



Alanya Limmer
King's Counsel

30 October 2025

Richard Saunders
Chief Executive Officer
Otago Regional Council
Dunedin

And to

Martina Courtier
Otago Regional Council
Dunedin

By email to: s 9(2)(a)
s 9(2)(a)

Tēnā kōrua

Clutha Pumped Hydro Consortium Limited – Consultation under the Fast-track Approvals Act 2024

1. I act for Clutha Pumped Hydro Consortium Limited (**Applicant**), which intends to apply for approvals under the Fast-track Approvals Act 2024 to construct and operate a large pumped hydro scheme at Lake Onslow in Central Otago (**Project**).
2. The Project is not listed. The Applicant is currently preparing a Referral Application. The Applicant is sending this letter and inviting further discussion with you, as part of its consultation obligations under section 11(1)(a) of the Fast-track Approvals Act 2024.
3. The Project area falls within the jurisdiction of the Otago Regional Council (**Regional Council**) and Central Otago District Council (**District Council**). As such, the Project will require various resource consents administered by your Council, as well as approvals from other regulatory authorities (such as the District Council and the Department of Conservation).
4. The Project will not be “new” to your Council. It was thoroughly investigated by the Ministry of Business, Innovation and Employment (**MBIE**) during the period 2020 to 2023. At that time the project was known as the New Zealand Battery Project. The purpose of the Battery Project was to identify the best option (or options) for managing New Zealand’s dry-year risk in a highly renewable electricity system. While numerous options were considered at the first stage, the primary focus of investigations became pumped hydro at Lake Onslow.
5. To the extent the Applicant is repeating or duplicating consultative effort from the Battery Project, my client apologises. It is obliged to carry out this consultation to meet its obligations under the Fast-Track Approvals Act 2024 (**FTAA**).
6. Mr John Hardie has enquired as to who at the Regional Council is responsible for consultation on FTAA applications. He was advised that person is likely to be Martina Courtier.

Landowner consultation

7. The Applicant chose to start consultation by engaging with those living near to the Project as potentially being the most directly affected by it. Mr Ken Smales (as representative of the Applicant) has been engaging with relevant landowners. Mr Smales has decades of experience liaising with landowners in a respectful manner on large energy projects.

8. As you may have seen reported in the media, the Applicant has been open about the fact if most local landowners were not supportive of the Project then, notwithstanding the Applicant's view of its importance, the Applicant would not proceed further.
9. Mr Smales has met personally with almost all of the affected landowners who live locally. The majority consulted are supportive, including some of those most affected. Some wish the Project would go away. Others are ambivalent but desire a clear outcome either way. Some wish to remain private while some will openly express support.
10. Mr Smales recently reported back to the landowners on behalf of the Applicant. He advised them that, in light of the responses received, the Applicant will proceed with an application to enter the Fast-Track Approvals process (i.e. a Referral Application). Accordingly, the Applicant is now entering the formal phase of consultation, which of course involves the Council.

Description of the project

11. The Clutha Pumped Hydro Project would pump water from the Mata-au/Clutha River (New Zealand's largest river by flow) to a reservoir at a higher elevation (an enlarged Lake Onslow). Water will be released back down the tunnel, when electricity is most urgently needed by New Zealand. By reversing the direction of flow up to an enlarged Lake Onslow then releasing the stored water from Lake Onslow back down to the Clutha River, electricity will be generated. The amount of storage proposed will exceed the storage capacity of all existing hydro-electricity storage facilities in New Zealand at present.
12. A more fulsome description of the Project is set out at **Schedule 1** to this letter.
13. Various options as to lake height, tunnel lines, powerhouse location, and abstraction/discharge points from and into the Clutha/Matu Au were considered.
14. The lake height option preferred by the Applicant is 769m. A contour line at 770m is delineated on the maps that form part of Schedule 1.

Consents needed

15. The Substantive Application will seek approval for all resource consents needed to build, maintain and operate the proposed dam, the raised lake, the tunnel, the powerhouse and the associated pond. This will entail resource consents from the Regional Council, the District Council, as well as other approvals from the Department of Conservation.
16. At this stage, the Applicant is seeking referral to the FTAA process. It is therefore not necessary for the Applicant to detail every planning rule engaged by the Application. The Applicant will need to do this for the Substantive Application, though, and therefore would be grateful for the Council's assistance in identifying all resource consents required.
17. The Applicant would of course also welcome the Regional Council's input as to any other considerations it sees as relevant. Such input will be most helpful both now (for the Referral Application) and later, for the Substantive Application.

Use of the FTAA process

18. The Project is of both regional and national significance. The electricity storage potential it offers is immense and urgently required. It would more than double the storage capacity of all hydro-electricity lakes in New Zealand at the present time. More storage will result in significant improvements to the security and affordability of electricity.
19. The economic and employment benefits on offer for the Region are also substantial, as would be expected for a project of this scale.
20. The Project also presents the opportunity for substantial environmental benefits such as reducing greenhouse gas emissions and biodiversity enhancement opportunities.
21. The Applicant has decided to advance this Project with speed, principally because of the perilous state of New Zealand's security of electricity supply. The estimated design and construction timeframe would

be around 10 years. Huntly power station is planned for retirement in 2035 (assuming it does not fail before then). The absence of a solution well in advance of that time creates grave difficulties for the country.

22. 2035 might seem a long time away, but infrastructure like this is a large undertaking. Every month counts. The FTAA presents the best chance of having this Project approved and constructed in time for Huntly's retirement.
23. Taking all circumstances into account, the Applicant hopes the Regional Council can understand and support use of the Fast-Track process.

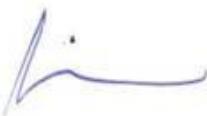
Offsets

24. The project is a large one. It can carry the cost of and should be an exemplar for offsets in accordance with the avoid – remedy – offset – compensate hierarchy.
25. The application proposes two significant environmental offset proposals, in addition to a proposal for a Millers Flat Community Trust.
26. The first relates to terrestrial flora and fauna, including geckos and other lizards. It includes more predator protected areas, similar to the Aldinger Reserve. The Central Otago area, including the Hawkdun Range, is a biodiversity hotspot and much good can be done.
27. The second relates to freshwater quality, water way morphology (e.g. scroll plains and wetlands) and native fish habitat. Again, the area holds much that is precious but under pressure.
28. The Applicant proposes significant annual investments which would run indefinitely, i.e. forever, in parallel with the facility. Ideas as to geographical limits, eligible project scope and governance alternatives have been developed.
29. Irrespective of the Regional Council's overall view of the Project, my client would like to engage with your staff as ideas are further developed so that, should approval be granted to use the Fast-track route, the Applicant can present the best possible proposal for offsets. My client is confident the Project can deliver an offset proposal that goes above and beyond existing practice in New Zealand.

Specific issues

30. There are some specific issues my client suggests discussion on, to open the dialogue. These are:
 - (a) Trout barriers. These are proposed to prevent trout moving upstream from the enlarged lake. The Applicant believes this is desirable to avoid trout predation of native fish.
 - (b) Galaxiids. Does the Regional Council consider there is sufficient knowledge about the distribution of galaxiids? Are there any gaps that might only be possible to plug via studies or other mahi undertaken over the summer months? Does the Regional Council have any insights to share on this topic?
31. The Applicant identifies these two topics (along with the topic of offsetting) to provide a tangible starting point for engagement. It is open to discuss any other matters your Council would like to advance, so please do not feel constrained to these topics.
32. If there is further information you need at this stage, please let me know.

Yours faithfully



Alanya Limmer KC

Mobile: s 9(2)(a)

Email: s 9(2)(a)



Alanya Limmer
King's Counsel

30 October 2025

Mr Trevor McGlinchey
Chair
Aukaha (1997) Limited
Otepoti

By email to: s 9(2)(a)

Mr Chris Rosenbrock
Chief Executive Officer
Aukaha (1997) Limited
Otepoti

By email to: s 9(2)(a)

Tēnā kōrua

Clutha Pumped Hydro Consortium Limited – Consultation under the Fast-track Approvals Act 2024

1. I act for the Clutha Pumped Hydro Consortium Limited (**Applicant**), which intends to apply for approvals under the Fast-track Approvals Act 2024 (**FTAA**) to build a large pumped hydro scheme at Lake Onslow in Central Otago (**Project**).
2. The Project is not listed. The Applicant is currently preparing a Referral Application.

Previous investigations

3. From previous investigations into and reports on the Project¹, the Applicant understands the three papatipu rūnaka that hold shared authority and mana whenua status in the area surrounding Lake Onslow, including the Mata-au, are:
 - (a) Te Runanga o Ōtākau;
 - (b) Kāti Huirapa ki Puketeraki; and
 - (c) Hokonui Rūnanga.
4. The remainder of this letter alternatively refers to the three papatipu rūnaka as Kā Rūnaka or mana whenua.
5. From the Reports in 2021 and 2022, discussing Cultural Values, the Applicant understands Aukaha (1997) Ltd (**Aukaha**) represented Kā Rūnaka during the period of earlier investigations into the New

¹ The Ministry for Business, Innovation and Employment investigated the feasibility of the Project as part of the New Zealand Battery Project. Information about those earlier investigations is available from the following website: <https://www.mbie.govt.nz/building-and-energy/energy-and-natural-resources/low-emissions-economy/nz-battery> Cultural considerations were reported on by two reports, both of which are on the webpage:

 [Cultural Values Statement: The Lake Onslow option for the New Zealand Battery Project – December 2021 \[PDF 1.7MB\]](#)

 [Cultural Values Statement: The Lake Onslow option for the New Zealand Battery Project Phase 1B – August 2022 \[PDF 2.2MB\]](#)

Zealand Battery project, between 2020 and 2023. It is for this reason the Applicant sends this letter to each of the papatipu rūnaka and Aukaha.

6. The Applicant has carefully considered the content of the two earlier reports, which are comprehensive and compelling. The Applicant has noted the conclusion in Section 4 of the Environmental Impact Statement (Appendix M to the Feasibility Study Report)²:

Aukaha (1997) Limited (Aukaha) has prepared Cultural Values Statements on behalf of Kā Rūnaka (appended in Appendix C.1 and C.2 of Volume Two) which outlines those tangible and intangible aspects of the natural and physical environment within the project area that are of particular value to Kā Rūnaka in and around Lake Onslow the Mata-Au/Clutha River, and Te Awa Makarara/Teviot River. This chapter provides a summary of those values and identifies aspects of the project which may impact those values.

The potential significance of such impacts has not yet been evaluated by Kā Rūnaka given the early stage of the project, and the implications of this for decision-making are discussed at the end of this chapter.

7. The Applicant wishes to commence engagement with Kā Rūnaka about taking the Project further. In particular, it would like to explore the potential significance of previously identified impacts, to mana whenua and on mana whenua values. The Applicant also notes the comments (at section 9.4 page 30 of first report and section 8.5 page 48 of the second report) on Equity Values and would like to discuss this matter with you further.
8. This consultation would commence in fulfilment of the Applicant's obligations under section 11(1)(b) of the FTAA. The Applicant's expectation is (mana whenua willing) that constructive dialogue between the parties will continue right throughout – and very likely beyond, if approvals are granted – the FTAA process (referral and substantive application phases).
9. It is evident from the two Aukaha reports that mana whenua are familiar with the Project already. To the extent this consultation may be repetitive or duplicative, the Applicant apologises. However, the Applicant hopes there might be some value to both parties in starting from the well-informed baseline that exists and exploring further the concerns held by Kā Rūnaka as well as the opportunities that may present.
10. The environmental issues that arise have been well identified and the New Zealand Battery webpage links to many reports on environmental effects, positive and negative.

The Project

11. The Clutha Pumped Hydro Project would pump water from the Mata-au/Clutha River (New Zealand's largest river by flow) to a reservoir at a higher elevation (an enlarged Lake Onslow). Water will be released back down the tunnel, when electricity is most urgently needed by New Zealand. By reversing the direction of flow up to an enlarged Lake Onslow then releasing the stored water from Lake Onslow back down to the Clutha River, electricity will be generated. The amount of storage proposed will exceed the storage capacity of all existing hydro-electricity storage facilities in New Zealand at present.
12. A more fulsome description of the Project is set out at **Schedule 1** to this letter.
13. Various options as to lake height, tunnel lines, powerhouse location, and abstraction/discharge points from and into the Clutha/Matu Au were considered.
14. The lake height option preferred by the Applicant is 769m. A contour line at 770m is delineated on the maps that form part of Schedule 1.

Benefits

15. The Project is of both regional and national significance. The electricity storage potential it offers is immense and urgently required. It would more than double the storage capacity of all hydro-electricity

² <https://www.mbie.govt.nz/building-and-energy/energy-and-natural-resources/low-emissions-economy/nz-battery> ; The Report found here

lakes in New Zealand at the present time. More storage will result in significant improvements to the security and affordability of electricity.

16. The economic and employment benefits on offer for the Region are also substantial, as would be expected for a project of this scale.
17. The Project also presents the opportunity for substantial environmental benefits such as reducing greenhouse gas emissions and biodiversity enhancement opportunities.

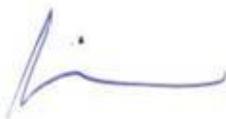
Biodiversity offsetting

18. Whatever mitigations are provided, if this project proceeds there are some unavoidable environmental costs. The mitigation proposed will be of vital importance and interest to mana whenua. This is an area in respect of which the Applicant hopes to discuss thoroughly with Kā Rūnaka.
19. One aspect of mitigation involves offsets and the Applicant's current aspirations are expanded on below, as an example of its desire to put forward a robust and healthy suite of mitigation measures.
20. The project is a large one. It can carry the cost of and should be an exemplar for offsets in accordance with the avoid – remedy – offset – compensate hierarchy.
21. The application proposes two significant environmental offset proposals, in addition to a proposal for a Millers Flat Community Trust.
22. The first relates to terrestrial flora and fauna, including geckos and other lizards. It includes more predator protected areas, similar to the Aldinger Reserve. The Central Otago area, including the Hawkdun Range, is a biodiversity hotspot and much good can be done.
23. The second relates to freshwater quality, water way morphology (e.g. scroll plains and wetlands) and native fish habitat. Again, the area holds much that is precious but under pressure.
24. The Applicant proposes significant annual investments which would run indefinitely, i.e. forever, in parallel with the facility. Ideas as to geographical limits, eligible project scope and governance alternatives have been developed.
25. Irrespective of Kā Rūnaka's overall position on whether the Project should proceed or not, my client would like to engage with you as ideas are further developed so that, should approval be granted to use the Fast-track route, the Applicant can present the best possible proposal for offsets. My client is confident the Project can deliver an offset proposal that goes above and beyond existing practice in New Zealand.

Next steps

26. The two Aukaha reports are available via the footnoted weblinks. These reports provide a sound summary of the proposal and its potential effects. They might also offer a useful starting point for the ongoing engagement the Applicant wishes to have with mana whenua.
27. However, if there is further information you need at this stage, please let me know. The Applicant otherwise looks forward to hearing from you as to how consultation might be best undertaken with Kā Rūnaka.

Yours faithfully



Alanya Limmer KC

Mobile: s 9(2)(a)

Email: s 9(2)(a)



Alanya Limmer
King's Counsel

30 October 2025

Resource Consents
Central Otago District Council
Alexandra

Attention: Tim Anderson

By email to: Resource.Consents@codc.govt.nz

Tēnā koe

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4. The Project will not be “new” to your Council. It was thoroughly investigated by the Ministry of Business, Innovation and Employment (**MBIE**) during the period 2020 to 2023. At that time the project was known as the New Zealand Battery Project. The purpose of the Battery Project was to identify the best option (or options) for managing New Zealand’s dry-year risk in a highly renewable electricity system. While numerous options were considered at the first stage, the primary focus of investigations became pumped hydro at Lake Onslow.
5. To the extent the Applicant is repeating or duplicating consultative effort from the Battery Project, my client apologises. It is obliged to carry out this consultation to meet its obligations under the Fast-Track Approvals Act 2024 (**FTAA**).
6. John Hardie has been in contact with Tim Anderson as to who the appropriate District Council contact is for this consultation. The Applicant has directed this application to the generic “consents” contact details in accordance with Mr Anderson’s advice.

Landowner consultation

7. The Applicant chose to start consultation by engaging with those living near to the Project as potentially being the most directly affected by it. Mr Ken Smales (as representative of the Applicant) has been engaging with relevant landowners. Mr Smales has decades of experience liaising with landowners in a respectful manner on large energy projects.
8. As you may have seen reported in the media, the Applicant has been open about the fact if most local landowners were not supportive of the Project then, notwithstanding the Applicant’s view of its importance, the Applicant would not proceed further.

Bridgeside Chambers

E: [s 9\(2\)\(a\)](mailto:s9(2)(a)@bridgesidechambers.co.nz) | M: [s 9\(2\)\(a\)](tel:0337636363)

Level 5, 77 Hereford Street, P O Box 3180, Christchurch 8140

9. Mr Smales has met personally with almost all of the affected landowners who live locally. The majority consulted are supportive, including some of those most affected. Some wish the Project would go away. Others are ambivalent but desire a clear outcome either way. Some wish to remain private while some will openly express support.
10. Mr Smales recently reported back to the landowners on behalf of the Applicant. He advised them that, in light of the responses received, the Applicant will proceed with an application to enter the Fast-Track Approvals process (i.e. a Referral Application). Accordingly, the Applicant is now entering the formal phase of consultation, which of course involves the Council.

Description of the project

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Consents needed

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Use of the FTAA process

18. The Project is of both regional and national significance. The electricity storage potential it offers is immense and urgently required. It would more than double the storage capacity of all hydro-electricity lakes in New Zealand at the present time. More storage will result in significant improvements to the security and affordability of electricity.
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22. 2035 might seem a long time away, but infrastructure like this is a large undertaking. Every month counts. The FTAA presents the best chance of having this Project approved and constructed in time for Huntly's retirement.
23. Taking all circumstances into account, the Applicant hopes the District Council can understand and support use of the Fast-Track process.

Title OT14B/499

24. In its investigations as to land affected by the raising of Lake Onslow, the Applicant found a title in the name of the Council which is under the existing Lake Onslow and described as a "Local purpose (Esplanade) Reserve".
25. This 450m² piece of land is in title OT14B/499 being Section 2 Survey Office Plan 22549. I have attached a copy of the title and Survey Office Plan 22549 (which is on the back of the title) as **Schedule 2**.
26. The Applicant is of the view that the Project, therefore, will involve reserve land vested in the District Council. As such, it is not an ineligible activity under section 5 of the Act. If the Council has a contrary view, the Applicant would appreciate knowing this at the earliest opportunity, given that there is a mechanism in the Act for approval in those circumstances.

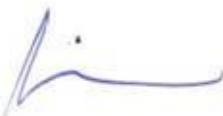
Offsets

27. The project is a large one. It can carry the cost of and should be an exemplar for offsets in accordance with the avoid – remedy – offset – compensate hierarchy.
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29. Relevant to the District Council, one of the offset proposals relates to terrestrial flora and fauna, including geckos and other lizards. It includes more predator protected areas, similar to the Aldinger Reserve. The Central Otago area, including the Hawkdun Range, is a biodiversity hotspot and much good can be done.
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Next steps

32. If there is further information you need at this stage, please let me know.
33. Otherwise, the Applicant would welcome the chance to meet with appropriate Council representatives as part of furthering its consultation activities. Mr Anderson has intimated there is little advantage in a meeting until the Council can understand the proposal. Mr Hardie will be in touch.

Yours faithfully



Alanya Limmer KC

Mobile: § 9(2)(a)

Email: § 9(2)(a)



Alanya Limmer
King's Counsel

30 October 2025

Ms Penny Nelson
Director General
Department of Conservation
Wellington

By email to: s 9(2)(a)

Dear Director General

Clutha Pumped Hydro Consortium Limited – Consultation under the Fast-track Approvals Act 2024

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3. The Project will not be “new” to DOC. It was thoroughly investigated by the Ministry of Business, Innovation and Employment (**MBIE**) during the period 2020 to 2023. At that time the project was known as the New Zealand Battery Project. The purpose of the Battery Project was to identify the best option (or options) for managing New Zealand’s dry-year risk in a highly renewable electricity system. While numerous options were considered at the first stage, the primary focus of investigations became pumped hydro at Lake Onslow.
4. Much of the investigatory work undertaken is available here: [NZ Battery Project | Ministry of Business, Innovation & Employment](#).
5. The Proposal will require various approvals, including some that will fall under the administration of the Department of Conservation (**DOC**). In addition, DOC will be an interested party as to the effects of the Project on natural resources – positive and negative. The environmental issues that arise have been well identified and the site links to many reports on environmental effects, positive and negative.
6. For example:
 - (a) [Blakely Associates - Landscape and visual assessment Lake Onslow](#), prepared for the Department of Conservation.
 - (b) The following 240 page report: [Feasibility Study Report: NZ Battery Project, Lake Onslow Pumped Storage Scheme – Volume 8, Appendix M – September 2022](#) – which *provide[s] a comprehensive outline of the key environmental features and values likely to be affected by the project, together with an assessment of the significance of those effects*.
7. As to environmental benefits, one example is a substantive reduction in New Zealand’s greenhouse gas emissions. The CPH project would achieve:

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E: s 9(2)(a) | M: s 9(2)(a)

Level 5, 77 Hereford Street, P O Box 3180, Christchurch 8140

- (a) More renewable generation in dry years from this project by displacing thermal generation and the fossil fuels it requires;
 - (b) A significant uplift in new renewable generation investment elsewhere in New Zealand because of improvements in the market for hedges or firming for those intermittent renewables; and
 - (c) A secure and reliable electricity supply for New Zealand regardless of whether the sun is shining, the wind is blowing or the existing hydro lakes are full; and
 - (d) Thereby enabling further electrification of the economy by facilitating transport and industrial heat to electrify using greenhouse-gas-free, electricity.
8. Put simply, the Project would be one of the most climate-positive infrastructure projects ever considered in New Zealand.

Description of the Proposal

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Matters of particular interest to DOC

13. Detailed consideration of issues arising from the Project primarily fall to be dealt with in the substantive application process. At this stage, however, the Consortium considers it would be helpful to draw your attention to several issues that may be of particular interest to DOC.

Inundation of DOC land

14. DOC administers a block of land to the northwest of the proposed enlarged Lake. That block in a legal sense is divided into two parts:
- (a) The 1447.5 ha of fee simple land in Title OT17B/406. This land is outside of the Onslow catchment and is not affected by the Proposal.
 - (b) The other part lies between title OT17B/406 and the enlarged Lake Onslow. This is described on the LINZ database as parcel 6699713. The LINZ database states that this fee simple parcel has no title associated with it, and records that the land vested under section 65(1) of the Crown Pastoral Land Act 1988 on 18 April 2016. A small part of this parcel 6699713 is proposed to be inundated by the enlarged Lake Onslow.
15. Copies of title OT17B/406 and the LINZ screen shot of the record for parcel 6699713 are attached as **Schedule 2**.

Land swap and/or concession

16. The Consortium would be grateful to clarify the status of this land. The Applicant expects the substantive application will need to seek a land exchange and/or concession under section 42(4)(f) and/or (e) of the FTAA in respect to the land which is proposed to be inundated.

17. While the area to be inundated is a small part of your block, you will understandably wish to ensure any exercise of your powers under the Conservation Act are consistent with the findings of the Courts in the *Ruataniwha* decisions.
18. The FTAA sets out the statutory process to be followed for land exchange applications made under the FTAA. The Consortium would welcome the chance to meet with you and/or your staff to discuss this further prior to the formalities of that process. There will likely be many alternatives to consider.

Wildlife Act

19. The Applicant intends applying for authority under the Wildlife Act 1953 for the disturbance of lizard habitat and, where appropriate the capture, holding and relocation of lizards, and where necessary the incidental killing of lizards, pursuant to section 42(h).

Reserves Act concession

20. It is unclear whether a concession pursuant to the Reserves Act is required. If it is, one will be sought under the FTAA. My client would be grateful for any thoughts the Department has as to whether a concession is needed.

Ineligible activities

21. During investigations into land interests affected by the raising of Lake Onslow, the Consortium found a title in the name of the Central Otago District Council in respect of a small piece of land under the existing Lake Onslow. It is described as a "Local purpose (Esplanade) Reserve".
22. This 450m² piece of land is in title OT14B/499 being Section 2 Survey Office Plan 22549. A copy of the title is **Schedule 3** to this letter.
23. The Department will be aware that under section 5 of the FTAA certain activities are ineligible.
24. My client has considered section 5 carefully given the reserve status of that small area of land. Sections 5(1)(a) to (h) plainly do not apply. Neither does (i) because the land is not a national reserve.
25. The Applicant has further concluded ss5(j) to (n) also do not apply because the area of reserve land is vested in the local authority. My client would be grateful if you could please confirm agreement or otherwise on this point.
26. My client has made a similar request of the Central Otago District Council.

Marginal strips

Marginal strip around Lake Onslow

27. The marginal strip around the existing Lake Onslow is incomplete due to freehold titles extending under the existing Lake. My client understands that in those areas, there is no existing marginal strip.
28. The Beaumont Station Limited pastoral lease renewal instrument (RCL 10803368.2) reserves a marginal strip under Part 4A of the Conservation Act, which your Department administers.
29. It is the Applicant's intention that either under section 24G of the Conservation Act 1987, or as a condition of consent, a new marginal strip be created around the entirety of the enlarged Lake Onslow (subject to safety issues around man-made structures such as the tunnel entrance or the dam). For convenience we reproduce Section 24G:

24G Effect of change to boundary of marginal strips

- (1) *Where, for any reason, the shape of any foreshore or of the margin of any lake or reservoir or of any bay or inlet of any lake or reservoir is altered and the alteration affects an existing marginal strip, a new marginal strip shall be deemed to have been reserved simultaneously with each and every such alteration.*

- (2) *Where, for any reason, the course of any river or stream is altered and the alteration affects an existing marginal strip, a new marginal strip shall be deemed to have been reserved simultaneously with each and every such alteration.*
- (3) *With respect to any foreshore, to any lake or reservoir and to any bay or inlet of any lake or reservoir, and to any river or stream, a marginal strip shall be reserved by subsection (1) or subsection (2) on all land of the Crown, and on all land the title to which is subject to this Part, and on no other land.*
- (4) *Every marginal strip reserved by subsection (1) or subsection (2) shall be of such dimensions and be situated as if the marginal strip had been reserved under [section 24](#), and shall extinguish either in whole or in part, as the case may require, the existing reservation of the existing marginal strip which would have continued but for the alterations referred to in those subsections.*
- (5) *Nothing in this section shall affect any right, title, or interest any person may have in respect of any assets or improvements existing on any marginal strip at the time such marginal strip is reserved by subsection (1) or subsection (2).*
- (6) *Subject to this section, the provisions of this Act shall apply to every marginal strip reserved by subsection (1) or subsection (2) as if such marginal strip had been reserved by [section 24](#).*
- (7) *Nothing in this section shall apply to any marginal strip reserved by [section 24\(3\)](#).*

Marginal strip beside the Mata-au/Clutha River

30. The proposed pond and powerhouse at Craig Flat Road and related infrastructure may have effects on the marginal strip next to the Mata-au/Clutha River. We presume the necessary authorisation can be provided under section 24G of the Conservation Act 1987 (set out above), but if this should be done by way of concession instead, my client would also seek approval for this under the FTAA.
31. Should this occur it would be described in the substantive application. The Applicant acknowledges the important public access rights which arise from marginal strips and would appreciate liaison with you to ensure these values are appropriately accommodated.

Conservation Issues

32. Your Department will be aware of the reports prepared for MBIE on the effect of the Project on flora and fauna, including on lizards and on native fish such as the Teviot flathead galaxias.
33. These are important issues, and we know from landowners they are pleased to have cooperated in the gathering of additional data on the distribution of galaxiid populations.
34. The Applicant recognises the relevance of the Freshwater Fisheries Regulations 1983 to its Proposal. It is likely to need a Complex Freshwater Fisheries Activity Approval and again, would like to discuss this with your advisors.
35. Most of the detailed consideration of these issues is not needed unless referral is granted. However, there is an early need for the Applicant to identify what approvals are needed and the Applicant hopes to be able to talk through these issues with your Department prior to a referral application being lodged.

Additional Information on Galaxiids

36. The Applicant understands from landowners that more survey work has been carried out on galaxiids. The Applicant has been unable to locate any recent reports in that regard and would be grateful if you could supply it with a copy as soon as possible.

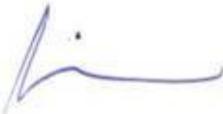
Offsets

37. My client accepts that if this project proceeds there would be some unavoidable environmental impacts. Because the Project is large it can carry the cost of and should be an exemplar for offsets in accordance with the avoid – remedy – offset – compensate hierarchy.
38. The application proposes two significant environmental offset proposals, in addition to a proposal for a Millers Flat Community Trust.
39. The first relates to terrestrial flora and fauna, including geckos and other lizards. It includes more predator protected areas, similar to the Aldinger Reserve. The Central Otago area, including the Hawkdun Range, is a biodiversity hotspot and much good can be done.
40. The second relates to freshwater quality, water way morphology (e.g. scroll plains and wetlands) and native fish habitat. Again, the area holds much that is precious but under pressure.
41. The Applicant proposes significant annual investments which would run indefinitely, i.e. forever, in parallel with the facility. Ideas as to geographical limits, eligible project scope and governance alternatives have been developed.
42. Irrespective of DOC's overall position on the Project, my client would like to engage with the Department as ideas are further developed so that, should approval be granted to use the Fast-track route, the Applicant can present the best possible proposal for offsets. My client is confident the Project can deliver an offset proposal that goes above and beyond existing practice in New Zealand.

Next steps

43. If there is further information you need at this stage, please let me know.
44. Otherwise, my client looks forward to hearing from you as to how consultation might be best initiated with DOC.

Yours faithfully



Alanya Limmer KC

Mobile: s 9(2)(a)

Email: s 9(2)(a)



Alanya Limmer
King's Counsel

30 October 2025

Sarah Gillies
Chief Executive
Electricity Authority
Wellington

By email to: info@ea.govt.nz

Tēnā koe

Clutha Pumped Hydro Consortium Limited – Consultation under the Fast-track Approvals Act 2024

1. I act for Clutha Pumped Hydro Consortium Limited (**Applicant**), which intends to apply for approvals under the Fast-track Approvals Act 2024 to construct and operate a large pumped hydro scheme at Lake Onslow in Central Otago (**Project**).
2. The Project is not listed. The Applicant is currently preparing a Referral Application. Whilst not mandatory, the Applicant is sending this letter to invite further discussion with the Electricity Authority if it wishes to do so.
3. The Project area falls within the jurisdiction of the Otago Regional Council (**Regional Council**) and Central Otago District Council (**District Council**). As such, the Project will require various resource consents administered by the Regional and District Councils, as well as approvals from other regulatory authorities such as the Department of Conservation.
4. The Project is not “new”. It was thoroughly investigated by the Ministry of Business, Innovation and Employment (**MBIE**) during the period 2020 to 2023. At that time the project was known as the New Zealand Battery Project. The purpose of the Battery Project was to identify the best option (or options) for managing New Zealand’s dry-year risk in a highly renewable electricity system. While numerous options were considered at the first stage, the primary focus of investigations became pumped hydro at Lake Onslow.

Description of the project

5. The Clutha Pumped Hydro Project would pump water from the Mata-au/Clutha River (New Zealand’s largest river by flow) to a reservoir at a higher elevation (an enlarged Lake Onslow). Water will be released back down the tunnel, when electricity is most urgently needed by New Zealand. By reversing the direction of flow up to an enlarged Lake Onslow then releasing the stored water from Lake Onslow back down to the Clutha River, electricity will be generated. The amount of storage proposed will exceed the storage capacity of all existing hydro-electricity storage facilities in New Zealand at present.
6. A more fulsome description of the Project is set out at **Schedule 1** to this letter.
7. Various options as to lake height, tunnel lines, powerhouse location, and abstraction/discharge points from and into the Clutha/Matu Au were considered.
8. The lake height option preferred by the Applicant is 769m. A contour line at 770m is delineated on the maps that form part of Schedule 1.

Bridgeside Chambers

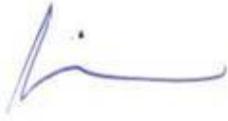
E: s 9(2)(a) | M: s 9(2)(a)

Level 5, 77 Hereford Street, P O Box 3180, Christchurch 8140

Next Steps

9. At this stage my client seeks to advise you that a Referral Application will shortly be filed and invite engagement with you, if that would be of interest and assistance.
10. If there is further information you need at this stage, please let me know.

Yours faithfully

A handwritten signature in blue ink, appearing to read 'Alanya Limmer', with a small dot above the 'y'.

Alanya Limmer KC

Mobile: s 9(2)(a)

Email: s 9(2)(a)

4 November 2025

Clutha Pumped Hydro Consortium Ltd
Registered Office: ICL Chartered Accountants Ltd
69 Tarbet St
Alexandra 9230

Heritage New Zealand
Wellington

By email to: information@heritage.org.nz

Clutha Pumped Hydro Consortium Limited – Consultation under the Fast-track Approvals Act 2024

1. Thank you for confirming that this is the correct email address for fast-track consultation. Clutha Pumped Hydro Consortium Limited (**Applicant**), intends to apply for approvals under the Fast-track Approvals Act 2024 (**FTAA**) to construct and operate a large pumped hydro scheme at Lake Onslow in Central Otago (**Project**).
2. The Project is not listed. The Applicant is currently preparing a Referral Application. The Applicant is sending this letter and inviting further discussion with you, as part of its consultation obligations under the FTAA.
3. The Project is not “new” to you. It was investigated by the Ministry of Business, Innovation and Employment (**MBIE**) during the period 2020 to 2023. At that time the project was known as the New Zealand Battery Project. The purpose of the Battery Project was to identify the best option (or options) for managing New Zealand’s dry-year risk in a highly renewable electricity system. While numerous options were considered at the first stage, the primary focus of investigations became pumped hydro at Lake Onslow.
4. Much of the investigatory work undertaken is available here: [NZ Battery Project | Ministry of Business, Innovation & Employment](#).
5. The Applicant believes the CPH project would achieve:
 - (a) More renewable generation in dry years from this project by displacing thermal generation and the fossil fuels it requires;
 - (b) A significant uplift in new renewable generation investment elsewhere in New Zealand because of improvements in the market for hedges or firming for those intermittent renewables; and
 - (c) A secure and reliable electricity supply for New Zealand regardless of whether the sun is shining, the wind is blowing or the existing hydro lakes are full; and
 - (d) Thereby enabling further electrification of the economy by facilitating transport and industrial heat to electrify using greenhouse-gas-free, electricity.

Description of the Proposal

6. The Project would pump water from the Mata-au/Clutha River (New Zealand’s largest river by flow) to a reservoir at a higher elevation (an enlarged Lake Onslow). Water will be released back down the tunnel, when electricity is most urgently needed by New Zealand. By reversing the direction of flow up to an enlarged Lake Onslow then releasing the stored water from Lake

Onslow back down to the Clutha River, electricity will be generated. The amount of storage proposed will exceed the storage capacity of all existing hydro-electricity storage facilities in New Zealand at present.

7. A more fulsome description of the Project is set out at **Schedule 1** to this letter.
8. Various options as to lake height, tunnel lines, powerhouse location, and abstraction/discharge points from and into the Clutha were considered.
9. The lake height option preferred by the Applicant is 769m. A contour line at 770m is delineated on the maps that form part of Schedule 1.
10. The maps show the land that could be affected by the Project or is adjacent to it. This includes land under the dam, the enlarged Lake, the tunnel, powerhouse, the lower reservoir and its connection to the Clutha River.

Matters of particular interest to you

11. A report was prepared by NZ Heritage Properties Ltd for Aukaha as part of the MBIE investigation. Material in that report is helpful in understanding heritage issues and would assist in meaningful consultation with you. Could you tell us whether the report can be made available? It would help if you could advise:
 - (a) What is the relationship between you and the report company?
 - (b) We understand the Government paid for the report. Do you know who paid?
 - (c) The authors claim copyright in the content. How can that be if the report was prepared for the Government (or paid for by them)?
 - (d) Affected landowners are working with us and want us to understand the issues. Is that relevant to its release?
 - (e) More investigation of heritage issues might be needed. This might need to occur this summer. We would want to discuss that with you.
12. If approval is granted to use the Fast-track process, then the substantive application would have to be sent to you. We understand you would have the right to make submissions under section 53(2)(k) of the Fast-track Approvals Act 2024. Other parts of the process are determined by the panel which considers the substantive application.

Offsets & Community trust

13. In addition to full compensation for affected landowners, The Applicant accepts that if this project proceeds there would be some unavoidable environmental impacts. Because the Project is large it can carry the cost of and should be an exemplar for offsets in accordance with the avoid – remedy - offset - compensate hierarchy.
14. The application proposes two significant environmental offset proposals. The first relates to terrestrial flora and fauna, including geckos and other lizards. It includes more predator protected areas, similar to the Aldinger Reserve. The Central Otago area, including the Hawkdun Range, is a biodiversity hotspot and much good can be done. The second relates to freshwater quality, water way morphology (e.g. scroll plains and wetlands) and native fish habitat. Again, the area holds much that is precious but under pressure.
15. Additionally the Applicant will be proposing the establishment of a Community Trust for the benefit of the local community.

16. The Applicant proposes significant annual investments which would run indefinitely, i.e. forever, in parallel with the facility. Ideas as to geographical limits, eligible project scope and governance alternatives have been developed.

Next steps

17. If there is further information you need at this stage, please contact Ken Smales at s 9(2)(a) [REDACTED], or contact the writer. We look forward to hearing from you in relation to our queries.

Yours faithfully



J.G. Hardie

Director of Clutha Pumped Hydro Consortium Ltd



Alanya Limmer
King's Counsel

30 October 2025

Ms Gaye Searanke
Chief Executive Officer
Land Information New Zealand
Wellington

By email: customersupport@linz.govt.nz

Tēnā koe

Clutha Pumped Hydro Consortium Limited – Consultation under the Fast-track Approvals Act 2024

- 1 I act for Clutha Pumped Hydro Consortium Limited (**Applicant**), which intends to apply for approvals under the Fast-track Approvals Act 2024 (**FTAA**) to construct and operate a large pumped hydro scheme at Lake Onslow in Central Otago (**Project**).
- 2 The Project is not listed. The Applicant is currently preparing a Referral Application. The Applicant is sending this letter and inviting further discussion with you, as part of its consultation obligations under section 11(1)(e) of the FTAA.
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Bridgeside Chambers

E: s 9(2)(a) | M: s 9(2)(a)

Level 5, 77 Hereford Street, P O Box 3180, Christchurch 8140

Issues of interest to LINZ

9 The proposed raised Lake Onslow inundates parts of two Crown Pastoral leases administered by LINZ:

- (a) s 9(2)(a) . Perpetually renewable pastoral lease under s83 Land Act 1948 recorded in Title OT338/21 which comprises 27,901.8610ha more or less being Run 656 and Run 657 and Run 658 and Run 814 and Run 815 and Run 816 and Section 32-35 Survey Office plane 22593 and Section 3 Block I Lammerlaw Survey District and Section 15 Block VII Beaumont Survey District, most recently renewed for 33 years from 1 July 2017 under renewal instrument RCL 10803368.2.

The portion of that property affected by the raising of the lake is at the northern end of the property and is shown on the map we have attached. The contour line is drawn at 770m above sea level to ensure that all land affected by the proposed 769m lake is identified.

In addition, the land at the Clutha River end of the property at Craigs Flat Road will be affected by the pond and powerhouse referred to above.

The proposed tunnel runs under s 9(2)(a) land.

- (b) s 9(2)(a) . This pastoral lease is described in Title OT386/92 which comprises a perpetually renewable pastoral lease under Section 83 of the Land Act 1948 of 10,921.7231 ha more or less being Section 4 Block IV Cairnhill Survey District and Run 566 and Section 1-2 Survey Office Plan 24757. The lease was last renewed by renewal 11128289 for 33 years commencing 1-7-2018.

The portion of that property affected by the raising of the Lake is at the southern end of the property as shown on the map we have attached. The contour line is again drawn at 770m above sea level to ensure that all land affected by the proposed 769m lake is identified.

10 We are aware of the different interests of the Lessor and the Lessee under pastoral leases, both above and below the land. Our client would like to understand the process you would envisage to deal with the issues which will arise from the proposed scheme, including the raising of the lake, the tunnel, the powerhouse and pond.

11 You may have given some consideration to this as part of the extensive work undertaken for MBIE's study of the project between 2020 and 2023.

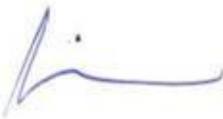
Next steps

12 If there is further information you need at this stage, please let me know.

13 Otherwise, my client would be grateful for:

- (a) the name of the person in your Department that my client should deal with on this Project; and
- (b) advice as to when and how consultation between my client and your Department is best advanced.

Yours faithfully



Alanya Limmer KC

Mobile: s 9(2)(a)

Email: s 9(2)(a)



Alanya Limmer
King's Counsel

30 October 2025

James Palmer
Chief Executive
Ministry for the Environment
Wellington

By email to: info@mfe.govt.nz

Tēnā koe

Clutha Pumped Hydro Consortium Limited – Consultation under the Fast-track Approvals Act 2024

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Description of the project

- 5 The Clutha Pumped Hydro Project would pump water from the Mata-au/Clutha River (New Zealand’s largest river by flow) to a reservoir at a higher elevation (an enlarged Lake Onslow). Water will be released back down the tunnel, when electricity is most urgently needed by New Zealand. By reversing the direction of flow up to an enlarged Lake Onslow then releasing the stored water from Lake Onslow back down to the Clutha River, electricity will be generated. The amount of storage proposed will exceed the storage capacity of all existing hydro-electricity storage facilities in New Zealand at present.
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Bridgeside Chambers

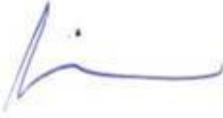
E: s 9(2)(a) | M: s 9(2)(a)

Level 5, 77 Hereford Street, P O Box 3180, Christchurch 8140

Next Steps

- 9 If there is further information you need at this stage, please let me know.
- 10 Otherwise, my client looks forward to hearing from you as to how you feel consultation with MfE is best progressed.

Yours faithfully



Alanya Limmer KC

Mobile: s 9(2)(a)

Email: s 9(2)(a)



Alanya Limmer
King's Counsel

30 October 2025

Mr Adrian McIntyre
Chair
Otago Fish & Game
Dunedin

By email: s 9(2)(a)

Mr Ian Hadland
Chief Executive
Otago Fish & Game
Dunedin

By email: s 9(2)(a)

Clutha Pumped Hydro Consortium Limited – Consultation under the Fast-track Approvals Act 2024

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Bridgeside Chambers

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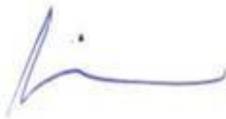
Issues that may be relevant for Otago Fish and Game

- 9 The Applicant is aware you worked with MBIE on its previous investigations and presumably have considered the effect of the proposed raising of Lake Onslow on trout, including spawning. Our client would like to meet with you to discuss these matters and the issue of offsets.
- 10 The project is a large one. It can carry the cost of and should be an exemplar for offsets in accordance with the avoid – remedy – offset – compensate hierarchy.
- 11 The application proposes two significant environmental offset proposals, in addition to a proposal for a Millers Flat Community Trust.
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- 15 Irrespective of the your organisation's overall view of the Project, my client would like to engage with you as ideas are further developed so that, should approval be granted to use the Fast-track route, the Applicant can present the best possible proposal for offsets. My client is confident the Project can deliver an offset proposal that goes above and beyond existing practice in New Zealand.

Next steps

- 16 If there is further information you need at this stage, please let me know.
- 17 Otherwise, my client looks forward to hearing from you as to how you feel consultation with Otago Fish & Game is best progressed.

Yours faithfully



Alanya Limmer KC

Mobile: s 9(2)(a)

Email: s 9(2)(a)

5 November 2025

Clutha Pumped Hydro Consortium Ltd
Registered Office: ICL Chartered Accountants Ltd
69 Tarbet St
Alexandra 9230

Parliamentary Commissioner for the Environment
Wellington

By email to: pce@pce.parliament.nz

Dear Mr Upton

Clutha Pumped Hydro Consortium Limited – Consultation under the Fast-track Approvals Act 2024

1. Clutha Pumped Hydro Consortium Limited (**Applicant**) intends to apply for approvals under the Fast-track Approvals Act 2024 (**FTAA**) to construct and operate a large pumped hydro scheme at Lake Onslow in Central Otago (**Project**).
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7. A more fulsome description of the Project is set out at **Schedule 1** to this letter.

8. Various options as to lake height, tunnel lines, powerhouse location, and abstraction/discharge points from and into the Clutha were considered.
9. The lake height option preferred by the applicant is 769m. A contour line at 770m is delineated on the maps that form part of Schedule 1.
10. The maps show the land that could be affected by the Project or is adjacent to it. This includes land under the dam, the enlarged Lake, the tunnel, powerhouse, the lower reservoir and its connection to the Clutha River.

Matters of particular interest to you

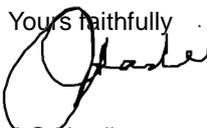
11. You have been concerned with the fast-track legislation. The Applicant states the Project cannot proceed unless that access is gained. But it does have to pass the tests in the Act to gain access. Those safeguards will be in place.
12. The Project has advantages beyond the dry year problem the electricity industry faces. This would effectively replace the coal fired Huntly Power Station. The Applicant is partly driven by the desire to ensure that New Zealand meets its international obligations concerning climate change, and the affordability of the transition to a low carbon economy in which electricity will play a key role. Those will be matters of interest to you.
13. The Applicant is intending this to be a gold standard for offsets and compensation given that some effects cannot be mitigated. That is a matter about which you have expressed concern in the past. We explain that below in more detail.

Offsets & Community trust

14. In addition to full compensation for affected landowners, the Applicant accepts that if this project proceeds there would be some unavoidable environmental impacts. Because the Project is large it can carry the cost of and should be an exemplar for offsets in accordance with the avoid – remedy - offset - compensate hierarchy.
15. The application proposes two significant environmental offset/compensation proposals. The first relates to terrestrial flora and fauna, including geckos and other lizards. It includes more predator protected areas, similar to the Aldinger Reserve. The Central Otago area, including the Hawkdun Range, is a biodiversity hotspot and much good can be done. The second relates to freshwater quality, water way morphology (e.g. scroll plains and wetlands) and native fish habitat. Again, the area holds much that is precious but under pressure.
16. Additionally the Applicant will be proposing the establishment of a Community Trust for the benefit of the local community.
17. The Applicant proposes significant annual investments which would run indefinitely, i.e. forever, in parallel with the facility. Ideas as to geographical limits, eligible project scope and governance alternatives have been developed.

Next steps

18. An application to use the fast-track process will likely be filed next week. If you have any comments in support of the consideration of the Proposal, we would like to hear from you. Contact the writer in the first instance.

Yours faithfully


J.C. Hardie
 Director of Clutha Pumped Hydro Consortium Ltd



Alanya Limmer
King's Counsel

30 October 2025

Mr James Kilty
Chief Executive
Transpower
Wellington

By email: s 9(2)(a) / communications@transpower.co.nz

Tēnā koe

Clutha Pumped Hydro Consortium Limited – Consultation under the Fast-track Approvals Act 2024

1. I act for Clutha Pumped Hydro Consortium Limited (**Applicant**), which intends to apply for approvals under the Fast-track Approvals Act 2024 to construct and operate a large pumped hydro scheme at Lake Onslow in Central Otago (**Project**).
2. The Project is not listed. The Applicant is currently preparing a Referral Application. Whilst not mandatory, the Applicant is sending this letter to invite further discussion with you if you wish to do so.
3. The Project area falls within the jurisdiction of the Otago Regional Council (**Regional Council**) and Central Otago District Council (**District Council**). As such, the Project will require various resource consents administered by the Regional and District Councils, as well as approvals from other regulatory authorities such as the Department of Conservation.
4. The Project is not “new”. It was thoroughly investigated by the Ministry of Business, Innovation and Employment (**MBIE**) during the period 2020 to 2023. At that time the project was known as the New Zealand Battery Project. The purpose of the Battery Project was to identify the best option (or options) for managing New Zealand’s dry-year risk in a highly renewable electricity system. While numerous options were considered at the first stage, the primary focus of investigations became pumped hydro at Lake Onslow.

Description of the project

5. The Clutha Pumped Hydro Project would pump water from the Mata-au/Clutha River (New Zealand’s largest river by flow) to a reservoir at a higher elevation (an enlarged Lake Onslow). Water will be released back down the tunnel, when electricity is most urgently needed by New Zealand. By reversing the direction of flow up to an enlarged Lake Onslow then releasing the stored water from Lake Onslow back down to the Clutha River, electricity will be generated. The amount of storage proposed will exceed the storage capacity of all existing hydro-electricity storage facilities in New Zealand at present.
6. A more fulsome description of the Project is set out at **Schedule 1** to this letter.
7. Various options as to lake height, tunnel lines, powerhouse location, and abstraction/discharge points from and into the Clutha/Matu Au were considered.
8. The lake height option preferred by the Applicant is 769m. A contour line at 770m is delineated on the maps that form part of Schedule 1.

Bridgeside Chambers

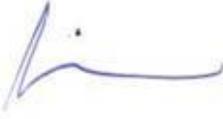
E: s 9(2)(a) | M: s 9(2)(a)

Level 5, 77 Hereford Street, P O Box 3180, Christchurch 8140

Next Steps

9. My client is not seeking consent for delivery of the power to the national grid, as that will follow if the approvals are eventually granted. At this stage it simply seeks to advise you that a Referral Application will shortly be filed and invite engagement with you, if that would be of interest and assistance.
10. If there is further information you need at this stage, please let me know.

Yours faithfully



Alanya Limmer KC

Mobile: s 9(2)(a)

Email: s 9(2)(a)

Clutha Pumped Hydro Consortium Limited
Registered office:
ICL Chartered Accountants Limited
69 Tarbet St
Alexandra, 9320

By email from:

s 9(2)(a)

31 October 2025

s 9(2)(a) s 9(2)(a)

s 9(2)(a)

s 9(2)(a)

By email:

s 9(2)(a)

s 9(2)(a)

and to:

s 9(2)(a) s 9(2)(a)

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s 9(2)(a)

By email:

s 9(2)(a)

s 9(2)(a)

and to

s 9(2)(a)

s 9(2)(a)

s 9(2)(a)

By email to:

s 9(2)(a)

Dear s 9(2)(a) & s 9(2)(a), s 9(2)(a) & s 9(2)(a)

Clutha Pumped Hydro Consortium Limited – Consultation under the Fast-track Approvals Act 2024

1. Clutha Pumped Hydro Consortium Limited (**Applicant**) intends to apply for approvals under the Fast-track Approvals Act 2024 (**FTAA**) to construct and operate a large pumped hydro scheme at Lake Onslow in Central Otago (**Project**).
2. The Project is not listed in the FTAA. The Applicant is currently preparing a Referral Application. The Applicant is sending this letter and inviting further discussion with you, as part of its consultation obligations under the FTAA.
3. The Project will not be “new” to you. It was investigated by the Ministry of Business, Innovation and Employment (**MBIE**) during the period 2020 to 2023. At that time the project was known as the New Zealand Battery Project. The purpose of the Battery Project was to identify the best option (or options) for managing New Zealand’s dry-year risk in a highly renewable electricity

system. While numerous options were considered at the first stage, the primary focus of investigations became pumped hydro at Lake Onslow.

4. Much of the investigatory work undertaken is available here: [NZ Battery Project | Ministry of Business, Innovation & Employment](#).
5. The Applicant believes the CPH project would achieve:
 - (a) More renewable generation in dry years from this project by displacing thermal generation and the fossil fuels it requires;
 - (b) A significant uplift in new renewable generation investment elsewhere in New Zealand because of improvements in the market for hedges or firming for those intermittent renewables;
 - (c) A secure and reliable electricity supply for New Zealand regardless of whether the sun is shining, the wind is blowing or the existing hydro lakes are full;
 - (d) Lower power prices;
 - (e) Thereby enabling further electrification of the economy by facilitating transport and industrial heat to electrify using greenhouse-gas-free, electricity.

Description of the Proposal

6. The Project would pump water from the Mata-au/Clutha River to a reservoir at a higher elevation (an enlarged Lake Onslow). Water will be released back down the tunnel, when electricity is most urgently needed by New Zealand. By reversing the direction of flow up to an enlarged Lake Onslow then releasing the stored water from Lake Onslow back down to the Clutha River, electricity will be generated. The amount of storage proposed will exceed the storage capacity of all existing hydro-electricity storage facilities in New Zealand at present.
7. A more fulsome description of the Project is set out at **Schedule 1** to this letter.
8. Various options as to lake height, tunnel lines, powerhouse location, and abstraction/discharge points from and into the Clutha were considered.
9. The lake height option preferred by the Applicant is 769m. A contour line at 770m is delineated on the maps that form part of Schedule 1.
10. The maps show the land that could be affected by or is adjacent to the Project. This includes land under the dam, the enlarged Lake, the tunnel, powerhouse, the lower reservoir and its connection to the Clutha River.

Matters of particular interest to you

11. Part of your land has been identified as being potentially affected by or adjacent to the Project. The title reference to that part of your land is set out in the next paragraph.
12. The title to your land adjacent to the project is:
 - (a) Title 515450 which comprises a fee-simple estate of 1600.0000 ha more or less being Part Section 1 Block IV Lammerlaw Survey District and Part Section 1 Block IV Lammerlaw Survey District and Part Section 1 Block IV Lammerlaw Survey District and Part Section 1 Block IV Lammerlaw Survey District.
13. Ken Smales is available to speak with you at any stage should you wish at s 9(2)(a) [REDACTED] And by email at s 9(2)(a) [REDACTED]

14. If approval is granted to use the Fast-track process, then the substantive application would be required to be sent to you. You would have the right to make submissions under section 53(2)(h) of the Fast-track Approvals Act 2024. Other parts of the process are determined by the panel which considers the substantive application.

Offsets & Community trust

15. In addition to full compensation for adversely affected landowners, the Applicant accepts that if this project proceeds there would be some unavoidable environmental impacts. Because the Project is large it can carry the cost of and should be an exemplar for offsets in accordance with the avoid – remedy - offset - compensate hierarchy.
16. The application proposes two significant environmental offset proposals. The first relates to terrestrial flora and fauna, including geckos and other lizards. It includes more predator protected areas, similar to the Aldinger Reserve. The Central Otago area, including the Hawkdun Range, is a biodiversity hotspot and much good can be done. The second relates to freshwater quality, water way morphology (e.g. scroll plains and wetlands) and native fish habitat. Again, the area holds much that is precious but under pressure.
17. Additionally, the Applicant will be proposing the establishment of a Community Trust for the benefit of the local community.
18. The Applicant proposes significant annual investments which would run indefinitely, i.e. forever, in parallel with the facility. Ideas as to geographical limits, eligible project scope and governance alternatives have been developed.

Next steps

19. If there is further information you need at this stage, please let Mr Smales know.

Yours faithfully



J G Hardie
Director
Clutha Pumped Hydro Consortium Ltd

Clutha Pumped Hydro Consortium Limited
Registered office:
ICL Chartered Accountants Limited
69 Tarbet St
Alexandra, 9320

By email from:

s 9(2)(a)

31 October 2025

s 9(2)(a)

s 9(2)(a)

By email to:

s 9(2)(a)

And by courier to:

s 9(2)(a)

Dear s 9(2)(a)

s 9(2)(a) – OT 8C/546

Clutha Pumped Hydro Consortium Limited – Consultation under the Fast-track Approvals Act 2024

1. David Parker made contact with s 9(2)(a) in respect of your above-named client, who is a registered owner of a 3.477ha piece of land adjacent to the Clutha River at Craig Hill, downstream of Millers Flat. Your above-named Trustee company is the co-owner. s 9(2)(a) suggested initial contact be by way of email to you, hence this letter.
2. Clutha Pumped Hydro Consortium Limited (**Applicant**) intends to apply for approvals under the Fast-track Approvals Act 2024 (**FTAA**) to construct and operate a large pumped hydro scheme at Lake Onslow in Central Otago (**Project**).
3. Ken Smales has been representing the Applicant in dealings with landowners. He does not have a contact phone number or postal or email address for s 9(2)(a). I would be grateful if you could forward copy of this letter to her, and (if authorised) provide me or Ken Smales with her contact details. Ken Smales' phone number is s 9(2)(a) and his email is s 9(2)(a).
4. The Project is not listed in the FTAA. The Applicant is currently preparing a Referral Application. The Applicant is sending this letter and inviting further discussion, as part of its consultation obligations under the FTAA.

5. The Project may not be “new” to your client. It was investigated by the Ministry of Business, Innovation and Employment (**MBIE**) during the period 2020 to 2023. At that time the project was known as the New Zealand Battery Project. The purpose of the Battery Project was to identify the best option (or options) for managing New Zealand’s dry-year risk in a highly renewable electricity system. While numerous options were considered at the first stage, the primary focus of investigations became pumped hydro at Lake Onslow.
6. Much of the investigatory work undertaken is available here: [NZ Battery Project | Ministry of Business, Innovation & Employment](#).
7. The Applicant believes the CPH project would achieve:
 - (a) More renewable generation in dry years from this project by displacing thermal generation and the fossil fuels it requires;
 - (b) A significant uplift in new renewable generation investment elsewhere in New Zealand because of improvements in the market for hedges or firming for those intermittent renewables;
 - (c) A secure and reliable electricity supply for New Zealand regardless of whether the sun is shining, the wind is blowing or the existing hydro lakes are full;
 - (d) Lower power prices;
 - (e) Thereby enabling further electrification of the economy by facilitating transport and industrial heat to electrify using greenhouse-gas-free, electricity.

Description of the Proposal

8. The Clutha Pumped Hydro Project would pump water from the Mata-au/Clutha River (New Zealand’s largest river by flow) to a reservoir at a higher elevation (an enlarged Lake Onslow). Water will be released back down the tunnel, when electricity is most urgently needed by New Zealand. By reversing the direction of flow up to an enlarged Lake Onslow then releasing the stored water from Lake Onslow back down to the Clutha River, electricity will be generated. The amount of storage proposed will exceed the storage capacity of all existing hydro-electricity storage facilities in New Zealand at present.
9. A more fulsome description of the Project is set out at **Schedule 1** to this letter.
10. Various options as to lake height, tunnel lines, powerhouse location, and abstraction/discharge points from and into the Clutha/ Matu Au were considered.
11. The lake height option preferred by the applicant is 769m. A contour line at 770m is delineated on the maps that form part of Schedule 1.
12. The maps show the land that could be affected by or is adjacent to the Project. This includes land under the dam, the enlarged Lake, the tunnel, powerhouse, the lower reservoir and its connection to the Clutha River.

Matters of particular interest to you

13. Part of your client’s land has been identified as being potentially affected by or adjacent to the Project. The title reference to your land is set out in the next paragraph. I say ‘potentially’ because this could arise from the position of the linkage between the Mata-au/ Clutha river and the lower reservoir. That position will not be finalised until more engineering work is done.
14. The land affected by or adjacent to the project is:

(a) Title OT 8C/546 which comprises a fee-simple estate of 3.4474 ha more or less being Section 11-12 Block IX Bengier Survey District.

15. Ken Smales is available to speak with your client, or to visit, should she (or a representative of your trustee company) wish to discuss this further at this stage.
16. If approval is granted to use the Fast-track process, then the substantive application would be required to be sent to you. You would have the right to make submissions under section 53(2)(h) of the Fast-track Approvals Act 2024. Other parts of the process are determined by the panel which considers the substantive application.
17. Some landowners have asked how they might be compensated if they are adversely affected, and whether the Public Works Act applies. The Applicant does not have recourse to the Public Works Act. The Applicant would have to negotiate with landowners should this arise.

Offsets & Community trust

18. In addition to full compensation for adversely affected landowners, the Applicant accepts that if this project proceeds there would be some unavoidable environmental impacts. Because the Project is large it can carry the cost of and should be an exemplar for offsets in accordance with the avoid – remedy - offset - compensate hierarchy.
19. The application proposes two significant environmental offset proposals. The first relates to terrestrial flora and fauna, including geckos and other lizards. It includes more predator protected areas, similar to the Aldinger Reserve. The Central Otago area, including the Hawkdun Range, is a biodiversity hotspot and much good can be done. The second relates to freshwater quality, water way morphology (e.g. scroll plains and wetlands) and native fish habitat. Again, the area holds much that is precious but under pressure.
20. Additionally, the Applicant will be proposing the establishment of a Community Trust for the benefit of the local community.
21. The Applicant proposes significant annual investments which would run indefinitely, i.e. forever, in parallel with the facility. Ideas as to geographical limits, eligible project scope and governance alternatives have been developed.

Next steps

22. If there is further information you need at this stage, please contact Ken Smales at the first instance or me.

Yours faithfully



J G Hardie
Director, Clutha Pumped Hydro Consortium Ltd

Clutha Pumped Hydro Consortium Limited
Registered office:
ICL Chartered Accountants Limited
69 Tarbet St
Alexandra, 9320

By email from:

s 9(2)(a)

31 October 2025

s 9(2)(a)

s 9(2)(a)

s 9(2)(a)

By email: s 9(2)(a)

and by courier to:

s 9(2)(a)

s 9(2)(a)

s 9(2)(a)

s 9(2)(a)

s 9(2)(a)

s 9(2)(a)

Dear s 9(2)(a) and s 9(2)(a)

Clutha Pumped Hydro Consortium Limited – Consultation under the Fast-track Approvals Act 2024

1. Clutha Pumped Hydro Consortium Limited (**Applicant**) intends to apply for approvals under the Fast-track Approvals Act 2024 (**FTAA**) to construct and operate a large pumped hydro scheme at Lake Onslow in Central Otago (**Project**).
2. The Project is not listed in the FTAA. The Applicant is currently preparing a Referral Application. The Applicant is sending this letter and inviting further discussion with you, as part of its consultation obligations under the FTAA.
3. The Project will not be “new” to you. It was investigated by the Ministry of Business, Innovation and Employment (**MBIE**) during the period 2020 to 2023. At that time the project was known as the New Zealand Battery Project. The purpose of the Battery Project was to identify the best option (or options) for managing New Zealand’s dry-year risk in a highly renewable electricity system. While numerous options were considered at the first stage, the primary focus of investigations became pumped hydro at Lake Onslow.
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5. The Applicant believes the CPH project would achieve:
 - (a) More renewable generation in dry years from this project by displacing thermal generation and the fossil fuels it requires;

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- (d) Lower power prices;
- (e) Thereby enabling further electrification of the economy by facilitating transport and industrial heat to electrify using greenhouse-gas-free, electricity.

Description of the Proposal

- 6. The Project would pump water from the Mata-au/Clutha River to a reservoir at a higher elevation (an enlarged Lake Onslow). Water will be released back down the tunnel, when electricity is most urgently needed by New Zealand. By reversing the direction of flow up to an enlarged Lake Onslow then releasing the stored water from Lake Onslow back down to the Clutha River, electricity will be generated. The amount of storage proposed will exceed the storage capacity of all existing hydro-electricity storage facilities in New Zealand at present.
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Matters of particular interest to you

- 11. Part of your land has been identified as being potentially affected by the Project or is adjacent to it. The title reference to this part of your land is set out in the next paragraph.
- 12. The title to your land affected by or adjacent to the project is:
 - (a) Title OT14C/754 which comprises a fee-simple estate of 7438.0767ha more or less being Section 18 Block XII and Section 1 Block XIII Upper Taieri Survey District and Part Section 1 Block XII Long Valley Survey District and Section 18,26,28,30, 41 Survey Office Plan 22539 and Section 1 Survey Office Plan 21588 and Section 3 Survey Office Plan 21589.
- 13. Ken Smales has been in contact with you on several occasions and you have also met with directors of the Applicant.
- 14. If approval is granted to use the Fast-track process, then the substantive application would be required to be sent to you. You would have the right to make submissions under section 53(2)(h) of the Fast-track Approvals Act 2024. Other parts of the process are determined by the panel which considers the substantive application.
- 15. Some landowners have asked how they might be compensated, and whether the Public Works Act applies. The Applicant does not have recourse to the Public Works Act. The Applicant will have to negotiate with you.

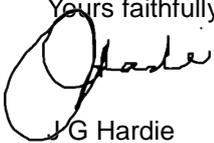
Offsets & Community trust

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Next steps

20. If there is further information you need at this stage, please let Mr Smales know. His email address is s 9(2)(a)

Yours faithfully



JG Hardie
Director, Clutha Pumped Hydro Consortium Ltd

Clutha Pumped Hydro Consortium Limited
Registered office:
ICL Chartered Accountants Limited
69 Tarbet St
Alexandra, 9320

By email from:

s 9(2)(a)

31 October 2025

s 9(2)(a)

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s 9(2)(a)

By email to:

s 9(2)(a)

And by courier to:

s 9(2)(a)

s 9(2)(a) :

s 9(2)(a)

s 9(2)(a)

s 9(2)(a)

Dear s 9(2)(a) and s 9(2)(a)

Clutha Pumped Hydro Consortium Limited – Consultation under the Fast-track Approvals Act 2024

1. As you know, I am a director of Clutha Pumped Hydro Consortium Limited (**Applicant**). It was a pleasure to meet with you recently. The Applicant intends to apply for approvals under the Fast-track Approvals Act 2024 (**FTAA**) to construct and operate a large pumped hydro scheme at Lake Onslow in Central Otago (**Project**).
2. The Project is not listed in the FTAA. The Applicant is currently preparing a Referral Application. The Applicant is sending this letter and inviting further discussion with you, as part of its consultation obligations under the FTAA.
3. The Project is not “new” to you. It was investigated by the Ministry of Business, Innovation and Employment (**MBIE**) during the period 2020 to 2023. At that time the project was known as the New Zealand Battery Project. The purpose of the Battery Project was to identify the best option (or options) for managing New Zealand’s dry-year risk in a highly renewable electricity system. While numerous options were considered at the first stage, the primary focus of investigations became pumped hydro at Lake Onslow.
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Description of the Proposal

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- 10. The maps show the land that could be affected by or is adjacent to the Project. This includes land under the dam, the enlarged Lake, the tunnel, powerhouse, the lower reservoir and its connection to the Clutha River.

Matters of particular interest to you

- 11. Part of your land has been identified as being potentially affected by or adjacent to the Project. The title references to these parts your land are set out in the next paragraph.
- 12. The titles to your land affected by or adjacent to the project are:
 - (a) Perpetually renewable pastoral lease under s83 Land Act 1948 recorded in Title OT338/21 which comprises 27,901.8610ha more or less being Run 656 and Run 657 and Run 658 and Run 814 and Run 815 and Run 816 and Section 32-35 Survey Office plane 22593 and Section 3 Block I Lammerlaw Survey District and Section 15 Block VII Beaumont Survey District, most recently renewed for 33 years from 1 July 2017 under renewal instrument RCL 10803368.2.
 - (b) Title OT 5B/943 which comprises a fee-simple estate of 1290.9000 ha more or less being Lot 1 Deposited Plan 12797.
 - (c) Title OT 7D/831 which comprises a fee-simple estate of 258.9988 ha more or less being Section 2 Block 1 Lammerlaw Survey District.
 - (d) Title OT 287/119 which comprises a fee-simple estate of 35.3417 ha more or less being Part Section 1 Block IX Benger Survey District.

- (e) Title OT 287/120 which comprises a fee-simple estate of 4.6539 ha more or less being Section 1 Block 1 Lammerlaw Survey District.
 - (f) Title 426369 which comprises a fee-simple estate of 5249.0843 ha more or less being Lot 2 Deposited Plan 12797 Lammerlaw Survey District.
13. Ken Smales has been in contact with you on several occasions and you have also met with the directors of the Applicant. I enjoyed my visit to your home and thank you for your hospitality.
 14. If approval is granted to use the Fast-track process, then the substantive application would be required to be sent to you. You would have the right to make submissions under section 53(2)(h) of the Fast-track Approvals Act 2024. Other parts of the process are determined by the panel which considers the substantive application.
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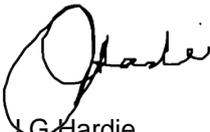
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Next steps

20. If there is further information you need at this stage, please let Ken Smales know. His email address is s 9(2)(a)

Yours faithfully



J.G. Hardie
Director, Clutha Pumped Hydro Consortium Ltd

Clutha Pumped Hydro Consortium Limited
Registered office:
ICL Chartered Accountants Limited
69 Tarbet St
Alexandra, 9320

By email from:

s 9(2)(a)

31 October 2025

Mike Fuge
CEO
Contact Energy Limited

By email to:

s 9(2)(a)

Dear Mr Fuge

Clutha Pumped Hydro Consortium Limited – Consultation under the Fast-track Approvals Act 2024

1. Clutha Pumped Hydro Consortium Limited (**Applicant**) intends to apply for approvals under the Fast-track Approvals Act 2024 (**FTAA**) to construct and operate a large pumped hydro scheme at Lake Onslow in Central Otago (**Project**).
2. The Project is not listed in the FTAA. The Applicant is currently preparing a Referral Application. The Applicant is sending this letter and inviting further discussion with you, as part of its consultation obligations under the FTAA.
3. The Project will not be “new” to you. It was investigated by the Ministry of Business, Innovation and Employment (**MBIE**) during the period 2020 to 2023. At that time the project was known as the New Zealand Battery Project. The purpose of the Battery Project was to identify the best option (or options) for managing New Zealand’s dry-year risk in a highly renewable electricity system. While numerous options were considered at the first stage, the primary focus of investigations became pumped hydro at Lake Onslow.
4. Much of the investigatory work undertaken is available here: [NZ Battery Project | Ministry of Business, Innovation & Employment](#).
5. The Applicant believes the CPH project would achieve:
 - (a) More renewable generation in dry years from this project by displacing thermal generation and the fossil fuels it requires;
 - (b) A significant uplift in new renewable generation investment elsewhere in New Zealand because of improvements in the market for hedges or firming for those intermittent renewables;
 - (c) A secure and reliable electricity supply for New Zealand regardless of whether the sun is shining, the wind is blowing or the existing hydro lakes are full;
 - (d) Lower power prices;

- (e) Thereby enabling further electrification of the economy by facilitating transport and industrial heat to electrify using greenhouse-gas-free, electricity.

Description of the Proposal

6. The Project would pump water from the Mata-au/Clutha River (New Zealand's largest river by flow) to a reservoir at a higher elevation (an enlarged Lake Onslow). Water will be released back down the tunnel, when electricity is most urgently needed by New Zealand. By reversing the direction of flow up to an enlarged Lake Onslow then releasing the stored water from Lake Onslow back down to the Clutha River, electricity will be generated. The amount of storage proposed will exceed the storage capacity of all existing hydro-electricity storage facilities in New Zealand at present.
7. A more fulsome description of the Project is set out at **Schedule 1** to this letter.
8. Various options as to lake height, tunnel lines, powerhouse location, and abstraction/discharge points from and into the Clutha/ Matu Au were considered.
9. The lake height option preferred by the Applicant is 769m. A contour line at 770m is delineated on the maps that form part of Schedule 1.
10. The maps show the land that could be affected by or is adjacent to the Project. This includes land under the dam, the enlarged Lake, the tunnel, powerhouse, the lower reservoir and its connection to the Clutha River.

Matters of particular interest to you

11. Part of your land has been identified as being potentially affected by or adjacent to the Project. The title references to these parts your land are set out in the next paragraph.
12. The titles to your land affected by or adjacent to the project are:
 - (a) Title OT 14C/642 which comprises a fee-simple estate of 10.8000 ha more or less being Section 16-18 Block VII Beaumont Survey District.
 - (b) Title OT 203/47 which comprises a fee-simple estate of 6.0703 ha more or less being Section 10 Block IX Bengier Survey District.
13. Dr Keith Turner has been in contact with you. Ken Smales is also available to you or your staff on s 9(2)(a) s 9(2)(a) if you or they wish to discuss any matters further.
14. If approval is granted to use the Fast-track process, then the substantive application would be required to be sent to you. You would have the right to make submissions under section 53(2)(h) of the Fast-track Approvals Act 2024. Other parts of the process are determined by the panel which considers the substantive application.

Offsets & Community trust

15. In addition to full compensation for adversely affected landowners, the Applicant accepts that if this project proceeds there would be some unavoidable environmental impacts. Because the Project is large it can carry the cost of and should be an exemplar for offsets in accordance with the avoid – remedy - offset - compensate hierarchy.
16. The application proposes two significant environmental offset proposals. The first relates to terrestrial flora and fauna, including geckos and other lizards. It includes more predator protected areas, similar to the Aldinger Reserve. The Central Otago area, including the Hawkdun Range, is a biodiversity hotspot and much good can be done. The second relates to freshwater quality, water way morphology (e.g. scroll plains and wetlands) and native fish habitat. Again, the area holds much that is precious but under pressure.

17. Additionally, the Applicant will be proposing the establishment of a Community Trust for the benefit of the local community.
18. The Applicant proposes significant annual investments which would run indefinitely, i.e. forever, in parallel with the facility. Ideas as to geographical limits, eligible project scope and governance alternatives have been developed.

Next steps

19. If there is further information you need at this stage, please let Mr Smales know.

Yours faithfully

A handwritten signature in black ink, appearing to read 'J.G. Hardie', written in a cursive style.

J.G. Hardie
Director, Clutha Pumped Hydro Consortium Ltd

Clutha Pumped Hydro Consortium Limited
Registered office:
ICL Chartered Accountants Limited
69 Tarbet St
Alexandra, 9320

By email from:

s 9(2)(a)

31 October 2025

s 9(2)(a)

s 9(2)(a)

s 9(2)(a)

By email to:

s 9(2)(a)

By courier to:

s 9(2)(a)

s 9(2)(a)

s 9(2)(a)

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s 9(2)(a)

s 9(2)(a)

Dear s 9(2)(a)

Clutha Pumped Hydro Consortium Limited – Consultation under the Fast-track Approvals Act 2024

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3. The Project will not be “new” to you. It was investigated by the Ministry of Business, Innovation and Employment (**MBIE**) during the period 2020 to 2023. At that time the project was known as the New Zealand Battery Project. The purpose of the Battery Project was to identify the best option (or options) for managing New Zealand’s dry-year risk in a highly renewable electricity system. While numerous options were considered at the first stage, the primary focus of investigations became pumped hydro at Lake Onslow.
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Description of the Proposal

- 6. The Project would pump water from the Mata-au/Clutha River (New Zealand's largest river by flow) to a reservoir at a higher elevation (an enlarged Lake Onslow). Water will be released back down the tunnel, when electricity is most urgently needed by New Zealand. By reversing the direction of flow up to an enlarged Lake Onslow then releasing the stored water from Lake Onslow back down to the Clutha River, electricity will be generated. The amount of storage proposed will exceed the storage capacity of all existing hydro-electricity storage facilities in New Zealand at present.
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Matters of particular interest to you

- 11. Part of your land has been identified as being potentially affected by or adjacent to the Project. The title references to those parts of your land are set out in the next paragraph.
- 12. The titles to your land affected by or adjacent to the project are:
 - (a) Title 360600 which comprises a fee-simple estate of 1121.9600 ha more or less being Lots 27-28 Deposited Plan 389879.
 - (b) Title 360597 which comprises a fee-simple estate of 1071.5613 ha more or less being Lot 13-19 Deposited Plan 389879 and Part Section 1 Block VI Lammerlaw Survey District and Part Section 1 Block VI Lammerlaw Survey District and Part Section 1 Block VI Lammerlaw Survey District and Part Section 1 Block VI Lammerlaw Survey District and Part Section 1 Block VI Lammerlaw Survey District and Part Section 1 Block VI Lammerlaw Survey District and Part Section 1 Block VI Lammerlaw Survey District and Part Section 1 Block VI Lammerlaw Survey District.
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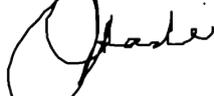
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Yours faithfully



J.G. Hardie
Director, Clutha Pumped Hydro Consortium Ltd

Clutha Pumped Hydro Consortium Limited
Registered office:
ICL Chartered Accountants Limited
69 Tarbet St
Alexandra, 9320

By email from:

s 9(2)(a)

31 October 2025

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And by courier to:

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Matters of particular interest to you

- 11. Part of your land has been identified as being potentially affected by or adjacent to the Project. The title reference to the part your land is set out in the next paragraph.
- 12. The title to your land adjacent to the project is:
 - (a) Title 14666 which comprises a fee-simple estate of 560.000 ha more or less being Section 2 Block IX Long Valley District.
- 13. Ken Smales has been in contact with you and remains available on s 9(2)(a)
- 14. If approval is granted to use the Fast-track process, then the substantive application would be required to be sent to you. You would have the right to make submissions under section 53(2)(h) of the Fast-track Approvals Act 2024. Other parts of the process are determined by the panel which considers the substantive application.

Offsets & Community trust

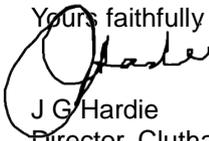
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Next steps

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Yours faithfully



J G Hardie
Director, Clutha Pumped Hydro Consortium Ltd

Clutha Pumped Hydro Consortium Limited
Registered office:
ICL Chartered Accountants Limited
69 Tarbet St
Alexandra, 9320

By email from:

s 9(2)(a)

31 October 2025

s 9(2)(a)

s 9(2)(a)

s 9(2)(a)

By email to:

s 9(2)(a)

And by email to:

David Hogue

s 9(2)(a)

And by courier to:

s 9(2)(a)

s 9(2)(a)

s 9(2)(a)

s 9(2)(a)

s 9(2)(a)

s 9(2)(a)

Dear s 9(2)(a)

Clutha Pumped Hydro Consortium Limited – Consultation under the Fast-track Approvals Act 2024

1. As you know, I am a director of Clutha Pumped Hydro Consortium Limited (**Applicant**). It was a pleasure to meet you recently and I thank you for your hospitality. The Applicant intends to apply for approvals under the Fast-track Approvals Act 2024 (**FTAA**) to construct and operate a large pumped hydro scheme at Lake Onslow in Central Otago (**Project**).
2. The Project is not listed in the FTAA. The Applicant is currently preparing a Referral Application. The Applicant is sending this letter and inviting further discussion with you, as part of its consultation obligations under the FTAA.
3. The Project is not “new” to you. It was investigated by the Ministry of Business, Innovation and Employment (**MBIE**) during the period 2020 to 2023. At that time the project was known as the New Zealand Battery Project. The purpose of the Battery Project was to identify the best option (or options) for managing New Zealand’s dry-year risk in a highly renewable electricity system. While numerous options were considered at the first stage, the primary focus of investigations became pumped hydro at Lake Onslow.
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Description of the Proposal

6. The Project would pump water from the Mata-au/Clutha River to a reservoir at a higher elevation (an enlarged Lake Onslow). Water will be released back down the tunnel, when electricity is most urgently needed by New Zealand. By reversing the direction of flow up to an enlarged Lake Onslow then releasing the stored water from Lake Onslow back down to the Clutha River, electricity will be generated. The amount of storage proposed will exceed the storage capacity of all existing hydro-electricity storage facilities in New Zealand at present.
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9. The lake height option preferred by the applicant is 769m. A contour line at 770m is delineated on the maps that form part of Schedule 1.
10. The maps show the land that could be affected by or is adjacent to the Project. This includes land under the dam, the enlarged Lake, the tunnel, powerhouse, the lower reservoir and its connection to the Clutha River.

Matters of particular interest to you

11. Part of your land has been identified as being directly affected by the Project. The title reference(s) to these parts your land are set out in the next paragraph.
12. The titles to your land affected by or adjacent to the project are:
- (a) Title 151508 which comprises a fee-simple estate of 539.258ha more or less being Lot 3 Deposited Plan 337026.
 - (b) Title 374352 which comprises a fee-simple estate of 403.52ha more or less being Lot 1 Deposited Plan 393527.
 - (c) Title 115742 which comprises a fee-simple estate of 1228ha more or less being Section 1 Blick VIII and Sections 36, 39 Survey Office Plan 22593.
13. Ken Smales has been in contact with you on several occasions and you have also met with the directors of the Applicant. You have asked that communication be via s 9(2)(a) [REDACTED]. This formal letter is required to be sent to you, but I have copied it to your advisor s 9(2)(a) [REDACTED] as requested.

14. If approval is granted to use the Fast-track process, then the substantive application would be required to be sent to you. You would have the right to make submissions under section 53(2)(h) of the Fast-track Approvals Act 2024. Other parts of the process are determined by the panel which considers the substantive application.
15. Some landowners have asked how they might be compensated, and whether the Public Works Act applies. The Applicant does not have recourse to the Public Works Act. The Applicant will have to negotiate with you. My client understands that other parts of your farm operation are also affected even though those parts are not "affected land" or "adjacent land" within the statutory definitions of the FTAA.

Offsets & Community trust

16. In addition to full compensation for landowners, the Applicant accepts that if this project proceeds there would be some unavoidable environmental impacts. Because the Project is large it can carry the cost of and should be an exemplar for offsets in accordance with the avoid – remedy - offset - compensate hierarchy.
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Yours faithfully



J.G. Hardie
Director, Clutha pumped Hydro Consortium Ltd

Clutha Pumped Hydro Consortium Limited
Registered office:
ICL Chartered Accountants Limited
69 Tarbet St
Alexandra, 9320

By email from:

s 9(2)(a)

31 October 2025

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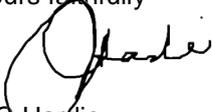
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J G Hardie
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Registered office:
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By email from:

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4. Much of the investigatory work undertaken is available here: [NZ Battery Project | Ministry of Business, Innovation & Employment](#).
5. The Applicant believes the CPH project would achieve:
 - (a) More renewable generation in dry years from this project by displacing thermal generation and the fossil fuels it requires;

- (b) A significant uplift in new renewable generation investment elsewhere in New Zealand because of improvements in the market for hedges or firming for those intermittent renewables;
- (c) A secure and reliable electricity supply for New Zealand regardless of whether the sun is shining, the wind is blowing or the existing hydro lakes are full;
- (d) Lower power prices;
- (e) Thereby enabling further electrification of the economy by facilitating transport and industrial heat to electrify using greenhouse-gas-free, electricity.

Description of the Proposal

- 6. The Project would pump water from the Mata-au/Clutha River to a reservoir at a higher elevation (an enlarged Lake Onslow). Water will be released back down the tunnel, when electricity is most urgently needed by New Zealand. By reversing the direction of flow up to an enlarged Lake Onslow then releasing the stored water from Lake Onslow back down to the Clutha River, electricity will be generated. The amount of storage proposed will exceed the storage capacity of all existing hydro-electricity storage facilities in New Zealand at present.
- 7. A more fulsome description of the Project is set out at **Schedule 1** to this letter.
- 8. Various options as to lake height, tunnel lines, powerhouse location, and abstraction/discharge points from and into the Clutha were considered.
- 9. The lake height option preferred by the applicant is 769m. A contour line at 770m is delineated on the maps that form part of Schedule 1.
- 10. The maps show the land that could be affected by or is adjacent to the Project. This includes land under the dam, the enlarged Lake, the tunnel, powerhouse, the lower reservoir and its connection to the Clutha River.

Matters of particular interest to you

- 11. Part of your land has been identified as being potentially affected by or adjacent to the Project. The title references to these parts of your land are set out in the next paragraph.
- 12. The titles to your land affected by or adjacent to the project are:
 - (a) Title 360599 which comprises a fee-simple estate of 743.3700 ha more or less being Section 16-18 Block VII Beaumont Survey District.
 - (b) Title 360598 which comprises a fee-simple estate of 326.1180 ha more or less being Lot 20-23 Deposited Plan 389879.
- 13. Ken Smales has been in contact with you and is available to speak further with you at any stage should you wish to.
- 14. If approval is granted to use the Fast-track process, then the substantive application would be required to be sent to you. You would have the right to make submissions under section 53(2)(h) of the Fast-track Approvals Act 2024. Other parts of the process are determined by the panel which considers the substantive application.
- 15. Some landowners have asked how they might be compensated, and whether the Public Works Act applies. The Applicant does not have recourse to the Public Works Act. The Applicant will have to negotiate with you.

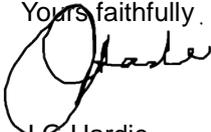
Offsets & Community trust

16. In addition to full compensation for affected landowners, the Applicant accepts that if this project proceeds there would be some unavoidable environmental impacts. Because the Project is large it can carry the cost of and should be an exemplar for offsets in accordance with the avoid – remedy - offset - compensate hierarchy.
17. The application proposes two significant environmental offset proposals. The first relates to terrestrial flora and fauna, including geckos and other lizards. It includes more predator protected areas, similar to the Aldinger Reserve. The Central Otago area, including the Hawkdun Range, is a biodiversity hotspot and much good can be done. The second relates to freshwater quality, water way morphology (e.g. scroll plains and wetlands) and native fish habitat. Again, the area holds much that is precious but under pressure.
18. Additionally, the Applicant will be proposing the establishment of a Community Trust for the benefit of the local community.
19. The Applicant proposes significant annual investments which would run indefinitely, i.e. forever, in parallel with the facility. Ideas as to geographical limits, eligible project scope and governance alternatives have been developed.

Next steps

20. If there is further information you need at this stage, please let Mr Smales know. His email address is ss 9(2)(a)

Yours faithfully,



J.G. Hardie
Director, Clutha Pumped Hydro Consortium Ltd

Clutha Pumped Hydro Consortium Limited
Registered office:
ICL Chartered Accountants Limited
69 Tarbet St
Alexandra, 9320

By email from:

s 9(2)(a)

31 October 2025

s 9(2)(a)

By email to:

s 9(2)(a)

And by courier to

s 9(2)(a)

s 9(2)(a)

s 9(2)(a)

s 9(2)(a)

s 9(2)(a)

as holders of a Forestry Right

Dear s 9(2)(a)

Clutha Pumped Hydro Consortium Limited – Consultation under the Fast-track Approvals Act 2024

1. Clutha Pumped Hydro Consortium Limited (**Applicant**) intends to apply for approvals under the Fast-track Approvals Act 2024 (**FTAA**) to construct and operate a large pumped hydro scheme at Lake Onslow in Central Otago (**Project**).
2. The Project is not listed in the FTAA. The Applicant is currently preparing a Referral Application. The Applicant is sending this letter and inviting further discussion with you, as part of its consultation obligations under the FTAA.
3. The Project will not be “new” to you. It was investigated by the Ministry of Business, Innovation and Employment (**MBIE**) during the period 2020 to 2023. At that time the project was known as the New Zealand Battery Project. The purpose of the Battery Project was to identify the best option (or options) for managing New Zealand’s dry-year risk in a highly renewable electricity system. While numerous options were considered at the first stage, the primary focus of investigations became pumped hydro at Lake Onslow.
4. Much of the investigatory work undertaken is available here: [NZ Battery Project | Ministry of Business, Innovation & Employment](#).

5. The Applicant believes the CPH project would achieve:
 - (a) More renewable generation in dry years from this project by displacing thermal generation and the fossil fuels it requires;
 - (b) A significant uplift in new renewable generation investment elsewhere in New Zealand because of improvements in the market for hedges or firming for those intermittent renewables;
 - (c) A secure and reliable electricity supply for New Zealand regardless of whether the sun is shining, the wind is blowing or the existing hydro lakes are full;
 - (d) Lower power prices;
 - (e) Thereby enabling further electrification of the economy by facilitating transport and industrial heat to electrify using greenhouse-gas-free, electricity.

Description of the Proposal

6. The Project would pump water from the Mata-au/Clutha River to a reservoir at a higher elevation (an enlarged Lake Onslow). Water will be released back down the tunnel, when electricity is most urgently needed by New Zealand. By reversing the direction of flow up to an enlarged Lake Onslow then releasing the stored water from Lake Onslow back down to the Clutha River, electricity will be generated. The amount of storage proposed will exceed the storage capacity of all existing hydro-electricity storage facilities in New Zealand at present.
7. A more fulsome description of the Project is set out at **Schedule 1** to this letter.
8. Various options as to lake height, tunnel lines, powerhouse location, and abstraction/discharge points from and into the Clutha were considered.
9. The lake height option preferred by the Applicant is 769m. A contour line at 770m is delineated on the maps that form part of Schedule 1.
10. The maps show the land that could be affected by or is adjacent to the Project. This includes land under the dam, the enlarged Lake, the tunnel, powerhouse, the lower reservoir and its connection to the Clutha River.

Matters of particular interest to you

11. Part of the land over which you have Forestry Rights has been identified as being potentially affected by or adjacent to the Project. The reference to forestry rights is set out in the next paragraph.
12. Your Forestry Right over part of the land affected by or adjacent to the project is:
 - (a) Forestry Right number 11846031.1 pursuant to the Forestry Rights Registration Act 1983, which is registered over parts of the land owned by Sanddale Farm Limited in Title 589511 (which title comprises a fee-simple estate of 519.4900 ha more or less being Lot 1 Deposited Plan 456324 and Lots 1 and 5 Deposited Plan 337026).
13. Ken Smales has spoken with s 9(2)(a) and is available to speak with you at any stage should you wish to. His phone number is s 9(2)(a) and his email address is s 9(2)(a).
14. If approval is granted to use the Fast-track process, then the substantive application would be required to be sent to you. You would have the right to make submissions under section 53(2)(h) of the Fast-track Approvals Act 2024. Other parts of the process are determined by the panel which considers the substantive application.

15. Some landowners have asked how they might be compensated, and whether the Public Works Act applies. The Applicant does not have recourse to the Public Works Act. The Applicant will have to negotiate with you.

Offsets & Community trust

16. In addition to full compensation for affected landowners, the Applicant accepts that if this project proceeds there would be some unavoidable environmental impacts. Because the Project is large it can carry the cost of and should be an exemplar for offsets in accordance with the avoid – remedy - offset - compensate hierarchy.
17. The application proposes two significant environmental offset proposals. The first relates to terrestrial flora and fauna, including geckos and other lizards. It includes more predator protected areas, similar to the Aldinger Reserve. The Central Otago area, including the Hawkdun Range, is a biodiversity hotspot and much good can be done. The second relates to freshwater quality, water way morphology (e.g. scroll plains and wetlands) and native fish habitat. Again, the area holds much that is precious but under pressure.
18. Additionally, the Applicant will be proposing the establishment of a Community Trust for the benefit of the local community.
19. The Applicant proposes significant annual investments which would run indefinitely, i.e. forever, in parallel with the facility. Ideas as to geographical limits, eligible project scope and governance alternatives have been developed.

Next steps

20. If there is further information you need at this stage, please let Mr Smales know.

Yours faithfully



J.G Hardie

Director, Clutha Pumped Hydro Consortium Ltd

Clutha Pumped Hydro Consortium Limited
Registered office:
ICL Chartered Accountants Limited
69 Tarbet St
Alexandra, 9320

By email from:

s 9(2)(a)

31 October 2025

Ms Gaye Saerancke
Chief Executive
Land Information New Zealand
Wellington

By email to:
customersupport @linz.govt.nz

Dear Ms Searancke

Clutha Pumped Hydro Consortium Limited – Consultation under the Fast-track Approvals Act 2024

1. Clutha Pumped Hydro Consortium Limited (**Applicant**) intends to apply for approvals under the Fast-track Approvals Act 2024 (**FTAA**) to construct and operate a large pumped hydro scheme at Lake Onslow in Central Otago (**Project**).
2. The Project is not listed in the FTAA. The Applicant is currently preparing a Referral Application. The Applicant is sending this letter and inviting further discussion with you, as part of its consultation obligations under the FTAA.
3. The Project will not be “new” to you. It was investigated by the Ministry of Business, Innovation and Employment (**MBIE**) during the period 2020 to 2023. At that time the project was known as the New Zealand Battery Project. The purpose of the Battery Project was to identify the best option (or options) for managing New Zealand’s dry-year risk in a highly renewable electricity system. While numerous options were considered at the first stage, the primary focus of investigations became pumped hydro at Lake Onslow.
4. Much of the investigatory work undertaken is available here: [NZ Battery Project | Ministry of Business, Innovation & Employment](#).
5. The Applicant believes the CPH project would achieve:
 - (a) More renewable generation in dry years from this project by displacing thermal generation and the fossil fuels it requires;
 - (b) A significant uplift in new renewable generation investment elsewhere in New Zealand because of improvements in the market for hedges or firming for those intermittent renewables;
 - (c) A secure and reliable electricity supply for New Zealand regardless of whether the sun is shining, the wind is blowing or the existing hydro lakes are full;
 - (d) Lower power prices;
 - (e) Thereby enabling further electrification of the economy by facilitating transport and industrial heat to electrify using greenhouse-gas-free, electricity.

Description of the Proposal

6. The Clutha Pumped Hydro Project would pump water from the Mata-au/Clutha River to a reservoir at a higher elevation (an enlarged Lake Onslow). Water will be released back down the tunnel, when electricity is most urgently needed by New Zealand. By reversing the direction of flow up to an enlarged Lake Onslow then releasing the stored water from Lake Onslow back down to the Clutha River, electricity will be generated. The amount of storage proposed will exceed the storage capacity of all existing hydro-electricity storage facilities in New Zealand at present.
7. A more fulsome description of the Project is set out at **Schedule 1** to this letter.
8. Various options as to lake height, tunnel lines, powerhouse location, and abstraction/discharge points from and into the Clutha were considered.
9. The lake height option preferred by the applicant is 769m. A contour line at 770m is delineated on the maps that form part of Schedule 1.
10. The maps show the land that could be affected by or is adjacent to the Project. This includes land under the dam, the enlarged Lake, the tunnel, powerhouse, the lower reservoir and its connection to the Clutha River.

Matters of particular interest to you

11. LINZ has also been consulted more generally under section 11(1)(e) of the FTAA. This letter pertains to LINZ interests in land it leases as pastoral lease properties described in the next paragraph.
12. Your legal interests in land as lessor which are affected by or adjacent to the project are:

- (a) The underlying title of the land leased to § 9(2)(a) . This land is subject to a perpetually renewable pastoral lease under s83 Land Act 1948 recorded in Title OT338/21 which comprises 27,901.8610ha more or less being Run 656 and Run 657 and Run 658 and Run 814 and Run 815 and Run 816 and Section 32-35 Survey Office plane 22593 and Section 3 Block I Lammerlaw Survey District and Section 15 Block VII Beaumont Survey District, most recently renewed for 33 years from 1 July 2017 under renewal instrument RCL 10803368.2.

Part of this property adjacent to the existing Lake Onslow would be inundated by the proposed raising of the lake. The proposed tunnel runs under and through part of this property. Part of the property adjacent to the Clutha may be affected by powerhouse, lower reservoir and connection to the Clutha.

- (b) The underlying title of the land leased to § 9(2)(a) . This land is subject to a perpetually renewable pastoral lease under s83 Land Act 1948 recorded Title OT386/92 which comprises 10,921.7231 ha more or less being Section 4 Block IV Cairnhill Survey District and Run 566 and Section1-2 Survey Office Plan 24757. The lease was last renewed by renewal 11128289 for 33 years commencing 1-7-2018.

Part of this property adjacent to the existing Lake Onslow would be inundated by the proposed raising of the lake.

13. Your pastoral lessees § 9(2)(a) and § 9(2)(a) are also being consulted directly.

14. If approval is granted to use the Fast-track process, then the substantive application would be required to be sent to you. You would have the right to make submissions under section 53(2)(h) of the Fast-track Approvals Act 2024. Other parts of the process are determined by the panel which considers the substantive application.

Offsets & Community trust

15. In addition to full compensation for affected landowners, the Applicant accepts that if this project proceeds there would be some unavoidable environmental impacts. Because the Project is large it can carry the cost of and should be an exemplar for offsets in accordance with the avoid – remedy - offset - compensate hierarchy.
16. The application proposes two significant environmental offset proposals. The first relates to terrestrial flora and fauna, including geckos and other lizards. It includes more predator protected areas, similar to the Aldinger Reserve. The Central Otago area, including the Hawkdun Range, is a biodiversity hotspot and much good can be done. The second relates to freshwater quality, water way morphology (e.g. scroll plains and wetlands) and native fish habitat. Again, the area holds much that is precious but under pressure.
17. Additionally, the Applicant will be proposing the establishment of a Community Trust for the benefit of the local community.
18. The Applicant proposes significant annual investments which would run indefinitely, i.e. forever, in parallel with the facility. Ideas as to geographical limits, eligible project scope and governance alternatives have been developed.

Next steps

19. Obviously, there are important issues arising from your legal rights as pastoral lessor and as owner of other residual interests on and under the land concerned. Some of this may have been considered as part of the MBIE project. I would be grateful if you could advise who in LINZ the Applicant should liaise with to enable considerations to continue.
20. If there is further information you need at this stage, please let me know.

Yours faithfully



J G Hardie
Director, Clutha Pumped Hydro Consortium Ltd

Clutha Pumped Hydro Consortium Limited
Registered office:
ICL Chartered Accountants Limited
69 Tarbet St
Alexandra, 9320

By email from:

s 9(2)(a)

31 October 2025

By email to:

s 9(2)(a)

s 9(2)(a)

s 9(2)(a)

s 9(2)(a)

s 9(2)(a)

By email to:

s 9(2)(a)

And by courier to:

s 9(2)(a)

s 9(2)(a)

s 9(2)(a)

s 9(2)(a)

s 9(2)(a)

Dear s 9(2)(a)

Clutha Pumped Hydro Consortium Limited – Consultation under the Fast-track Approvals Act 2024

1. Clutha Pumped Hydro Consortium Limited (**Applicant**) intends to apply for approvals under the Fast-track Approvals Act 2024 (**FTAA**) to construct and operate a large pumped hydro scheme at Lake Onslow in Central Otago (**Project**).
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3. The Project will not be “new” to you. It was investigated by the Ministry of Business, Innovation and Employment (**MBIE**) during the period 2020 to 2023. At that time the project was known as the New Zealand Battery Project. The purpose of the Battery Project was to identify the best option (or options) for managing New Zealand’s dry-year risk in a highly renewable electricity system. While numerous options were considered at the first stage, the primary focus of investigations became pumped hydro at Lake Onslow.
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Description of the Proposal

- 6. The Clutha Pumped Hydro Project would pump water from the Mata-au/Clutha River (New Zealand's largest river by flow) to a reservoir at a higher elevation (an enlarged Lake Onslow). Water will be released back down the tunnel, when electricity is most urgently needed by New Zealand. By reversing the direction of flow up to an enlarged Lake Onslow then releasing the stored water from Lake Onslow back down to the Clutha River, electricity will be generated. The amount of storage proposed will exceed the storage capacity of all existing hydro-electricity storage facilities in New Zealand at present.
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- 8. Various options as to lake height, tunnel lines, powerhouse location, and abstraction/discharge points from and into the Clutha/ Matu Au were considered.
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Matters of particular interest to you

- 11. Part of your land has been identified as being potentially affected by or adjacent to the Project. The title reference to that part of your land is set out in the next paragraph.
- 12. The titles to your land affected by or adjacent to the project is:
 - (a) Title OT386/92 which comprises a perpetually renewable pastoral lease under Section 83 of the Land Act 1948 of 10,921.7231 ha more or less being Section 4 Block IV Cairnhill Survey District and Run 566 and Section 1-2 Survey Office Plan 24757. The lease was last renewed by renewal 11128289 for 33 years commencing 1-7-2018.
- 13. Ken Smales has met with s 9(2)(a) on behalf of s 9(2)(a), which is why this letter has been copied to her.
- 14. If approval is granted to use the Fast-track process, then the substantive application would be required to be sent to you. You would have the right to make submissions under section 53(2)(h) of the Fast-track Approvals Act 2024. Other parts of the process are determined by the panel which considers the substantive application.

15. Some landowners have asked how they might be compensated, and whether the Public Works Act applies. The Applicant does not have recourse to the Public Works Act. The Applicant will have to negotiate with you.

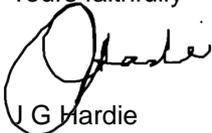
Offsets & Community trust

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Next steps

20. If there is further information you need at this stage, please let contact Ken Smales at the first instance at s 9(2)(a) or s 9(2)(a)

Yours faithfully



J G Hardie
Director, Clutha Pumped Hydro Consortium Ltd

Clutha Pumped Hydro Consortium Limited
Registered office:
ICL Chartered Accountants Limited
69 Tarbet St
Alexandra, 9320

By email from:

s 9(2)(a)

31 October 2025

s 9(2)(a)

s 9(2)(a)

s 9(2)(a)

s 9(2)(a)

s 9(2)(a)

By email to:

s 9(2)(a)

And by courier to:

s 9(2)(a)

s 9(2)(a)

s 9(2)(a)

s 9(2)(a)

s 9(2)(a)

Dear s 9(2)(a)

Clutha Pumped Hydro Consortium Limited – Consultation under the Fast-track Approvals Act 2024

1. As you know, I am a director of Clutha Pumped Hydro Consortium Limited (**Applicant**). It was a pleasure to meet you recently and I thank you for your hospitality. The Applicant intends to apply for approvals under the Fast-track Approvals Act 2024 (**FTAA**) to construct and operate a large pumped hydro scheme at Lake Onslow in Central Otago (**Project**).
2. The Project is not listed in the FTAA. The Applicant is currently preparing a Referral Application. The Applicant is sending this letter and inviting further discussion with you, as part of its consultation obligations under the FTAA.
3. The Project is not “new” to you. It was investigated by the Ministry of Business, Innovation and Employment (**MBIE**) during the period 2020 to 2023. At that time the project was known as the New Zealand Battery Project. We listened to your story about the effects of that on your farming operation! The purpose of the Battery Project was to identify the best option (or options) for managing New Zealand’s dry-year risk in a highly renewable electricity system. While numerous options were considered at the first stage, the primary focus of investigations became pumped hydro at Lake Onslow.
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Description of the Proposal

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Matters of particular interest to you

- 11. Part of your land has been identified as being potentially affected by or adjacent to the Project. The title references to these parts of your land are set out in the next paragraph.
- 12. The titles to your land affected by or adjacent to the project are:
 - (a) Title 374353 which comprises a fee-simple estate of 758ha more or less being Lots 1 & 3 Deposited Plan 23197.
 - (b) Title OT14B/498 which comprises a fee-simple estate of 6,800m² (0.68 ha) more or less being Section 1 Survey Office Plan 22594.
 - (c) Title 575971 which comprises a fee-simple estate of 1511.09ha more or less being Sections 1,6-7,10,15-16,19,21,23 and 40 Survey Office Plan 22593; and Pt Section 1 Block X and Pt Section 3 Block XV Long Valley Survey District; and Lot 3 Deposited Plan 451594.
 - (d) Title 575970 which comprises a fee-simple estate of 15.838ha more or less being Lot 2 Deposited Plan 451594.
 - (e) Title 575969 which comprises a fee-simple estate of 293.770ha more or less being Lot 1 Deposited Plan 451594.

13. Ken Smales has been in contact with you on several occasions and you have also met with the directors of the Applicant.
14. If approval is granted to use the Fast-track process, then the substantive application would be required to be sent to you. You would have the right to make submissions under section 53(2)(h) of the Fast-track Approvals Act 2024. Other parts of the process are determined by the panel which considers the substantive application.
15. Some landowners have asked how they might be compensated, and whether the Public Works Act applies. The Applicant does not have recourse to the Public Works Act. The Applicant will have to negotiate with you. My client understands that other parts of your farm operation are also affected even though those parts are not "affected land" or "adjacent land" within the statutory definitions of the FTAA.

Proposed land exchange with the Crown

16. The maps that form part of schedule 1 show that a small part of the Crown land administered by the Department of Conservation is proposed to be inundated by the raised Lake Onslow.
17. That piece of Crown land administered by the Department of Conservation land lies adjacent to your land in Title 575971. Your land in Title 575971, which is also listed at paragraph 12(c) above, comprises a fee-simple estate of 1511.09ha more or less being Sections 1,6-7,10,15-16,19,21,23 and 40 Survey Office Plan 22593; and Pt Section 1 Block X and Pt Section 3 Block XV Long Valley Survey District; and Lot 3 Deposited Plan 451594.
18. You are aware from our discussions to date with you that the Applicant wishes to acquire your land which is affected by the project, including the land in Title 575971. The maps in Schedule 1 also show that part of the land in Title 575971 is not inundated by the raised Lake Onslow.
19. If approval is granted to use the Fast-track process, then the Applicant will be proposing that the part of the land in Title 575971 which is not inundated or otherwise needed for the Project be exchanged with the Crown in return for the land referred to at paragraph 16 which is proposed to be inundated.
20. This is being described here because section 11(1)(f) of the FTAA provides that if the substantive application is to propose approval for a land exchange with the Crown under section 42(4)(f), then the holder of interests in that land to be exchanged must be consulted in this part of the process.

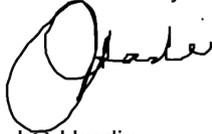
Offsets & Community trust

21. In addition to full compensation for landowners, the Applicant accepts that if this project proceeds there would be some unavoidable environmental impacts. Because the Project is large it can carry the cost of and should be an exemplar for offsets in accordance with the avoid – remedy - offset - compensate hierarchy.
22. The application proposes two significant environmental offset proposals. The first relates to terrestrial flora and fauna, including geckos and other lizards. It includes more predator protected areas, similar to the Aldinger Reserve. The Central Otago area, including the Hawkdun Range, is a biodiversity hotspot and much good can be done. The second relates to freshwater quality, water way morphology (e.g. scroll plains and wetlands) and native fish habitat. Again, the area holds much that is precious but under pressure.
23. Additionally, the Applicant will be proposing the establishment of a Community Trust for the benefit of the local community.
24. The Applicant proposes significant annual investments which would run indefinitely, i.e. forever, in parallel with the facility. Ideas as to geographical limits, eligible project scope and governance alternatives have been developed.

Next steps

25. If there is further information you need at this stage, please let Ken Smales know. You have his contact details.

Yours faithfully

A handwritten signature in black ink, appearing to read 'J G Hardie', written over a large, light-colored oval shape.

J G Hardie
Director, Clutha Pumped Hydro Consortium Ltd

Clutha Pumped Hydro Consortium Limited
Registered office:
ICL Chartered Accountants Limited
69 Tarbet St
Alexandra, 9320

By email from:

s 9(2)(a)

31 October 2025

s 9(2)(a)

s 9(2)(a)

s 9(2)(a)

s 9(2)(a)

s 9(2)(a)

s 9(2)(a)

By email to:

s 9(2)(a)

And by courier to:

s 9(2)(a)

s 9(2)(a)

s 9(2)(a)

s 9(2)(a)

s 9(2)(a)

Dear s 9(2)(a)

Clutha Pumped Hydro Consortium Limited – Consultation under the Fast-track Approvals Act 2024

1. Clutha Pumped Hydro Consortium Limited (**Applicant**) intends to apply for approvals under the Fast-track Approvals Act 2024 (**FTAA**) to construct and operate a large pumped hydro scheme at Lake Onslow in Central Otago (**Project**).
2. The Project is not listed in the FTAA. The Applicant is currently preparing a Referral Application. The Applicant is sending this letter and inviting further discussion with you, as part of its consultation obligations under the FTAA.
3. The Project will not be “new” to you. It was investigated by the Ministry of Business, Innovation and Employment (**MBIE**) during the period 2020 to 2023. At that time the project was known as the New Zealand Battery Project. The purpose of the Battery Project was to identify the best option (or options) for managing New Zealand’s dry-year risk in a highly renewable electricity system. While numerous options were considered at the first stage, the primary focus of investigations became pumped hydro at Lake Onslow.
4. Much of the investigatory work undertaken is available here: [NZ Battery Project | Ministry of Business, Innovation & Employment](#).
5. The Applicant believes the CPH project would achieve:
 - (a) More renewable generation in dry years from this project by displacing thermal generation and the fossil fuels it requires;

- (b) A significant uplift in new renewable generation investment elsewhere in New Zealand because of improvements in the market for hedges or firming for those intermittent renewables;
- (c) A secure and reliable electricity supply for New Zealand regardless of whether the sun is shining, the wind is blowing or the existing hydro lakes are full;
- (d) Lower power prices;
- (e) Thereby enabling further electrification of the economy by facilitating transport and industrial heat to electrify using greenhouse-gas-free, electricity.

Description of the Proposal

- 6. The Project would pump water from the Mata-au/Clutha River to a reservoir at a higher elevation (an enlarged Lake Onslow). Water will be released back down the tunnel, when electricity is most urgently needed by New Zealand. By reversing the direction of flow up to an enlarged Lake Onslow then releasing the stored water from Lake Onslow back down to the Clutha River, electricity will be generated. The amount of storage proposed will exceed the storage capacity of all existing hydro-electricity storage facilities in New Zealand at present.
- 7. A more fulsome description of the Project is set out at **Schedule 1** to this letter.
- 8. Various options as to lake height, tunnel lines, powerhouse location, and abstraction/discharge points from and into the Clutha were considered.
- 9. The lake height option preferred by the Applicant is 769m. A contour line at 770m is delineated on the maps that form part of Schedule 1.
- 10. The maps show the land that could be affected by or is adjacent to the Project. This includes land under the dam, the enlarged Lake, the tunnel, powerhouse, the lower reservoir and its connection to the Clutha River.

Matters of particular interest to you

- 11. Part of your land has been identified as being potentially affected by or adjacent to the Project. The title reference to this part of your land is set out in the next paragraph.
- 12. The title to your land affected by or adjacent to the project is:
 - (a) Title 589513 which comprises a fee-simple estate of 355.9ha more or less being Lot 3 Deposited Plan 456324.
- 13. Ken Smales has been in contact with you and is available to speak further with you at any stage should you wish to. His email is [s 9\(2\)\(a\)](mailto:s 9(2)(a)@example.com)
- 14. If approval is granted to use the Fast-track process, then the substantive application would be required to be sent to you. You would have the right to make submissions under section 53(2)(h) of the Fast-track Approvals Act 2024. Other parts of the process are determined by the panel which considers the substantive application.
- 15. Some landowners have asked how they might be compensated, and whether the Public Works Act applies. The Applicant does not have recourse to the Public Works Act. The Applicant will have to negotiate with you.

Offsets & Community trust

16. In addition to full compensation for affected landowners, the Applicant accepts that if this project proceeds there would be some unavoidable environmental impacts. Because the Project is large it can carry the cost of and should be an exemplar for offsets in accordance with the avoid – remedy - offset - compensate hierarchy.
17. The application proposes two significant environmental offset proposals. The first relates to terrestrial flora and fauna, including geckos and other lizards. It includes more predator protected areas, similar to the Aldinger Reserve. The Central Otago area, including the Hawkdun Range, is a biodiversity hotspot and much good can be done. The second relates to freshwater quality, water way morphology (e.g. scroll plains and wetlands) and native fish habitat. Again, the area holds much that is precious but under pressure.
18. Additionally, the Applicant will be proposing the establishment of a Community Trust for the benefit of the local community.
19. The Applicant proposes significant annual investments which would run indefinitely, i.e. forever, in parallel with the facility. Ideas as to geographical limits, eligible project scope and governance alternatives have been developed.

Next steps

20. If there is further information you need at this stage, please let Mr Smales know.

Yours faithfully



J.C. Hardie
Director, Clutha Pumped Hydro Consortium Ltd

Clutha Pumped Hydro Consortium Limited
Registered office:
ICL Chartered Accountants Limited
69 Tarbet St
Alexandra, 9320

By email from:

s 9(2)(a)

31 October 2025

s 9(2)(a)

s 9(2)(a)

s 9(2)(a)

By email to:

s 9(2)(a)

And to:

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s 9(2)(a)

And by courier to:

s 9(2)(a)

s 9(2)(a)

s 9(2)(a)

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s 9(2)(a)

Dear s 9(2)(a) and s 9(2)(a)

Clutha Pumped Hydro Consortium Limited – Consultation under the Fast-track Approvals Act 2024

1. Clutha Pumped Hydro Consortium Limited (**Applicant**) intends to apply for approvals under the Fast-track Approvals Act 2024 (**FTAA**) to construct and operate a large pumped hydro scheme at Lake Onslow in Central Otago (**Project**).
2. The Project is not listed in the FTAA. The Applicant is currently preparing a Referral Application. The Applicant is sending this letter and inviting further discussion with you, as part of its consultation obligations under the FTAA.

3. The Project will not be “new” to you. It was investigated by the Ministry of Business, Innovation and Employment (**MBIE**) during the period 2020 to 2023. At that time the project was known as the New Zealand Battery Project. The purpose of the Battery Project was to identify the best option (or options) for managing New Zealand’s dry-year risk in a highly renewable electricity system. While numerous options were considered at the first stage, the primary focus of investigations became pumped hydro at Lake Onslow.
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 - (a) More renewable generation in dry years from this project by displacing thermal generation and the fossil fuels it requires;
 - (b) A significant uplift in new renewable generation investment elsewhere in New Zealand because of improvements in the market for hedges or firming for those intermittent renewables;
 - (c) A secure and reliable electricity supply for New Zealand regardless of whether the sun is shining, the wind is blowing or the existing hydro lakes are full;
 - (d) Lower power prices;
 - (e) Thereby enabling further electrification of the economy by facilitating transport and industrial heat to electrify using greenhouse-gas-free, electricity.

Description of the Proposal

6. The Project would pump water from the Mata-au/Clutha River to a reservoir at a higher elevation (an enlarged Lake Onslow). Water will be released back down the tunnel, when electricity is most urgently needed by New Zealand. By reversing the direction of flow up to an enlarged Lake Onslow then releasing the stored water from Lake Onslow back down to the Clutha River, electricity will be generated. The amount of storage proposed will exceed the storage capacity of all existing hydro-electricity storage facilities in New Zealand at present.
7. A more fulsome description of the Project is set out at **Schedule 1** to this letter.
8. Various options as to lake height, tunnel lines, powerhouse location, and abstraction/discharge points from and into the Clutha were considered.
9. The lake height option preferred by the Applicant is 769m. A contour line at 770m is delineated on the maps that form part of Schedule 1.
10. The maps show the land that could be affected by or is adjacent to the Project. This includes land under the dam, the enlarged Lake, the tunnel, powerhouse, the lower reservoir and its connection to the Clutha River.

Matters of particular interest to you

11. Part of your land has been identified as being potentially affected by or adjacent to the Project. The titles references to your land are set out in the next paragraph.
12. The titles in the name of s 9(2)(a) [REDACTED] which are affected by or adjacent to the project are:
 - (a) Title OT15A/87 which comprises a fee-simple estate of 121.4 ha more or less being Section 2-5, Section 8-9, Section 11-14, Section 17, Section 20, Section 22 and Section 24 Survey Office Plan 22593.

(b) Title OT17A/329 which comprises a fee-simple estate of 540.00 ha more or less being Section 37-38 Survey Office Plan 22593.

13. Ken Smales s 9(2)(a) has been in contact with s 9(2)(a) and remains available to you. He would also like to meet with members of the s 9(2)(a).
14. If approval is granted to use the Fast-track process, then the substantive application would be required to be sent to you. You would have the right to make submissions under section 53(2)(h) of the Fast-track Approvals Act 2024. Other parts of the process are determined by the panel which considers the substantive application.
15. The Applicant will want to work with you in advance of that substantive application to ensure that your electricity generation interests and irrigation interests are both properly protected.

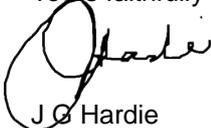
Offsets & Community trust

16. In addition to full compensation for affected landowners, my client accepts that if this project proceeds there would be some unavoidable environmental impacts. Because the Project is large it can carry the cost of and should be an exemplar for offsets in accordance with the avoid – remedy - offset - compensate hierarchy.
17. The application proposes two significant environmental offset proposals. The first relates to terrestrial flora and fauna, including geckos and other lizards. It includes more predator protected areas, similar to the Aldinger Reserve. The Central Otago area, including the Hawkdun Range, is a biodiversity hotspot and much good can be done. The second relates to freshwater quality, water way morphology (e.g. scroll plains and wetlands) and native fish habitat. Again, the area holds much that is precious but under pressure.
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Next steps

20. If there is further information you need at this stage, please let Mr Smales know.

Yours faithfully



J G Hardie
Director, Clutha Pumped Hydro Consortium Ltd

Clutha Pumped Hydro Consortium Limited
Registered office:
ICL Chartered Accountants Limited
69 Tarbet St
Alexandra, 9320

By email from:

s 9(2)(a)

31 October 2025

s 9(2)(a)

s 9(2)(a)

s 9(2)(a)

By email to:

s 9(2)(a)

And by courier to:

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Dear s 9(2)(a)

Clutha Pumped Hydro Consortium Limited – Consultation under the Fast-track Approvals Act 2024

1. Clutha Pumped Hydro Consortium Limited (**Applicant**) intends to apply for approvals under the Fast-track Approvals Act 2024 (**FTAA**) to construct and operate a large pumped hydro scheme at Lake Onslow in Central Otago (**Project**).
2. The Project is not listed in the FTAA. The Applicant is currently preparing a Referral Application. The Applicant is sending this letter and inviting further discussion with you, as part of its consultation obligations under the FTAA.
3. The Project will not be “new” to you. It was investigated by the Ministry of Business, Innovation and Employment (**MBIE**) during the period 2020 to 2023. At that time the project was known as the New Zealand Battery Project. The purpose of the Battery Project was to identify the best option (or options) for managing New Zealand’s dry-year risk in a highly renewable electricity system. While numerous options were considered at the first stage, the primary focus of investigations became pumped hydro at Lake Onslow.
4. Much of the investigatory work undertaken is available here: [NZ Battery Project | Ministry of Business, Innovation & Employment](#).
5. The Applicant believes the CPH project would achieve:
 - (a) More renewable generation in dry years from this project by displacing thermal generation and the fossil fuels it requires;

- (b) A significant uplift in new renewable generation investment elsewhere in New Zealand because of improvements in the market for hedges or firming for those intermittent renewables;
- (c) A secure and reliable electricity supply for New Zealand regardless of whether the sun is shining, the wind is blowing or the existing hydro lakes are full;
- (d) Lower power prices;
- (e) Thereby enabling further electrification of the economy by facilitating transport and industrial heat to electrify using greenhouse-gas-free, electricity.

Description of the Proposal

- 6. The Project would pump water from the Mata-au/Clutha River (New Zealand's largest river by flow) to a reservoir at a higher elevation (an enlarged Lake Onslow). Water will be released back down the tunnel, when electricity is most urgently needed by New Zealand. By reversing the direction of flow up to an enlarged Lake Onslow then releasing the stored water from Lake Onslow back down to the Clutha River, electricity will be generated. The amount of storage proposed will exceed the storage capacity of all existing hydro-electricity storage facilities in New Zealand at present.
- 7. A more fulsome description of the Project is set out at **Schedule 1** to this letter.
- 8. Various options as to lake height, tunnel lines, powerhouse location, and abstraction/discharge points from and into the Clutha were considered.
- 9. The lake height option preferred by the applicant is 769m. A contour line at 770m is delineated on the maps that form part of Schedule 1.
- 10. The maps show the land that could be affected by or is adjacent to the Project. This includes land under the dam, the enlarged Lake, the tunnel, powerhouse, the lower reservoir and its connection to the Clutha River.

Matters of particular interest to you

- 11. Part of your land has been identified as being potentially affected by or adjacent to the Project. The title reference to your land is set out in the next paragraph.
- 12. The title to your land affected by or adjacent to the project is:
 - (a) Title 589512 which comprises a fee-simple estate of 561.2696 ha more or less being Lot 2 Deposited Plan 456324 and Lots 8-14,16 Deposited Plan 337206.
- 13. David Parker s 9(2)(a) [REDACTED] has been in contact with you. Ken Smales is also available on s 9(2)(a) [REDACTED] Either are available to you.
- 14. If approval is granted to use the Fast-track process, then the substantive application would be required to be sent to you. You would have the right to make submissions under section 53(2)(h) of the Fast-track Approvals Act 2024. Other parts of the process are determined by the panel which considers the substantive application.
- 15. Some landowners have asked how they might be compensated, and whether the Public Works Act applies. The Applicant does not have recourse to the Public Works Act. The Applicant will have to negotiate with you.

Offsets & Community trust

16. In addition to full compensation for affected landowners, the Applicant accepts that if this project proceeds there would be some unavoidable environmental impacts. Because the Project is large it can carry the cost of and should be an exemplar for offsets in accordance with the avoid – remedy - offset - compensate hierarchy.
17. The application proposes two significant environmental offset proposals. The first relates to terrestrial flora and fauna, including geckos and other lizards. It includes more predator protected areas, similar to the Aldinger Reserve. The Central Otago area, including the Hawkdun Range, is a biodiversity hotspot and much good can be done. The second relates to freshwater quality, water way morphology (e.g. scroll plains and wetlands) and native fish habitat. Again, the area holds much that is precious but under pressure.
18. Additionally, the Applicant will be proposing the establishment of a Community Trust for the benefit of the local community.
19. The Applicant proposes significant annual investments which would run indefinitely, i.e. forever, in parallel with the facility. Ideas as to geographical limits, eligible project scope and governance alternatives have been developed.

Next steps

20. If there is further information you need at this stage, please let us know.

Yours faithfully



J G Hardie

Director, Clutha Pumped Hydro Consortium Ltd

Clutha Pumped Hydro Consortium Limited
Registered office:
ICL Chartered Accountants Limited
69 Tarbet St
Alexandra, 9320

By email from:

s 9(2)(a)

31 October 2025

s 9(2)(a)

By email to:

s 9(2)(a)

And by courier to:

s 9(2)(a)

s 9(2)(a)

s 9(2)(a)

s 9(2)(a)

s 9(2)(a)

Dear s 9(2)(a)

Clutha Pumped Hydro Consortium Limited – Consultation under the Fast-track Approvals Act 2024

1. Clutha Pumped Hydro Consortium Limited (**Applicant**) intends to apply for approvals under the Fast-track Approvals Act 2024 (**FTAA**) to construct and operate a large pumped hydro scheme at Lake Onslow in Central Otago (**Project**).
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Description of the Proposal

- 6. The Project would pump water from the Mata-au/Clutha River to a reservoir at a higher elevation (an enlarged Lake Onslow). Water will be released back down the tunnel, when electricity is most urgently needed by New Zealand. By reversing the direction of flow up to an enlarged Lake Onslow then releasing the stored water from Lake Onslow back down to the Clutha River, electricity will be generated. The amount of storage proposed will exceed the storage capacity of all existing hydro-electricity storage facilities in New Zealand at present.
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- 10. The maps show the land that could be affected by or is adjacent to the Project. This includes land under the dam, the enlarged Lake, the tunnel, powerhouse, the lower reservoir and its connection to the Clutha River.

Matters of particular interest to you

- 11. Part of your land has been identified as being potentially affected by or adjacent to the Project. The title reference to this part of your land is set out in the next paragraph.
- 12. The title to your land affected by or adjacent to the project is:
 - (a) Title 589511 which comprises a fee-simple estate of 519.4900 ha more or less being Lot 1 Deposited Plan 456324 and Lots 1 and 5 Deposited Plan 337026.
- 13. Ken Smales has been in contact with you and is available to speak further with you at any stage should you wish to. His email address is s 9(2)(a) [REDACTED]
- 14. If approval is granted to use the Fast-track process, then the substantive application would be required to be sent to you. You would have the right to make submissions under section 53(2)(h) of the Fast-track Approvals Act 2024. Other parts of the process are determined by the panel which considers the substantive application.
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Yours faithfully



J G Hardie

Director, Clutha Pumped Hydro Consortium Ltd

Clutha Pumped Hydro Consortium Limited
Registered office:
ICL Chartered Accountants Limited
69 Tarbet St
Alexandra, 9320

By email from:

s 9(2)(a)

31 October 2025

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Dear s 9(2)(a) and s 9(2)(a)

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6. The Project would pump water from the Mata-au/Clutha River to a reservoir at a higher elevation (an enlarged Lake Onslow). Water will be released back down the tunnel, when electricity is most urgently needed by New Zealand. By reversing the direction of flow up to an enlarged Lake Onslow then releasing the stored water from Lake Onslow back down to the Clutha River, electricity will be generated. The amount of storage proposed will exceed the storage capacity of all existing hydro-electricity storage facilities in New Zealand at present.
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Matters of particular interest to you

11. Part of your land has been identified as being potentially affected by or adjacent to the Project. The title references to your land interests are set out in the next paragraph.
12. The titles to your land interests affected by or adjacent to the project are:
 - (a) Title 537962 which comprises an easement under Section 60 Land Act 1948 over 130 ha being Run 814, being the Right of Way and Right to Convey Electricity marked D on Deposited Plan 407503..
 - (b) Title 426368 which comprises a fee-simple estate of 11.8290 ha more or less being Lot 1 Deposited Plan 407503.
13. § 9(2)(a) has spoken to Ken Smales about the project. Ken is available on § 9(2)(a) and at § 9(2)(a) should you wish to continue those discussions.

14. If approval is granted to use the Fast-track process, then the substantive application would be required to be sent to you. You would have the right to make submissions under section 53(2)(h) of the Fast-track Approvals Act 2024. Other parts of the process are determined by the panel which considers the substantive application.
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Offsets & Community trust

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Yours faithfully



J G Hardie

Director, Clutha Pumped Hydro Consortium Ltd