



FTC #145: Application for referred project under the COVID-19 Recovery (Fast-track Consenting) Act 2020 – Stage 1 decisions

Application 2022-098 Waiterimu Solar Farm Project Application 2022-100 Waikanae North Project

Date submitted:	28 th July 2022	Tracking #: BRF-1923	
Security level:	In-Confidence	MfE priority:	Urgent

	Action sought:	Response by:
To Hon David Parker, Minister for the Environment	Decision on recommendations in Table A	To be advised

Actions for Minister's Office	1. Return the signed briefing to MfE.
staff	 Send attached letter (if signed) with accompanying template and links to application documents.
Number of	Attachments:
attachments: 6	1. Application documents for Waiterimu Solar Farm Project (pdf/Databox link)
	2. Application documents for Waikanae North Project (pdf/Databox link)
	 Letter to Ministers – inviting comments on Waiterimu Solar Farm Project and Waikanae North Project referral
	 Letter to Minister of Energy and Resources – inviting comment on Waiterimu Solar Farm Project
	 Letter to Associate Minister for the Environment (Urban Policy) – inviting comment on Waikanae North Project
	6. Template for ministerial comment

Ministry for the Environment contacts

Position	Name	Cell phone	1 st contact
Principal Author	Max Gander-Cooper, Samantha Maxwell		
Manager	Madeline Berry	s 9(2)(a)	✓
Director	Stephanie Frame	s 9(2)(a)	

FTC#145: Application for referred project under the COVID-19 Recovery (Fast-track Consenting) Act 2020 – Stage 1 decisions

Key messages

- This briefing seeks your initial decisions on applications to refer the following projects to an expert consenting panel (panel) under the COVID-19 Recovery (Fast-track Consenting) Act 2020 (FTCA):
 - a. Waiterimu Solar Farm Project, from Waikato Solar Farms Limited and Transpower NZ Limited
 - b. Waikanae North Project, from Bulletin Trust
- 2. The Waiterimu Solar Farm Project is to construct and operate a solar farm on a 380-hectare site at 304 and 345 Waiterimu Road, Waiterimu, Waikato, and to connect it to the national electricity grid. The solar farm will have an approximate output of 140 Megawatt peak, and will comprise:
 - a. approximately 225,000 solar panels up to approximately 3.5 metres high and, occupying approximately 63 hectares
 - b. inverter cabinets, arrays, mounting structures, motors and poles to support the panels
 - c. a substation and transmission line to connect to the national grid
 - d. an energy storage facility
 - e. underground electricity cables
 - f. ancillary buildings, structures and infrastructure (including roads, fencing, security lighting and for connection to existing overhead electricity lines)
 - g. landscaping including planting and enhancement of wetlands and streams.
- 3. The project will require land use consents under the Operative and Proposed Waikato District Plans, land use consent and water and discharge permits under the Waikato Regional Plan and resource consent under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES-CS) and the Resource Management (National Environmental Standards for Freshwater) Regulations 2020 (NES-F).
- 4. The project site is in the Rural Zone under the Operative and Proposed Waikato District Plans and the proposed activities will have overall discretionary activity status under those plans due to exceeding various permitted activity standards. The applicants note the project is considered 'specified infrastructure' and will have overall discretionary activity status under the NES-F relating to construction, maintenance and operation.
- 5. The Waikanae North Project is to subdivide an approximately 33-hectare site located at 99 and 103 State Highway 1, Waikanae, Wellington and construct approximately 410 residential units and supporting infrastructure including roads, accessways, parking areas and three-waters services. The project includes the creation of open space areas and restoration and planting of natural wetlands on the site. The project will also require the infilling of several modified streams on the site.
- 6. The project will require subdivision and land use consents under the Kapiti Coast District Plan (KCDP), land use consent and water and discharge permits under the Proposed Natural Resources Plan for the Wellington Region and the Regional Freshwater Plan for the Wellington Region, and resource consents under the NES-F.
- 7. The project site is located in the General Rural Zone and the Waikanae North Eco Hamlet

Precinct (the precinct) under the KCDP. The precinct is located adjacent to the Waikanae North urban growth area and is intended to provide a buffer or transition between the urban area and rural zones. The KCDP anticipates that some development in the precinct may be clustered, however the overall density should be relatively low to retain the sense of openness, recognise sensitive landscape and ecological characteristics, and maintain compatibility with primary production activities. The proposed activities have overall non-complying activity status due to the density of residential subdivision and development, and earthworks within 10 metres of, and diversion of water within 100 metres of, natural wetlands.

- 8. Kapiti Coast District Council (KCDC) adopted a growth strategy, Te tupu pai Growing well, in February 2022 (the strategy). The strategy sets out a vision and roadmap for 30 years and identifies land to the north of Waikanae, including the project site, as a 'medium priority greenfield growth area'. The strategy identifies a future local centre and potential rapid transit stop at Waikanae North but notes the need for further investigation of constraints, including required infrastructure. KCDC intends to implement the strategy through plan changes to the KCDP, however a specific timeframe for the Waikanae North area is not provided.
- 9. If the project is referred it will be assessed against the KCDP and NES-F as a non-complying activity. The applicant considers that the project will not be contrary to the relevant objectives and policies of the KCDP and NES-F, and that adverse effects will be no more than minor, which will allow the project to pass the 'gateway tests' in section 104D of the Resource Management Act 1991 (RMA).
- 10. We have undertaken an initial (Stage 1) analysis of the referral applications and this is presented along with our recommendations in Table A.
- 11. The projects meet all the eligibility criteria in section 18(3) of the FTCA, but more analysis is needed before we can advise you if they meet the purpose of the FTCA (thus satisfying section 18(2) of the FTCA) and advise you on matters in section 23(5) which may influence your referral decision.
- 12. We recommend you progress consideration of both applications to the next stage of analysis (Stage 2) and invite comments from the relevant local authorities and specific Ministers listed in section 21(6) of the FTCA.
- We recommend that for the Waiterimu Solar Farm Project you invite comments from the Minister of Energy and Resources as an additional Minister under section 21(6)(n) of the FTCA.
- 14. We recommend that for the Waikanae North Project, you invite comments from the Associate Minister for the Environment (urban policy) as an additional Minister under section 21(6)(n) of the FTCA, and from Waka Kotahi NZ Transport Agency as an additional party under section 21(3) of the FTCA.
- 15. We also recommend that for the Waikanae North Project you request further information from the applicant, KCDC and Greater Wellington Regional Council as detailed in Table A.

Statutory framework summary

- 16. You are the sole decision maker for the referral applications as the projects will not occur in the coastal marine area.
- 17. You may decline a referral application before seeking comments from the relevant local authorities and any relevant Ministers:
 - a. if you are satisfied the project does not meet the referral criteria in section 18 of the FTCA, (which include helping to achieve the purpose of the FTCA) (see sections 18(2) and 23(1) of the FTCA)

- b. for any other reason (see section 23(2) of the FTCA).
- 18. If you do not decline a referral application at this stage:
 - a. you must provide the application to, and invite comments from, the relevant local authorities and the relevant Ministers prescribed by section 21(6) of the FTCA
 - b. you may provide the application to and invite comments from any other person.
- 19. You are also able to request further information from the applicants or any relevant local authority at any time before you decide to decline or accept a referral application (see section 22 of the FTCA).

Action sought

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

Signature

MSE

Madeleine Berry Acting Manager – Fast-track Consenting

Table A: Stage 1 initial assessment of project eligibility – projects where the Minister for the Environment is the only decision maker

Projects to progress

				Will project help to achieve the purpose of the FTCA? [section 18(2)]						Τ
Project details	Project description	Project funding	Is project eligible for referral? [section 18(3)]	Economic benefits and costs for people or industries affected by COVID-19 [section 19(a)]	Effect on social and cultural wellbeing of current and future generations [section 19(b)]	Likelihood project will progress faster under the FTCA than would otherwise be the case [section 19(c)]	Public benefit [section 19(d)]	Potential for significant adverse environmental effects, including greenhouse gas emissions [section 19(e)]	Any other relevant matters [section 19(f)]	
Name Waiterimu Solar Farm Project Applicants Waikato Solar Farms Limited Transpower NZ Limited c/- Chapman Tripp Location 304 and 345 Waiterimu Road, Waiterimu, Waikato	The project is to construct and operate a solar farm on a 380- hectare site at 304 and 345 Waiterimu, Road, Waiterimu, Waikato, and to connect it to the national electricity grid. The solar farm will have an approximate output of 140 Megawatt peak, and will comprise: a. approximately 225,000 solar panels up to approximately 3.5 metres high and, occupying approximately 63 hectares b. inverter cabinets, arrays, mounting structures, motors and poles to support the panels c. a substation and transmission line to connect to the national grid d. an energy storage facility e. underground electricity cables f. ancillary buildings, structures and infrastructure (including	Waikato Solar Farms Limited has provided information to demonstrate they have a track record of delivering several projects of a similar or larger scale overseas. We are not concerned about the applicants' ability to fund and deliver the project. We note that the ultimate holding company for Waikato Solar Farms Limited is registered overseas. While the applicant states in their applicant states in their applicant states in their applicant office (OIO) is not required, we recommend that you seek additional information from the applicant on this matter.	 Based on available information at this stage, we consider the project is eligible for referral because: it does not include any prohibited activities it does not include land returned under a Treaty settlement it does not occur in a customary marine title area or protected customary rights area under the Marine and Coastal Area (Takutai Moana) Act 2011. 	The applicants estimate the project will: • provide approximately 100 direct full- time equivalent (FTE) jobs over a 2-year period and 5-10 ongoing FTE jobs • contribute \$170M to GDP during construction. The applicants have not provided an economic assessment to support these figures, and it is not clear whether the employment figures cover only construction or design, engineering etc. We recommend that you seek additional information from the applicant to support these figures.	The applicants estimate the project will contribute to the social wellbeing of current and future generations as it will: • contribute to job creation and flow- on economic benefits. While the applicants have not identified how the project will contribute to cultural wellbeing, they have stated that they are in consultation with the local marae on how they can contribute to cultural initiatives as part of the project. We also consider that the project will contribute to increased electricity supply and security which will assist communities.	The applicants estimate that the FTCA process will allow the project to progress 6-12 months faster than under standard RMA processes due to the likelihood of notification and a hearing and potential for appeals under standard process. We recommend that you seek comments from Waikato District Council and Waikato Regional Council on the appropriateness of using the FTCA process.	Based on the applicants' information we consider the project may result in the following public benefits: generating employment by providing approximately 100 direct FTE jobs over a 2-year period and 5- 10 ongoing FTE jobs providing infrastructure that will contribute to improving economic and employment outcomes assisting New Zealand's efforts to mitigate climate change and transition more quickly to a low emissions economy by increasing New Zealand's total amount of renewable energy generation.	The project has the potential for adverse environmental effects including: • traffic generation and effects on access • amenity effects • landscape, rural character and visual amenity effects • ecological effects • temporary construction effects, including noise and vibration • glint and glare effects • contaminated land effects • loss of productive land The applicants have confirmed that specialists have prepared technical assessments on the above matters. The applicants consider the project will not result in significant adverse environmental effects. We note that you do not require a full Assessment of Environment Effects and supporting evidence to make a referral decision, and that a panel will consider the significance of effects and appropriate mitigation should the project be referred.	The application involves works within a 10-metre setback from natural wetlands, which may have a prohibited activity status under the NES-F. The applicant has provided an assessment which states that the project meets the definition of specified infrastructure and regionally significant infrastructure under the NES-F and National Policy Statement for Freshwater Management 2020 (NPSFM). We are satisfied at this stage that the project will not include prohibited activities.	

	Re	commendations	Minister's decisions
n /	a.	Note that section 23(3) of the FTCA permits you to decline the referral application without inviting comments from the relevant local authorities and any relevant Ministers.	
ct	b.	Note that you have not yet provided the application to, nor sought any comments on it from, relevant local authorities or relevant Ministers but that you are required to do so if you do not decline the application under section 23(3) of the FTCA.	
:	C.	Note that section 21(3) of the FTCA permits you to forward an application to, and invite written comments from, any other person.	
9	d.	Note that section 22 of the FTCA permits you to request further information from the applicants or relevant local authorities at any time before you decide whether to accept or decline an application.	
d	e.	Agree to progress the Waiterimu Solar Farm Project to our Stage 2 analysis. The project warrants further analysis because it has potential to achieve the purpose of the FTCA but we need to consider some matters further before providing you with our final advice on the referral application.	Yes/No
	f.	Agree to provide the application to, and invite comments from:	Yes/No
		 the Ministers listed in section 21(6)(a)–(m) of the FTCA the Minister of Energy and Resources as an additional relevant Minister under section 21(6)(n) of the FTCA the relevant local authorities – Waikato District Council and Waikato Regional Council. 	
	g.	Agree to seek further information from the applicant supporting their analysis of economic benefits, and whether OIO approvals are	Yes/No

				Will project help to achieve the purpose of the FTCA? [section 18(2)]					
Project details	Project description	Project funding	Is project eligible for referral? [section 18(3)]	Economic benefits and costs for people or industries affected by COVID-19 [section 19(a)]	Effect on social and cultural wellbeing of current and future generations [section 19(b)]	Likelihood project will progress faster under the FTCA than would otherwise be the case [section 19(c)]	Public benefit [section 19(d)]	Potential for significant adverse environmental effects, including greenhouse gas emissions [section 19(e)]	Any other relevant matters [section 19(f)]
	roads, fencing, security lighting and for connection to existing overhead electricity lines) g. landscaping including planting and enhancement of wetlands and streams. The project will require land use consents under the Operative and Proposed Waikato District Plans, land use consent and water and discharge permits under the Waikato Regional Plan and resource consent under the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (NES-CS) and the Resource Management (National Environmental Standards for Freshwater) Regulations 2020 (NES-F).								

ner relevant n 19(f)]	Recommendations	Minister's decisions
	 required. h. Sign the attached letters to Ministers. i. Note that while awaiting comments from invited parties, the Ministry for the Environment will, in consultation with the Office of Māori Crown Relations – Te Arawhiti, prepare a report for the purpose of section 17 of the FTCA. 	Yes/No

				Will project help to achieve the purpose of the FTCA? [section 18(2)]						
Project details	Project description	Project funding	Is project eligible for referral? [section 18(3)]	Economic benefits and costs for people or industries affected by COVID-19 [section 19(a)]	Effect on social and cultural wellbeing of current and future generations [section 19(b)]	Likelihood project will progress faster under the FTCA than would otherwise be the case [section 19(c)]	Public benefit [section 19(d)]	Potential for significant adverse environmental effects, including greenhouse gas emissions [section 19(e)]	Any other relevant matters [section 19(f)]	Recommendations
Name Waikanae North Project Applicant Bulletin Trust c/- Scope Planning Limited Location 99 and 103 State Highway 1, Waikanae	The Waikanae North Project is to subdivide an approximately 33- hectare site located at 99 and 103 State Highway 1, Waikanae and construct approximately 410 residential units and supporting infrastructure including roads, accessways, parking areas and three-waters services. The project includes the creation of open space areas, restoration and planting of natural wetlands on the site and stream reclamation. The project will require subdivision and land use consents under the Kapiti Coast District Plan (KCDP), land use consent and water and discharge permits under the Proposed Natural Resources Plan for the Wellington Region and the Regional Freshwater Plan for the Wellington Region, and resource consents under the Resource Management (National Environmental Standard for Freshwater)	The applicant has advised that it is part of the Thames Pacific Limited group of companies and that Thames Pacific is an experience development company with 6 large projects currently underway in the Wellington region. The project will be funded by a traditional residential development funding model, with the majority of funding to be provided by major New Zealand banks once resource consents are in place. At the early stage costs will be borne by Thames Pacific Limited from their balance sheet. At this stage we do not have any concerns about the applicant's ability to finance the project.	Based on available information at this stage, we consider the project is eligible for referral because: • it does not include any prohibited activities • it does not include land returned under a Treaty settlement • it does not occur in a customary marine title area or protected customary rights area under the Marine and Coastal Area (Takutai Moana) Act 2011.	Based on the information provided by the applicant we consider the project may result in the following economic benefits: • provide approximately 747 direct full time equivalent (FTE) jobs over an approximately 4-year design and construction period • contribute approximately \$99.3 M to national GDP.	The project will provide for the social wellbeing of current and future generations as it will: • generate employment through the provision of approximately 747 direct FTE jobs • provide an additional housing supply of approximately 410 residential units.	The applicant considers that the fast-track process will allow the project to progress approximately 14-38 months faster than under standard Resource Management Act 1991 (RMA) process, due to the likelihood of public notification and subsequent appeal under standard process. We recommend seeking comment from Kapiti Coast District Council (KCDC) and Greater Wellington Regional Council on the appropriateness of using the FTCA process.	Based on the information provided, the project may result in the following public benefits: • generating employment • increasing housing supply. The applicant considers that due to the proximity to the Waikanae township and public transport, the project is likely to contribute to a well-functioning urban environment.	The project has the potential for adverse environmental effects including: effects on freshwater, including on wetlands and wetland ecology stormwater and sediment discharge effects effects on character, landscape, visual and amenity values loss of rural production land and reverse sensitivity effects relating to rural activities on adjacent land noise, vibration, odour, traffic and other temporary construction effects effects relating to infrastructure and servicing capacity transport effects The applicant provided an ecological assessment that identifies five natural wetlands on the project site. No development is proposed within the wetland areas, however stormwater diversion will occur within 100 metres of, and earthworks within 10 metres of, natural wetlands. We recomment from Greater Wellington Regional Council on whether it agrees with the location and extent of the natural wetlands identified in the applicant's ecological assessment, and whether any proposed works are prohibited activities under the NES-F. The applicant has provided preliminary	The project site is located in the General Rural Zone and the Waikanae North Eco Hamlet Precinct under the KCDP (the precinct). The precinct is located adjacent to the Waikanae North urban growth area and is intended to provide a buffer or transition between the urban area and rural zone. The KCDP anticipates that some development in the precinct may be clustered, however the overall density should be relatively low to retain the sense of openness, recognise sensitive landscape and ecological characteristics, and maintain compatibility with primary production activities. The proposed activities have overall non-complying activity status due to the density of residential subdivision and development, and earthworks within 10 metres of, and diversion of water within 100 metres of, natural wetlands. Kapiti Coast District Council (KCDC) recently adopted a growth strategy, Te tupu pai – Growing well (the strategy), in February 2022. The strategy sets out a vision and roadmap for 30 years and identifies land to the north of Waikanae, including the project	 a. Note that section 23(3) permits you to decline the application without invitie comments from the releauthorities and any releauthorities and any releauthorities and any releauthorities or relevant to the application to, nor secomments on it from, reauthorities or relevant to do not decline the application to do not decline the application 23(3) of the FTC. c. Note that section 21(3) permits you to forward a application to, and invite comments from, any other decline an application to, and invite comments from, any other decline an application to decline an application. d. Note that section 22 of permits you to request from from the apprelevant local authorities before you decide whether or decline an application. e. Agree to progress the W North Project to our State analysis. The project was further analysis because potential to achieve the the FTCA but we need the Some matters further be providing you with our fir on the referral application. f. Agree to provide the appand invite comments from the application of the section 21(6)(n) of the Function and ditional relevant M section 21(6)(n) of the function and the applicant on the referral application of the relevant local and the section 21(6)(n) of the function and the applicant on the applicant on: provision of three-was infrastructure

ant tal	Any other relevant matters [section 19(f)]	Recommendations	Minister's decisions
er, ds y nd ion it ion	The project site is located in the General Rural Zone and the Waikanae North Eco Hamlet Precinct under the KCDP (the precinct). The precinct is located adjacent to the Waikanae North urban growth area and is intended to provide a buffer or transition between the urban area and rural zone. The KCDP anticipates that some development in the precinct may be clustered, however the overall density should be relatively low to retain the sense of openness, recognise sensitive landscape and ecological	 a. Note that section 23(3) of the FTCA permits you to decline the referral application without inviting comments from the relevant local authorities and any relevant Ministers. b. Note that you have not yet provided the application to, nor sought any comments on it from, relevant local authorities or relevant Ministers but that you are required to do so if you do not decline the application under section 23(3) of the FTCA. c. Note that section 21(3) of the FTCA permits you to forward an application to, and invite written comments from, any other person. d. Note that section 22 of the FTCA permits you to request further information from the applicant or relevant local authorities at any time before you decide whether to accept or decline an application. e. Agree to progress the Waikanae North Project to our Stage 2 	Yes/No
d nent iral ct is	characteristics, and maintain compatibility with primary production activities. The proposed activities have overall non-complying activity status due to	analysis. The project warrants further analysis because it has potential to achieve the purpose of the FTCA but we need to consider some matters further before providing you with our final advice on the referral application.	
er will es hin r nal the ther re	the density of residential subdivision and development, and earthworks within 10 metres of, and diversion of water within 100 metres of, natural wetlands. Kapiti Coast District Council (KCDC) recently adopted a growth strategy, Te tupu pai – Growing well (the strategy), in February 2022. The strategy sets out a	 f. Agree to provide the application to, and invite comments from: the Ministers listed in section 21(6)(a)–(m) of the FTCA the Associate Minister for the Environment (urban policy) as an additional relevant Minister under section 21(6)(n) of the FTCA the relevant local authorities – Greater Wellington Regional Council and Kapiti Coast District Council Waka Kotahi NZ Transport Agency as an additional entity under section 21(3) of the FTCA. 	Yes/No
ider	vision and roadmap for 30 years and identifies land to the north of Waikanae, including the project	 g. Agree to seek further information from the applicant on: provision of three-waters infrastructure 	Yes/No

					Will project	help to achieve the	purpose of the Fl	[CA? [section 18(2)]		
Project details	Project description	Project funding	Is project eligible for referral? [section 18(3)]	Economic benefits and costs for people or industries affected by COVID-19 [section 19(a)]	Effect on social and cultural wellbeing of current and future generations [section 19(b)]	Likelihood project will progress faster under the FTCA than would otherwise be the case [section 19(c)]	Public benefit [section 19(d)]	Potential for significant adverse environmental effects, including greenhouse gas emissions [section 19(e)]	Any other relevant matters [section 19(f)]	R
	Regulations 2020 (NES-F). The location and extent of proposed stream reclamation is unclear in the application and we recommend you seek further information from the applicant on this, and the need for additional consents under the NES-F and regional plan/s.					[section 19(c)]		assessments/statements from a number of technical experts and considers that the project will not result in any significant adverse effects on the environment. We note that you do not require a full Assessment of Environment Effects and supporting evidence to make a referral decision, and that a panel will consider the significance of effects and appropriate mitigation should the project be referred.	site, as a 'Medium priority greenfield growth area'. The strategy identifies a future local centre and potential rapid transit stop at Waikanae North but notes the need for further investigation of constraints, including what infrastructure development would be required. KCDC intends to implement the strategy through plan changes to the KCDP, however a specific timeframe for the Waikanae North area is not provided. We recommend seeking feedback from KCDC on the appropriateness of using the FTCA for the project (given the existing KCDC policy framework applying to the site) and the anticipated timeframe for rezoning of the site for urban development as indicated in the strategy, and any infrastructure upgrades that will be required to service the project. The applicant has not clearly outlined what infrastructure upgrades may be required to service the project and we recommend you seek further information from the applicant and KCDC on this, including funding mechanisms for any required upgrades. With respect to the proposed stream	h. i.

evant	Recommendations	Minister's decisions
ium eld The ies a htre apid th but I for ation	 encumbrances on the records of titles the proposed stream reclamation h. Agree to seek further information from Greater Wellington Regional Council on: any concerns about the availability of three-waters infrastructure the applicant's assessment of the 	Yes/No
vould CDC ement rough o the er a ume for North vided.	 Agree to seek further information from Kapiti Coast District Council on: any concerns about the availability of three-waters infrastructure whether the project align with the outcomes and timing outlined in the growth strategy 	Yes/No
d ack the ss of A for en the policy lying to le eframe the s s iny will be vice	 h. Sign the attached letters to Ministers. i. Note that while awaiting comments from invited parties and further information, the Ministry for the Environment will, in consultation with the Office of Māori Crown Relations – Te Arawhiti, prepare a report for the purpose of section 17 of the FTCA. 	Yes/No
has not I what be vice we we u seek tion ant this, ng or any des. o the im		

Project details	Project funding	Is project eligible for referral? [section 18(3)]	Will project help to achieve the purpose of the FTCA? [section 18(2)]						
			Economic benefits and costs for people or industries affected by COVID-19 [section 19(a)]	Effect on social and cultural wellbeing of current and future generations [section 19(b)]	Likelihood project will progress faster under the FTCA than would otherwise be the case [section 19(c)]	Public benefit [section 19(d)]	Potential for significant adverse environmental effects, including greenhouse gas emissions [section 19(e)]	Any other relevant matters [section 19(f)]	Minister's decisions
								reclamation, we recommend you request further assessment from the applicant against the objectives and policies of the National Policy Statement for Freshwater Management 2020, and Policy P102 of the Proposed Natural Resources Plan for the Wellington Region - Appeals Version (relating to avoiding the loss of extent and values of the beds of rivers). As the project site is located adjacent to State Highway 1 we recommend that you seek comment on the application from Waka Kotahi New Zealand Transport Agency.	

Signed:

Hon David Parker Minister for the Environment

Date: