. The Scheme has been designed to avoid adverse effects on wetlands wherever practicable. A suite of mitigation and offsetting is proposed as appropriate to manage effects on wetlands and enhance wetlands where there is an opportunity to do so. As such, it is considered that the objectives and policies relating to the protection and maintenance of wetlands will be satisfied.

The assessment of natural hazards under the RPS is considered to equally apply to the consideration of the natural hazard provisions in the RNRP.



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>
		<u>SUMMARY:</u> There are a wide range of restrictive and enabling provisions in the RNRP. Through the design of the Scheme, range of technical assessment conclusions and proposed mitigation and offsetting measures, the Scheme is not considered contrary to the relevant objectives and policies contained within these sections of the RNRP.
Rotorua Lakes District Plan (“RLDP”) (Operative 2016 and updated in 2021 in accordance with National Planning Standards)	Uncertain	The RLDP identifies issues relating to resource use, development and/or protection and sets out objectives and policies which address the issues. The RLDP also contains various district-wide and area-specific policy matters that are relevant to the Scheme, including: > Energy, infrastructure and transport; > Strategic Direction > Natural Environment values; > General matters (including earthworks); > Rural Zone matters; and > Development area matters (including Taheke 8C development area). The RLDP identifies key strategic or significant resource management matters for the district, including in relation to renewable electricity. Of specific relevance to this proposal is Objective SDRE-O1 which: <i>“promotes the development and operation of renewable electricity generation resources and activities that contribute to the economic, cultural, and social wellbeing of Rotorua District, region and New Zealand”.</i> This objective is supported by a range of policies (namely Policy SDRE-P1 to P5). SDRE-P3 in particular recognises the challenges often encountered when trying to establish renewable energy project of scale



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>
		under the RMA and suggests a balanced approach is encouraged. The Scheme is consistent with these provisions. Objective EIT-O1 encourages “infrastructure that provides for the economic, cultural, social and environmental wellbeing of the Rotorua district, the region and New Zealand.” Objective EIT-O2 enables ‘Infrastructure that avoids, mitigates or remedies the adverse effects on the character and amenity of the area’. Policy P1-4, P6 and P7, P10 and P11 and P13 support these Objectives. The Scheme and technical assessments which support it provide a consistency with these provisions. Consistent with EIT-O2 and NATC-O1 and NATC-P1, the natural character and amenity area of the area has been specifically assessed by technical experts, with the conclusion that effects are low. Objective EIT-05 provides for an effective and efficient high voltage electricity transmission network that provides a safe and secure electricity supply to the district and beyond, while managing the environmental effects of the network and ensuring development does not adversely affect the safe and efficient operation of the transmission network. This provision and the supporting policy P15 to P17, are relevant in regard to establishing new transmission lines as part of the Scheme. Objective SASM-O2 and supporting Policies SASM-P1 to P4 require resource management decisions that give appropriate weighting to the relationship of tangata whenua with water, the lakes, rivers and streams of the district. In this regard, ongoing consultation and cultural impact assessments will ensure that there is sufficient alignment with these provisions. As required under SASM-P7, consideration has been given to iwi management plans and documents. SDML-O1 and SDML-P2 relate to opportunities for development on Māori land that meets the needs of those landowners and respects the exercise of kaitiakitanga and the relationship of tangata whenua with land, water, significant sites and Wāhi tapu. The policy species that the plan “enable development of Māori land within the provisions of the plan for the purposes of fulfilling the economic and social aspirations of those owners”. The Proprietors of Taheke 8C & Adjoining Blocks Incorporation (the



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>
		Incorporation) is a Māori land incorporation established by the Māori Land Court in 1954. The Scheme is to mitigate adverse effects, and ensure consistent with Taheke Cultural Values, informed by Te Tiriti o Waitangi and Te Mana o te Wai. The Scheme is considered to be strongly aligned and consistent with these provisions as evidenced through a cultural impact assessment. SDED-O1 and SDED-P4 relate to the economic development of the district. There are potential tourism opportunity created by the Scheme. There is an overall net benefit in terms of access to wider audiences as confirmed by the technical recreational assessment. In regard to the effects on Significant Natural Areas (“SNAs”), a terrestrial ecological assessment has been undertaken and appropriate mitigation (including management plans) and offsetting approach proposed to ensure that ECO-O1 (and supporting policies ECO-P1 and P2) and SDIB-O1 (and supporting policies SDIB-P1 to P3) may still be achieved after the establishment of this Scheme. Uncertainty is created by the absence of offsetting as an option within ECO-P1. The offsets proposed as part of the Scheme design are a key component of complying with the wider provisions of ECO-P1. The terrestrial ecologist concludes that overall effects (after avoidance, mitigation and offsetting) on terrestrial ecology range from ‘very low’ to ‘low’, except for indigenous forest types and wetlands, which are considered to result in ‘net gain’ in biodiversity outcomes. Objective NATC-O2 and NATC-P2 require the management of riparian margins and waterbodies to protect natural conservation values, aquatic habitats, and improve water quality. The ecological health of waterbodies has been a key consideration of the ecological technical assessments, and impacts have been avoided as far as practicable through design measures and proposed mitigation, including offsetting. PA-O1 and PA-P1 are provisions relating to public access. The Scheme will not result in an adverse effect on access when compared to the status quo, however where there are opportunities for improvements to access, these have been explored.



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>
		The Scheme is not considered inconsistent with Objective RURZ-O2 and Policy RURZ-P9 of the Rural Zone in that there is a common requirement for renewable energy infrastructure to occupy rural land, subject to the adverse effects associated with those activities being managed. RURZ-O3 and RURZ-P11 ensure that the character and amenity values of the rural environment are maintained and enhanced. A landscape assessment addresses the effects on rural character. RURZ-P16 in relation to managing effects on the transport network are considered through the traffic assessment. The development area matters relate to geothermal and are not directly relevant to this Scheme. <u>SUMMARY:</u> There are a wide range of restrictive and enabling provisions in the RLDP. Despite the range of technical assessments and proposed mitigation and offsetting measures, it is uncertain that the Scheme meets all the relevant objectives and policies contained within these sections of the RLDP in the context of being considered under s104D of the RMA.



4. IWI MANAGEMENT PLANS

The following Iwi Management Plans and Iwi Planning Documents are considered relevant to the proposed Scheme:

- > Ngāti Pikiao;
 - > “Ngāti Pikiao Iwi Resource Management Plan (1997) and Te Mana o Te Wai Statement (2023)”;
 - > “Ngā Tikanga Whakahaere Taonga O Ngāti Pikiao Whanui Iwi Management Plan (1997)”;
- > Tapuika: “Tapuika Environmental Management Plan 2014-2024”;
- > Ngāti Rangiwewehi: “Ngāti Rangiwewehi Environmental Management Plan (2012)”;
- > Ngāti Whakaue ki Maketu:
 - > “Ngāti Whakaue ke Maketū Iwi Resource Management Plan Phase 2 (2011)”;
 - > Te Ratau te Rahui Taketake Ngāti Whakaue ke Maketū Hapu Management Plan 2018-2028 (2018);
- > Waitaha: “Waitaha Iwi management Plan 2014”
- > Te Awara Lakes Trust:
 - > Te Tuapapa o ngā Wai o Te Arawa – Te Arawa Cultural Values Framework (with the addition of He Mahere Taiao mō ngā Wai o Te Arawa, Te Arawa Lakes Environmental Plan) (2019).

The following key factors are notable in regard to the Applicant’s commitment to ensuring consistency with iwi management plans/documents:

- > The Applicant has committed to consultation with mana whenua, both prior to, during and after the consenting phase and acknowledge that each iwi have their own cultural values and perspectives of the impact of the Scheme.
 - > The principles of the Treaty of Waitangi will be upheld.
 - > A Mana Whenua Committee will be established as part of the project;
 - > Once operational, the Scheme does not involve any discharges of contaminants that detrimentally affect waahi tapu, fisheries and water quality; and
- As part of any Scheme that proceeds, the Applicant is committed to mitigating, offsetting and enhancing adverse cultural impacts with the intent of a net positive change in cultural values and an improvement to the health and well-being of the river and other natural resources located on their land.



Table 3: Iwi Management Plans

Iwi Management Plans/Documents	High level assessment
The Kaituna River Document: Kaituna, he taonga tuku iho – a treasure handed down (2008)	The Kaituna River Document is an outcome of the Tapuika Claims Settlement Act 2014. It is a statutory document that was launched by Te Maru o Kaituna River Authority on 22 June 2018. The Kaituna River Document sets out an iwi and community vision, objectives and desired outcomes for the Kaituna River and its tributaries and the document will influence councils' planning documents and local government decisions relevant to the awa (river). The eight Objectives within this document specifically cover (as paraphrased below): > The traditional and contemporary relationships that iwi and hapu have with the Kaituna River and that these are recognised and provided for (Obj 1); > Iwi led projects which restore, protect and/or enhance the Kaituna River are actively encouraged and supported (Obj 2) > Water quality and the mauri of the water in the Kaituna River are restored to a healthy state and meet agreed standards (Obj 3) > There is sufficient water quantity in the Kaituna River (Obj 4) > Water from the Kaituna River is sustainably allocated and efficiently used (Obj 5) > The environmental well-being of the Kaituna River is enhanced through improved land management practices (Obj 6) > Ecosystem health, habitats that support indigenous vegetation and species and wetlands are restored, protected and enhanced (Obj 7) > Te Maru o Kaituna in collaboration with iwi and the wider community enable environmental, economic, social, educational and cultural aspirations for the restoration, protection and enhancement of the Kaituna River (Obj 8). Plan Change 5 (Kaituna River) to the Bay of Plenty RPS has been completed and is now operative. The RPS incorporates the vision, objectives and desired outcomes of the Kaituna River Document as discussed within the RPS assessment provided above. Consultation is being undertaken with tangata whenua to ensure the cultural effects on the Kaituna River are appropriately considered and managed.



Iwi Management Plans/Documents	High level assessment
	Effects on the Kaituna River have been assessed through relevant technical reports. The aquatic ecology report prepared for the Scheme concludes that <i>‘proposed residual flow and the provision for flushing flows if required will maintain high quality aquatic habitat (through sediment removal) and good ecological health (through periphyton removal) and will be protective and possibly enhance ecological values (e.g. through increased habitat suitability for kōura, native fish and trout) and could also enhance mahinga kai gathering opportunities, all of which are consistent with the relevant regional and national policies and the Kaituna River Management Plan’.</i> Through consultation and technical assessments, due regard is being given to maintaining consistency with this document and the relevant objectives and policies now incorporated into the RPS.
Te Tini A Tuna – Kaituna Action Plan 2019-2029	The purpose of this Action Plan is to ‘give life’ to the Kaituna River Document through an action plan. The priority actions are: > Take collective responsibility for improving the health and well-being of the Kaituna River and its tributaries > Create a network of healthy and diverse Kaituna habitats and ecosystems > Connect our communities and visitors to our River and to our projects The consultative processes and resulting mitigation and offset measures proposed in the Scheme will ensure consistency with the Kaituna Action Plan, in particular that the health of the river, habitats and ecosystems are a priority of the Scheme. Due regard has been given to achieving consistency with this document.
Tapuika Environmental Management Plan 2014-2024	Feedback received from Tapuika identify that the mauri of the Kaituna River is of paramount importance; the wellbeing of their people is intrinsically linked to the wellbeing of their awa; and the wellbeing of their mahinga kai and freshwater taonga species is intrinsically linked to the wellbeing of their awa. The Tapuika Claims Settlement Act 2014 (“Settlement Act”) provides for the full and final settlement of historical Treaty of Waitangi claims by Tapuika. The Settlement Act recognises breaches of the Treaty of Waitangi and its principles in its dealings with Tapuika. One of those breaches included the modification, pollution and degradation of the Kaituna River has destroyed Tapuika wāhi tapu, caused significant harm to food sources and compromised traditional water supplies.



Iwi Management Plans/Documents	High level assessment
	The Settlement Act established a framework of co-governance of the Kaituna River. The Kaituna River Authority (Te Maru o Kaituna) consists of eight members comprising representatives from Councils, Tapuika and other iwi who have associations with the Kaituna River. One of the priority issues of significance to Tapuika (and of particular relevance to this Scheme) is set out on page 13 of this Environmental Management Plan and that is that “<i>Certain land uses and activities have an adverse effect on the health of our land, groundwater aquifers, rivers and streams. This affects our own health, wellbeing and way of life.</i>” The expected outcomes for water are set out on page 22 of this document (supported by a range of policies): > The relationship of Tapuika with water is recognised and acknowledged. > The values and interests of Tapuika are reflected in freshwater management, including decision-making. > Tapuika is actively involved in resource management processes relating to water. > The mauri of waterways and aquifers within Te Takapū o Tapuika are protected and enhanced to: > Ensure high water quality for swimming, food gathering and drinking water. > Maintain sufficient water flow to protect freshwater fisheries, customary resources and uses. > Ensure access to waterways for customary use e.g. food gathering. > Protect cultural values (particularly spiritual) and sites of significance. The expected outcomes for their people are > Tapuika is involved and empowered > Tapuika values and interests are reflected in resource management decisions > Greater collaboration for positive outcomes Through consultation that is being undertaken and ongoing, Tapuika are recognised as kaitiaki of the Kaituna River. Appropriate ecological and cultural mitigation and offsetting is proposed to create general alignment with this document and will ensure the health and mauri of the Kaituna River is not adversely affected.



Iwi Management Plans/Documents	High level assessment
Te Tuapapa o ngā Wai o Te Arawa – Te Arawa Cultural Values Framework (With the addition of He Mahere Taiao mō ngā Wai o Te Arawa, Te Arawa Lakes Environmental Plan) (2019).	The purpose of this Framework is to provide a holistic and values-based foundation for the management of the Te Arawa Lakes and surrounding land. This Framework relates to the 14 Lakes subject to the Te Arawa Lake Settlement Act 2006 (including Lake Rotoiti). It also relates to the rivers, streams, tributaries, puna (springs) and other freshwater sources (including waterways) in the Te Arawa rohe as proclaimed under the Waitangi Treaty claim Wai 1875. The specific objectives of this framework that are particularly relevant for consideration in regard to this Scheme include (but are not limited to): > Objective 5.1A: Te mā o te wai e rite ana kia kite i ngā tapuwae ā te kōura. The quality of the water is such that you can see the footsteps of the koura. > Objective 5.1B: Land and freshwater planning and management: > Affords greater priority to the natural limits of the Lakes; lands; and, freshwater that feeds into the Lakes. > Recognises the values and interests of mana whenua. > Recognises the intergenerational knowledge and experience of mana whenua. > Values the role of Te Arawa as a Treaty partner. > Values the role of Te Arawa Lakes Trust (“TALT”) as Lakebed owner. > Encourages collective responsibility for the care and use of land and water > Objective 5.2A: Restore and enhance the health and diversity of ecosystems and habitats in and around Te Arawa Lakes. This includes: > Enhancing and creating wetlands and Lake riparian habitats. > Enhancing ecological corridors within and across Lake catchments. > Enhancing mahinga kai / kai roto stocks. > Objective 5.2B: Take a targeted approach to improving the habitats in and around Te Arawa Lakes. This includes prioritising efforts in areas that are culturally significant to Te Arawa hapū and Iwi and/or have high ecological value. > Objective 5.2C: No further degradation or loss of wetlands and significant Lake riparian habitats around the Lakes and their catchments.



Iwi Management Plans/Documents	High level assessment
	> Objective 5.2D: Revitalise and utilise Te Arawa cultural knowledge and practices in relation to native fauna and flora. Through consultation, undertaken and ongoing, the cultural values and aspirations outlined in this document have been recognised. The effects of the Scheme on a catchment scale, particularly in relation to the quantity and quality of freshwater have been considered through the technical assessments and targeted mitigation and offsetting identified to ensure consistency with this document.
The Ngāti Pikiao Te Mana O Te Wai Statement of 2023	The Ngāti Pikiao Te Mana O Te Wai Statement of 2023 requires any decision on intended abstraction from waterbodies to be supported by thorough assessments of impacts upon mauri and mauriora which are to be conducted alongside mana whenua. This document aligns with the NPS-FM and its core concept of Te Mana o te Wai. Incorporating feedback from iwi consultation, a cultural impact assessment has been prepared to assess the consistency of the Scheme with Te Mana o te Wai. This assessment concludes that with the design of the Scheme as proposed, combined with mitigation and offsetting projects implemented, the overall health of the Kaituna River will be enhanced. Overall, the Scheme can remain consistent with the Ngāti Pikiao Te Mana O Te Wai Statement of 2023.
Ngā Tikanga Whakahaere Taonga O Ngāti Pikiao Whanui Iwi Management Plan (1997)	The Ngāti Pikiao Iwi Management Plan 1997 states that all taonga are to be protected from modification, that only Ngāti Pikiao Iwi can define and undertake cultural effects assessments, and that the management of natural resources shall be undertaken in consultation with Ngāti Pikiao Iwi. The Plan sets out three policies in relation to Historic Heritage, Definition of Special Places and Māori Concepts, which in summary, state that only Ngāti Pikiao can determine those places of special interest, character, intrinsic, amenity value or visual appeal. Another relevant policy in the Plan states that only Ngāti Pikiao has the right to determine what constitutes sustainable management of its natural resources within its tribal territories and that only Ngāti Pikiao Iwi has the right to determine the nature of the relationship between its culture and traditions and its ancestral lands, waters, sites, waahi tapu and other taonga. A further policy of the Plan states that any activities that detrimentally affect waahi tapu, fisheries and water quality shall be prohibited. Given that this document was prepared in 1997, consultation has occurred with iwi to further understand the cultural values that may be affected by the Scheme today. Mitigation and offsetting conditions will protect water quality during the construction and operation



Iwi Management Plans/Documents	High level assessment
	of the Scheme. There is potential for the range of offset restoration projects to result in water quality improvements within the catchment.
Ngāti Rangiwewehi Iwi Environmental Management Plan 2012	The Ngāti Rangiwewehi Iwi Environmental Management Plan identifies the core rohe as the northwestern segment of the Lake Rotorua catchment. Some of the relevant key issues identified relate to declining water quality, loss of stream and wetland habitats, loss of traditional food stocks and cultural resources and minimum flow settings not providing for cultural values. The objectives of this plan as they relate to Whenua: Lands and Areas of Significance, include that: > Land is protected and appropriate land use activities are encouraged. > Ecological corridors inter-connecting forest ecosystems are re-established > Places of significance and wāhi tapu are recognised and protected. > Habitat and natural resource restoration > Wāhi tapu and cultural heritage protection > Green technology is used where available and where feasible, sustainable land use is encouraged using three criteria (cultural, social and environmental). > Economic returns are assessed against tangible benefits to the surrounding community in general and Ngāti Rangiwewehi in particular. > That land use activities that suit the land and climatic conditions are promoted (see Wai Māori Issues). > That livestock exclusion from waterways is encouraged (see Wai Māori Issues) > That all wetlands are protected. > The draining of wetlands will be opposed (see Wai Māori Issues). > That catchment-based integrated riparian management plans are promoted (see Wai Māori Issues). > That the ad-hoc use of chemicals or poisons near waterways are opposed (see Wai Māori Issues).



Iwi Management Plans/Documents	High level assessment
	Through consultation undertaken and ongoing, the cultural values and aspirations outlined in this document have been recognised. Potential and actual effects on water quality, the loss of stream and wetland habitats, mahinga kai and minimum flows have been assessed through the technical reports that have been prepared. With the mitigation and offsetting package prepared in association with the Scheme, consistency can be achieved with the relevant objectives of this plan.
Te Ratau te Rahui Taketake Ngāti Whakaue ke Maketū Hapu Management Plan 2018-2028	Of particular relevance to this Scheme the following objectives and policies as they relate to water quality, water quality, wetlands and ecosystems are set out below: Water Quality > Objective 1: To take a more holistic and collective approach to sustainable land use and development within our rohe > Policy 1.1: Councils, landowners and consent applicants to recognise the principle of interconnectedness or “ki uta ki tai” (from the mountains to the sea). This includes the localised and cumulative effects of land use and development > Objective 2: Manage the effects of discharges on freshwater and coastal water quality > Policy 2.2: Advocate for the use of mātauranga-based tools to measure and monitor the cultural impact of consented discharges. > Policy 2.9: Work with Regional Council and Kaituna Catchment Control Scheme Advisory Group with regards to the operation and maintenance of...weirs...to ensure that our cultural values and interests are protected; and concerns around sludge and water quality are addressed. > Objective 3: Improve and share knowledge about water quality within our rohe > Policy 3.1: Install more water quality monitoring sites within our rohe Water Quantity > Objective 5: To ensure there is sufficient water for the taiao (first) and for use (second) and that water use is efficient.



Iwi Management Plans/Documents	High level assessment
	> Policy 5.1: Recognise and provide for the national significance of Te Mana o Te Wai within freshwater planning, management and decision making. > Policy 5.2: Advocate for greater recognition and use of intergenerational knowledge (Mātauranga Māori) in freshwater management and planning within our rohe > Policy 5.3: Provide for freshwater allocation and use on Māori Land, particularly under-utilised Māori land and/or Te Arawa settlement lands, to enhance social and economic wellbeing of our people. > Objective 6: To improve and share knowledge about water quantity and allocation within our rohe > Policy 6.1: Install more monitoring sites within our rohe to monitor river and stream flows as well as aquifer levels. Wetlands > Objective 13: To have more wetland ecosystems that provide healthy habitats for flora and fauna and access for cultural and educational use. > Policy 13.1: Oppose further drainage of wetland areas within our rohe. > Policy 13.2: Advocate for an increase in the extent of wetlands within our rohe, particularly in areas where wetness is a limitation e.g. gullies, high water table areas. > Policy 13.4: Advocate for greater recognition and use of intergenerational knowledge (Mātauranga Māori) in the use and enhancement of wetlands. Biodiversity/Habitats > Objective 14: To restore the balance, health and diversity of ecosystems to enable habitat enhancement for our valued flora and fauna. > Policy 14.1: Value and manage our taiao as a network of interconnected ecosystems. > Policy 14.3: Promote the creation and/or connection of pathways for our flora and fauna comprising corridors of ngahere, wetlands, riparian margins and other habitats.



Iwi Management Plans/Documents	High level assessment
	> Policy 14.4: Advocate for greater recognition and use of intergenerational knowledge (Mātauranga Māori) in ecosystem and habitat enhancement within our rohe > Policy 14.5: Require riparian planting on the edges of the river banks using plant species that will benefit our taonga fish species such as inanga (whitebait) and tuna (eels). Through consultation undertaken and ongoing, the cultural values and aspirations outlined in this document have been recognised. The effects of the Scheme on a catchment scale, particularly in relation to the quantity and quality of freshwater have been considered through technical assessments and targeted mitigation and offsetting identified to ensure consistency with this document.
Ngāti Whakaue ke Maketū Iwi Resource Management Plan Phase 2 (2011)	This plan states that the right to Kaitiakitanga (Guardianship) of Maketu in particular the Maketu Estuary and lower Kaituna River lies with Ngāti Whakaue ki Maketu. Like other Iwi, Ngāti Whakaue ki Maketu are determined to seek co-management over the waterways with the territorial authority. Part four of this plan identifies the issues and outcomes that NWKM hapu see as significant to the cultural, historical, social, environmental and economic well-beings. The following outcomes of direct relevance to this Scheme include the need to: > Recognise the importance of the Kaituna River in connection with the Rotorua Lakes > The implementation of the Kaituna River / Maketu estuary strategy > Regional and District Councils taking responsibility and accountability for the effects of discharges on the well-being of the waterways. > Wetland restoration is given a priority and status as important to improve water quality > Water management plan to include management of discharge consents. Through consultation undertaken and ongoing, the cultural values and aspirations outlined in this document have been recognised. Understanding the potential downstream water quality effects on the Lower Kaituna River as a result of this Scheme has been a key consideration by the aquatic ecologist who have assessed the effects. Appropriate mitigation and offset projects (including wetland



Iwi Management Plans/Documents	High level assessment
	restoration) have been identified that provide an opportunity to deliver significant water quality and ecological enhancements as well as mahinga kai gathering opportunities within the catchment. With these measures in place, consistency can be achieved with this document.
Waitaha Iwi Management Plan 2014	Waitaha have a Statutory Acknowledgement for the lower reach of the Kaituna River, downstream of the confluence with the Waiari Stream. This plan highlights that “Our fundamental aspiration is to maintain our intrinsic relationships with each other, our ancestral environment and how this connects us as a people to who we are. We want to maintain the quality of the natural world as Waitaha becomes more proactive in monitoring the environment to which we are intimately connected. The care and sustainability of the mauri and wairua of all natural resources is of a high priority.” The document sets out the Waitaha Tikanga (Policy), problems faced and desired outcomes. Some of the problems identified that are relevant for consideration in relation to this scheme are: > Disturbance, interference or any impacts that may adversely affect any waahi tapu or archaeological sites of significance > Threats to fish, birdlife, mammals, invertebrate. > Threats from introduced pest animals and plants > Only a small portion of indigenous fauna and flora species left > Sensitive biodiversity disturbed from humans and vehicles trampling land > Need to protect riparian habitats > Effects on rivers and streams as a result of developments i.e. Exploration – renewable energy. > Siltation and sedimentation of harbour > Stormwater run off > Water diversions



Iwi Management Plans/Documents	High level assessment
	> Water allocations > Effects of climate change > Restoration of wetlands > Modification to water bodies and increased discharge of pollutants > Any major earthworks, or extractions of natural resources > Lack of outsiders understanding our cultural relationship to the land > Environmental damage creates cultural harm Desired outcomes include that Waitaha protocols are appropriately implemented in accordance with legislation and that the Waitaha process for consultation and engagement is adhered to (page 33 of this plan). Through consultation undertaken and ongoing, the cultural values and aspirations outlined in this document have been recognised. Understanding the potential downstream water quality effects on the Lower Kaituna River as a result of this Scheme has been a key consideration by the aquatic ecologist who have assessed the effects. Appropriate mitigation and offset projects have been identified that provide an opportunity to deliver significant water quality and ecological enhancements as well as mahinga kai gathering opportunities within the catchment. These management measures all assist with issues identified through this Iwi Management Plan and ensuring consistency with the outcomes sought.

