Memo

To:	Meridian Energy Limited	**Job No:**	1097626
From:	Sam Heggie-Gracie	**Date:**	13 May 2026
cc:	Amy Callaghan, Patrick Lees, Stephen Douglas		
Subject:	Lake Pūkaki Hydo Storage and Dam Resilience works (FTAA-2510-1120): Response to RFI No.: 1.D – Ecology Issues		

1 Introduction

The Lake Pūkaki Hydro storage and dam resilience works substantive application was lodged on 5 November 2025 under the Fast-track Approvals Act 2024 (FTAA). The application included an Ecological Impact Assessment (EcIA)[1].

In a request for further information, the Fast-track Expert Panel requested an assessment of the proposal's effects on wetland features where the lake level of 518 m RL is the existing environment and no permitted baseline is applied below that lake level. This memo has been prepared to respond to the Request for information.

2 Feedback to be addressed

The Fast-track Expert Panel request is set out below:

The assessment of ecological effects on the Tasman Delta and other wetlands, and the response to Dr Susan Walker, both reason that the ecological effects of lowering the lake level below 518 m RL are permitted, because of rules in the relevant plan allowing lake lowering as a permitted activity in certain circumstances, and thus the identified effects on these wetland features can be disregarded. Understanding that application of the permitted baseline approach per s 104(2) of the resource Management Act 1991 is at the discretion of the decision-maker, the Panel asks the Applicant to provide an assessment of ecological effects on these wetland features on the basis that a lake level of 518 m RL is the existing environment and no permitted baseline is applied.

3 Response to request

The EcIA assessed ecological effects of the proposal on the Tasman Delta and 16 other wetlands hydrologically connected to Lake Pūkaki (as identified by Boffa Miskell (2023)[2]), by comparing the proposal against an existing environment in which Lake Pūkaki is operated at or above 518 m RL under the standard operational framework, in conjunction with the groundwater assessment which concluded that the 17 wetlands are occasionally inundated by the lake. With the exception of the Tasman Delta these wetlands interact with the lake at 525 m RL and above.

[1] Tonkin & Taylor Ltd. (October, 2025). Lake Pūkaki Fast-track Consent Substantive Application. Ecological Impact Assessment. Prepared for Meridian Energy Limited.

[2] Boffa Miskell (2023). Assessment of Environmental Effects of the Waitaki Power Scheme – Wetlands. Prepared for Meridian Energy Limited.

While Plan Change 1 provides for lake lowering below 518 m RL in certain circumstances (e.g., Security of Supply Alert or an Official Conservation Campaign), the EcIA did not rely on those provisions to disregard or exclude effects on wetland features. Instead, the EcIA identified and assessed the potential adverse effects of lake lowering below 518 m RL on values and concluded that the overall level of effect on wetlands would be low.

Section 2.1 of the EcIA describes the expected utilisation of the consent to drawdown lake levels below 518 m RL. For the avoidance of doubt, this response (and the conclusions in the EcIA) should be understood on the basis requested by the Fast-track Expert Panel: that a minimum lake level of 518 m RL (outside of certain circumstances) represents the existing environment, and that no permitted baseline is applied or determinative of any of the assessments and opinions expressed. On that basis, the EcIA describes wetland values (Section 4.2) and assesses the adverse effects associated with lake lowering to 513 m RL (Section 5.4).

Effects on eastern turf communities were assessed in our terrestrial and wetland Statement of Evidence (SoE)[3], and on the same basis as described above.

The EcIA and SoE conclude that the overall level of effect on wetland features (including the Tasman Delta and eastern turf communities) would be **low** as a result of the proposed activity, due to:

- The short duration and shallow extent of dips below 518 m RL.
- The eased access scenario provision is time-bound (maximum three years).
- Wetland habitats are adapted to the existing operational immersion/emersion regime and 16 of the 17 identified wetlands only interact with the lake above 525 m RL.
- Turf communities also interact with the lake at high lake levels, and adverse effects are constrained by the short duration and time-bound nature of the eased access regime.
- No material change to groundwater levels is anticipated.

[3] Statement of Evidence of Sam Heggie-Gracie and Dean Miller on behalf of Meridian Energy Limited (15 April 2026). Terrestrial and wetland ecology Assessment. FTAA-2510-1120.

4 Applicability

This report has been prepared for the exclusive use of our client Meridian Energy Limited, with respect to the particular brief given to us and it may not be relied upon in other contexts or for any other purpose, or by any person other than our client, without our prior written agreement.

We understand and agree that our client will submit this memo as part of an application under the Fast-track Approvals Act 2024 and that the Expert Panel appointed to make a decision on the application will use this report for the purpose of assessing that application. We understand and agree that this report will be used by the Expert Panel in undertaking its functions.

Tonkin & Taylor Ltd

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