

September 2026

Use of Public Conservation Land Report (section 19)

For the referral application for FTAA-2608-1275-Coleridge Hydro-
electric Power Scheme Reconsenting Project



Department of
Conservation
Te Papa Atawhai

**Te Kāwanatanga
o Aotearoa**
New Zealand Government

Contents

Introduction	2
The Referral Application	2
Figure 1: Lake Coleridge HEPS location (PCL identified in green)	3
Public Conservation Land Affected by the Project	3
Summary of Advice	4
Assessment	4
Existing arrangements for the public conservation land	4
Risks and potential liabilities to the Crown	7
Electricity Infrastructure	7
Existing electricity infrastructure	8
Outcomes of consultation	8
Any other relevant information	8

Introduction

The Director-General of Conservation is required to provide a report under section 19 of the Fast-track Approvals Act 2024 (the Act or the FTAA). Statutory delegations are in place for the Department of Conservation (DOC) to prepare it. It provides information for the Minister for Infrastructure (the Minister) in relation to the use of public conservation land (PCL) as part of the consideration of the referral application for Coleridge Hydro-electric Power Scheme Reconsenting Project by Manawa Energy Limited and Contact Energy Limited.

The Act defines “public conservation land” as land to which either or both of the following apply:

- (a) *The land is held, managed, or administered under the Conservation Act 1987, the National Parks Act 1980, the Reserves Act 1977, or the Wildlife Act 1953;*
- (b) *The land is listed in Schedule 4*

This report addresses the information that must be contained in a report in relation to PCL as set out in s19(2)(a) and (b). No relevant PCL has been identified that is not administered by DOC, so no consultation as outlined in s19(3) was required in the preparation of this report.

The information required under s19(2)(c) is not required in this report because Manawa Energy Limited and Contact Energy Limited are not seeking a ministerial determination under section 24(2) or (4) for new electricity lines as part of the Coleridge Hydro-electric Power Scheme Reconsenting Project and the referral application is not required to provide information under section 13(4)(q) or (r).

The Referral Application

The Project seeks to renew approvals for the Coleridge Hydro-electric Power Scheme (“the Scheme”). The Scheme was first commissioned in 1914. It is located around Lake Coleridge, within the Selwyn District of Canterbury. The Scheme utilises the storage capacity of Lake Coleridge and the Rakaia River. Water is diverted from the Wilberforce and Harper Rivers, and is then carried by canals into Lake Coleridge. The Archeron River is diverted through a pipeline and race to the Coleridge Stream, and from there to Lake Coleridge. Water from the lake is diverted into the power station and following power generation is discharged into the Rakaia River.

The Project seeks a suite of approvals under the Fast-track Approvals Act 2024 (“FTAA” or “the Act”) including:

- Resource consents under the Resource Management Act 1991;
- Concessions under the Conservation Act 1987;
- Wildlife approvals under the Wildlife Act 1953; and
- An approval, dispensation, or an authorisation that would otherwise be applied for in respect of a complex freshwater fisheries activity under the Freshwater Fisheries Regulations 1983.

The Project relates to a number of facilities around Lake Coleridge, including intake structures, outlet structures, access roads, and power station infrastructure. Figure 1 shows the location of the Project.



Figure 1: Lake Coleridge HEPS location (PCL identified in green)

Public Conservation Land Affected by the Project

The project footprint covers an area of approximately 47 square kilometres and is contained within a number of records of title. Of these, DOC has identified six parcels that are considered to be Public Conservation Land. These parcels are identified in Table 1:

Table 1: Public Conservation Land within the application area

Name	PCL Type	Comment
Wilberforce River Catchment Marginal Strip	Moveable Marginal Strip under s.24(1) & (2) of the Conservation Act 1987	Applicant identified as potentially within application area
Harper River Marginal Strip	Moveable Marginal Strip under s.24(1) & (2) of the Conservation Act 1987	Applicant identified as potentially within application area
Craigieburn Forest Park	Conservation Park under s.19 of the Conservation Act 1987	Applicant identified as potentially within application area
Wilberforce Riverbed Conservation Area	Stewardship Area under s.25 of the Conservation Act 1987	Applicant identified as potentially within application area
Korowai/Torlesse Tussocklands Park	Conservation Park under s.19 of the Conservation Act 1987	Applicant identified as potentially within application area
Acheron River Marginal Strip	Fixed Marginal Strip under s.24(3) of the Conservation Act 1987	Applicant identified as potentially within application area

Summary of Advice

The Applicant has identified that there are a number of pieces of PCL that may be located within the application area and that further investigations are required to determine the full extent. This report has identified a number of other approvals that may be applicable to the application area and as such should be considered by the Applicant at the time of making the substantive application. Based on the information available at this point in time, there are no existing approvals that will be directly impacted by the proposal, acknowledging that the proposal is the 'reconsent' of a well-established activity that has been operating in this locality for a considerable period of time. As such, there are limited risks to the Crown (with reference to section 19(2)(b)) resulting from the application. Further information will be required from the applicant to determine if additional approvals associated with the proposal will be necessary.

Assessment

The Department of Conservation has used the information points set out in section 19 of the Act as a framework for providing advice on this application.

Existing arrangements for the public conservation land

It is noted that the area applicable to the application is broad and that there may be some uncertainty in regarding the outmost bounds of the activity. It is understood that the information provided at the referral stage is high-level and may be subject to change.

There are a number of existing permissions in the general locality of the Site or general permissions applicable to all Public Conservation Land. The following table provides details:

ID	Status	Holder	Location	Description
71046-FAU	Active	Individual	Craigieburn Forest Park, Wilberforce Riverbed Conservation Area, Korowai/Torlesse Tussocklands Park, Acheron River Marginal Strip	Capture, hold, transfer, release and take samples of all types of lizard species pursuant to Section 53 of the Wildlife Act 1953. Continue activity from 35196-FAU
93529-FAU	Active	Individual	Craigieburn Forest Park, Wilberforce Riverbed Conservation Area, Korowai/Torlesse Tussocklands Park, Acheron River Marginal Strip	WA application to catch and handle lizards while undertaking site management work in all private land in the South Island and all PCL in the South Island (except nature reserves and scientific reserves)
69301-RES	Active	New Zealand Institute for Earth Science Limited	Craigieburn Forest Park	Research Collection Application for the Lakes380 project. The project is doing comprehensive research on Lakes in New Zealand. The research will reconstruct water quality and lake health over the past 1000 years and provide a richer understanding of the value of our lakes. Second of three applications related to this project - The bottom of the South Island is included in this section.
94716-GUI	Active	New Zealand Professional Fishing Guides Association	Craigieburn Forest Park, Wilberforce Riverbed Conservation Area	National concession for guided fishing (nationwide except Northland)
64146-FAU	Active	Ospri New Zealand Limited	Craigieburn Forest Park, Wilberforce Riverbed Conservation Area, Korowai/Torlesse	National authorisation for trapping (leghold, kill and live capture) ferrets and possums on all land

			Tussocklands Park, Acheron River Marginal Strip	managed by the Department or the purpose of Bovine TB Eradication - Replacement of previous permit's 36927-DAM and 35818-FAU.
125901-FAU	Active	University of Canterbury (National Holder)	Craigieburn Forest Park, Korowai/Torlesse Tussocklands Park	Low-impact sampling of freshwater environments including electric fishing on PCL. The sampling will contribute to research and some teaching of important South Island freshwater ecosystems
97464-FAU	Active	University of Otago (NATIONAL HOLDER)	Craigieburn Forest Park	Catch and handle birds, take blood samples, and attach identification bands in order to understand long-term dynamics of avian malaria in native New Zealand wildlife. Related to 80145-FAU, 72475-FAU, 87614-FAU, 87796-FAU, but this application is for the entire South Island. Term: ten years.
53857-OTH	Active	Manawa Energy Limited	Griffiths Rain Gauge in Craigieburn Forest Park	<i>This concession application was lodged by Trustpower Limited for the Griffiths Rain Gauge in the upper Rakaia area, Canterbury, and covered:</i> <i>• The establishment and maintenance of a helicopter landing site near the Griffiths Rain Gauge; and</i> <i>• Up to 10 helicopter landings per year for maintenance purposes and any emergency repairs.</i>

Risks and potential liabilities to the Crown

The following risks and liabilities are identified:

Risk of failure, inability to remediate land

Partial non-completion of upgrades or failure of activities on PCL resulting in land disturbance, contamination and sedimentation, hazards, stranded assets and infrastructure can create significant financial, legal, health and safety, and reputational risk for the Crown. It can also create significant demand on DOC resources in terms of staff time and operating budget. For example, if a project fails the Crown will have to manage the land and impacted adjacent lands in accordance with the statutory purpose for which those lands are held, and this may require remediation of the land.

There may be reputational risk to the Crown, and for the fast-track process as a whole, if a granted proposal is not technically feasible or there is an inability to progress the proposal or any part of it; particularly if those parts constitute offsetting or compensation for effects. There may also be a reputational risk for the fast-track process if the process is abused, for example if there was no intention to progress the development but approval is used to, for example, inflate land value.

Frustration of pre-existing activities

If a fast-tracked activity frustrates pre-existing parties operating with lawful authority from carrying out activities on the land, the Crown is exposed to legal, financial and reputational risk. If a legal challenge succeeds against the Crown, the remedies a court may order will vary in accordance with the degree of frustration, the type of lawful authority the pre-existing actor was operating under and other contextual factors.

Frustration of concessions in the form of permits and other statutory authorisations that do not create an interest in land may lead to equitable estoppel and specific performance, compensation and costs.

While there exist some risks and liabilities to the Crown associated with the project in relation to existing active approvals, the concessions relating to the PCL affected by this project are either general approvals or specific locations in proximity of the proposal, rather than just the specific project area. Therefore, there is a low risk that these activities will be directly impacted.

A transmission line and airspace easement

It is uncertain at this stage if there are any transmission line easements relevant to the existing or future operations. The interaction of a transmission line and airspace easement with public conservation land is relatively minor. Therefore, the risks and potential liabilities to the Crown are also considered to be minor.

In stream works

The project includes works and structures within a number of water bodies associated with the operation of the scheme. Further detail of the proposed management of these works and infrastructure necessary will be required for DOC to make an assessment as to risk and potential liabilities. Therefore, at this time, the risks and potential liabilities to the Crown are unknown until further detail is received.

Electricity Infrastructure

Applicants may seek a ministerial determination under section 24(4) if the referral application relates to construction and operation of new electricity lines and the activity would occur on certain land listed in Schedule 4 FTAA or in a national reserve. Applicants seeking a determination under section 24(4) are required to provide information outlined in section 13(4)(r).

The Coleridge Hydro-electric Power Scheme Project applicant does not seek a ministerial determination under section 24(4) and therefore the referral application is not required to provide information under section 13(4)(r).

Existing electricity infrastructure

The applicant is not seeking a determination under section 24(2). It is noted that the existing electricity infrastructure on the Site relates to the existing Lake Coleridge operations and therefore the Proposal will not impact on it.

Outcomes of consultation

Section 19(3) requires the reporting on matters required by sections 19(2)(a) and 19(2)(b) to be prepared in consultation with every owner, administrator, or manager of the affected PCL who is not the Crown. As highlighted above, aside from the Applicant, DOC has not identified any owner, administrator, or manager of the affected PCL who is not the Crown.

Any other relevant information

No other information is considered relevant at this point in time.