



FTAA–2503-1036: Application received for referral of the project Lake Pūkaki Hydro Storage and Dam Resilience Works under the Fast-track Approvals Act 2024 – Stage 1 decisions

Project Name: Lake Pūkaki Hydro Storage and Dam Resilience Works

Date submitted:	23 May 2025	Tracking #: BRF–6266	
Security level:	In-Confidence	MfE priority:	Urgent

	Action sought:	Response by:
To Hon Chris Bishop, Minister for Infrastructure	Decisions on recommendations in Table A	28 May 2025

Actions for Minister's Office staff	Return the signed briefing to MfE FTAreferals@mfe.govt.nz Send email to Ministers to invite comment
Number of attachments: 3	Attachments: 1. Application documents for the Lake Pūkaki Hydro Storage and Dam Resilience Works project 2. List of the Māori groups referred to in section 18(2)) 3. Statutory framework summary

Ministry for the Environment contacts:

Position	Name	Cell phone	1 st contact
Principal Author(s)	Helen Willis / Joanne Waitoa		
Manager	Stephanie Frame	s 9(2)(a)	✓
General Manager	Ilana Miller	s 9(2)(a)	

Project location



Figure 1 – Project location

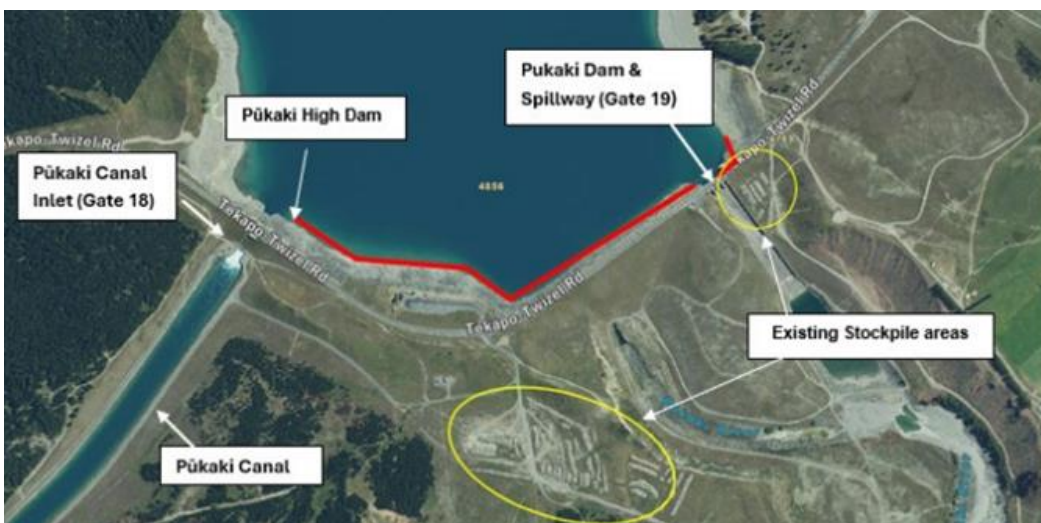


Figure 2 – Pūkaki Dam at southern point of Lake Pūkaki

Key messages

1. This briefing seeks your initial decisions on an application from Meridian Energy Limited to refer the Lake Pūkaki Hydro Storage and Dam Resilience Works project (the project) under the Fast-track Approvals Act 2024 (the Act) to the fast-track approvals process. At this stage you can either decline an application for the reasons set out section 21, or provide the application to, and invite comments from, the parties identified in section 17. If you do not decline the application, you will receive a further briefing following receipt of comments, to support your final decision on whether to refer the project.
2. Lake Pūkaki is located on Tekapo-Twizel Road, approximately 10 kilometres north of Twizel, in the Mackenzie Basin. The application notes Lake Pūkaki is the largest storage reservoir in New Zealand and is nationally significant electricity infrastructure. Lake Pūkaki covers an area of approximately 178km² and is part of the wider Waitaki Hydroelectric scheme which provides over half New Zealand's hydroelectricity storage capacity.
3. The project seeks resource consents for water takes from Lake Pūkaki contingent storage to occur over three consecutive winters from winter 2026 at levels lower than the minimum permitted level of 518mRL, which is a prohibited activity under the Resource Management Act 1991 (RMA). Despite this prohibited activity status, the application does not trigger any ineligibility criteria under section 5 of the Act. Note that the applicant already holds resource consents to operate the lake above the permitted level.
4. As the project would be a prohibited activity under the Canterbury Regional Council Waitaki Catchment Water Allocation Plan (WAP), the fast-track process, if successful, offers a more efficient option than a formal plan change using standard RMA processes.
5. The project also seeks resource consents to install permanent rock armouring on Pūkaki Dam at the southern end of the lake. Rock armouring works can only be undertaken when lake levels are lower than permitted and will take 10-12 weeks to complete from commencement.
6. The project also seeks a wildlife permit under the Wildlife Act 1953 in case native lizard species require capture and relocation.
7. The applicant notes that the project will require the temporary closure and subsequent relocation of some visitor infrastructure owned by Mackenzie District Council (MDC). A council leaseholder (Mt Cook Alpine Salmon Shop) will also be displaced. The applicant advises it is continuing discussions with MDC on these matters.
8. We have undertaken initial analysis of the referral application, and this is presented along with our analysis and recommendations in Table A.
9. We have decided the application is complete and complies with section 14 of the Act, as the application complies with section 13 requirements, may be capable of satisfying the criteria in section 22 and does not appear to involve an ineligible activity. The applicable fee and levy have been paid.
10. We recommend you progress consideration of the referral application to the next stage of analysis (Stage 2) and invite written comments from the parties prescribed in section 17(1) of the Act being: the Minister for the Environment and the Minister for Energy as 'other relevant portfolio Ministers', relevant local authorities, relevant administering agencies, the owners of Māori land within the project area and identified Māori groups from section 18(2) of the Act. The parties are listed in Attachment 2.
11. We recommend that you invite written comments from the following as additional parties

under section 17(5) of the Act:

- a. The Minister for Economic Development and the Minister for Regional Development.
 - b. The Chief Executive of Land and Information New Zealand (LINZ) because the project site includes Crown land with an operating easement in favour of the applicant, and as the administrator of Crown land, LINZ can advise on whether there are any matters which might adversely affect the applicant's ability to undertake the proposed works.
 - c. The Chief Executive of Transpower New Zealand Limited (Transpower) because as the operator of the National Grid, Transpower can advise on any impact the project may have on national security of supply and contingent hydro storage.
12. We recommend that under section 20 you request further information from the applicant as detailed in Table A.

Action sought

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

Signature

A handwritten signature in black ink, consisting of a large, stylized 'I' followed by a horizontal stroke that tapers to a point.

Ilana Miller
General Manager – Delivery and Operations

Table A: Stage 1 analysis

Project details	Project Name		Applicant		Project Location			
	Lake Pūkaki Hydro Storage and Dam Resilience Works		Meridian Energy Limited c/- GHD Limited The applicant intends to apply for resource consents under the Resource Management Act 1991 (RMA) and the Wildlife Act 1953, therefore is eligible to apply.		The southern end of Lake Pūkaki, approximately 10 kilometres north of Twizel in the Mackenzie Basin. Lot 1 DP 368484 on the Tekapo-Twizel Road. The engineering infrastructure associated with the hydro dam and control of lake levels is adjacent to the lake, next to the Lake Pūkaki lookout.			
Project description	The project seeks resource consents for water takes from Lake Pūkaki contingent storage to occur over three consecutive winters from winter 2026 at levels lower than the minimum permitted level of 518mRL, which is a prohibited activity under the Resource Management Act 1991 (RMA). Despite this prohibited activity status, the application does not trigger any ineligibility criteria under section 5 of the Act. Note that the applicant already holds resource consents to operate the lake above the permitted level.							
	The project also seeks resource consents to install permanent rock armouring on Pūkaki Dam at the southern end of the lake. Rock armouring works can only be undertaken when lake levels are lower than permitted and will take 10-12 weeks to complete from commencement. The project also seeks a wildlife permit under the Wildlife Act 1953 in case native lizard species require capture and relocation.							
Consultation undertaken	As required by s11, the applicant has consulted with:							
	Relevant local authorities		Relevant iwi authorities, hapu and Treaty settlement entities:		Relevant MACA groups	Ngā hapū o Ngāti Porou	Relevant administering agencies	Holder of land to be exchanged
	<ul style="list-style-type: none">Canterbury Regional Council (CRC)Mackenzie District Council (MDC)		<ul style="list-style-type: none">Te Rūnanga o MoerakiTe Rūnanga o ArowhenuaTe Rūnanga o Waihao		N/A	N/A	Ministry for the Environment Department of Conservation	N/A
Section 22 assessment criteria								
The project is an infrastructure or development project that would have significant regional or national benefits [section 22(1)(a)]	The Minister may consider any of the following matters, or any other matters the Minister considers relevant.							
	<i>Will deliver new regionally or nationally significant infrastructure or enable the continued functioning of existing regionally or nationally significant infrastructure [s22(2)(a)(ii)]</i> The application notes Lake Pūkaki is the largest storage reservoir in New Zealand and is nationally significant electricity infrastructure. The applicant considers the proposed temporary removal of operational triggers on the lake will allow for better planning and utilisation of the realisable electricity generating capacity, and together with the associated rock armouring works, will enable the continued functioning of this nationally significant infrastructure. The project will enhance the operability of lake storage, and the applicant considers this provides flexibility to manage hydro storage effectively and support establishment of other renewable electricity generation sources.							
	<i>Will deliver significant economic benefits [s22(2)(a)(iv)]</i> The application considers the project will deliver significant regional and national economic benefits by enhancing electricity supply security and reducing wholesale electricity prices, both on average and during shortages, which are essential for fostering economic growth. It notes contingent hydro storage represents fuel available to the system at a cost lower than alternatives (such as coal) and removing blocks to access this storage is the most efficient and cost-effective way to boost New Zealand’s energy reserves which do not rely on external supply chains.							
	The application does not provide metrics to support these assertions; therefore we have recommended you request further information (including metrics) from the applicant to demonstrate how the project will deliver significant regional or national economic benefits.							
	<i>Will support climate change mitigation, including the reduction or removal of greenhouse gas emissions [s22(2)(a)(vii)]</i> The application considers the project will support climate change mitigation by reducing greenhouse gas emissions by -224 kilo-tonnes CO2 equivalent per annum. This will be realised by increasing the availability of hydroelectric power, and reducing reliance on coal generation, diesel power, and thermal generation during energy shortage periods. The project aligns with New Zealand’s goals for reducing emissions and transitioning to renewable energy sources.							
	<i>Is consistent with local or regional planning documents, including spatial strategies [s22(2)(a)(x)]</i> The applicant already holds resource consents to operate the lake at levels within required thresholds. The application notes that the project is consistent with aspects of the local and regional planning documents, particularly noting the Canterbury Regional Policy Statement, the Canterbury Land and Water Regional Plan and the Canterbury Air Regional Plan. The project is consistent with the intent of the Canterbury Regional Council ‘Waitaki Catchment Water Allocation Plan’ (WAP), however the lowering of the lake levels below the current consented level triggers the prohibited activity rule. Policy 37 of the WAP allows for the temporary lowering of Lakes Tekapo, Pūkaki, and Ōhau when necessary for the maintenance or rehabilitation of electricity generation infrastructure, which the applicant considers is consistent with and supports the project.							
While the applicant seeks consents for a prohibited activity, it considers that the overall benefits of the project align with those anticipated by the WAP.								
	<i>Any other matters that may be relevant [s22(b)]</i> The application notes that under the Mackenzie District Plan, Lake Pūkaki is identified as being within an Area of Significance to Māori (ID: SASM17, SASM76 and SASM79). SASM76 and SASM79 are both listed on the Mackenzie District Council website as unnamed and silent files with wāhi tapu value, and SASM79 is listed as a statutory acknowledgement area with significant cultural value relating to wai tapu, wai taoka, wāhi tūpuna and wāhi tapu.							

	The section 18 report will provide you with further information on any obligations or matters arising regarding this matter if you decide to progress the application to our second stage of analysis.		
referring the project to the fast-track approvals process [section 22(1)(b)]	<p><i>Would facilitate the project, including by enabling it to be processed in a more timely and cost-effective way than under normal processes [s22(1)(b)(i)]</i></p> <p>The applicant considers project referral is essential to facilitate the project given there is currently no statutory pathway to lower Lake Pukaki levels below 518mRL, without a plan change, due to its classification as a prohibited activity under the WAP. The application further notes that utilising the fast-track approvals process will help mitigate or avoid energy shortages such as were experienced in Winter 2024. This will improve market planning/utilisation of all the realisable generation capacity of Lake Pūkaki as well as enable the rock armouring works to be completed as soon as practicable – works which must occur when lake levels are lowered.</p> <p><i>Is unlikely to materially affect the efficient operation of the fast-track approvals process [s22(1)(b)(ii)]</i></p> <p>The applicant considers that the project is unlikely to materially affect the efficient operation of the Fast-track approvals process as the temporary consent for eased access to contingent storage is specific and time-bound for the next three consecutive winters which ensures a streamlined review and approval process. The consent for the rock armouring is also considered unlikely to affect process due to development of a detailed construction methodology that allows for the identification and mitigation of potential environmental effects.</p> <p>The project site includes some Crown land (shown in record of titles provided with the application) with an operating easement registered in favour of the applicant. As the administrator of Crown land, Land Information New Zealand (LINZ) has expressed to the applicant its interest in the project. The application states that no approvals or permissions will be required from LINZ to enable the project, however we recommend you seek comment from LINZ to ensure any interests will not adversely affect the applicant's ability to undertake the proposed works.</p>		
Minister invites comments	<p><i>You must copy the application to, and invite written comments from [s17(1)]:</i></p> <ol style="list-style-type: none"> Canterbury Regional Council and Mackenzie District Council as the relevant local authorities The Minister for the Environment and the Minister for Energy as 'other relevant portfolio Ministers' The Ministry for the Environment and the Department of Conservation as the relevant administering agencies The Māori groups identified in Attachment 2 The owners of Māori land in the project area identified in Appendix 2. 	<p><i>The Minister may also copy the application to, and invite written comments from, any other person[s17(5)].</i></p> <ul style="list-style-type: none"> The Minister for Economic Development and the Minister for Regional Development. The Chief Executive of Land and Information New Zealand (LINZ) because the project site includes Crown land with an operating easement in favour of the applicant, and as the administrator of Crown land LINZ can advise on whether there are any matters which might adversely affect the applicant's ability to undertake the proposed works. The Chief Executive of Transpower New Zealand Limited (Transpower) because as the operator of the National Grid, Transpower can advise on any impact the project may have on national security of supply and contingent hydro storage. 	<p><i>The Minister may request further information about a referral application from the applicant, the relevant local authorities, or the relevant administering agencies to be provided within the time frame specified in the request.</i></p> <p><i>Applicant</i></p> <ul style="list-style-type: none"> Further information (including metrics) to demonstrate how the project will deliver significant regional or national economic benefits.
Recommendations			Minister's decision
a. Note that section 25 of the Act permits you to decline the referral application without inviting comments from the relevant local authorities and any relevant Ministers.			Noted
b. Note that you have not yet provided the application to, nor sought any comments on it from, the parties listed in section 17(1) but that you are required to do so if you do not decline the application under section 21 of the Act.			Noted
c. Note that section 17(5) of the Act permits you to forward an application to, and invite written comments from, any other person.			Noted
d. Note that if comments have been sought and provided within the required time frame you are required to consider it, along with the referral application, before deciding to decline the application.			Noted
e. Note that section 20 of the Act permits you to request further information from the applicant or relevant local authorities or relevant administering agencies at any time before you decide whether to accept or decline an application.			Noted
f. Agree to progress the Lake Pūkaki Hydro Storage and Dam Resilience Works Project to our Stage 2 analysis (invitation to comment and section 18 report stage).			Yes / No
g. Agree to provide a copy of the application to, and invite comments from: <ul style="list-style-type: none"> Canterbury Regional Council and Mackenzie District Council as the relevant local authorities The Minister for the Environment and the Minister for Energy as 'other relevant portfolio Ministers' The Ministry for the Environment and the Department of Conservation as the relevant administering agencies The Māori groups identified in Attachment 2 The owners of Māori land in the project area identified in Appendix 2 			Yes / No
<ul style="list-style-type: none"> Agree to provide the application to and invite comments from the following additional entities/persons under section 17(5): The Minister for Economic Development and the Minister for Regional Development. The Chief Executive of Land and Information New Zealand (LINZ) because the project site includes Crown land with an operating easement in favour of the applicant, and as the administrator of Crown land LINZ 			Yes / No

can advise on whether there are any matters which might adversely affect the applicant's ability to undertake the proposed works. - The Chief Executive of Transpower New Zealand Limited (Transpower) because as the operator of the National Grid, Transpower can advise on any impact the project may have on national security of supply and contingent hydro storage.	
h. Agree to seek further information from the applicant on: - Further information (including metrics) to demonstrate how the project will deliver significant regional or national economic benefits.	Yes / No
i. Note that you have agreed to delegate to the Secretary for the Environment your responsibility to send all correspondence other than to Ministers.	Noted
j. Agree to provide a copy of the application to and invite comments from the Ministers invited to comment under section 17(3).	Yes / No
k. Agree to provide a copy of the application to and invite comments from the Ministers invited to comment under section 17(5).	Yes / No

Signed:

Hon Chris Bishop
Minister for Infrastructure

Date:

Attachment 1: Application documents for the Lake Pūkaki Hydro Storage and Dam Project:

Attachment 2: List of the Māori groups referred to in section 18(2)

Name of group	Type of group (section of Fast-track Approvals Act 2024)
Te Rūnanga o Ngāi Tahu	Iwi authority (s18(2)(a)); Treaty settlement entity – Ngāi Tahu Claims Settlement Act 1998 (s18(2)(a))
Te Rūnanga o Arowhenua	Ngāi Tahu Papatipu Rūnanga – Iwi authority (s18(2)(a)); Treaty settlement entity (s18(2)(a))
Te Rūnanga o Waihao	Ngāi Tahu Papatipu Rūnanga – Iwi authority (s18(2)(a)); Treaty settlement entity (s18(2)(a))
Te Rūnanga o Moeraki	Ngāi Tahu Papatipu Rūnanga – Iwi authority (s18(2)(a)); Treaty settlement entity (s18(2)(a))
Aoraki Environmental Consultancy Limited	Entity owned by Papatipu Rūnanga (s18(2)(k))
Aukaha	Entity owned by Papatipu Rūnanga (s18(2)(k))

Attachment 3: Statutory framework summary

Statutory framework summary

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