

Response ID ANON-URZ4-5FY9-2

Submitted to Fast-track approval applications  
Submitted on 2024-05-01 17:30:50

Submitter details

Is this application for section 2a or 2b?

2B

1 Submitter name

Individual or organisation name:  
Stewart Family Assets Limited

2 Contact person

Contact person name:  
Mark Johnston

3 What is your job title

Job title:  
Land and Delivery Manager

4 What is your contact email address?

Email:  
s 9(2)(a)

5 What is your phone number?

Phone number:  
s 9(2)(a)

6 What is your postal address?

Postal address:  
  
Aon House  
388 Blenheim Road  
Upper Riccarton  
Christchurch, 8041

7 Is your address for service different from your postal address?

No

Organisation:

Contact person:

Phone number:

Email address:

Job title:

Please enter your service address:

Section 1: Project location

Site address or location

Add the address or describe the location:

98 & 136 Colyer Road, 5, 90 Hamilton Road, 99 Awarua Siding Road, Awarua, Southland

File upload:

240418 7795-2 - SITE PLAN - DRAFT - REV A.pdf was uploaded

Upload file here:

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Do you have a current copy of the relevant Record(s) of Title?

Yes

upload file:

Awarua Titles.zip was uploaded

Who are the registered legal land owner(s)?

Please write your answer here:

Stewart Family Assets Limited, Invercargill City Council

Detail the nature of the applicant's legal interest (if any) in the land on which the project will occur

Please write your answer here:

The applicant owns all of the land subject to the application site. Invercargill City Council is listed as an owner on RT 371768 however this only includes the rights to minerals. There is no impediment to Stewart Family Assets Limited developing this site.

## Section 2: Project details

What is the project name?

Please write your answer here:

Awarua Quadrant Windfarm

What is the project summary?

Please write your answer here:

Stewart Family Assets Limited propose to build and operate up to 7 wind turbines which will have a total generation capability of up to 42 megawatts. The proposed Awarua Quadrant Windfarm will be constructed at the Awarua Quadrant industrial business park which is currently 500 hectares of bare land that is zoned for heavy industry.

What are the project details?

Please write your answer here:

The purpose of the proposed project is to construct and operate a windfarm, along with associated civil works and electrical plant on land that is zoned for heavy industry. The up to 42 megawatts power generated on site will be used by the future industrial businesses that will be co-located at the Awarua Quadrant industrial business park. A connection to the local electrical grid will also be provided for any surplus power generated which could be used to power households in the local community.

The windfarm project will involve:

- Environmental investigations including
  - o 12 months of avifauna monitoring
  - o Acoustic baseline testing and modelling
  - o Ecology investigation – including further wetland assessments
  - o Geotechnical investigation
  - o Stormwater quality investigation
  - o Traffic engineering assessment
  - o Cultural impact assessment
  - o Shadow flicker assessment
- Construction of wind turbine foundations
- Installation, operation and maintenance of 7 wind turbines with a hub height of 160m, a rotor diameter of 200m and a maximum height of 260m to the tip of the turbine.
- Construction and or upgrade of tracks on the property for construction access and ongoing maintenance.
- Construction of facilities to house electrical equipment.
- Connection to Powernet operated substation located at the Colyer Road boundary.
- Ongoing consultation with affected parties (Invercargill Council, Environment Southland, neighbouring properties, etc)

Describe the staging of the project, including the nature and timing of the staging

Please write your answer here:

Stewart Family Assets Limited intends to complete the project in one stage as outlined in the timeline included in the application.

What are the details of the regime under which approval is being sought?

Please write your answer here:

Resource Management Act 1991 – Resource Consent

If you seeking approval under the Resource Management Act, who are the relevant local authorities?

Please write your answer here:

Invercargill City Council and Environment Southland.

What applications have you already made for approvals on the same or a similar project?

Please write your answer here:

A resource consent application has been made to locate a test mast on the site to house data collection instruments to guide the detailed design of the turbines themselves. A decision granting the application was made by Invercargill City Council on 19 February 2024.

Is approval required for the project by someone other than the applicant?

No

Please explain your answer here:

No other approval is required for the project.

If the approval(s) are granted, when do you anticipate construction activities will begin, and be completed?

Please write your answer here:

Upon resource consent being approved it is anticipated:

- Detailed design completed by: May 2025. This work will be undertaken in parallel with the consenting process.
- Order for turbines placed upon granting of consent: Estimate - May 2025
- Funding in place by: May 2025
- Site works to commence by: January 2026
- Windfarm operational by: January 2027

Please note that this timeline does not account for events outside the applicants control, e.g. disrupted supply chains due to pandemics.

### Section 3: Consultation

Who are the persons affected by the project?

Please write your answer here:

Invercargill City Council  
Environment Southland,  
Te Runanga o Ngāi Tahu, (Waihopai and Awarua Rūnaka),  
Waka Kotahi – NZ Transport Agency  
Space Operations New Zealand Limited

Detail all consultation undertaken with the persons referred to above. Include a statement explaining how engagement has informed the project.

Please write your answer here:

Te Ao Marama Incorporated (TAMI)

Stewart Family Assets Limited engaged with TAMI as representatives of Awarua and Waihōpai Rūnaka at the time they purchased the land to discuss industrial development of the site. A further meeting was held with TAMI in April 2024 to discuss the development of the site for a windfarm. TAMI stated that they were in general supportive of initiatives for renewable energy and in particular the intention that the windfarm would be used to power the industrial development of the Awarua Quadrant industrial business park. TAMI noted that many windfarms were in the consenting process or had already been developed and had holistic concerns relating to the effects on the wider landscape of their whenua. TAMI's concerns related specifically to the effects of the windfarms on the views and aspect from Bluff, including Motopohue (Bluff Hill), Awarua marae and the Bluff foreshore.

In response to this feedback Stewart Family Assets Limited has committed to obtaining a landscape assessment and providing conceptual images from a range of locations of importance to Rūnaka including the above mentioned locations, as well as wider areas of Invercargill such as Sandy Point Otatara and Murihiku Marae. Stewart Family Assets Limited have also committed to engaging TAMI to prepare a Cultural Impact Assessment on behalf of the Awarua and Waihōpai Rūnaka.

#### Invercargill City Council

A meeting was held with Invercargill City Council in April 2024 to discuss the proposed windfarm. The main point of concern raised by Invercargill City Council was in relation to effects on landscape. Planning staff advised that any application received would be publicly notified. Effects of lighting on the turbines was raised as well as effects on roading during the construction phase. A landscape assessment is being obtained and will inform the full application for the windfarm.

#### Environment Southland

A meeting was held with Environment Southland (ES) in April 2024 to discuss the proposed windfarm. Stewart Family Assets Limited provided plans showing the location of the windfarm in relation to identified wetlands meeting the definition on 'inland wetlands' under the NPS-FW. Environment Southland in later correspondence queried the identification of wetlands in the area and suggested they may be more widespread than the initial investigation showed. ES were clear that the turbines and excavations should be kept clear of any wetland areas and that there was strong direction from MfE that the protection of wetlands should be prioritised.

Additional feedback related to the presence of birdlife in the area and any risk that the operational turbines might pose to the birdlife.

In response to this feedback Stewart Family Assets Limited are seeking further assessment from their ecologist to confirm the location of the wetlands on the site and to ensure the turbine locations and any excavations are located at least 100m from these areas. An avifauna survey is currently underway to determine bird life species in the area and patterns of flight. This assessment deriving from this survey will assist in informing the full application for the windfarm.

#### PowerNet

PowerNet own and operate the substation located near the Colyer Road-State highway 1 intersection which is the closest substation to the property. Stewart Family Assets Limited has been in discussion with PowerNet in relation to feeding surplus power to this substation. PowerNet are supportive of this and have raised no concerns in relation to the development of the windfarm or feeding power to the substation. There is no conflict of interest between Stewart Family Assets Limited and PowerNet's activities.

#### Space Operations NZ Limited (SpaceOps)

Space Ops own and operate the Awarua Satellite Ground Station which is located to the south of the property. The site hosts antennas for 'all the big players in the small sat world'. SpaceOps requires clear 'lines of sight' for their antenna to the satellites. While the Space Ops facility is some distance from the property and proposed location of the turbines, Stewart Family Assets Limited is committed to ensuring the location of wind turbines will not affect the operation of the SpaceOps ground station and have engaged in several high levels meetings with SpaceOps.

#### NZTA

Stewart Family Assets Limited will consult with NZTA as part of the preparation of the full application. This will include an analysis of the traffic effects associated with bringing the turbines to site.

#### Adjoining Landowners

Stewart Family Assets Limited will consult with the adjoining landowners as part of the preparation of the full application. This will include discussing the acoustic and landscaping assessments with them.

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Describe any processes already undertaken under the Public Works Act 1981 in relation to the land or any part of the land on which the project will occur:

Please write your answer here:

N/A

## Section 4: Iwi authorities and Treaty settlements

What treaty settlements apply to the geographical location of the project?

Please write your answer here:

There are no treaty settlements associated with the site itself, however the Ngai Tahu Claims Settlement Act 1998 sets out Statutory Acknowledgement areas that acknowledge Ngai Tahu's special relationship with identified areas.

Statutory Acknowledgment Areas within the locality of the site are as follows:

- Schedule 44 – Statutory acknowledgement for Motupōhue (Buff Hill). This is approximately 11.5km from the site.
- Schedule 73 – Statutory acknowledgement for Waituna Wetland. This is approximately 14km from the site.

The purpose of the Statutory Acknowledgements is to ensure that Ngāi Tahu's particular association with Motupōhue and Waituna Wetland in the South Island are identified, and that Te Rūnanga o Ngāi Tahu is informed when a proposal may affect one of these areas

The purpose is also to improve the implementation of RMA processes, in particular by requiring consent authorities to have regard to Statutory Acknowledgements when making decisions on the identification of affected parties.

Consent authorities are required to forward summaries of resource consent applications that are for an activity within, adjacent to or impacting directly upon a statutory acknowledgement area. Te Runanga o Ngai Tahu and any member of Ngai Tahu Whanui is able to cite this statutory acknowledgement as evidence of the association of Ngai Tahu to Motupōhue and Waituna Wetland.

Are there any Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019 principles or provisions that are relevant to the project?

No

If yes, what are they?:

N/A

Are there any identified parcels of Māori land within the project area, marae, and identified wāhi tapu?

No

If yes, what are they?:

N/A

Is the project proposed on any land returned under a Treaty settlement or any identified Māori land described in the ineligibility criteria?

No

Has the applicant has secured the relevant landowners' consent?

Yes

Is the project proposed in any customary marine title area, protected customary rights area, or aquaculture settlement area declared under s 12 of the Māori Commercial Aquaculture Claims Settlement Act 2004 or identified within an individual iwi settlement?

No

If yes, what are they?:

N/A

Has there been an assessment of any effects of the activity on the exercise of a protected customary right?

No

If yes, please explain:

The site is not located within an area subject to a protected customary right and is zoned for heavy industrial activity.

Upload your assessment if necessary:

No file uploaded

## Section 5: Adverse effects

What are the anticipated and known adverse effects of the project on the environment?

Please describe:

### Construction Effects

#### Wetlands

Construction activities have the potential to result in effects associated with direct and indirect discharge of sediment to watercourses associated with construction activities; the extraction of water, including increased sediment input, downstream flow reductions (e.g. reduced habitat, increased water temperatures). Any potential effects will be minimised by locating turbines, cable locations and other structures away from identified natural inland wetlands, implementing an erosion and sediment control plan to minimise sediment discharge from excavation sites, and undertaking dewatering in a manner that maintains the hydrological patterns of the wetlands.

### Biodiversity

There are no known bird nesting sites on the site and wetland areas and the manuka stand will be unaffected by the location of the turbines and operation of the windfarm. There is however potential for bird fatalities as a result of the windfarm in this area which is close to the New River Estuary, Bluff Harbour and the Waituna Lagoon wetland. Previous research into wind turbine related bird fatalities shows that a smaller number of large turbines results in a lower predicted mortality rate than when compared to a greater number of small turbines. Options to reduce bird fatalities will be explored using both overseas and New Zealand experiences and will be implemented where proven to be effective at minimising fatalities.

### Landscape and Visual Effects

The site sits on an area of flat land between New River Estuary and Bluff Harbour. Given this the wind turbines which will have a tip height of approximately 200 metres above ground level will be visible from various view points. In particular clear but distant views will be experienced from Motopohue (Bluff Hill) and the Bluff foreshore. The turbines will also be visible from some areas of Invercargill City, the southern part of Sandy Point reserve, and some area of Otatara. The turbines will not sit on ridgeline and being at near sea level the turbines visibility will quickly diminish as distance increases. Areas of bush or urban development will be sufficient to screen the turbines from the majority of the surrounding area however it is noted that

this will not be the case for Bluff residents who will experience distant views of the turbines.

#### Traffic Effects

Traffic effects during the operational phase of the windfarm will be negligible with no effect on the operation or safety of the surrounding local roads or State highway. During the construction phase there will be higher traffic movements as the turbine bases and structures are established. The construction phase access point to the site has not yet been confirmed. The site has frontage onto three legal roads being State highway 1, Colyer Road and Awarua Siding Road. The construction access to the site has not yet been determined by the applicant with the possibility that a temporary access may be formed off the State highway to reduce effects on the local roads which are not sealed.

The State highway is expected to carry high levels of vehicles and with appropriate access construction and/or traffic management it is not expected that there will be any detrimental effect on the safety and operation of the State highway. Any effects will be temporary in nature during the construction phase and with only 7 turbines proposed the effects on the surrounding roading layout will be over a relatively short term.

#### Light Effects

Due to CAA requirements, the windfarm is likely to require red obstruction lights located on the top of the nacelle (wind turbine generator housing) and low intensity lights on the towers at a height of half the nacelle. The lighting is required in order to ensure aircraft safety and may result in some adverse effects for occupiers of residences which have closer views of the turbines.

#### Noise Effects

##### Construction

Noise effects during the construction phase will involve the movement and operation of heavy machinery including pile drivers, loaders, dump trucks, cranes, delivery truck, concrete trucks and pumping and will result from the formation or upgrading of access tracks within the site, construction of the turbine platforms, including piling, delivery and installation of the turbines. All works will be undertaken in daylight hours and will be for a short term only. The site is zoned for heavy industrial activities and has higher maximum noise levels in the District Plan than the adjacent Rural zoned sites.

##### Operational Noise

Turbine related noise effects. There are four residential dwellings associated with rural properties within 1km of the proposed turbine sites. These dwellings may experience effects associated with the operation of the wind turbines. A noise assessment will be undertaken by an acoustic engineer to determine levels at the notional boundary of nearby dwellings and measures to mitigate any exceedance of noise levels at these locations will be implemented where possible.

#### Shadow Flicker Effects

Shadow flicker effects occur as moving wind turbine blades create shadows which move across the ground. When the shadows pass over buildings, they can have an impact on the occupants within the buildings. The outside light entering a building through the windows can create a flickering effect each time a moving shadow passes over a window.

There are some residential dwellings associated with rural properties located near to the proposed turbine sites which could be affected by shadow flicker effects. An assessment of this will be undertaken and where possible turbines will be relocated to reduce effects on neighbouring landowners/occupiers.

#### Effects on Operation of Space Ops

SpaceOps requires clear lines of sight between the ground based antenna and satellites. Wind turbines will be located to ensure there is no obstruction of these sight lines. Stewart Family Assets Limited are engaging in ongoing discussions with SpaceOps to ensure a good working relationship.

#### Terrestrial and Wetland Effects

Generally the site is pasture covered farmland currently operated as a dairy farm. There is a stand of manuka which is protected from development within the ICC District Plan and which will not be affected by the windfarm. The applicants ecologist has identified several natural inland wetlands on the site. All wind turbines are expected to be able to be located at least 100m from the identified wetlands and the development of the windfarm will not result in the loss of any natural inland wetland. The site has a high water table and during the construction phase it will be necessary to undertake dewatering to enable the turbine platforms to be constructed. The methodology undertaken for the dewatering is yet to be confirmed however it is expected that the dewatering will be able to be undertaken with no or minimal effect on the hydrological stability of the wetland.

#### Cultural Effects

It is noted that it is for Ngāi Tahu to describe any cultural or historic associations with the site and a cultural impact assessment is to inform this aspect. During initial consultation with Te Ao Marama Inc effects on the landscape from sites of importance to mana whenua such as Motopohue and the Bluff harbour foreshore were raised and will form part of the Cultural Impact Assessment analysis.

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## Section 6: National policy statements and national environmental standards

What is the general assessment of the project in relation to any relevant national policy statement (including the New Zealand Coastal Policy Statement) and national environmental standard?

Please write your answer here:

NATIONAL POLICY STATEMENTS

#### NATIONAL POLICY STATEMENT FOR RENEWABLE ELECTRICITY GENERATION (NPS-REG)

The NPS-REG came into effect in 2011. It seeks to enable the sustainable management of renewable electricity generation under the RMA.

The sole objective of the NPS-REG is:

“To recognise the national significance of renewable electricity generation activities by providing for the development, operation, maintenance and upgrading of new and existing renewable electricity generation activities, such that the proportion of New Zealand's electricity generated from renewable energy sources increases to a level that meets or exceeds the New Zealand Government's national target for renewable electricity generation.”

The Awarua Quadrant Windfarm is consistent with, and is strongly supported by, the NPS-REG as it will provide a significant source of renewable energy.

#### NATIONAL POLICY STATEMENT FOR FRESHWATER MANAGEMENT

The NPS-FM sets out objectives and policies that direct local authorities to manage water in an integrated and sustainable way, while providing for economic growth within set water quantity and quality limits.

The site contains identified natural inland wetlands.

(1) The objective of this National Policy Statement is to ensure that natural and physical resources are managed in a way that prioritises:

- (a) first, the health and well-being of water bodies and freshwater ecosystems
- (b) second, the health needs of people (such as drinking water)
- (c) third, the ability of people and communities to provide for their social, economic, and cultural well-being, now and in the future.

There are 15 policies which seek to manage freshwater, the wind turbines, cables and access tracks will be constructed to ensure that the identified wetlands area not affected by construction and operation of the windfarm. The windfarm can be constructed and operated in accordance with the NPS-FM.

#### NATIONAL POLICY STATEMENT FOR ELECTRICITY TRANSMISSION

The National Policy Statement on Electricity Transmission (NPS-ET) was gazetted on 13 March 2008 and sets out the objective and policies to be applied by decision-makers under the RMA in managing the effects of and on the electricity transmission network.

The NPS-ET was developed to acknowledge the national significance of the National Grid and guide the balanced consideration of the national benefits and the local effects of electricity transmission. Transpower's assets are afforded recognition by the NPS-ET which effectively permits the growth and upgrade of the National Grid network subject to certain conditions or controls. Through consultation with Transpower, Stewart Family Assets Limited will ensure that any future network connection from the windfarm will be undertaken in a manner that does not impact wider Transpower assets.

#### NATIONAL ENVIRONMENTAL STANDARDS

##### RESOURCE MANAGEMENT (NATIONAL ENVIRONMENTAL STANDARDS FOR FRESHWATER) REGULATIONS 2020

The NES-FW came into force in 2020 and regulate activities that pose risks to the health of freshwater and freshwater ecosystems. The proposed windfarm meets the definition of specified infrastructure in the NES-FW as it:

- Is infrastructure that delivers a service operated by a lifeline utility, as defined in the Civil Defence Emergency Management Act 2002 (Stewart Family Assets Limited will be an entity that “generates electricity for distribution through a network or distributes electricity through a network” as listed in Part B of Schedule 1 of that Act).

Therefore, the provisions of the NES-FW relating to specified infrastructure apply to the proposed activity. The resource consents that may be required for the construction of the Awarua Quadrant Windfarm under the NES-FW are:

- (4) The taking, use, damming, or diversion of water within, or within a 100 m setback from, a natural inland wetland is a discretionary activity if—
  - a) the activity is for the purpose of constructing or upgrading specified infrastructure; and
  - b) there is a hydrological connection between the taking, use, damming, or diversion and the wetland; and
  - c) the taking, use, damming, or diversion will change, or is likely to change, the water level range or hydrological function of the wetland.
- (5) The discharge of water into water within, or within a 100 m setback from, a natural inland wetland is a discretionary activity if—
  - a) the discharge is for the purpose of constructing or upgrading specified infrastructure; and
  - b) there is a hydrological connection between the discharge and the wetland; and
  - c) the discharge will enter the wetland; and
  - d) the discharge will change, or is likely to change, the water level range or hydrological function of the wetland.

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#### Section 7: Eligibility

Will access to the fast-track process enable the project to be processed in a more timely and cost-efficient way than under normal processes?

Yes

Please explain your answer here:

In initial consultation with Invercargill City Council the planning manager highlighted concerns with effects on landscape and the requirement to publicly notify the application. Stewart Family Assets Limited consider that this is likely to result in significant delays to the consenting process with a high probability of appeals. Windfarms are polarising and opposition is anticipated despite the heavy industrial zoning of the site and the benefits to the residential households by generating renewable energy. The planning manager at Invercargill City Council further suggested that the fast track option would be the most suitable for this development.

What is the impact referring this project will have on the efficient operation of the fast-track process?

Please write your answer here:

No adverse impacts on the efficient operation of the fast track process are anticipated if this project is accepted for referral. The applicant has all required assessments underway and is able to provide a timely application to the expert panel. The development furthers the goals of successive governments to increase renewable energy generation and decrease reliance on fossil fuels.

Has the project been identified as a priority project in a:

Local government plan or strategy

Please explain your answer here:

Two regional strategies have been produced which prioritise renewable energy generation as follows:

- The Beyond2025 Southland Regional Long Term Plan seeks to provide for Southlands “future energy needs in a clean and resilient way.” The LTP prioritises sources of renewable energy and the ability of windfarms to provide for community wellbeing.
- The Southland Murihiku Regional Energy Strategy 2022 - 2050, developed in partnership between Murihiku Regeneration and Great South, states that it's aim is to “support energy resilience and affordability for all and provide clean renewable energy to support the region becoming carbon neutral by 2050.”

The Climate Change Response Act includes a target of net zero emissions of all greenhouse gas emissions by 2050. This project will help these targets to be met by generating up to 42 megawatts of renewable energy for both the occupiers of the Awarua Quadrant industrial park and the local community.

Will the project deliver regionally or nationally significant infrastructure?

National significant infrastructure

Please explain your answer here:

Yes - Renewable electricity generation facilities that connect with the national grid are considered nationally or regionally significant infrastructure. The proposed windfarm will generate power that can supply the equivalent of up to 21,000 households.

Will the project:

contribute to a well-functioning urban environment

Please explain your answer here:

The project will contribute to a well-functioning urban environment and indirectly address housing needs. Sustainable and resilient energy generation is essential to provide for the wellbeing of communities and the Awarua Quadrant Windfarm will provide green energy generation for industrial and residential applications.

Will the project deliver significant economic benefits?

Yes

Please explain your answer here:

The windfarm will deliver significant economic benefits through job creation and engagement of regional firms in the construction phase of the windfarm.

In addition the windfarm is intended to kick start the heavy industrial development of the Awarua Quadrant industrial business park. The site is zoned for heavy industrial use with a wide range of light to heavy industrial activities permitted within the site. The ability to power the future industry through the windfarm will result in significant economic benefits to Invercargill, Bluff and the wider Southland region through job creation, associated services by established and new businesses. Green energy and sustainability is becoming a high incentive for business to establish in a region and the Awarua Quadrant industrial business park will lead the way in providing a sustainable, green source of power for future industrial operators.

The site in question was owned and rezoned to become heavy industrial by the Invercargill City Council. Given the scale of the site (approximately 500 hectares), it requires significant investment to unlock the full economic benefit of the area. By providing certainty to the consenting process of the proposed windfarm, it enables Stewart Family Assets Limited to unlock the wider development in the area and also provide renewable energy for the wider community. The benefit of this site being that it already has heavy industrial zoning, which should allow for a shorter lead time to development.

Will the project support primary industries, including aquaculture?



No

Please explain your answer here:

N/A

Will the project support development of natural resources, including minerals and petroleum?

No

Please explain your answer here:

N/A

Will the project support climate change mitigation, including the reduction or removal of greenhouse gas emissions?

Yes

Please explain your answer here:

By creating new renewable energy generation the windfarm will support climate change mitigation. The new power source of up to 42 megawatts can be reduce reliance on fossil fuels through provision of reliable sources of green energy. In a site specific manner, industries locating within the Awarua Quadrant industrial business park which may have previously used coal fired boilers will instead have a reliable green energy option for the use of electric boilers significantly reducing the potential for greenhouse gas emissions. It will also provide renewable energy for the wider community of Invercargill and Bluff.

Will the project support adaptation, resilience, and recovery from natural hazards?

Yes

Please explain your answer here:

A local power generation source that feeds into a local substation will help ensure uninterrupted power supply in the event of a natural hazard that may affect transmission lines to the north of Invercargill. The Awarua Quadrant windfarm will provide additional resilience for the local network.

Will the project address significant environmental issues?

Yes

Please explain your answer here:

The Awarua Quadrant windfarm addresses significant environmental issues through development of green renewable energy generation. This assists in reducing the reliance of New Zealand on fossil fuel power generation, reducing emissions of greenhouses gases and will assist in the aim of achieving net zero by 2050.

Is the project consistent with local or regional planning documents, including spatial strategies?

Yes

Please explain your answer here:

The development of the windfarm is in accordance with the Southland Regional Policy Statement and Invercargill City District Plan which each place high importance on ensuring regional and nationally critical infrastructure is secure, enabling the wellbeing, health and safety of people and communities.

The Southland Regional Policy Statement Objective ENG.3 seeks that generation and use of renewable energy is increased. Renewable energy sources such as wind are specified as suitable options for renewable energy generation and significant development of renewable electricity generation activities is required to meet or exceed the Governments national target for generation of electricity from renewable resources.

Policy ENG.2 states:

Recognise and make provision for the development of renewable energy activities, and their benefits, which include:

- maintaining or increasing electricity generation capacity while avoiding, reducing or displacing greenhouse gas emissions;
- maintaining or increasing security of electricity supply at local, regional and national levels by diversifying the type and/or location of electricity generation;
- using renewable natural resources rather than finite resources;
- the reversibility of the adverse effects on the environment of some renewable electricity generation technologies;
- avoiding reliance on imported fuels for the purposes of generating electricity; while appropriately addressing adverse effects

The Invercargill City District Plan includes objectives and policies which support the generation of renewable energy as follows:

ENE-O3 Generation and use of renewable energy resources is increased.

ENE-O4 The national significance of renewable electricity generation activities is recognised.

ENE-O5 Maintenance and, where possible, strengthening of the security of electricity supply is enabled.

ENE-P2 Renewable Energy: To recognise the local, regional and national benefits of renewable energy, and provide for the use and development of

renewable energy resources while recognising the need to avoid, remedy or mitigate adverse effects on the environment and public health, where this is practicable.

The development of the windfarm at Awarua furthers the objectives and policies of the Southland Regional Policy Statement and the Invercargill City District Plan.

#### Non Statutory Strategies

The Southland Murihiku Regional Energy Strategy 2022 – 2050

The vision statement and goal for this strategy is stated as follows:

“Energy in Southland Murihiku is clean, resilient and affordable supporting a thriving community”

The Beyond 2025 Southland Regional Long Term Plan In relation to Energy provides the following vision statement:

“We will support the region's future energy needs in a clean and resilient way, while ensuring affordability for our communities and remaining globally competitive for exporters and new industry”

The development of the windfarm at Awarua furthers the goals and aspirations of the Southland Murihiku Regional Energy Strategy 2022 – 2050 and Beyond 2025 Southland Regional Long Term Plan.

Anything else?

Please write your answer here:

Does the project includes an activity which would make it ineligible?

No

If yes, please explain:

N/A

## Section 8: Climate change and natural hazards

Will the project be affected by climate change and natural hazards?

No

If yes, please explain:

Natural Hazards and climate change have been assessed following the Ministry for the Environment 2024 Coastal Hazards and Climate Change Guidance, the Ministry for the Environment 2022 Interim Guidance on the use of new sea-level rise projections, the Invercargill City Council District Plan 2019 flood and inundation maps, the NZ SeaRise data, the LINZ 2022-24 LIDAR land surface elevations and the surveyed turbine locations.

None of the turbine sites are within the Invercargill City Council Climate Change and Storm Surge inundation boundaries, or their river inundation boundaries. The council's Climate Change and Storm Surge areas are based on surface elevations less than 3 m.

Based on the LIDAR data the lowest turbine would be at a minimum of 4.1 m. From the nearest SeaRise data, inundation to 4.1 m is not projected until by the year 2150, and only under the most extreme climate change scenario, with low probability.

The wind turbines themselves are not subject to significant damage in the event of a flood.

Invercargill and surrounds sits in a low seismic risk area as defined by the Ministry of Business, Innovation and Employment.

## Section 9: Track record

Please add a summary of all compliance and/or enforcement actions taken against the applicant by any entity with enforcement powers under the Acts referred to in the Bill, and the outcome of those actions.

Please write your answer here:

Stewart Family Assets Limited and its related companies have not had compliance or enforcement actions taken against them.

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## Declaration

Do you acknowledge your submission will be published on [environment.govt.nz](https://environment.govt.nz) if required

Yes

By typing your name in the field below you are electronically signing this application form and certifying the information given in this application is true and correct.

Please write your name here:

Mark Johnston

Important notes