Response ID ANON-URZ4-5F8T-V

Submitted to Fast-track approval applications Submitted on 2024-05-03 10:50:49

Submitter details

Is this application for section 2a or 2b?

2A

1 Submitter name

Individual or organisation name: Southern Generation Limited Partnership (SGLP)

2 Contact person

Contact person name: Chris Baldwin (Project Manager) and Tony Jack (Development Engineer)

3 What is your job title

Job title: See above.

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:

s 9(2)(a)

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

Yes

Organisation: Gallaway Cook Allan

Contact person: Bridget Irving and Gus Griffin

Phone number: s 9(2)(a)

Email address: s 9(2)(a)

Job title: Partner/Solicitor

Please enter your service address:

123 Vogel Street, Dunedin, NZ. (Gallaway Cook Allan Lawyers)

Note other contact email addresses:

s 9(2)(a)

Section 1: Project location

Site address or location

Add the address or describe the location:

The project site for the proposed wind farm is the land at 146 and 153 Jericho Road, and 3312 Blackmount Redcliff Road, Otautau that is comprised in Section 1 SO 11732 and Lot 1 DP 12551. This is near the southern boundary of the Jericho Farm Property, and accessed through the Forestry Road at 3312 Blackmount Redcliff Road. It is located in the Rural Zone and within the Mountains Overlay in the Southland District Plan.

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Upload file here: Attachment 1 - Jericho site.pdf was uploaded

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

Yes

upload file: Jericho Wind Farm Records of Title.pdf was uploaded

Who are the registered legal land owner(s)?

Please write your answer here:

146 and 153 Jericho Road - Edward James Harold Pinckney, Pinckney Fairmount Trustees Limited.

3312 Blackmount Redcliff Road - Matariki Forests

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:

SGLP has contractual agreements in place with both landowners to facilitate land access and for establishment of a wind farm. This will allow it to undertake the work required for the project.

Section 2: Project details

What is the project name?

Please write your answer here: Jericho Wind Farm (JWF)

What is the project summary?

Please write your answer here:

SGLP intends to develop JWF on the Jericho Farm property, near Otukaramea/Blackmount (Southland). Consent is sought for eight turbines up to 210m high (to blade tip), and with a rotor diameter of up to 160m. JWF is anticipated to have a combined capacity of 35 MW and an anticipated electricity output of 140 GWH per annum.

What are the project details?

Please write your answer here:

Purpose - develop eight wind turbines at Jericho Farm and associated ancillary infrastructure.

Objectives - the JWF objectives include achieving an electricity output of 140 GWH per annum whilst utilising careful construction management and operational conditions to manage potential effects on indigenous biodiversity.

Activities and details - the project will require: the establishment of site facilities; measures to control erosion and sediment during construction; internal road construction; underground cabling along the internal road; earthworks for excavation of turbine foundations and crane/turbine laydown areas; erection of the turbines; on site substation construction; connections to the distribution network (underground and/or overhead); and subsequent site rehabilitation and the ongoing operation and maintenance of the wind turbines.

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

Please write your answer here:

There is no staging proposed but there is a construction sequence.

Construction sequence: the process is expected to take 6-8 months and the construction sequence is likely to take place as follows:

1. Establishment of office and facilities.

2. Erosion and sedimentation control measures.

3. Ecological management measures including trapping of herpetofauna, relocation of red tussocks within areas of the site to be disturbed.

4. Internal road construction, including underground cabling.

5. Excavation of turbine foundations and laydown areas.

6. Establishment of Crane pad and turbine foundations

7. Turbine erection.

8. On site substation construction.

9. Electrical connections and commissioning.

10. Site rehabilitation.

(Some of the above can be undertaken in parallel)

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

Please write your answer here:

The project seeks to be included in Schedule 2 Part A of the Fast Track Approvals Bill.

Main activity - land use consents under Resource Management Act 1991 to develop a wind farm and associated activities including earthworks.

Wildlife Act 1953 authority.

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

Please write your answer here:

The relevant local authority is Southland District Council. No consents are required from the Southland Regional Council.

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

Please write your answer here:

In December 2023 SGLP made an application for referral under the Natural and Built Environment Act 2023 to use that legislation's Schedule 10 process. It is currently awaiting a decision.

As of 2 May 2024, that application is sitting in the latter stages of clause 18 of NBEA Schedule 10. Invitations for comment have been sought and received from parties. SGLP is awaiting the decision of the Minister under clause 19.

If that referral application is accepted by the Minister, then a resource consent application can be lodged with EPA. But at this stage a consent application has not been lodged.

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

No

Please explain your answer here:

No. Both relevant landowners have given their permission for access and development of the site as a wind farm.

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

Please write your answer here:

If approvals are granted in 2024, SGLP anticipates the following project timeframes:

Detailed design/procurement: 2025

Construction Starts: 2025

First power: Early 2026

Operational Handover: Late 2026

Section 3: Consultation

Who are the persons affected by the project?

Please write your answer here:

Transpower Limited

PowerNet Limited

Te Rūnanga o Ngāi Tahu

Southland Regional Council

Southland District Council

Civil Aviation Authority

Department of Conservation

Ōraka-Aparima Rūnanga

Te Ao Mārama Inc

Te Waiau Mahika Kai Trust

Minister of Energy and Resources

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:

SGLP has consulted with Transpower and PowerNet regarding electrical distribution and infrastructure matters, with ongoing technical discussions taking place.

SGLP has also consulted with Ōraka Aparima whānau, Te Ao Mārama Inc (TAMI) staff, Te Waiau Mahika Kai Trust representatives and local experts at various times over recent years. TAMI represents the four Rūnanga in Murihiku on matters pertaining to the management of natural resources under the RMA 1991. These Rūnanga are: Awarua, Waihōpai, Hokonui and Oraka Aparima. The proposed JWF is within the takiwā of Oraka-Aparima Rūnanga. A Cultural Values Assessment was prepared in May 2015 and has informed the preparation of draft consent applications. Multiple meetings have taken place and SGLP have commissioned a full Cultural Impact Assessment from TAMI which it awaits completion of.

The following meetings have taken place:

17 May 2023 - TAMI and SGLP - SGLP presentation relating to project and update on progress. Agreement that CIA terms of engagement will be entered into and TAMI will carry out cultural impacts assessment.

17 May 2023 - Te Waiau Mahika Kai Trust - SGLP presentation in relation to project and update on progress. Discussion in relation to visual and acoustic assessments. General discussion of ecology assessments (Bats and Birds).

28 September 2023 - TAMI and SGLP - SGLP provides executed terms of engagement for CIA. TAMI propose it will be completed by end of November 23.

10 November 2023 - TAMI, Te Waiau Mahika Kai Trust, Iwi representatives and SGLP - Site visit and Hui, discussion around wind farm, construction methods, explanation about CIA methodology.

27 March 2024 - TAMI and SGLP - Virtual meeting seeking update on progress with CIA.

As at 2 May SGLP have not received the CIA.

Pre-application meetings have been held with the Environmental Planning Department of Southland District Council in November 2019, October 2022 and July 2023. Feedback during those meetings has been incorporated into the draft consent applications.

Pre-application meetings have also taken place with Department of Conservation (DoC) in March, May and December 2023 and January 2024, particularly with respect to Long-tail Bats, avifauna and terrestrial ecology. DoC's feedback has been incorporated into draft conditions of consent.

Numerous discussions have also occurred with surrounding landowners and a community open day has been held.

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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:

None.

Section 4: Iwi authorities and Treaty settlements

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

Please write your answer here:

Ngāi Tahu Claims Settlement Act 1998:

Legislation was passed in 1998 that put into effect the terms and redress package agreed to by Ngāi Tahu and the Crown. The Ngāi Tahu Claims Settlement Act 1998 includes several mechanisms specifically designed to be used in implementing other legislation such as the Resource Management Act 1991 and Conservation Act 1987.

In summary the key elements of the Ngāi Tahu Settlement are:

- Apology: The Crown apologies unreservedly for the suffering and hardship caused to Ngāi Tahu;

- Aoraki/Mount Cook: gifting of Aoraki, co-management and renaming;

- Cultural redress: restoring effective kaitiakitanga;

- Non-tribal redress: providing a commitment to resolve claims by individuals that were heard by the Waitangi tribunal. These private claims are separate from the collective Ngāi Tahu Claim, Te Kerēme.

- Economic redress: to provide finance and mechanisms to give Ngāi Tahu the capacity to build tribal assets to generate funds for social and cultural development.

A significant component of the Ngāi Tahu Settlement is the elements of cultural redress, which seek to restore the ability of Ngāi Tahu to give effect to its kaitiaki responsibilities. These include:

- Ownership and control: pounamu, high country stations, specific sites and wahi taonga;

- Mana recognition: Statutory Acknowledgements, Deeds of Recognition, Topuni, dual place names;

- Mahinga kai: Nohoanga, customary fisheries management, taonga species management; and

- Management Input: Statutory Advisors to DOC, dedicated memberships, Department of Conservation protocols, Resource Management Act implementation, and heritage protection review.

These elements are all relevant to the proposed JWF. The Wind Farm is near Te Koawa Turoa o Takitimu, which is a mahinga kai restoration site. Whilst the proposed wind farm could have adverse effects on this site, it is considered that appropriate mitigation methods will ensure these effects are not significant, particular with respect to mahinga kai species.

The Waiau River, which at its closest is ~2km from the project site, is a Statutory acknowledgement area under Schedule 69 of the Ngai Tahu Claims Settlement Act 1998.

Jericho Farm was offered to Ngāi Tahu on a first right of refusal basis when sold by Landcorp. Ngāi Tahu elected not to exercise the purchase option. Ngai Tahu was aware of the potential windfarm development at the time.

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?:

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

If yes, what are they?:

A search of Pātaka Whenua shows no identified parcels of Māori land within the project area. There is no marae or identified wāhi tapu in or around the project area.

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?:

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

No

If yes, please explain:

No. There is no effect anticipated on the exercise of any protected customary right.

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:

ECOLOGICAL EFFECTS

Terrestrial ecology: The Application site contains some areas of indigenous vegetation, largely Red Tussock and woody shrubs. The turbine locations and road alignments have been designed to minimise the effects on terrestrial ecology. Some areas of Red Tussock will need to be translocated (turbine foundation areas etc) or removed and reinstated following construction (laydown areas etc). Ecological assessments have concluded that with reinstatement/rehabilitation the terrestrial ecology effects will be low. The application will propose conditions requiring the reinstatement/rehabilitation of indigenous flora affected by the proposed works, consistent with the recommendations of the ecological assessment.

Avifauna: Risk assessment concludes there is a low risk to birds due to habitat loss. The risk to avifauna from disturbances, displacement and barrier effects is assessed as potentially high for shorebirds, waders, terns, gulls, waterfowl and raptor and owls due to loss of nesting, foraging and roosting habitat and due to avoidance behaviour including changes to flight patterns. Risk of collision with turbines and blades was also assessed as potentially high owing to a lack of information on bird movements through the site for shorebirds, waders, terns, gulls, waterfowl and raptor and owls. To respond to this potential issue the Applicant undertook further survey work to quantify with more precision the level of avian risk. The first six months of data collection was completed in April and an interim report has been prepared by Boffa Miskell. The report concludes that the majority of species of concern were limited to the Waiau River Valley and not present on the project site. The only threatened species observed at the site was the New Zealand Falcon. The report notes that the NZ Falcon is widespread within the lower South Island and has been present at every windfarm so far consented or being investigated. Boffa Miskell does not consider it to be of species concern. A further assessment will be completed by Boffa Miskell based on the final three months of bird activity that are yet to be surveyed (from April 1 to June 30) prior to a consent application being lodged and these will continue to inform final site layout, and operational conditions.

Lizards: Site surveys detected tussock skink population of low abundance through the windfarm footprint with tall statured tussocks and inter tussock herbs being favoured habitat. Key mitigation measures proposed to avoid or reduce adverse effects on tussock skinks involves configuring the site layout to avoid areas of good quality habitat and undertaking a lizard salvage operation in advance of the construction commencing. This will involve the capture and release of the skinks into premade rock habitat. With these proposed mitigation measures the effects on Skinks are assessed as low.

Bats: A survey utilising automated bat monitoring units (ABMs) confirmed the presence of long tailed bat in the vicinity of the turbine locations. The ABMs showed an increase in bat activity at the JWF site in January and February 2023, indicating that the site may have a role during the late summer/early autumn period for bat roosting and foraging. Further monitoring work is being undertaken and will inform the mitigation measures to be utilised. The level of effect of the proposed wind farm on bats is assessed as low.

AMENITY AND LANDSCAPE EFFECTS

The site of the proposed wind farm is a terrace landform at the southern end of the Te Anau Basin with moderately high visual prominence. Whilst this is

within the Mountains Overlay of the Rural Resource Area in the SDP, its natural landscape values are considerably modified by agricultural and forestry land use and are of only moderate significance. It is not an outstanding natural feature or landscape.

The proposed development involves erecting up to eight turbines up to 210m tall along the northern edge of the terrace top over a distance of approximately 2.8km. As the access road already exists, the vegetation character of the site is already considerably modified, and the topography is gentle. Significant physical landscape change is limited to the introduction of the large, dynamic turbines along the top of the terrace.

Given that the wind farm will further reduce natural character, the landscape architect assessed the effects of the development on landscape values as adverse in nature. As regards the degree of effect, this will range from high to low or less, depending on the extent of screening and proximity to the site and the attitude of the viewer. There will be some locations in close proximity with static viewers where effects could be significant.

Overall, given the existing modified character of the area, the relative scale and character of the host landform, and the sparse settlement pattern in the area, the landscape architect considered that the wind farm can be acceptably accommodated in this landscape without major adverse impact on its values.

TRANSPORT ASSESSMENT AND PLAN

The preferred route for the transport of the Turbine Components is via the port of Bluff to Shannon Street, State Highway 1 to Invercargill, Invercargill to Lumsden on SH6, Lumsden to The Key on SH94 and Blackmount Redcliff Road from The Key to Jericho Saddle.

Whilst it will be necessary for Permits for Overweight, Over-Dimension and proximity to Overhead lines to be obtained from relevant road controlling authorities and the electricity distribution network operator, the route is feasible.

NOISE EFFECTS

At all receivers, the predicted wind farm sound levels comply with the fixed part of the NZS 6808 Wind Farm Noise, by a considerable margin, and are also below the 'high amenity' noise limit of 35 dB LA90. These limits have been set in NZS 6808 to provide protection from sleep disturbance and to maintain reasonable residential amenity, the predicted wind farm sound levels should be acceptable.

Wind Farm noise will be audible at times. This is most likely to occur at Te Koawa, which has the highest predicted sound level. However, as the prevailing wind is a northerly, Te Koawa is expected to be well below the predicted level for most of the time. The 34 dB LA90 should only occur during a southerly wind direction.

At other locations wind farm sound is predicted to be at a level where it will blend into the natural environment. Sound being audible is common for all sound sources controlled by district plans which set absolute limits.

There are no adverse effects from ground borne wind farm vibration.

The construction programme will be greater than 20 weeks and hence the 'long-term' construction noise limits from NZS 6803 Acoustics – Construction noise are applicable to the works. Compared to other types of infrastructure projects, most construction activities for windfarms occur at a significant distance from residences, in this case generally over 1km away. At this distance, compliance with the NZS 6803 construction noise limits can normally be achieved for daytime construction work with no restrictions. Any night-time work should generally be limited to activities such as continuous concrete pours, and these could also be managed to comply with the construction noise limits with standard practice.

CONSTRUCTION EFFECTS

Construction will require a range of activities that have potential to result in adverse environmental effects to some degree. The following construction activities will take place:

- Excavation

- Road and maintenance hardstand construction
- Construction of crane pads and their associated laydown areas
- Installation of underground cable
- Possible installation of overhead lines between the site and the distribution network
- Transportation of turbines, cranes, and construction materials
- Erection of turbine with the use of large cranes
- Site remediation and rehabilitation

All of these activities can have effects but are readily managed to avoid, remedy or mitigate them.

Any environmental impact from sediment run-off, erosion and dust emission is likely to be minor given the large catchment areas relative to the amount of proposed disturbance. The location of the proposed construction is not in the vicinity of any permanent water bodies. To further mitigate against any adverse effects an Erosion and Sediment Control Plan (ESCP) will be prepared for the site.

EFFECTS ON TELECOMMUNICATIONS

Highly unlikely that any of the identified radio links will be affected by the proposed wind turbines. The proposed wind turbine sites will not obstruct any existing point to point radio links which propagate in the area surrounding Jericho.

EFFECTS ON CULTURALLY SIGNIFICANT SITES

The JWF site overlooks Te Koawa Turoa o Takitimu ('Te Koawa') a property managed by Ōraka Aparima Rūnanga and owned by Te Waiau Mahika Kai Trust and is within a culturally important landscape. A Cultural Values assessment was commissioned and has informed project development. SGLP has commissioned a Cultural Impact Assessment which is currently being completed.

The cultural values assessment identified the Ngāi Tahu ki Murihiku values associated with the area that could be influenced by the JWF. Various legislation, policies and agreements help inform resource management in Southland. Of relevance to the JWF proposal is the Ngāi Tahu Claims Settlement Act 1998, Resource Management Act 1991, Local Government Act 2002, Conservation Act 1987, Wildlife Act 1953, National Policy Statement for Renewable Energy 2011, Ngāi Tahu ki Murihiku Iwi Management Plan, the Regional Policy Statement for Southland, and the Southland District Plan.

The area has been used for mahinga kai, habitation, pounamu trails and is part of the history and travels of the ancestral Takitimu waka (canoe) and the explorer Tamatea. The Takitimu Range and Otukaramea (Blackmount) are important symbols of the Takitimu tradition.

Mahinga kai is a central pillar of the cultural health and well-being of Ngāi Tahu whānui. Past development of the Waiau Catchment has had major impacts on the mahinga kai resource. A focus for mahinga kai restoration for Ngāi Tahu is at Te Koawa Turoa o Takitimu, which is owned by Te Waiau Mahika Kai Trust and managed by Ōraka-Aparima Rūnaka. This site is an area for whānau to reflect and spiritually connect with the ancestral maunga (mountains) in the area. This restoration is the main part of the mitigation for the loss of mahinga kai by the ECNZ (now Meridian) hydro-electrical generation operations for the Manapouri Power Scheme.

The cultural values assessment identifies that wind farm operations can have positive effects, however there are some site-specific adverse environmental effects which require careful consideration in certain localities. Of the list of possible negative effects of wind farms the potential adverse effects identified include: ecology, amenity and landscape, cultural health, land use at Te Koawa, and cumulative effects of renewable energy generation pertaining to this area. The JWF has the potential to affect the rich cultural landscape and values within and adjacent to the proposed wind farm site, for the following main reasons:

- Te Koawa Turoa o Takitimu is adjacent to the JWF site and is likely to be the most affected site. 'Te Koawa' is a site of mahinga kai restoration. It was chosen for its restoration potential, the unimpeded vista of the surrounding maunga (Mountains) and its ability to connect whānau to its rich cultural landscape. The site is highly sensitive to sound and changes in the amenity of its surrounding landscape.

- There already has been high impact from other renewable energy development (hydroelectric generation) in Waiau Catchment on tangata whenua.

- Ngai Tahu chose to purchase Te Koawa as the mitigation (managed by Ngai Tahu Whānui) for loss of mahinga kai site from the Manapouri Power scheme operations.

- Mahinga kai is central to cultural identity and wellbeing for Ngai Tahu Whānui. The JWF proposal has ability to impact on a major Ngai Tahu mahinga kai restoration area in the Waiau Catchment, including mortality on taonga species, such as kāhu, kārearea and other birds.

- Much of the proposed activity of the JWF is incongruent to the current and proposed use of Te Koawa, such as restoration, tourism, education and 'Takitimu bound' ventures.

ARCHAEOLOGICAL AND HISTORICAL EFFECTS

The ground survey of the area of the proposed wind farm has demonstrated that there is no evidence of above surface archaeological features, hence archaeological values are low or non-existent.

It should not be necessary for SGLP to apply for an archaeological authority prior to the installation of wind turbines as part of the proposed project at Jericho Farm. However, an accidental discovery protocol will be included in the proposed conditions to manage effects if there was a discovery during construction.

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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:

See attachment.

File upload: Section 6 National Direction Answers.docx was uploaded

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?

Please explain your answer here:

Yes - the project requires approval under both the Resource Management Act 1991 and the Wildlife Act 1953. Being able to utilise the Fast Track Approval 'one stop shop' will remove the need for multiple applications for this proposal, saving time and resources.

Electricity generation projects have historically been highly contested under the RMA and other approvals processes. This is partly because the adverse effects accrue locally whereas the benefits tend to accrue regionally and nationally. Further, sites that are attractive for wind turbines are often also attractive for other reasons including landscape and amenity values and presence of indigenous fauna and flora.

The MBIE document "Strengthening National Direction on Renewable Electricity Generation and Electricity Transmission – A summary of proposed changes (April 2023)" notes that New Zealand is fortunate to have access to significant renewable energy sources, but our current planning settings are not fit for purpose to meet the challenge faced.

Through the proposed one-stop-shop there is an opportunity to ensure consistency and alignment between the approvals and conditions imposed under the relevant RMA and Wildlife Act Regimes. This will make implementation, compliance and monitoring of the proposed activity easier and more efficient.

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

Please write your answer here:

The project is eligible for this process and is ready to go. If all the necessary approvals were granted in 2024 under this process the wind farm could be operational in early 2026.

Although this project requires multiple approvals, the project itself is comparatively straightforward. The potential adverse effects are not novel and there is good information available to enable them to be assessed. The environmental risks at issue are relatively minor compared to other potential fast track projects and due to the process of engagement and consultation being undertaken by SGLP there is a good opportunity for alignment between it and affected agencies in relation to proposed conditions.

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

Central government plan or strategy

Please explain your answer here:

NATIONAL PLAN/STRATEGY

New Zealand's First Emissions Reduction Plan:

Action 11.2.1 – Accelerate development of new renewable electricity generation across the economy. Sub-actions include supporting renewable energy in communities. This project aligns with that action.

Action 11.2.2 – Ensure the electricity system and market can support high levels of renewables. A sub action is to support the electricity market to transition to 100 percent renewable generation. This project is consistent with the Action.

JWF is generally consistent with the aims of the ERP to allow for energy to be:

- a. Accessible and affordable and support the wellbeing of all New Zealanders
- b. Secure, reliable and resilient

c. Support economic development and an equitable transition into a low emissions economy.

[Minister for Climate Change and Ministry for the Environment Aotearoa New Zealand's First Emissions Reduction Plan (ME 1639, May 2022) at 203.]

National Policy Statement on Renewable Energy Generation 2011: This document provides national direction under the RMA. Its objective 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. This includes: recognising the benefits of renewable electricity generation activities; acknowledging the practical implications of achieving New Zealand's target for electricity generation from renewable resources; acknowledging the practical constraints associated with the development, operation, maintenance and upgrading of new and existing renewable electricity generation activities.

The JWF is entirely consistent with this document.

Strengthening National Direction on Renewable Electricity Generation and Electricity Transmission – A summary of proposed changes (April 2023): This MBIE produced document notes that 'Renewable electricity generation is critical to our future wellbeing and prosperity'. It further notes that "rapid and efficient investment in renewable electricity and the national grid is needed for New Zealand to reach its emissions reduction targets and renewable electricity generation and electricity transmission was developed before emissions reduction

targets were incorporated into New Zealand law and are no longer fit for purpose to support the pace and scale of development that is required." This project is consistent with those aims.

New Zealand Energy Efficiency and Conservation Strategy 2017-2022: this document sets the overarching policy direction for government support and intervention for promoting energy efficiency, energy conservation and the use of renewable sources of energy. It encourages businesses, individuals, households, community institutions and public sector agencies to take actions to help unlock renewable energy and energy efficiency potential, to the benefit of all New Zealanders. Its priority areas include innovative and efficient use of electricity. The strategy notes that converting from fossil fuels to renewable energy unlocks further emissions reductions and reduces dependence on energy imports. This strategy is consistent with the JWF proposal.

Central government plan for the Energy and Industry sector: The Government's 2050 vision for energy and industry is to have a highly renewable, sustainable, and efficient energy system that is accessible and affordable, secure and reliable, and supports New Zealanders' wellbeing. It has committed to reaching net zero for long-lived gases by 2050, set a target that 50% of total energy consumption will come from renewable sources by 2035, and has an aspirational target of 100% renewable electricity by 2030.

In August 2023 MBIE put out a consultation document 'Measures for Transition to an Expanded and Highly Renewable Electricity System'. The document notes the Government's commitment to reaching net zero for all greenhouse gas emissions (excluding biogenic methane) by 2050. It also acknowledges that "while New Zealand already has a high share of renewable electricity, we need to build substantially more by 2050 to enable electrification" (page 7). This project aligns with these aims.

REGIONAL

Environment Southland: is working with regional partners on a response to climate change in partnership with Southland's three other councils. In April 2023, ES Councilors adopted an organisational target to reach net zero greenhouse gas emissions by 2050.

Southland Regional Policy Statement 2017: the Infrastructure/Transport chapter (page 169) reinforces that the benefits of renewable energy generation and the need to operate, maintain, develop and upgrade renewable electricity generation activities and the electricity transmission network, are matters of national significance. It also notes (page 8) that "the region has significant renewable energy resources, for example wind resources, and the maintenance and development of these has an important role to play in improving regional and national security of supply".

Objective ENG.3 (Energy Chapter) is for generation and use of renewable energy and states that generation and use of renewable energy resources is increased. And, notably under explanation/reasons:

Maximising the ability to appropriately harness the region's renewable resources to provide energy for Southland communities will ensure there is a suitable supply of energy into the future and will not reduce future generations' ability to provide for their energy needs. Renewable energy resources such as wind, water, solar, biomass, tidal, wave and ocean current can be used to generate electricity. ... Meeting or exceeding the New Zealand Government's national target for the generation of electricity from renewable resources will require the significant development of renewable electricity generation activities.

The JWF proposal is consistent with this document.

OTHER

New Zealand National Party and New Zealand First Coalition Agreement:

11H. Deliver Net Zero by 2050 including by doubling New Zealand's renewable electricity and supporting new technology to reduce agricultural emissions.

Amend the Resource Management Act 1991 to make it easier to consent new infrastructure including renewable energy ... (Page 5, with emphasis added).

New Zealand National Party and Act New Zealand Coalition Agreement: Amend the Resource Management Act 1991 to make it easier to consent new infrastructure including renewable energy ... (Page 5, with emphasis added).

Will the project deliver regionally or nationally significant infrastructure?

National significant infrastructure

Please explain your answer here:

National significance:

Yes, the need to develop, operate, maintain and upgrade renewable electricity generation activities throughout New Zealand and the benefits of renewable electricity generation are identified as matters of national significance under the National Policy Statement for Renewable Electricity Generation 2011. That document explicitly acknowledges contribution of REG, regardless of scale, to addressing the effects of climate change, and the wellbeing of communities. Small and Community Scale REG has an important role to play in increasing the security of supply at a local/regional level and resilience of the electricity system to adverse weather events.

Regional Significance:

The Southland Regional Policy Statement 2017 defines:

- Regionally significant infrastructure as infrastructure in the region which contributes to the wellbeing and health and safety of the people and communities of the region, and includes all critical infrastructure.

- Critical infrastructure is defined as infrastructure that provides services which, if interrupted, would have a significant effect on the wellbeing and health and safety of people and communities and would require reinstatement, and includes all strategic facilities.

- Strategic facilities include nationally significant infrastructure like renewable electricity generation facilities.

Accordingly, the JWF proposal is both nationally significant under the NPSREG and regionally significant infrastructure under the SRPS.

It is worth noting that the NPSREG requires decisionmakers to recognise and provide for the national significance of renewable electricity generation activities, including the national, regional and local benefits relevant to renewable electricity generation activities. In that sense, local renewable benefits still have national significance.

Will the project:

Please explain your answer here:

No.

Will the project deliver significant economic benefits?

Yes

Please explain your answer here:

Yes. Through the construction period and once operational the JWF will contribute to the local economy via employment opportunities. It will also contribute through procurement of construction materials and goods and services. JWF will have positive effects on the regional economy.

Overall construction costs are estimated to be in the order of ^{\$42(b)00}, requiring approximately 80FTE staff during construction.

Will the project support primary industries, including aquaculture?

Yes

Please explain your answer here:

Yes. The agreement with the landowner to develop a wind farm will support the ongoing viability of Jericho Station by providing ongoing revenue to the farming operation.

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

Yes

Please explain your answer here:

Yes - Data obtained from the monitoring mast has identified the site as having a high-quality wind resource well suited to renewable energy generation via a wind farm. Wind direction at the site is predominately north-south with the prevailing wind blowing down the Te Anau Basin Valley and over the ridge and Terrace that form the application site. The average wind speed at over 8 metres per second is very favourable for renewable energy generation via a wind farm. The wind farm is expected to generate approximately 123 GW/h per year, enough to supply projected demand growth in Otago/Southland for approximately 15 years.

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

Yes

Please explain your answer here:

Yes. New Zealand Government has set a target of 90% of electricity from renewable sources by 2025 pursuant to the NPSREG. More recently via the Emissions Reduction Plan the Government has committed to achieving 100% renewable generation by 2030. Increasing renewable electricity generation will help to reduce greenhouse gas emissions and support this strategy.

The quality of the wind resource and level of annual electricity generation is a key determinant of the viability of wind farms and where they are located. Monitoring of the JWF site has been ongoing for some time and the site has been identified as having a high-quality wind resource.

JWF is expected to generate up to 35MW of electricity (maximum output) and produce enough energy for 19,000 average homes a year.

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

Yes

Please explain your answer here:

Yes. The RMA defines 'natural hazard' as meaning: "any atmospheric or earth or water related occurrence including earthquake, tsunami, erosion, volcanic and geothermal activity, landslip, subsidence, sedimentation, wind, drought, fire, or flooding) the action of which adversely affects or may adversely affect human life, property, or other aspects of the environment."

The extra generation capacity injected into the grid diversifies the options and potential volume of electricity generation and will thus increase the resilience of the grid in the event of any natural hazard disaster that might adversely affect another generation facility.

There is also a correlation between average temperature and extreme weather events. By contributing to climate change mitigation through renewable energy generation this project will thus indirectly support the country's resilience from natural hazards exacerbated by climate change.

Will the project address significant environmental issues?

Yes

Please explain your answer here:

Yes. Our atmosphere and climate 2023. New Zealand's Environmental Reporting Series. Ministry for the Environment. (October 2023) highlights pressures brought by climate change, which are a significant environmental issue. On page 11 these include:

- increasing greenhouse gases from human activity are the most significant driver of climate change since pre-industrial times.

- NZ's gross emissions have increased since 1990 and have remained relatively stable since 2006.

NZ still supplements electricity generation with coal and gas generation (EECA, 2023). Therefore, this proposal will reduce reliance on those fuel sources, diversify our energy generation and help to mitigate climate change impacts.

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

Yes

Please explain your answer here:

REGIONAL PLANNING DOCUMENTS: The relevant objectives and policies of the SRPS include:

Objective TW.2 – Provision for iwi management plans

All local authority resource management processes and decisions take into account iwi management plans.

-> The proposal is assessed against the iwi management plan below.

Objective ENG.3 - Generation and use of renewable energy

Generation and use of renewable energy resources is increased.

-> The proposal is consistent with this Objective.

Objective ENG.4 – National significance

Recognise and make provision for the national significance of renewable electricity generation activities.

-> The proposal is consistent with this Objective.

Policy ENG.2 - Benefits of renewable energy

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 proposal is consistent with this Policy.

Policy BIO.9 - Biodiversity offsets and environmental compensation

In addressing significant residual adverse effects (i.e. those effects left after all the appropriate avoidance, remediation, or mitigation actions have been

taken), local authorities will consider the use of any biodiversity offset and/or environmental compensation measures offered by an applicant.

-> Relocation and retention/restoration of indigenous vegetation and habitats of indigenous fauna on the site is proposed. Several avoidance and mitigation measures are promoted in relation to actual and potential adverse effects on vegetation, birds, bats and lizards.

Objective ENG.2 - Use and development of energy resources

Use, development, transmission and distribution of local and regional energy resources is undertaken where the adverse effects on the environment (including communities) are avoided, remedied, mitigated, or where appropriate, and such measures are volunteered by the resource user, offset or compensated for.

-> The JWF can be constructed, operated and maintained in a manner that avoids, remedies or mitigates the adverse effects on the environment.

LOCAL PLANNING DOCUMENTS

The operative Southland District Plan 2018 is a relatively new planning instrument that has been prepared in accordance with the requirements of the Act. The District Plan is required to 'give effect to' the provisions of all higher planning instruments. As such it gives effect to the Southland Regional Policy Statement 2017 (SRPS). The regional policy statement in turn gives effect to relevant National Policy Statements (NPS), that predate it and the provisions of the Act.

The relevant objectives and policies of the Southland District Plan are listed and discussed below.

9.3.1 Section 2.1 Tangata Whenua

Objective TW.1: To recognise the importance of and provide for, Māori culture and traditions with ancestral lands, sites, water, wāhi tapu and other taonga.

Policy TW.1: Recognise and provide for tangata whenua to exercise kaitiakitanga in the management of and decision making process regarding natural and physical resources, with particular regard to lwi Management Plans.

-> Black Mount Otukaramea and the wider cultural landscape are important to Ngāi Tahu Whānui. A CVA has been completed and utilised to inform the broader assessments of the proposal The relevant provisions of the lwi Management Plan are listed and assessed below. The proposal is not considered contrary to Objective TW.1 or Policy TW.1.

9.3.2 Section 2.9 Energy, Minerals and Infrastructure

Objective ENGM.1: Energy and mineral resources are developed and electricity is generated, in a manner that avoids, remedies or mitigates the adverse effects on the environment.

-> The JWF can be constructed, operated and maintained in a manner that avoids, remedies or mitigates the adverse effects on the environment.

Objective ENGM.2: To recognise that energy and mineral resources are important to the current and foreseeable needs of Southland and New Zealand.

-> The JWF will maintain or improve security of supply of electricity, will provide a new renewable electricity generation facility which will have positive effects locally, regionally and nationally.

Policy ENGM.1: Provide for the investigation and development of renewable electricity energy resources and non-renewable energy and mineral resources whilst avoiding, remedying or mitigating adverse effects on the environment.

-> The JWF can be constructed, operated and maintained in a manner that avoids, remedies or mitigates the adverse effects on the environment.

Policy ENGM.3: Recognise the local, regional and national benefits associated with the development of energy and mineral resources and the generation of electricity.

-> The JWF will provide a new renewable electricity generation facility which will have positive effects locally, regionally and nationally.

Policy ENGM.4: Recognise that development of energy and mineral resources and the generation of electricity can have a functional, technical or operational requirement to be sited at a particular location.

Policy ENGM.6: Recognise and provide for the development, operation, maintenance, repowering and upgrading of new and existing renewable electricity generation activities, in a matter that:

1. Recognises the need to locate renewable electricity generation activities where the renewable electricity resources are available.

2. Recognises logistical and technical practicalities associated with developing, upgrading, operating and maintaining renewable electricity generation activities.

3. Encourages, facilitates and provides for research and exploratory-scale investigations into existing and emerging renewable electricity generation technologies and methods.

-> The JWF site has been identified as having high wind energy resource and is located close to existing electricity transmission lines with capacity to service the wind farm and connect it to the national grid. The proposal is considered consistent with this policy.

Policy ENGM.8: Provide for offsetting measures or environmental compensation where any residual environmental effects of renewable electricity generation activities cannot be avoided, remedied or mitigated.

-> The applications proposed a suite of conditions to respond to potential effects. Particularly those associated with terrestrial ecology. If required offsetting is part of this response.

Objective INF.1: To ensure that infrastructure meets the current and foreseeable needs of the District whilst ensuring that the adverse effects on the environment are avoided, remedied or mitigated.

-> Development, operation and maintenance of the JWF, a large-scale renewable energy infrastructure development is consistent with provision of infrastructure that meets the current and foreseeable needs of the District whilst ensuring that the adverse effects on the environment are avoided, remedied or mitigated.

Policy INF.1: Recognise and provide for the development, operation, maintenance upgrading or relocation of infrastructure, particularly regionally significant infrastructure, whilst avoiding, remedying or mitigating the adverse effects of that infrastructure on the environment

-> The JWF proposal is a large-scale renewable energy infrastructure development that can be constructed, operated and maintained in a manner that can avoid and mitigate a number of actual and potential adverse environmental effects.

Policy INF.2: Recognise that infrastructure can have a functional, technical or operational requirement to be sited at a particular location.

-> The JWF is proposed in a location with suitable wind resource and the ability to connect to existing lines infrastructure. There is a functional, technical, and operational requirement for the proposal to be located at the site.

Policy INF.4: Infrastructure, particularly regionally significant infrastructure, should be located so that the effects of climate change and natural hazards are avoided or mitigated.

-> The site of the JWF proposal is not identified as being subject to any specific natural hazard risks or any specific adverse effects relating to climate change.

9.3.3 Section 2.11 Noise

Objective NSE.1: To control the adverse effects of noise emissions and manage the potential for conflict between land use activities.

Policy NSE.1: Manage subdivision, land use and development in a manner that avoids, remedies or mitigates the adverse effects of noise.

Policy NSE.2: Avoid, remedy or mitigate reverse sensitivity effects arising from noise emissions.

-> The Acoustic Assessment indicates that the proposed JWF development will not result in any significant adverse noise effects. The proposal is consistent with this objective and these two policies.

9.3.5 Section 3.1 Rural Zone

Objective RURAL.1: Subdivision, land use and development in the Rural Zone shall be undertaken in a manner that maintains the life supporting capacity and productive value of the land resource.

-> The JWF development can be undertaken in a manner that overall maintains the life supporting capacity and productive value of the land resource at Jericho Station. Areas of the farm will be developed to enable construction of the turbines, associated hardstand areas and internal access tracks. In terms of productive value the establishment of the JWF on part of Jericho Station will improve the viability and productivity of the farm once it is completed and commences operation. The wind farm will provide an additional source of income for the farm owners via the site's wind resource. The internal farm access roads required for the construction and operation of the wind farm will be utilised as part of farming operations, post construction. Overall, the JWF proposal is considered consistent with this objective.

Objective RURAL.2: Maintain amenity values, including rural character.

Policy RURAL.2: Manage subdivision, land use and development in a manner that maintains or enhances amenity values, including rural character and landscapes.

-> The JWF will not have a significant adverse effect on landscape values associated with the site but will have a significant adverse visual effect when viewed from close proximity viewpoints particularly where viewers are static. Jericho will continue to be farmed post construction of the JWF and is a large property. The rural character of that part of the farm where JWF will be constructed will be altered by wind farm infrastructure but overall, the rural character of the farm will continue around the windfarm infrastructure.

Policy RURAL1: Recognise the benefits of subdivision, land use and development in providing for growth and development of the District, whilst avoiding, remedying or mitigating adverse effects on the environment.

-> Through the construction period and once operational the JWF will contribute to the local economy via employment opportunities. It will also contribute through procurement of construction materials and goods and services. Positive economic effects will arise through employment of staff, contractors, suppliers, and provision of local services once operational. JWF will have positive effects on the local economy and this application promotes a range of avoidance, and mitigation measures. The proposal is consistent with this policy.

Policy RURAL.4:

Subdivision, land use and development shall be undertaken in a manner that:

1. Promotes sustainable land use and soil management practices.

2. Maintains the life supporting capacity and productive value of the land resource.

3. Avoids or mitigates erosion, sedimentation and instability of soils, particularly on hill country land.

-> A Construction Management Plan has been prepared for use in development of the JWF and forms part of this application and conditions of consent are promoted that will avoid, remedy or mitigate actual and potential adverse effects on soils at the site.

Policy RURAL.8: Avoid, remedy or mitigate the adverse effects of earthworks.

-> A Construction Management Plan has been prepared for use in development of the JWF and forms part of this application and conditions of consent are promoted that will avoid, remedy or mitigate actual and potential adverse effects.

Objective MTO.1: The soil resource and natural character of the area encompassed by the Mountains Overlay shall be maintained.

Policy MTO.2: To avoid, remedy or mitigate the adverse effects on natural character and soil resources within the Mountains Overlay.

-> The site of the JWF is highly modified and utilised for rural land use purposes. Rural land use activities will continue on-site post construction of the wind farm. The JWF will not have any significant adverse effects on natural character or soil resources at the site. As noted in the Landscape Assessment the site does not have high natural character values. The proposal is not contrary to Objective MTO.1 or Policy MTO.2.

9.3.6 2.2 Biodiversity

Objective BIO.1 - Significant indigenous vegetation and significant habitats of indigenous fauna are identified and protected and other indigenous vegetation and habitats of indigenous fauna are maintained so that the overall life supporting capacity of ecosystems are safeguarded.

-> The proposed activity proposes relocation and retention of indigenous vegetation and habitats of indigenous fauna present on the site.

Policy BIO.1 - Protect ecosystems which support significant indigenous vegetation and significant habitats of indigenous fauna.

-> Relocation and retention restoration of indigenous vegetation and habitats of indigenous fauna on the site is proposed. Several avoidance and mitigation measures are promoted in relation to actual and potential adverse effects on vegetation, birds, bats and lizards.

Policy BIO.2 - Maintain areas of indigenous vegetation and habitats of indigenous fauna including indigenous ecosystem connections.

-> Relocation and retention restoration of indigenous vegetation and habitats of indigenous fauna on the site is proposed.

Policy BIO.3 - Avoid, remedy or mitigate the adverse effects of subdivision, land use and development on indigenous vegetation and habitats of indigenous fauna.

-> Relocation and retention restoration of indigenous vegetation and habitats of indigenous fauna on the site is proposed.

Policy BIO.8 - Identify the ecological value of indigenous vegetation and habitats of indigenous fauna to determine significance.

-> The ecological assessments assess the values of indigenous vegetation and habitats of indigenous fauna at the site and fauna that could interact with proposed wind farm and determined significance.

Policy BIO.9 - Encourage biodiversity initiatives that promote the retention, maintenance and enhancement of indigenous biodiversity.

-> The applicant is open to consideration of options for environmental compensation initiatives including measures or compensation which will benefit the local environment and community. Many of the actual and potential adverse effects of the proposal can be avoided, remedied or mitigated.

NGĀI TAHU KI MURIHIKU IWI MANAGEMENT PLAN 2008

The relevant provisions of Te Tangi are listed and discussed below.

Section 3.4: Takatimu Me Ona Uri - High Country & Foothills

Section 3.4.3: Energy Generaiton and Efficiency

2. Ensure that Ngāi Tahu ki Murihiku is proactively involved with the management of future energy development within high country and foothill areas. This includes assessing the appropriateness of large and small scale energy development and the localised effects of these developments on communities, natural character, biodiversity, cultural significance and the possible changes in experiences tangata whenua may have when visiting the area or areas adjacent to the development.

-> SGLP has consulted Ngāi Tahu ki Murihiku via Te Ao Marama on the windfarm proposal. SGLP commissioned a Cultural Values Assessment (CVA) early in the project. The CVA informed subsequent assessments and the application. A Cultural Impact Assessment (CIA) has also been sought from Te Ao Marama Incorporated. SGLP has also consulted Te Waiau Mahika Kai Trust owners of the Te Kōawa Tūroa o Takitimu property.

3. Protect the natural and cultural landscape and potential loss or irreversible change to landforms from inappropriate energy development.

-> The site is not an outstanding landscape as per the landscape assessment. The site as highlighted in the CVA and CIA is an important part of the cultural landscape. The proposed JWF is not considered an inappropriate energy development and will not result in a loss of landform or an irreversible change to it. At the end of its operating life the wind farm can be decommissioned, and the visual effects of the proposal are reversible.

4. Ensure that the scale and location of any new energy development does not unreasonably detract from the natural landscape and character of the high country and foothill areas, e.g. wind farms. Such development must recognise and provide for cumulative effects on the land, water, possible down stream effects, biodiversity, changes to experiences with the land and visual impacts.

-> The JWF development at up to 8 turbines is not a large-scale wind farm in comparison to others in New Zealand. As noted in the Landscape Assessment JWF will not have a significant adverse effect on landscape values associated with the site but will have a significant adverse visual effect when viewed from close proximity viewpoints particularly where viewers are static. As such the proposal will not unreasonably detract from the natural landscape and character of the high country and foothill areas.

5. Ensure that the scale and location of any new energy development does not impede migratory bird paths.

-> An assessment of effects on avifauna has concluded that the actual and potential adverse avian effects range from low to potentially high. Further monitoring work is currently underway and conditions to mitigate effects will be incorporated as necessary.

6. Encourage use of visual representations in the consent and consultation process to enable rūnanga to picture the projects (large or small scale) on the landscape and clearly visualise the effects it may have.

-> Visuals of the proposed wind farm development are included as part of the Landscape and Visual Effects Assessment.

8. Development and utilisation of energy resources should be managed to ensure that negative environmental impacts are avoided or remedied. This includes the effects this may have on a community and its infrastructure.

-> A range of avoidance and mitigations measures are incorporated into the proposal. application. The proposal will have positive economic effects for the local community and positive infrastructure related effects.

9. Promote and encourage the efficient use of existing energy production and energy infrastructure.

-> The JWF proposal is consistent with efficient use of existing energy infrastructure, namely the distribution network.

10.Support, where appropriate, alternatives to energy production that have less environmental impacts than traditional energy production methods. This removes potential to concentrate on sources of energy that are more easily accessible despite the high environmental cost associated with these more traditional sources. Furthermore supporting use of alternative methods leads to more efficient energy use.

-> The proposed wind farm provides an alternative renewable energy generation to new hydro development and is not contrary to this policy.

11. Any earthworks undertaken must recognise for the policies outlined in Provision 3.5.8 Earthworks in Section 3.5 Te Rā a Takitimu - Southland Plains of this iwi management plan.

-> This earthworks policy has been considered and discussed below.

Section 3.5: Te Rā a Takitimu - Southland Plains

Section 3.5.8 - Earthworks

1. Consent applicants who are undertaking earthworks may be required to enter into Accidental Discovery Protocol and monitoring agreements with Ngāi Tahu ki Murihiku, stating that any earthworks, fencing, landscaping or other such activity has the potential to uncover archaeological sites. Procedures and processes associated with such an occurrence should also be outlined.

-> This application promotes use of an accidental discovery protocol.

9. Any earthworks or roadworks near rivers must have appropriate measures in place to avoid contaminants (including dust, sediment run-off from stockpiles or any hazardous substance) from entering waterways that may cause contamination, discolouration, or siltation in such waterways.

-> No earthworks or road works are proposed as part of the JWF near any rivers or waterways. As this application does not seek any regional council consents and does not propose any activities relating to water or in waterways or wetlands the provisions of Section 3.5.10 - General Water Policy and Section 3.5.15 – Activities in the Beds and Margins of Rivers are not considered relevant.

Anything else?

Please write your answer here:

None.

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

No

If yes, please explain:

Section 8: Climate change and natural hazards

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

No

If yes, please explain:

No. The site of the JWF proposal is not identified as being subject to any specific natural hazard risks or any specific adverse effects relating to climate change. The Jericho ridge itself sits at an altitude of about 500masl.

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:

There has been no compliance or enforcement action taken against SGLP.

Load your file here: No file uploaded

Declaration

Do you acknowledge your submission will be published on 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: Bridget Irving

Important notes