

# Response ID ANON-URZ4-5FXR-T

Submitted to Fast-track approval applications  
Submitted on 2024-05-03 15:38:23

## Submitter details

Is this application for section 2a or 2b?

2A

### 1 Submitter name

Individual or organisation name:  
Santoft Wind Limited

### 2 Contact person

Contact person name:

s 9(2)(a)

### 3 What is your job title

Job title:  
Country Manager, Yinson Renewables

### 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:  
Aurecon New Zealand Limited

Contact person:

s 9(2)(a)

Phone number:

s 9(2)(a)

Email address:

s 9(2)(a)

Job title:

s 9(2)(a)

Please enter your service address:

s 9(2)(a)

## Section 1: Project location

Site address or location

Add the address or describe the location:

The project is a proposed wind farm and associated transmission line (Wind Farm or Project), described in further detail in the following section.

The project location is shown in the maps/aerial images attached. The Project is situated over multiple legal titles of more than 3000 hectares total area. A suitable reference address is s 9(2)(b)(ii) (the Wind Farm Site). The Wind Farm Site is located in the Rangitikei District s 9(2)(b)(ii) s 9(2)(b)(ii). The route for the transmission line has not yet been finalised.

File upload:

Aerial imagery Santoft Wind Farm.pdf was uploaded

Upload file here:

No file uploaded

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

Yes

upload file:

RoTs Santoft Wind Farm.pdf was uploaded

Who are the registered legal land owner(s)?

Please write your answer here:

WIND FARM SITE

The Wind Farm Site's landowners (as reflected in the Records of Title attached to this application) are:

s 9(2)(b)(ii)  
[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]

TRANSMISSION LINE ROUTE

The potential transmission line route has been identified via a desktop aerial map analysis. Initial consultation with s 9(2)(b)(ii) within that potential route began in s 9(2)(b)(ii) via meetings, phone calls and emails. s 9(2)(b)(ii) details of the registered legal landowners have not been included at this stage.

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:

Santoft Wind Limited (the applicant) is a subsidiary of Yinson Renewables Pte Limited (Yinson Renewables), the renewable energy business unit of Yinson Holdings Berhad, a global infrastructure and technology company. Yinson Holdings Berhad is a publicly listed company, headquartered in Malaysia. The Yinson Renewables team led by a team of renewable energy professionals, is located in Europe, with a New Zealand Country Manager based in Auckland.

s 9(2)(b)(ii)  
[Redacted]  
[Redacted]  
[Redacted]

s 9(2)(b)(ii)  
[Redacted]  
[Redacted]

## Section 2: Project details

What is the project name?

Please write your answer here:

Santoft Wind Farm

What is the project summary?

Please write your answer here:

Santoft Wind Limited proposes to construct, operate and maintain a wind farm of up to s 9(2)(b)(ii) wind turbines and associated roading and infrastructure on land s 9(2)(b)(ii). A connection to the National Grid is required and therefore, a s 9(2)(b)(ii) long transmission line is also proposed to connect the Wind Farm to s 9(2)(b)(ii). The transmission route will run from s 9(2)(b)(ii) s 9(2)(b)(ii). The capacity of the Wind Farm is expected to be approximately s 9(2)(b)(ii).

What are the project details?

Please write your answer here:

The purpose and objectives of the Project are to generate renewable electricity for the National Grid through harnessing wind energy in a manner which supports the economic and social wellbeing of the surrounding community and which is appropriately located and designed to manage adverse effects on the natural environment.

The proposed Wind Farm will deliver nationally significant infrastructure and is large in the national context, predicted to power s 9(2)(b)(ii)

It is likely to inject tens of millions of dollars of expenditure during construction, add hundreds of jobs during construction and operation phases and provide a number of indirect economic benefits for support services within the region.

It will also have other beneficial effects to the wider economy by adding to the portfolio of renewable energy generation, improving security of generation to meet demand, avoiding transmission losses by reducing import of electricity from further away, and displacing greenhouse gas emissions thus helping New Zealand meet its emission reduction targets under the Paris Agreement.

The Project would include, but is not limited to, the following works:

s 9(2)(b)(ii)

Works to upgrade public roads may also be required to facilitate transport of Project components from ports to the Site.

s 9(2)(b)(ii)

Operation and maintenance activities would be undertaken by a small team of dedicated staff working from an operations and maintenance facility constructed on the Site.

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

Please write your answer here:

No formal staging of the Project is proposed at this time.

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

Please write your answer here:

Approvals will be sought under:

- Resource Management Act 1991 (RMA). Consents will be required under district and regional plans and National Environmental Standards. Land use consents, discharge permits and consents for structures and works in streams (and potentially wetlands) will likely be required.
- Heritage New Zealand Pouhere Taonga Act 2014 (HNZPTA). Archaeological authority under the HNZPTA will be sought on a precautionary basis.
- Wildlife Act 1953. Approvals may be required under the Wildlife Act if any native fauna need to be relocated, and to disturb, catch, handle and / or release protected wildlife at one site, to catch and / or hold protected wildlife for rehabilitation, or to catch, handle and / or hold and release protected wildlife in accordance with translocation activities as part of the Project.

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

Please write your answer here:

Rangitikei District Council  
Manawatū-Whanganui Regional Council (Horizons Regional Council)

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

Please write your answer here:

Notification to the Civil Aviation Authority under the Civil Aviation Rules Part 77 for the construction of wind monitoring masts on the Wind Farm Site.

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

No

Please explain your answer here:





s 9(2)(b)(ii)

Upload file here:

Letter of Support - Santoft Wind Farm Fast Track (1).pdf was uploaded

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

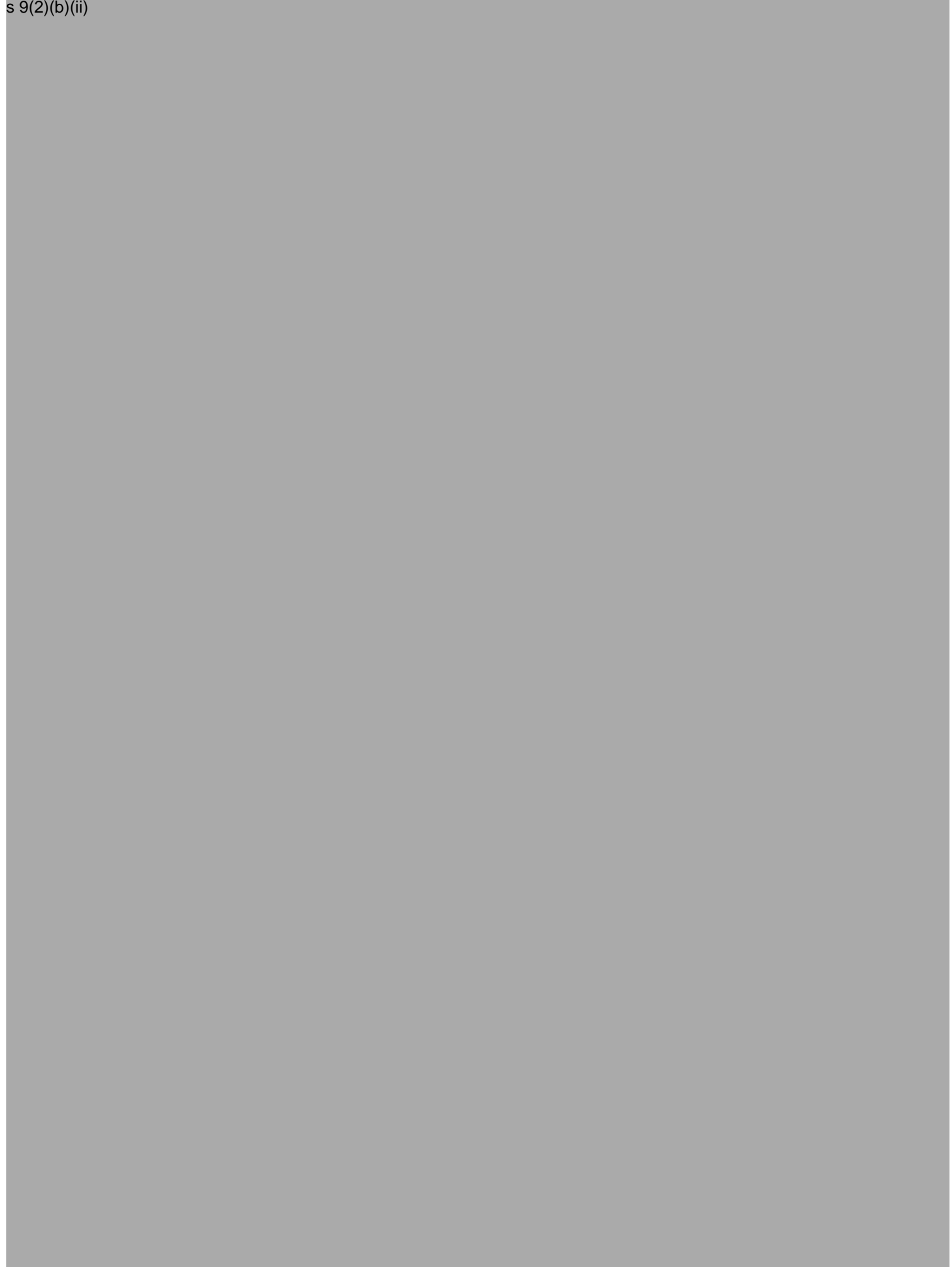
#### Section 4: Iwi authorities and Treaty settlements

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

Please write your answer here:

The following Te Tiriti o Waitangi Settlements apply to the Site:

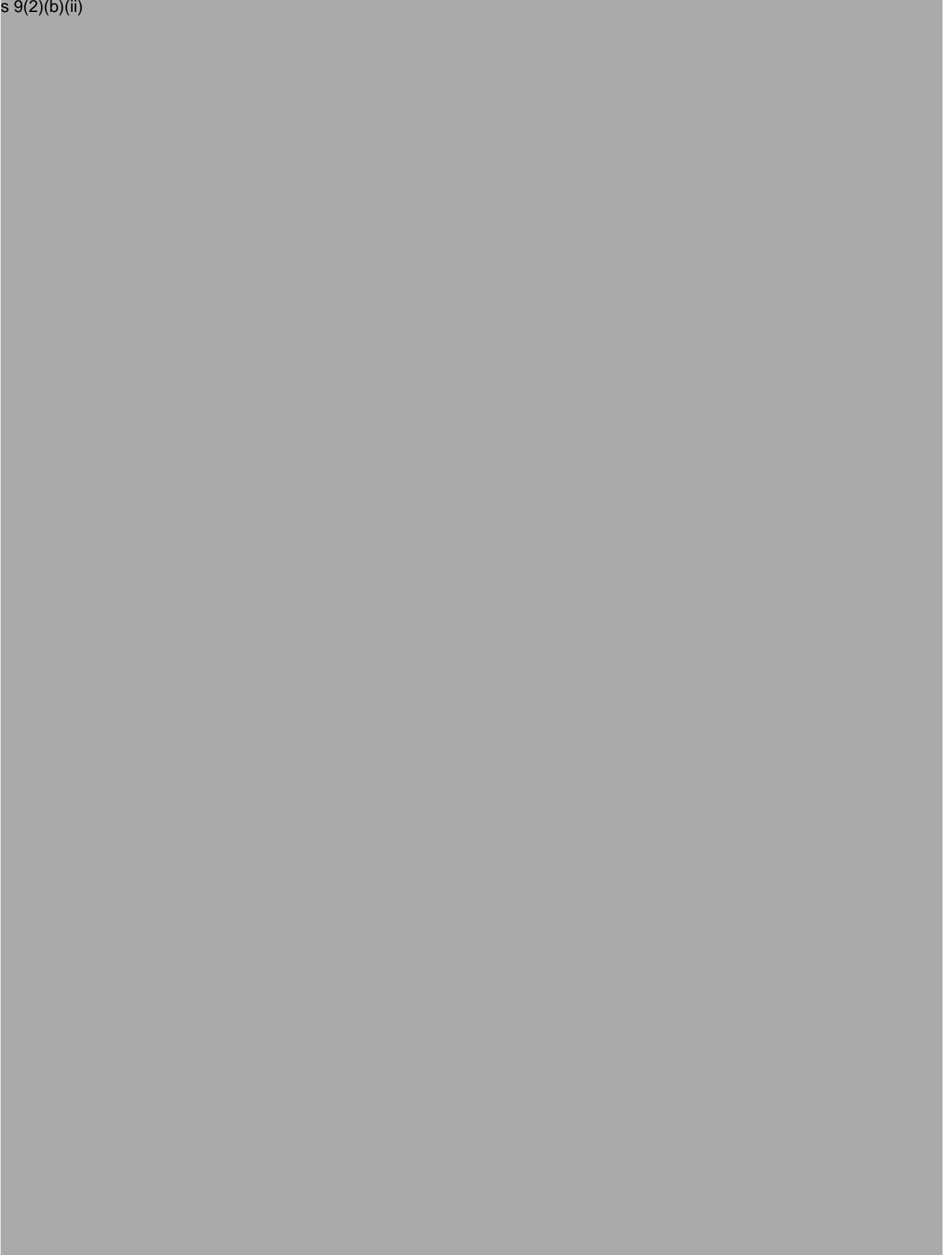
s 9(2)(b)(ii)



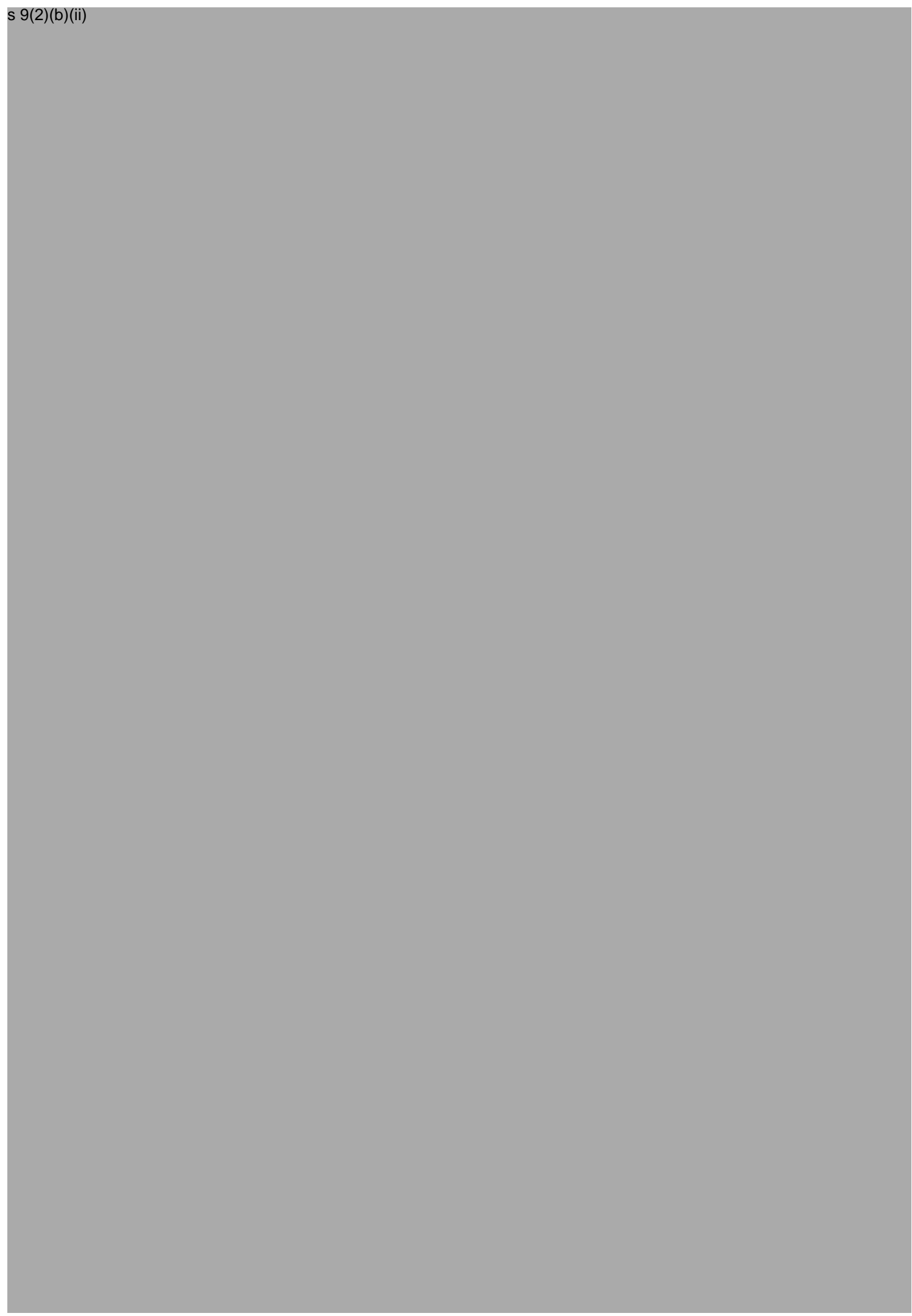
What are the anticipated and known adverse effects of the project on the environment?

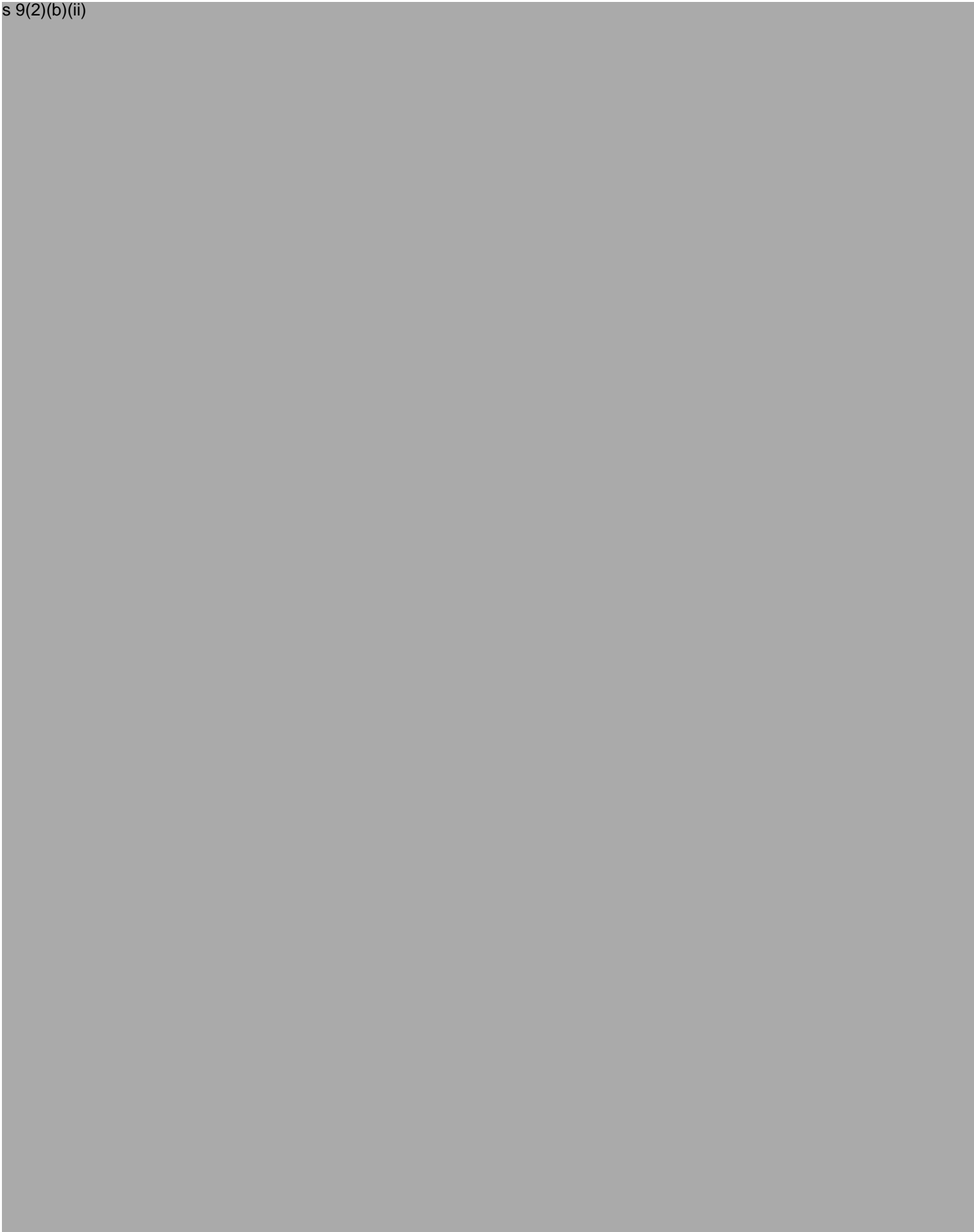
Please describe:

s 9(2)(b)(ii)









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:

Relevant national policy statements are:

- National Policy Statement on Renewable Electricity Generation 2011 (NPS-REG)
- National Policy Statement on Electricity Transmission 2008 (NPS-ET)
- National Policy Statement for Freshwater Management 2020 (NPS-FM)
- New Zealand Coastal Policy Statement (NZCPS)
- National Policy Statement for Highly Productive Land 2022 (NPS-HPL)
- National Policy Statement for Indigenous Biodiversity 2023 (NPS-IB)

Relevant national environmental regulations are:

- National Environmental Standards for Electricity Transmission Activities 2009 (NES-ETA)
- National Environmental Standard for Freshwater Regulations 2020 (NES-F)
- National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health 2011 (NES-CS)

A general assessment of the Project in relation to each is as follows.

### 1. NPS-REG

The NPS-REG seeks to enable the sustainable management of renewable electricity generation under the RMA and to provide for the development and operation of new and existing renewable electricity generation activities in order to meet the Government's national target for renewable electricity generation. It recognises (in the preamble) that New Zealand's energy demand will continue to grow and that there are two major challenges:

1. to respond to the risks of climate change by reducing greenhouse gas emissions caused by the production and use of energy
2. to deliver clean, secure, affordable energy while treating the environment responsibly.

The NPS-REG acknowledges that renewable energy generation developments can have effects at many scales, with a risk of adverse local effects but positive national effects, and that the benefits can also compete with matters of national importance (section 6 of the RMA) and matters to which decision makers are to have particular regard (section 7 of the RMA).

The primary 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 NPS-REG seeks to provide further direction on amenity effects, including allowing activities where there are potential adverse effects on local amenity values, so long as effects are avoided, remedied, or mitigated to the extent practicable.

The Project is consistent with the policy direction of the NPS-REG as it provides for renewable electricity generation, which will be fed into the National Grid. The Project will provide an important contribution to meeting the New Zealand Government's national target for the generation of electricity from renewable resources.

### 2. NPS-ET

The NPS-ET sets out the objective and policies to enable the management of the effects of the electricity transmission network under the RMA. It 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.

The objective of the NPS-ET is: "to recognise the national significance of the electricity transmission network by facilitating the operation, maintenance and upgrade of the existing transmission network and the establishment of new transmission resources to meet the needs of present and future generations while: managing the adverse environmental effects of the network; and managing the adverse effects of other activities on the network."

Policy 1 directs decision makers to recognise and provide for the national, regional and local benefits of sustainable, secure and efficient electricity transmission, including through the facilitation, use and development of new electricity generation and recognising the benefits associated with renewable energy which assists in the management of the effects of climate change. Policy 2 directs decision makers to recognise and provide for the effective operation, upgrading and development of the electricity transmission network.

Further policies direct the management of adverse environmental effects, including the consideration of the imposition of constraints on the technical and operational requirements of the network (Policy 3), how adverse effects have been avoided, remedied or mitigated by route, site and method selection (Policy 4) and the use of upgrades to reduce the existing adverse effects of transmission, particularly on sensitive activities (Policy 6).

The Project is consistent with the policy direction of the NPS-ET. It will provide for national, regional and local benefits through the development of significant new electricity generation and the environmental effects of transmission will be appropriately managed. Transpower will be consulted to ensure appropriate network connection options are considered.

### 3. NPS-FM

The NPS-FM sets out objectives and policies to protect the quality and quantity of fresh water. It directs that freshwater is managed in a way which, first, prioritises the health and well-being of freshwater bodies and ecosystems, second, the health needs of people, and third, the ability of people and communities to provide for their social, economic, and cultural well-being, now and in the future.

Policy 1 of the NPS-FM requires that freshwater be managed in a way that gives effect to Te Mana o te Wai. There are six principles that inform Te Mana o te Wai, being mana whakahaere, kaitiakitanga, manaakitanga, governance, stewardship, and care and respect. Policy 2 directs that tangata whenua are actively involved in freshwater management and that Māori freshwater values are identified and provided for. Policies 1 and 2 will be met through

pursuing design and best-practice mitigation measures developed in partnership with local landowners s 9(2)(b)(ii)

Policy 3 directs that freshwater be managed in an integrated way that considers the effects of use and development of land on a whole of catchment basis. An ecological assessment will be commissioned to consider the whole of catchment when determining potential effects of the Project and appropriate mitigation strategies. Culverts will be designed to ensure fish passage is provided and best practice ESC measures will be implemented to minimise sediment inputs to the waterways.

Policy 6 requires no further loss of extent of natural inland wetlands, that their values are protected, and their restoration is promoted; Policy 7 requires the loss of river extent and values is avoided to the extent practicable; and Policy 9 requires the habitats of indigenous freshwater species are protected. Further ecological assessment and design work will inform a response to these policies and ensure that they are met.

Overall, the Project will be able to meet the objective and policies of the NPS-FM, through proper design and the implementation of best practice erosion and sediment controls as noted in the assessment of effects section.

#### 4. NZCPS

The purpose of the NZCPS is to state policies in order to achieve the purpose of the RMA in relation to the coastal environment of New Zealand. When considering development proposals in the coastal environment, local councils must have regard to the NZCPS. The NZCPS applies to both the coastal marine area (territorial sea out to 12 nautical miles) and to the inland coastal environment which requires local authorities to define its extent.

The inland coastal environment has not been defined within the relevant district and regional plans. The Site may be considered coastal under Policy 1 of the NZCPS. Under this policy the coastal environment includes: areas where coastal processes, influences or qualities are significant, including coastal lakes, lagoons, tidal estuaries, saltmarshes, coastal wetlands, and the margins of these; and coastal vegetation and the habitat of indigenous coastal species including migratory birds.

s 9(2)(b)(ii)

These matters would need to be assessed further as part of application preparation and pre-application discussion with the Councils. If necessary, the NZCPS would need to be considered.

To that end, it is noted that the NZCPS recognises the special characteristics of coastal areas. It includes directive policy direction with "avoid" policies in relation to specific indigenous biodiversity, outstanding natural character and outstanding natural features and landscapes in the coastal environment. It also provides expectations regarding cultural values, public access and amenity and coastal hazard risk.

At the same time, the NZCPS recognises that the provision of infrastructure and the generation and transmission of electricity are important to the social, economic and cultural well-being of people and communities.

Appropriate design and mitigation measures would need to be implemented to ensure the Project could meet the various (and sometimes competing) objectives and policies of the NZCPS, if required.

#### 5. NPS-HPL

The NPS-HPL seeks to protect highly productive land for use in land-based primary production, both now and for future generations. A transitional definition currently in place means that the NPS-HPL only applies to land that is zoned General Rural or Rural Production and classed as Land Use Capability (LUC) 1, 2 or 3, and is not identified for future development or subject to a plan change which seeks to rezone that land for rural lifestyle or urban purposes. The majority of the Site does not meet the NPS-HPL transitional definition of "highly productive land". There are, however, pockets of highly productive land where turbines and/or transmission line structures may potentially be located. Any Wind Farm activities that take place on this highly productive land will have an extremely limited footprint, rehabilitation of temporarily disturbed surfaces following construction will take place, and productive land uses will generally be allowed to continue.

Of particular relevance to this Project, Policy 8 of the NPS-HPL seeks to protect highly productive land from "inappropriate" use and development. As part of implementing that policy, the NPS-HPL identifies that all activities will be "inappropriate" (and therefore subject to more rigorous assessment under the NPS-HPL) unless, inter alia, it is associated with the maintenance, operation, upgrade or expansion of specified infrastructure (which includes renewable energy generation), and those activities minimise or mitigate impacts on the availability and productive capacity of highly productive land, and addresses reverse sensitivity effects on land-based primary production activities.

There has been some uncertainty as to whether the construction of renewable energy generation infrastructure falls within that exemption. In 2023, the Ministry for the Environment undertook consultation on proposed amendments to the NPS-HPL to address that uncertainty, and provide clear confirmation that it does. Those amendments to the NPS-HPL have not yet been made, but even absent those amendments, an expert consenting panel appointed under the COVID-19 Recovery (Fast-track Consenting) Act 2020 concluded that construction of those facilities was already included in that exemption. That decision was not challenged.

In that context, the Proposal is considered to be an "appropriate" land use in the context of the NPS-HPL and would otherwise accord with its directions. Should the Government and/or a higher authority reach a different conclusion regarding the interpretation of that "specified infrastructure" exemption, a consenting pathway is still available for the Proposal under the NPS-HPL, albeit it would face more significant assessment hurdles.

#### 6. NPS-IB

The NPS-IB is limited to land (terrestrial) ecosystems and some aspects of wetlands. Clause 1.3(3) states that 'Nothing in this NPS applies to the

development, operation, maintenance or upgrade of renewable electricity generation assets and activities and electricity transmission network assets and activities'. Therefore, the NPS-IB does not apply to the Project.

#### 7. NES-CS

The NES-CS is a national set of planning controls and soil contaminant values aimed at ensuring that land affected by contaminants in soil is appropriately identified and assessed before it is developed. The controls are also intended to ensure that, if necessary, land is remediated, or contaminants are contained to make the land safe for human use.

The NES-CS applies to any piece of land on which an activity or industry described in the current Hazardous Activities and Industries List schedule is being undertaken, has been undertaken, or is more likely than not to have been undertaken. These can include farming activities such as sheep dips. A PSI will be undertaken to identify the presence (or likelihood) of contaminated or potentially contaminated soils within the Wind Farm Site. Depending on the findings of the PSI and the level of soil disturbance, a DSI may be required to support a consent application under the NES-CS and direct any necessary design response or mitigation measures.

#### 8. NES-F

The NES-F regulates activities that pose risks to the health of freshwater and freshwater ecosystems. Anyone carrying out these activities needs to comply with certain standards, which are designed to (among other things) protect existing inland wetlands, protect streams from in-filling, and ensure connectivity of fish habitat (fish passage).

The need for NES-F consents is triggered for proposals to clear vegetation or carry out earthworks within or near an inland wetland, drain a wetland, or install culverts within or reclaim a stream bed. The NES-F sets up a strict regime for works within or near a natural inland wetland, introducing high thresholds to obtain consent to carry out works within, or drain, a natural wetland. For these reasons, the Wind Farm will be designed to avoid natural wetlands as much as possible, minimise effects on streams and freshwater habitats, and minimise the amount of culvert works required.

#### 9. NES-ETA

The NES-ETA sets out a national framework for activities on existing National Grid transmission lines. The regulations of the NES-ETA recognise and provide for the effective operation, maintenance and upgrading, relocation and removal of existing lines but exclude the development of new lines and substations.

The NES-ETA will apply to the activities that relate to s 9(2)(b)(ii)

Under the NES-ETA, the relevant Transpower works are generally expected to be a permitted activity. However, this will be further investigated in consultation with Transpower and resource consent under the NES-ETA will be sought should it be required.

File upload:

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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:

If the Project is listed in the Fast-track Approvals Bill Schedule 2A, and later referred to an expert panel for consideration, it is anticipated that approval could be granted for the Project s 9(2)(b)(ii). By comparison, under a standard process, that would likely take between 18-24 months with the potential for a further 12+ months if that decision was appealed. That is a significant time saving.

The Fast-track process also allows for multiple approvals to be processed in a single application (a "one stop shop"), which will allow for a quicker and more cost-efficient process than separate approvals under different pieces of legislation.

It is further noted that the current Fast-track process available under the Natural and Built Environment Act is not a viable option for this Project as consents will not be ready to lodge during the lifetime of that process.

Compared to the RMA, the Fast-track process will accelerate the consenting of the Project coupled with other necessary approvals, and will provide greater certainty of outcome, enabling the applicant to better plan for and accelerate the implementation of the approvals, once granted.

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

Please write your answer here:

Referral of this Project will require the dedication of some resource within the EPA to manage the approvals process as well as the appointment of an expert consenting panel to consider and make recommendations on any application. However, the applicant is confident that referral of the Project will not adversely impact the efficient operation of the fast-track process for the following reasons:

- Appropriate design and planning work will be carried out in the coming months to ensure that a robust application can be made.
- Appropriate engagement with stakeholders and the community will be carried out as part of application work.
- The applicant's planning team and legal counsel engaged for the Project have experience with consent applications under the COVID-19 Recovery (Fast-track Consenting) Act 2020.

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

Central government plan or strategy

Please explain your answer here:

The Project aligns with the relevant national direction issued under the RMA and the Government's stated initiatives. Accelerating delivery of the Project is consistent with the NPS-REG and the Government's commitments to begin efforts to double renewable energy production and to implement a fast-track consenting regime for development and infrastructure projects. The Fast-track Approvals Bill providing for that regime was introduced in early March, and specifically recognises that activities which contribute to the removal or reduction of greenhouse gas emissions may meet the eligibility criteria under that legislation.

The Project also aligns with the following national strategies and documents:

- New Zealand Energy Efficiency and Conservation Strategy 2017-2022
- Aotearoa New Zealand's first Emissions Reduction Plan: Towards a more productive, sustainable and inclusive economy
- Urutau, ka taurikura: Kia tū pakari a Aotearoa i ngā huringa āhuarangi / Adapt and thrive: Building a climate-resilient New Zealand – New Zealand's first national adaptation plan

Will the project deliver regionally or nationally significant infrastructure?

National significant infrastructure

Please explain your answer here:

It is considered that the Project will deliver nationally significant infrastructure for the following reasons.

As s 9(2)(b)(ii) is larger than all existing wind farms in New Zealand, and larger than all proposed wind farms listed on the NZWEA website: <https://www.windenergy.org.nz/consented-likely-wind-farms>.

Developments of this type are given priority as 'specified infrastructure' in the context of applicable national policy and environmental standards (such as the NES-F).

Also of note is the Horizons One Plan (within Part 2 of the Regional Policy Statement) which confirms that "facilities for the generation of more than 1MW of electricity and its supporting infrastructure where the electricity generated is supplied to the electricity distribution and transmission networks" are physical resources of regional or national importance. s 9(2)(b)(ii)

Projects of this nature and scale will be essential for realising the Government's objectives around doubling renewable energy generation, and meeting international climate commitments.

Will the project:

Please explain your answer here:

Will the project deliver significant economic benefits?

Yes

Please explain your answer here:

The Project is expected to make a significant economic contribution to New Zealand's economic wellbeing, bringing forward investment which will in turn support the regional economy and provide for employment opportunities.

An economic assessment for the Wind Farm has not yet been carried out. However, based on economic assessments for other wind farms in the region, the main direct effects of a wind farm on the local region would potentially be:

- Injection of some tens of millions of dollars of expenditure during construction, of which a proportion would be economic value added for the region.
- Some hundreds of additional full time equivalent (FTE) jobs during construction, with approximately 25 FTE jobs per year during operation.
- Rental income for the owners of land that is used by the Wind Farm.

A number of indirect economic benefits would also be derived for support services within the region. The impact of the Wind Farm on the regional economy would be most pronounced in the construction stage which is expected to be s 9(2)(b)(ii). Over its s 9(2)(b)(ii), benefits from operations and maintenance would be much smaller, but nonetheless significant.

Beyond the impact of construction, the principal benefit of the Wind Farm would be in harnessing wind energy to create a valuable product, electricity. While the profits from power sales benefit the generating company, other beneficial effects to the wider economy include:

- Adding to the portfolio of renewable energy generation, improving security of generation to meet demand.
- Avoiding transmission losses by reducing import of electricity from further away.
- Displacing greenhouse gas emissions from thermal generation, either directly or indirectly by conserving hydro storage to use in displacing peak thermal use, thus helping New Zealand meet its emission reduction targets under the Paris Agreement.

Will the project support primary industries, including aquaculture?

No

Please explain your answer here:

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

Yes

Please explain your answer here:

The Project is to develop a new wind farm to generate electricity from wind energy, a natural resource. It may also support the development of other natural resources, where aggregate and other raw materials are required to be sourced for Project construction.

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

Yes

Please explain your answer here:

The Project will support climate change mitigation targets. New Zealand is a signatory to the Paris Agreement, which is a global commitment to reduce greenhouse gas emissions for the purpose of keeping the global average temperature well below 2 degrees Celsius above pre-industrial levels. New Zealand's stated contribution to that target is the reduction of greenhouse gas emissions by 50% below 2005 levels by 2030.

Studies have shown that the transition to renewable energy is a crucial strategy for mitigating greenhouse gas emissions that drive climate change. Wind energy is a sustainable solution with low impact which sets itself apart from other energy production methods in terms of emissions throughout its life cycle. Moving to renewable energy solutions such as wind energy can effectively displace some emissions from the burning of gas and coal. These pollutants not only contribute to climate change but also have a detrimental effect on health. Accelerating the increase of renewably generated electricity to replace fossil fuels will therefore support climate change mitigation.

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

Yes

Please explain your answer here:

The Project will support adaptation, resilience and recovery from natural hazards. Fundamentally, it will help to mitigate greenhouse gas emissions, therefore mitigating the effects of climate change driven by power generation in New Zealand. It will also contribute to the overall resilience of the national infrastructure system by diversifying the sources of energy generation. Local electricity generation is also important in recovery from a natural disaster. This was a noted issue in the recovery from the impacts of Cyclone Gabrielle.

Will the project address significant environmental issues?

Yes

Please explain your answer here:

As noted above, New Zealand is a signatory to the Paris Agreement, a global commitment to reduce greenhouse gas emissions to keep the global average temperature well below 2 degrees Celsius above pre-industrial levels. New Zealand's stated contribution to that target is the reduction of greenhouse gas emissions by 50% below 2005 levels by 2030. Accelerating the increase of renewably generated electricity to replace fossil-fuels and accommodate future demand is critical to achieving that. As a large renewable electricity generation project, the Project will contribute significantly to that work.

The electricity generated from the Project will also support the decarbonisation of our transport and industrial sectors, with direct environmental benefits including air quality improvements.

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

Yes

Please explain your answer here:

The Horizons One Plan is supportive of renewable energy development at the policy level, while noting that environmental effects need to be avoided, remedied or mitigated. The Regional Policy Statement section of the One Plan also requires that regard needs to be given to the benefits that derive from regionally and nationally important infrastructure and utilities, and that the establishment, operation and maintenance of such infrastructure be provided for in district plans.

Objective EIT-01 of the One Plan is to have regard to the benefits of infrastructure and other physical resources of regional or national importance by recognising and providing for their establishment, operation, maintenance and upgrading. Policy EIT-P1 recognises facilities which generate and supply more than 1MW of electricity to distribution and transmission networks as being "physical resources of regional or national importance". Policy EIT-P4 also provides that the regional council and territorial authorities must have particular regard to the benefits of the use and development of renewable energy and the need for renewable energy activities to locate where the resource is located, among other things.

The RDP has a specific section focused on renewable electricity generation issues, objectives, and policies. Issue 22A identifies the concerns regarding potential effects from global warming and climate change, and the directives from national and international policy to increase the proportion of

electricity generation from renewable electricity sources. Objectives 22A – 22C and policies A5-2.1 to A5-2.6 outline how the RDP intends to address renewable energy developments.

The RDP recognises the national policy and regulatory framework which is set up to enable the development and maintenance of network utilities, and it contains policies to enable the establishment and operation of network utilities within the district (Chapter A5). The RDP also contains policies aimed at avoiding, remedying and mitigating the effects of developments on the environment.

Taken together, it is considered that the Project is consistent with these local or regional planning documents. It will be renewable energy infrastructure of regional or national importance which will assist with meeting climate change goals. It can also be developed in such a way as to avoid, remedy, mitigate, offset or compensate any environmental effects as generally noted in the high level effects assessment included with this application.

Anything else?

Please write your answer here:

s 9(2)(b)(ii)

In the event it is determined that the Project does not satisfy all the criteria for inclusion in Schedule 2A, the applicant respectfully requests that it be considered for inclusion in Schedule 2B in the alternative.

With regard to the Declaration below, the applicant has ticked "No" to the question: "Do you acknowledge your submission will be published on environment.govt.nz if required". That is because some of the information in the application is considered to be commercially or otherwise sensitive. The applicant would not want the application to be declined on the basis of this "No" answer; rather, the applicant would like the opportunity to discuss and provide a redacted version of the application that may be shared on the website or provided to third parties if requested.

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?

Yes

If yes, please explain:

The Site is located adjacent to the coastal environment and may be affected by natural hazards.

The coastal environment is subject to coastal processes that may result in coastal hazards, including erosion that may be exacerbated by climate change, in particular the effects of sea level rise, and wind erosion and landward migration of sand dunes. The likelihood of the Wind Farm being significantly affected by these types of coastal hazards within its operational life is considered to be negligible. The hydrology of the Site, including the effects of climate change, will be assessed in more detail as part of development of a consent application.

s 9(2)(b)(ii)

## 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:

No compliance and/or enforcement actions have ever been taken against the applicant in New Zealand.

Load your file here:

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## Declaration

Do you acknowledge your submission will be published on environment.govt.nz if required

No

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:

s 9(2)(a)

Important notes