

1 SEPTEMBER 2026

MEMORANDUM

To Ministry for Cities, Environment and Transport (**MCERT**)

From Holland Beckett

COLERIDGE HYDRO-ELECTRIC POWER SCHEME RECONSENTING REFERRAL APPLICATION - ADDITIONAL INFORMATION

1. This Memorandum is provided on behalf of Manawa Energy Limited (**Manawa**) and Contact Energy Limited (**Contact**) in response to MCERT's request for additional information for the Coleridge Hydro-electric Power Scheme Reconsenting referral application (**Project**).¹
2. MCERT has requested the following:
 - (a) **Section 13(4)(d) – Project area:** The application includes maps identifying the project area (Attachment 3), which indicate that the project area does not include public conservation land (PCL). However, the application also states that approvals or concessions under the Conservation Act 1987 may be required for access roads, river works and/or structures. Please confirm whether any part of the project area includes PCL. If so, please provide details, including the names of the relevant areas of PCL. This information will assist us in determining whether a section 19 report must be obtained from DOC for the referral application.
 - (b) **Section 13(4)(h) – Adverse effects:** The application includes a description of the anticipated and known adverse effects of the project on the environment (refer section 3 of Attachment 5). To address the requirements of section 13(4)(h), please also provide a description of the significance of those adverse effects.
3. Responses to these requests are set out below.

Project area

4. Scope for concessions in the referral application is included out of an abundance of caution while Manawa/Contact ascertain the extent to which the Project area may overlap with public conservation land. That assessment is ongoing and, at this stage, Manawa/Contact are unable to confirm the exact extent of any overlap. Manawa/Contact are in the process of obtaining land status reports and surveys of land parcels to assist it in determining whether any part of the Project is on public conservation land.
5. However, we set out an overview below, which reflects the fullest possible extent of any overlap between the Project and public conservation land:
 - (a) Manawa/Contact undertake maintenance dredging within the bed of the Acheron River immediately north of the Acheron Weir. Based on a review of aerial imagery, part of a Department of Conservation (**DOC**) administered marginal strip adjacent to the river (with appellation: Crown Land Survey Office Plan 16773, and parcel identifier 3321644) may overlap with the riverbed and the footprint of those dredging activities. See the attached plans titled Coleridge HEPS Cadastre – Acheron.

¹ [FTAA-2608-1275].

- (b) Part of the Acheron Weir may be located within that same DOC administered marginal strip. See the attached plans labelled Coleridge HEPS Cadastre – Acheron attached.
 - (c) Part of the access road to the Acheron Weir appears to be located within that same DOC administered marginal strip and may also be located within an adjacent conservation land parcel (with appellation Lot 3 and Lot 6 Deposited Plan 64972 and parcel identifier 3477419). See the attached plan titled Coleridge HEPS Cadastre – Acheron. Unlike the Project, the access road is not being ‘reconsented’. As such, Manawa/Contact will consider whether to obtain a concession through the fast-track process, if one is required.
 - (d) Part of a parcel held under s 62(1) of the Conservation Act 1987 (with appellation Part RES 408 and parcel identifier 3507442) overlaps with an area of the Wilberforce Riverbed that Manawa currently holds consent to undertake activities in. See the area labelled ‘Crown Land’ in the attached plan titled Coleridge HEPS Cadastre – Wilberforce River.
 - (e) A conservation area (with appellation Section 1 SO 342149 and parcel identifier 6718898) is adjacent to Lake Coleridge. See the area labelled ‘Department Of Conservation’ in the attached plan titled Coleridge HEPS Cadastre – Section 1 SO 342149.
6. Additionally, several moveable marginal strips², administered by DOC, are located in or near the Wilberforce and Harper Rivers and may overlap with the Project’s operational area. Those marginal strips are labelled ‘DOC Moveable Marginal Strips’ in the attached plans titled Coleridge HEPS Cadastre – Wilberforce River and Coleridge HEPS Cadastre – Harper River. The relevant parcel identifiers are:
- (a) Wilberforce River 8069491, 8272880, and 8069490
 - (b) Harper River 8272869
7. Although these parcels have been surveyed, they comprise marginal strips that are intended to be captured spatially and whose boundaries move or ambulate over time as the position of the riverbed changes through erosion and accretion. Accordingly, the mapping provided is indicative only and is not intended to represent the precise location of the marginal strips’ boundaries. Manawa/Contact are continuing to refine the extent of the Project’s operational area. To the extent that the final operational area overlaps with any of the moveable marginal strips, Manawa/Contact may seek any necessary concession in the substantive application.
8. The plans attached to this memorandum are intended to be used for illustrative purposes only and do not purport to depict exact boundaries, parcel extents or legal land descriptions. Their purpose is to provide MCERT with a general indication of the location of public conservation areas.

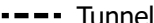
Adverse effects

9. The Project was last reconsented in 1995/96 under the Resource Management Act 1991. This process included the commissioning of a number of technical assessments to consider the environmental effects of the operation and maintenance of the Coleridge HEPS, which resulted in the development of a condition and monitoring framework with stakeholders to ensure that effects were appropriately managed. This approach ensured that the environmental effects of the Project achieved the sustainable management purpose of the Resource Management Act 1991.

² LINZ, and the relevant survey plans, records the intent of these parcels as ‘Marginal Strip – Moveable’. Section 24 Conservation Act 1987.

10. The Project is seeking new resource consents for the continued operation and maintenance of the Coleridge HEPS, with the Scheme to be operated on similar terms and conditions as it is currently subject to. As such, adverse effects of the ongoing operation and maintenance are expected to be largely the same or similar to those which already occur.
11. As noted in the referral application, Manawa/Contact have commissioned a number of technical assessments, including additional field investigations, to further understand and assess the significance of the adverse effects associated with the operation of the Coleridge HEPS.
12. To the extent that these technical assessments do identify adverse effects that require management (either due to the severity of the effect or due to policy considerations), Manawa/Contact anticipate addressing those effects through an appropriate suite of consent conditions that avoid, remedy or mitigate such effects. These will be proposed as part of the substantive application – and may include, amongst other things, operational controls, monitoring requirements and management plans (e.g. a Native Fish Management Plan). Of note, Manawa/Contact:
 - (a) Are trialling 'bird islands' to provide safe habitat for native birds species;
 - (b) Have undertaken tuna netting within Lake Coleridge for the past two years;
 - (c) Have installed fish passage traps to assist upstream migration; and
 - (d) Have sediment control measures in place, which can be updated to address any adverse effects not already managed.
13. The significance of the Project's adverse effects, including any residual effects remaining after the implementation of proposed mitigation measures, will be assessed in detail and reported on in the technical assessments and substantive application report.



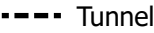
-  Intake Structure
-  Tunnel
-  LINZ Property Boundaries

- Central Record of State Land
-  Department Of Conservation
 -  To Be Determined
 -  University Of Canterbury

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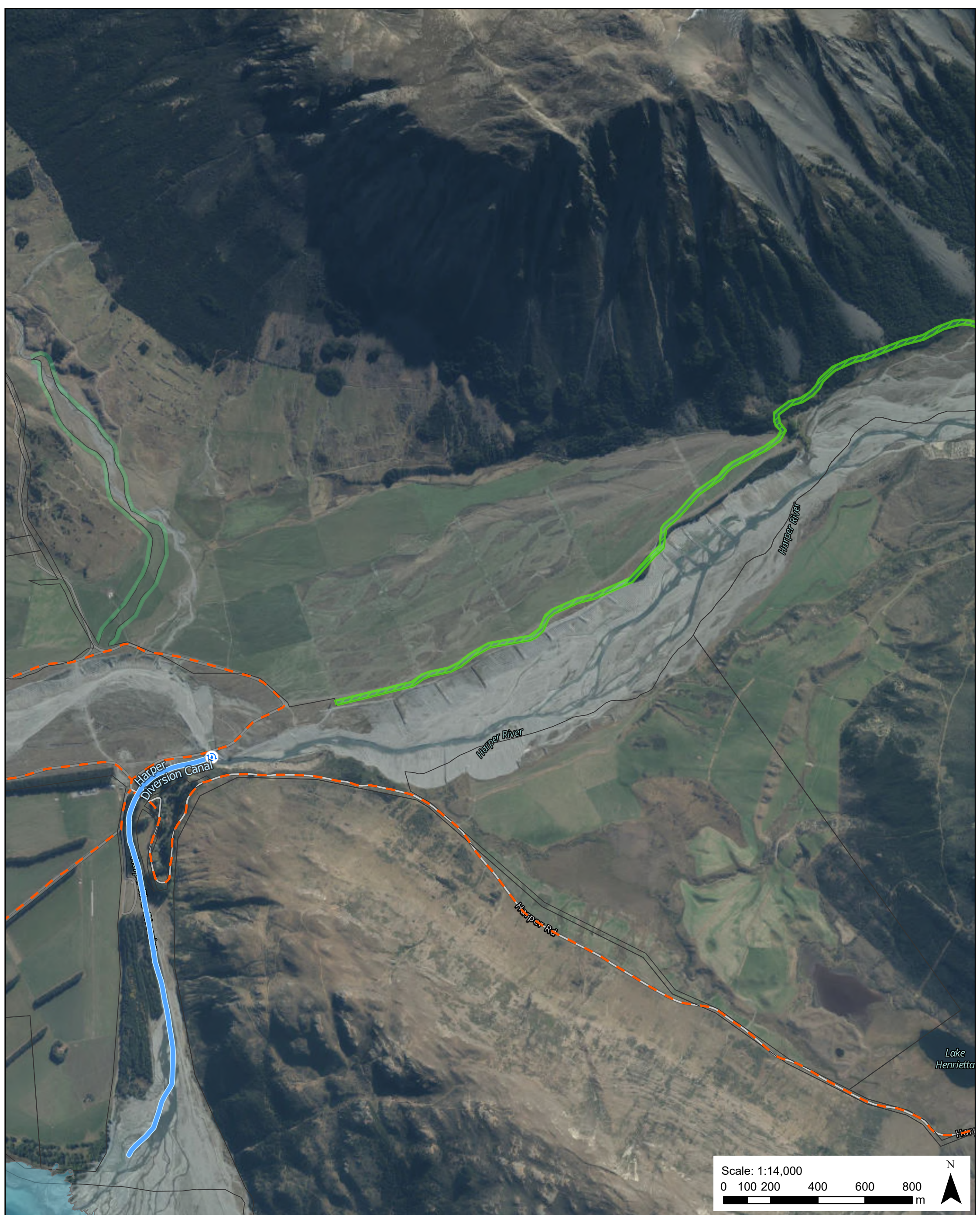
Coleridge HEPS Cadastre
Acheron



-  Intake Structure
-  Tunnel
-  LINZ Property Boundaries

- Central Record of State Land
-  Department Of Conservation
 -  To Be Determined
 -  University Of Canterbury

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|-----------------------------|--------------------------|
| DOC Moveable Marginal Strip | Access Road |
| Intake Structure | Crown Land |
| Canal | LINZ Property Boundaries |
| Lake | |

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Coleridge HEPS Cadastre
Harper River

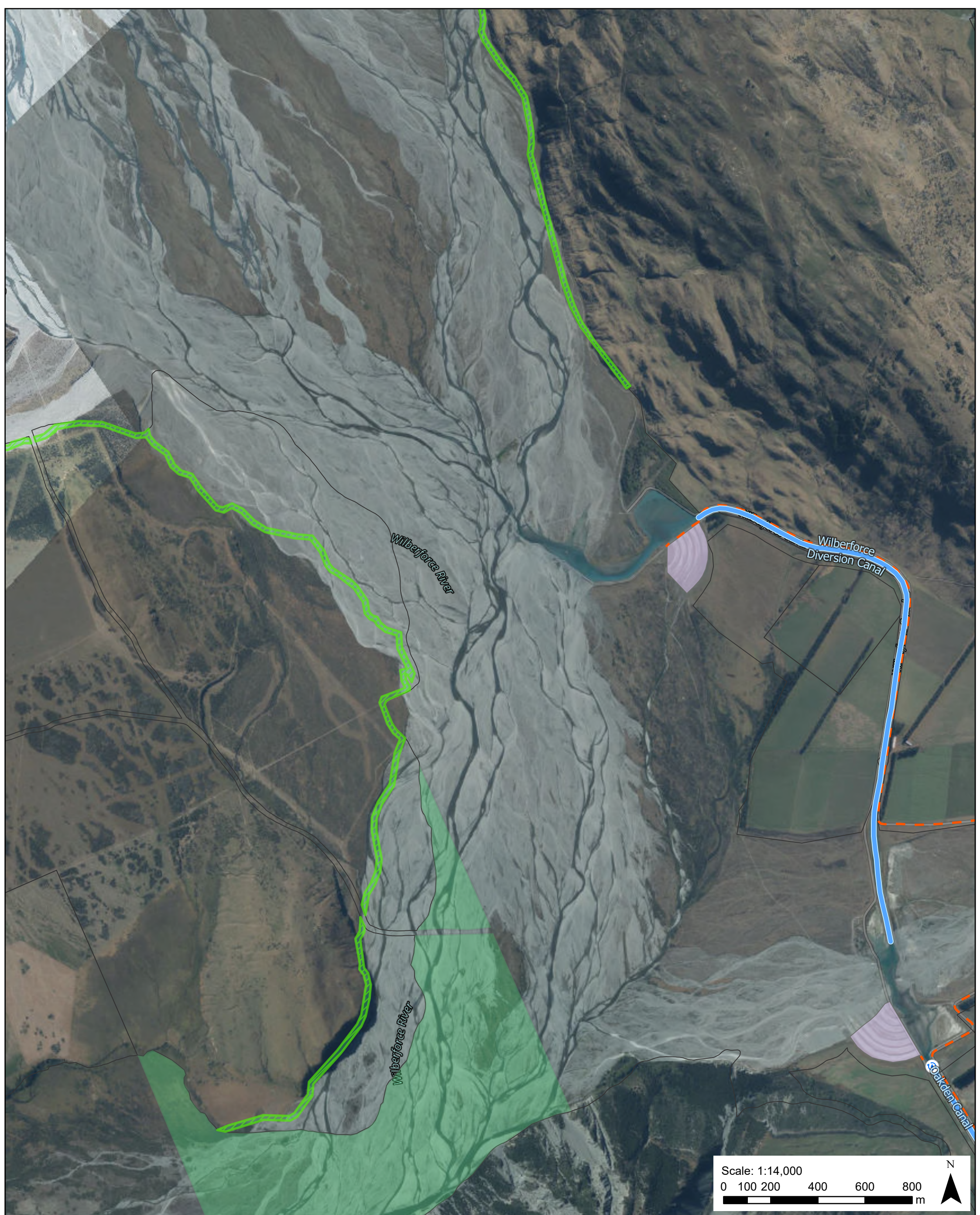


-  Lake
-  LINZ Property Boundaries

- Central Record of State Land
-  Department Of Conservation
 -  Land Information New Zealand
 -  University Of Canterbury

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Coleridge HEPS Cadastre
Section 1 SO 342149



- DOC Moveable Marginal Strip
- Intake Structure
- Canal
- Lake
- Access Road

- Overflowing Spillway Channels
- Crown Land
- LINZ Property Boundaries

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Coleridge HEPS Cadastre Wilberforce River