

Response ID ANON-URZ4-5F8J-J

Submitted to Fast-track approval applications
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Submitter details

Is this application for section 2a or 2b?

2A

1 Submitter name

Individual or organisation name:
Lochindorb Wind Limited Partnership

2 Contact person

Contact person name:
Chris Baldwin

3 What is your job title

Job title:
Project Manager

4 What is your contact email address?

Email:

s 9(2)(a)

5 What is your phone number?

Phone number:

s 9(2)(a)

6 What is your postal address?

Postal address:

C/O Pioneer Energy

11 Ellis Street

P.O Box 275
Alexandra 9320, New Zealand

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

No

Organisation:

Contact person:

Phone number:

Email address:

Job title:

Please enter your service address:

Section 1: Project location

Site address or location

Add the address or describe the location:

The Kaihiku Wind Farm is to be located on private farmland approximately 8 km from Clinton and 12 km from Balclutha in the Kaihiku Range of South Otago. The project site is accessible off Glenfalloch Road, Hillfoot Road and Lochindorb Runs Road.

The area proposed for the establishment of the wind farm covers ridgelines and hilltops over approximately 2,000 ha across 10 properties. The core project is comprised of 8 properties, and Lochindorb Wind Limited Partnership is in the final stages of negotiations with two additional landowners to add additional scale and benefit to the project. Assessments have been undertaken across all 10 of the properties.

Lochindorb Wind Limited Partnership is an entity formed through a 50/50 partnership between Manawa Energy Limited (formerly Trustpower) and Pioneer Energy Limited.

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

Yes

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Who are the registered legal land owner(s)?

Please write your answer here:

Core project:

- Stoney Summits Limited
- Hopefield Investments Limited
- Dearco Limited
- Muskerry Farm Limited
- Kaihiku Holdings Limited
- Ian Bruce Sinclair and Esther Joy Sinclair
- Roy Trustee 2022 Limited
- Lochindorb Estate Limited

Additional landowners currently under negotiation to add additional benefit:

- Treebilly Limited (land rights not yet finalised)
- Young Partnership Limited (land rights not yet finalised)

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:

Lochindorb Wind Limited Partnership has a wind farm development agreement with eight property owners whose properties are proposed to support the Kaihiku Wind Farm. This agreement gives the Partnership the legal right to investigate the potential for a wind farm on the properties and to construct, operate and maintain a wind farm if all the necessary approvals are granted. The project infrastructure will be located across ten farm stations.

Lochindorb Wind Limited Partnership is in the final stages of negotiations with two additional landowners to add additional benefit to the project, by those being Treebilly Limited and Young Partnership Limited.

Section 2: Project details

What is the project name?

Please write your answer here:

Kaihiku Wind Farm

What is the project summary?

Please write your answer here:

Lochindorb Wind Limited Partnership, are proposing to establish a large-scale wind farm near Clinton and Balclutha on a Class 1 wind site in South Otago (being the Kaihiku Wind Farm). The expected generation capacity of the wind farm is approximately 300 MW and it would generate enough electricity to power approximately 150,000 households.

Up to 80 wind turbines and associated infrastructure may be accommodated in the proposed project envelope, with the maximum tip height for the turbines up to 220 m.

What are the project details?

Please write your answer here:

The purpose of the Kaihiku Wind Farm is to increase the Renewable Energy Generation (REG) and enhance the energy security, while diversifying New Zealand's energy portfolio. The Kaihiku Wind Farm will generate electricity and connect into the national grid (which runs through the site and thereby reduces transmission losses) to ensure generation stability. Kaihiku Wind Farm ranks at the top end of current proposed national REG projects when considering cost per GWh due to its high wind resource and ease of construction.

Kaihiku is estimated to have an installed capacity of 300MW and have an annual output of 1180 GWh – this is enough electricity to power more than 150,000 typical households. The Kaihiku Wind Farm will make a significant contribution to New Zealand's security of supply and increased generation capacity, while materially contributing to greenhouse gas emission reductions of between 510,000 tCO₂-e (for gas) or 1,295,000 tCO₂-e (for coal).

As noted, the Kaihiku Wind Farm will diversify New Zealand's energy portfolio in terms of renewable generation type (wind). The electricity generated by the Kaihiku Wind Farm will be used to power homes, businesses and industries, displace and reduce reliance on fossil fuels, and lower carbon emissions. The wind farm will be a reliable source of clean energy for the country.

The key activities involved in the project include:

- Earthworks and vegetation clearance to establish access roads, hard stands for turbines, turbine foundations, and ancillary activities;
- The establishment of culverts for vehicle crossings;
- The establishment of up to 80 turbines (and transformers) across the project site;
- The establishment of meteorological masts across the project site;
- Underground or overhead cabling between each wind turbine;
- The establishment of an operations / maintenance building and switchyard / substation within the project site; and
- An overhead transmission line between each of the three turbine clusters within the wind farm to the National Grid.

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

Please write your answer here:

Construction would be undertaken in a single stage but works would be sequenced in the sense that enabling works including earthworks for the access tracks and sediment control devices would be constructed first. Construction of the various components would then be undertaken prior to commissioning. The construction period is estimated to be up to 36 months.

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

Please write your answer here:

The construction, operation and maintenance of the Kaihiku Wind Farm will require authorisations under the Resource Management Act 1991, Wildlife Act 1953 and Heritage New Zealand Pouhere Taonga Act 2014.

With respect to the Resource Management Act 1991, the Kaihiku Wind Farm will require the following resource consents pursuant to the identified sections of the Act:

- Land use consents under s.9 from the Clutha District Council for the establishment of wind turbines, anemometers, substation / switchyard infrastructures, transmission lines, operations building, access tracks, earthworks, vegetation clearance, temporary construction compounds, and the storage and use of hazardous substances;
- Land use consent under s.9 from the Otago Regional Council for vegetation clearance and soil disturbance activities, including possibly adjacent to natural inland wetlands;
- Land use consent under s.13 from the Otago Regional Council for the construction and use of culverts and erosion control structures in waterbodies;
- A water permit under s.14 from the Otago Regional Council for the diversion of water;

- A water permit under s.14 from the Otago Regional Council for diverting groundwater during the construction of the wind farm;
- A discharge permit under s.15 from the Otago Regional Council for the discharge of water and contaminants into land and / or water.
- A discharge permit under s.15 from the Otago Regional Council for the deposition of fill to land; and
- A discharge permit under s.15 from the Otago Regional Council for treated wastewater to land (domestic).

The construction and operation of the Kaihiku Wind Farm will also require wildlife permits pursuant to the Wildlife Act 1953 in relation to the monitoring and management of long tail bat and avifauna mortalities on the project site, as well as the potential management and relocation of lizards on the project site.

The construction of the Kaihiku Wind Farm will also require an archaeological authority under the Heritage New Zealand Pouhere Taonga Act in relation to the potential damage of heritage sites within the project site.

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

Please write your answer here:

Clutha District Council and Otago Regional Council

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

Please write your answer here:

No resource consent applications or notices of requirement have been lodged by Lochindorb Wind Limited Partnership with the relevant local authorities in relation to the Kaihiku Wind Farm.

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

No

Please explain your answer here:

Lochindorb Wind Limited Partnership does not require any approvals from third parties to build the Kaihiku Wind Farm. All necessary access agreements are in place to enable construction to commence once resource consents, wildlife permits, and archaeological authorities are granted.

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, Lochindorb Wind Limited Partnerships anticipates the following project timeframes:

Detailed Design/procurement: Consent granted + 12 months

Financial Investment Decision: Consent granted + 6-12 months

Construction: Consent granted + 12 - 48 months

First Power: Consent granted + 36 months

Handover: Consent granted + 48 months

Section 3: Consultation

Who are the persons affected by the project?

Please write your answer here:

The persons potentially affected by the project are:

- Otago Regional Council;
- Clutha District Council;
- Ngāi Tahu;
- Aukaka (being the collective organisation representing Waihao, Moeraki, Puketeraki, Ōtākou, and Hokonui).

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:

Consultation has been undertaken via in person meetings, virtual meetings and email correspondence. A summary is provided below:

Lochindorb Wind Limited Partnerships have held pre-application meetings with the Otago Regional Council and the Clutha District Council in 2023 and 2024.

Ngāi Tahu - Contact made via local Runanga consultancy representatives Aukaha (since Feb 2023) and Te Ao Marama Inc (since Nov 2023). Meetings held and a site visit completed by one Aukaha senior planner in April 2024.

Community – One open day held to date in October 2023 to introduce the project to the community. Email correspondence with local businesses, homeowners and a community working group since. More open days are planned in the future. Newsletters published and posted to local community in Oct 23 and another published on the Project website in April 24.

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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:

No processes under the Public Works Act 1981 have been undertaken, or are proposed to be undertaken, in order to facilitate the construction and operation of the Kaihiku Wind Farm. In this regard, Lochindorb Wind Limited Partnerships holds all necessary approvals to enable access to the site for construction and operation of the wind farm.

Section 4: Iwi authorities and Treaty settlements

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

Please write your answer here:

There is one relevant treaty settlements that apply to the geographical location of the project, being the Ngāi Tahu Claims Settlement Act 1998. This Act reflects the deed of settlement in which the Crown acknowledged that Ngāi Tahu suffered grave injustices which significantly impaired Ngāi Tahu's economic, social and cultural development and which recorded the matters required to give effect to a settlement of all of Ngāi Tahu's historical claims.

There are no statutory acknowledgement areas in close proximity to the project site (the closest area is the Clutha River which is approximately 14 km to the north).

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?

No

If yes, what are they?:

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:

N/A – as there no group with protected customary rights in and around the project site.

Upload your assessment if necessary:

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Section 5: Adverse effects

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

Please describe:

The activities associated with the construction, operation and maintenance of the Kaihiku Wind Farm are similar to many other wind farms consented around New Zealand and the Otago Region. This provides confidence that any potential adverse effects of the wind farm can be avoided, remedied, mitigated or compensation responses developed.

Lochindorb Wind Limited Partnership has commissioned a number of technical assessments for the Kaihiku Wind Farm. These assessments, which are currently being prepared, include:

- Landscape and visual amenity (Isthmus);
- Ecology (Boffa Miskell and Alliance Ecology);
- Noise (AECOM);
- Heritage (AECOM/NZ Heritage);
- Civil design (AECOM);
- Transportation (AECOM);
- Radio and telecommunications (Kordia);
- Aviation (Peet Aviation);
- Economic effects (NZIER);
- Shadow Flicker effects (Energy 3); and
- Planning (Mitchell Daysh).

The key potential adverse effects of the project on the environment are:

- Visual and landscape effects;
- Bat and avifauna effects;
- Noise effects;
- Freshwater effects;
- Wetland effects;
- Terrestrial ecological effects (flora and fauna);
- Construction and stormwater management effects; and
- Cultural effects.

These are discussed further below:

Visual and Landscape Effects

Wind farms in rural environments inevitably introduce some change to their surrounding landscape which can have visual amenity and landscape effects. Of particular importance to the consideration of wind farms are any potential effects on the character and values of outstanding natural landscape / features, and the rural amenity of the proximate surroundings.

The site is not an outstanding natural landscape / feature under the Clutha District Plan or the Otago Regional Policy Statement and Isthmus have concluded that a wind farm on the site will not interfere with the values and characteristics of the nearest outstanding landscapes / features).

The project site is relatively remote and there are very few dwellings adjacent to the proposed wind farm. The project site is also to the south of most dwellings' orientation. Whilst those few dwellings that are near the project site will experience a change in the visual amenity effects, it is considered that any change will not be significantly adverse and will be appropriate in the context of the wider benefits the project will generate.

The conclusions of the assessment work undertaken by Isthmus to date demonstrate that any adverse visual amenity and landscape effects can be appropriately managed.

Bat and Avifauna Effects

The project site has been monitored for long-tail bats and NZ Falcon by the consultant ecologist team.

With regard to bats, the presence of long-tailed bats has been confirmed on the project site through acoustic surveys – which is similar to many other wind farms currently being investigated in New Zealand at present. Further assessment work is currently occurring to understand how the wind farm might interact with the bat population and potential measures to mitigate for any potential adverse effects. This may include further monitoring of the wind farm once operational and predator control measures targeted to reducing predation on bats in order to protect the wider population.

Similarly to bats, baseline monitoring and analysis of avifauna on the project site has been undertaken. It is considered, partly due to previous consenting experience, that the wind farm can operate without unduly harming any avifauna on the site. In this regard, there is extensive evidence of NZ Falcon co-existing with wind farms throughout the South Island such that the Kaihiku Wind Farm is not considered a material risk to the species.

Terrestrial Ecology Effects

The project site has also been monitored for terrestrial ecology values and lizards / invertebrates by the consultant ecologist team.

The project site is largely a series of working farms where disturbance activities are occurring on a regular basis. As such, the predominant vegetation type in the project site is pasture and is not requiring of management / mitigation. Areas of tussock are also located in the project envelope.

Several lizard species have been identified on the site, including species that have a threatened status. However, it is noted that the majority of these species are present across much of the wider landscape and other areas of habitat also exist. Several established mitigation / management measures are being considered to address potential adverse effects on lizard species. These include trapping and relocating lizards from potential disturbance areas, creating new habitat and predator control where necessary.

Noise Effects

Wind turbines generate some noise while in operation. However, they also only operate when there is wind and windy conditions tend to mask the operation wind farm noise. The operation of the wind farm is being assessed by AECOM and it has been concluded that it will comply with the relevant noise standards for wind farms in NZS6808:2010 (in part due to the distance of the project site from nearby dwellings).

Potential noise effects can also be generated by noise associated with substations and construction noise. However, it is considered that the noise from these activities comply with the Clutha District Plan and NZS6803.

Freshwater Effects

The construction of the Kaihiku Wind Farm will involve substantial earthworks and such works have the potential to result in the discharge of sediment to waterbodies if not appropriated managed.

The project ecologists are currently undertaking various assessments of the ecological values of the waterbodies around the site and AECOM have also considered how construction effects, particularly sediment, can be appropriately managed on site. Based upon these assessments, it is considered that appropriate sediment controls and discharge standards can be implemented to ensure that the runoff of sediment from the site into waterways is appropriately controlled.

Likewise, culverts will be installed with fish passage where appropriate to ensure that fish passage into habitat within upper parts of the project site is maintained.

A similar regime has been successfully implemented on the resource consents for many other wind farms in New Zealand.

Wetland Effects

An assessment of natural inland wetlands is currently being undertaken by Boffa Miskell and refinements are being made to the project envelope to ensure that wetlands are avoided as far as practicable. In addition, a wetland mitigation package is being developed for those wetlands that cannot be avoided due to the functional needs of the wind farm.

The above measures will ensure that adverse effects on wetlands are no more than minor.

Construction and Stormwater Management Effects

A suite of environmental controls will be implemented on the site, and discharge standards implemented by way of consent conditions, to ensure that construction activities on the site do not adversely affect the surrounding environment (including waterbodies). These measures which by way of example include stormwater management, erosion and sediment control, dust control and site rehabilitation measures that will be implemented with a suite of approved construction management and erosion and sediment control plans.

Overall, it is considered that the Kaihiku Wind Farm will generate positive social and economic benefits for the broader community and can be constructed and operated in a manner that will appropriately avoid, remedy or mitigate potential adverse effects on the environment.

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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:

The national policy statements and national environmental standards of relevance to the Kaihiku Wind Farm include:

- National Policy Statement for Renewable Electricity Generation ("NPSREG");
- National Policy Statement for Freshwater Management ("NPSFM");
- Resource Management (National Environmental Standards for Freshwater) Regulations 2020 ("NESF");

The National Policy Statement on Indigenous Biodiversity does not apply to the Kaihiku Wind Farm as clause 1.3(3) of the NPS states that "nothing in this National Policy Statement applies to the development, operation, maintenance or upgrade of renewable electricity generation assets and activities and electricity transmission network assets and activities. For the avoidance of doubt, renewable electricity generation assets and activities, and electricity transmission network assets and activities, are not "specified infrastructure" for the purposes of this National Policy Statement."

In addition, the National Policy Statement on Highly Productive Land does not apply to the Kaihiku Wind Farm as the land use classification for the project site as identified by the New Zealand Land Resource Inventory consists of a combination of LUC Classes 4, 5 and 6. The project site therefore does not meet the criteria for highly productive land and therefore, the NPSHPL is not considered to be of relevance.

A general assessment of the each of the relevant national policy statements and national environmental standards that are relevant to the Kaihiku Wind Farm is summarised below.

National Policy Statement for Renewable Electricity Generation

The sole objective of the NPSREG seeks to provide for the development and operation of new and existing renewable electricity generation activities, such that the proportion of New Zealand's electricity generated from renewable energy sources increases to levels that meet or exceed the Government's national target for renewable electricity generation.

The Kaihiku Wind Farm is consistent with the NPSREG, particularly with regard to Policies A, B and C1 which seek to ensure decision makers:

- Recognise the benefits of renewable electricity generation activities;
- Acknowledge the practical implications for achieving an increase in the proportion of electricity generated from renewable sources; and
- Acknowledge the practical constraints associated with the development, operation, maintenance and upgrading of new and existing renewable electricity generation activities.

In this regard, the development of the Kaihiku Wind Farm will provide additional renewable electricity generation capacity and contribute to security of renewable electricity supply, and assist in displacing greenhouse gas emissions that would otherwise be released by the generation of electricity through non-renewable processes.

It is also noted potentially suitable sites for wind farms are reasonably limited and that infrastructure required to harness the wind resource will inevitably have some adverse effects on the environment. These practical implications are recognised in the NPSREG.

The practical implications and locational constraints associated with the development of renewable electricity generation activities are recognised in Policy C1 of the NPSREG. There are a number of factors that influence the identification of a site as being suitable for the development of a wind farm – not least being the quality / consistency of the wind resource and proximity to transmission infrastructure.

The Kaihiku Wind Farm is considered to be consistent with the stated objective and policy directives of the NPSREG.

National Policy Statement for Freshwater Management

The fundamental concept of the NPSFM is Te Mana o te Wai, a concept that refers to the importance of water and recognises that protecting the health of

freshwater will protect the health and wellbeing of the wider environment which represents an adoption of a water-centric approach to freshwater management.

The sole objective of the NPSFM follows this concept and seeks to ensure that natural and physical resource are managed in a way that:

- Firstly, prioritises the health and wellbeing of water bodies and freshwater ecosystems;
- Then, the health and needs of people; and
- Then, the ability of people and communities to provide for their social, economic, and cultural wellbeing.

Of relevance to the Kaihiku Wind Farm is the potential for the construction activities to impact on freshwater resources (including wetlands) via the potential discharge of sediment to surface water bodies (namely sediment during construction) and impacts on natural inland wetlands and streams from the configuration of the roading network and the installation of culverts as necessary. Whilst the wind farm is being designed to avoid adverse effects on these values as far as practicable, the policy expectations of the NPSFM with respect to applying an effects management hierarchy and mitigation / compensation are being followed by Lochindorb Wind Limited Partnerships where necessary. These mitigation / compensation measures will form part of the consent conditions and management plans proffered as part of the resource consent applications.

Overall, it is considered that with careful design and management of the construction of the Kaihiku Wind Farm the policy directives of the NPSFM will be achieved – particularly those that set specific instructions for how adverse effects on wetlands and streams should be managed and prioritised.

National Environmental Standards for Freshwater

The NESF regulates activities that pose risks to the health of freshwater and freshwater ecosystems. Of particular relevance to the Kaihiku Wind Farm are the rules in the NESF relating to activities that may affect natural wetlands and streams. Resource consent will be required for activities associated with the wind farm construction, including vegetation removal or earthworks, within, or within 10 m of natural wetlands, or the taking, damming, diversion of water within 100m of natural wetlands, and the establishment of culverts.

Lochindorb Wind Limited Partnerships will apply the effects management hierarchy under the NPSFM to the construction activities requiring consent under the NESF to ensure that potential adverse effects on wetlands and streams within the project site are avoided as far as practicable (which will primarily be via the configuration of the wind farm layout and mitigation planting measures in and around other wetlands and streams on the site). These measures will ensure that any adverse effects are no more than minor.

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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:

Consenting a new wind farm under the Resource Management Act 1991 often takes multiple years. It is costly, lengthy, and challenging. Applications for wind farms are generally publicly notified processes attracting submissions from a range of parties in opposition, including nearby residents, iwi/hapū, the Department of Conservation, various environmental groups, and often persons who have no material interests in the site or surrounds. A hearing is inevitable for a wind farm application, with extensive evidence and legal submission requirements placed on the applicant. A de novo appeal to the Environment Court is commonplace and can, if it proceeds to hearing, add an additional 1-2 years to the consenting timeframe.

The fast-track process will significantly reduce the consenting timeframe and costs for the Kaihiku Wind Farm, including by making the following key changes to the RMA consenting process:

- The timeframes provided under the fast-track process are materially more efficient than those the Kaihiku Wind Farm would otherwise be subject to.
- No limited or full notification. Under the RMA, Kaihiku Wind Farm would almost certainly be fully notified, adding significant cost and delay.
- No hearing is required. Under the RMA, the Kaihiku Wind Farm would have resulted in a hearing, along with the associated cost and delay.
- No de novo appeal to the Environment Court, with appeals being available to the High Court on points of law only.

An additional important aspect that the fast-track process enables is the securing of approvals under several different pieces of legislation. As noted in section 2 of this document, approvals for the Kaihiku Wind Farm are required under the RMA (for land use consents and regional council consents), the Wildlife Act, and the Heritage New Zealand Pouhere Taonga Act 2014 with respect to archaeological authorities for accidental discovery. Obtaining those approvals under the traditional approvals process without the benefit of a 'one-stop shop' approval process would add considerably uncertainty, delay, and additional complexity. The Kaihiku Wind Farm will therefore benefit considerably through the fast-track process, especially as approval processes under the Wildlife Act and concessions under the Conservation Act do not have defined timeframes.

Given the Kaihiku Wind Farm will require approvals across multiple Acts, each with their own bespoke approval processes and relevant considerations,

under normal processes there will be both a duplication of application processes and, importantly, on-going uncertainty. For example, if Wildlife Act permits are declined, then notwithstanding consents may have been successfully obtained for the Kaihiku Wind Farm under the RMA (with all the costs and delay that process involves) the project may well be frustrated at that point. That is neither efficient nor in the interests of delivering national or regionally significant infrastructure.

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

Please write your answer here:

In terms of the Kaihiku Wind Farm's impact on the efficient operation of the fast-track process:

- The Kaihiku Wind Farm is a nationally significant renewable energy project that will have an installed capacity of up to 300MW. It meets the eligibility criteria and it will benefit from the cost and process efficiencies of the fast-track process. It is, simply put, the exact type of application that the fast-track process is intended to apply to.

The effects of establishing a wind farm are largely known. Expert assessments for the Kaihiku Wind Farm are currently being advanced by Lochindorb Wind Limited Partnership and it is anticipated that, as a result, the wind farm will be ready to be considered under the fast-track process, the effects are capable of appropriate management by way of conditions recommended by an Expert Panel, and listing the project in Schedule 2A of the Bill will not adversely affect the efficiency of the fast-track process and efficient operation of the process.

Lochindorb Wind Limited Partnership is not aware of any consenting issue that would materially negatively impact on the efficient processing of an application for the Kaihiku Wind Farm in line with the timeframes and processes set out in the Bill.

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

Other

Please explain your answer here:

The Kaihiku Wind Farm is not specifically identified as a priority project, however renewable energy development is a key plank of numerous central government, local government, and other plans/policies.

The National Policy Statement for Renewable Electricity Generation records that the need to develop, operate, maintain and upgrade renewable electricity throughout New Zealand is a matter of national significance, as are the benefits of renewable electricity generation.

MBIE is currently advancing New Zealand's Energy Strategy and notes that New Zealand through the Climate Response Act 2002 has committed to reaching net zero emissions by 2050, and has previously set a target 100% renewable electricity by 2030. The Kaihiku Wind Farm will have a material role in contributing to that target for renewable electricity (and as noted below, it will also have a very important role in displacing non-renewable electricity sources from despatch and therefore a reduction in greenhouse gas emissions from the electricity sector).

The Kaihiku Wind Farm will have a capacity of up to 300 MW and will generate on average 1180 GWh each year, which is enough electricity to power approximately 150,000 average-sized households. Lochindorb Wind Limited Partnership has commissioned economic analysis by NZEIR for this project, which reports greenhouse gas emission reductions at Kaihiku Wind Farm of between 510,000 tCO₂-e (for gas) or 1,295,000 tCO₂-e (for coal).

The Minister for RMA Reform has recently confirmed "on renewable energy, we intend to deliver on our ambitious policy called Electrify New Zealand, which aims to double renewable energy in New Zealand" (<https://www.beehive.govt.nz/speech/speech-new-zealand-planning-institute>). The Kaihiku Wind Farm's 300MW installed capacity will contribute positively and materially to the target of Electrify New Zealand.

Furthermore, the Climate Change Commission's/He Pou a Rangi final advice to inform the Government's plan to meet New Zealand's greenhouse gas reduction goal for 2026-2030 recommended building new wind projects in the first, second, and third emission budget periods. The Kaihiku Wind Farm is consistent with that recommendation.

Will the project deliver regionally or nationally significant infrastructure?

National significant infrastructure

Please explain your answer here:

The Kaihiku Wind Farm is nationally significant infrastructure which will deliver nationally significant benefits including up to 300MW of new renewable energy; increased security of electricity supply to the Otago Region; displacement of greenhouse gas emissions that will make a material contribution to New Zealand's climate change response; and stimulus of the local economies through employment, wind farm supplies and services.

As noted in the National Policy Statement for Renewable Electricity Generation, the need to develop renewable electricity generation activities throughout New Zealand and the benefits of renewable electricity generation are matters of national importance. Against this context it is noted that the Kaihiku Wind Farm will generate up to 300 MW of renewable electricity which will be connected into the National Grid which traverses through the Project site.

The Kaihiku Wind Farm will generate up to 1180 GWh each year, which is enough electricity to power approximately 150,000 average-sized households. Lochindorb Wind Limited Partnership has commissioned economic analysis by NZEIR for this project, which reports greenhouse gas emission reductions at Kaihiku Wind Farm of between 510,000 tCO₂-e (for gas) or 1,295,000 tCO₂-e (for coal).

Will the project:

contribute to a well-functioning urban environment

Please explain your answer here:

The Kaihiku Wind Farm will not provide additional housing supply to the New Zealand housing market.

However, it is noted that the provision of reliable electricity supply (which does not contribute to climate change) is critical to well-functioning urban environments and communities. In this regard, the Kaihiku Wind Farm will provide electricity to the National Grid that then ensures essential services are available to urban environments.

Will the project deliver significant economic benefits?

Yes

Please explain your answer here:

Building the Kaihiku Wind Farm will materially benefit regional economies in the Lower South Island through increased spending, employment and incomes in local economies. It will also provide significant benefit to the national economy by providing low-cost renewable generation to the energy sector, displacing higher cost sources of energy and therefore lowering total system costs.

The wind farm construction would result in the employment of around 117 to 129 full-time equivalent jobs each year over two years of the construction, and 13-15 full-time equivalent jobs per year over 30 years in operation.

A wind farm of this scale could cost around s 9(2)(b)(ii), take around three years to build, and result in about s 9(2)(b)(ii) spending in New Zealand after taking out costs of imported components.

Landowner payments and royalties from the Kaihiku Wind Farm may also boost the economic wellbeing of the community. These payments provide a stable source of income for the landowners, which can support local families and businesses. This injection of funds can stimulate local spending, benefiting local sectors such as retail, hospitality, and services.

The construction of the wind farm would result in infrastructure development, such as roading improvements, result in benefits to ports, the transport, and aggregate sectors. In some cases, wind farm development can provide opportunities for improving public access to previously inaccessible areas of high recreational value.

Kaihiku Wind Farm will provide employment and generate spending in the region, thereby contributing to the local communities' economic well-being. The positive economic impacts would be mostly concentrated in the initial phase of building the wind farm. The positive impacts on the electricity system would last longer through the 30-year expected operating life of the wind farm, contributing to efficient use and development of resources.

Wind farms are long-term infrastructure that utilise a free and reliable fuel supply. This helps make wind energy a low-risk form of electricity generation that can readily contribute to New Zealand's wider electricity generation system. The Kaihiku Wind Farm would also contribute to New Zealand's reduced reliance on imported fossil fuels.

The environmental benefits of a wind farm, such as reducing greenhouse gas emissions and mitigating climate change, can have long-term economic advantages by avoiding the costs associated with environmental damage. Wind farms contribute to New Zealand's national and international obligations for reducing greenhouse gas emissions and addressing climate change.

Will the project support primary industries, including aquaculture?

No

Please explain your answer here:

The Kaihiku Wind Farm does not involve the development of aquaculture activities.

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

No

Please explain your answer here:

The Kaihiku Wind Farm will utilise the wind resource prevalent on the hills around the Kaihiku Ranges to generate electricity. It will generate up to 300 MW and provide enough electricity for approximately 150,000 standard households.

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

Yes

Please explain your answer here:

The Kaihiku Wind Farm will have significant climate change mitigation benefits, including the reduction of greenhouse gas emissions.

The Kaihiku Wind Farm proposes up to 80 turbines, with a total installed capacity of approximately 300MW. Analysis by NZEIR of the annual generation suggest annual generation in the range of around 1,180 GWh of electricity each year.

Generating when sufficient wind is available can assist in conserving stored hydroelectricity that can then be despatched to meet peak demands. Importantly, wind can displace thermal generation at the margin. Displacement of thermal generation results in the reduction of greenhouse gas emissions relative to the counterfactual of having less new wind generation to meet demand.

The Kaihiku Wind Farm has an important role in achieving New Zealand's 2050 targets in the Climate Change Response Act 2002. The Kaihiku Wind Farm will also play a role in substituting fossil fuel energy with renewable energy. That amounts to real emissions reduction, especially as New Zealand's electricity cannot be imported, and therefore it will contribute to reductions in the country's greenhouse gas inventory. The actual reductions will depend on whether gas-fired or coal-fired generation has been displaced. Economic analysis by NZEIR indicates greenhouse gas emission reductions at the Kaihiku Wind Farm of between 510,000 tCO₂-e (for gas) or 1,295,000 tCO₂-e (for coal).

The National Policy Statement for Renewable Electricity Generation, Policy A, provides for as a matter of national significance renewable electricity generation, including its benefit of maintaining or increasing electricity generation capacity while avoiding, reducing or displacing greenhouse gas emissions. The Preamble to the National Policy Statement for Renewable Electricity Generation notes "the contribution of renewable electricity generation, regardless of scale, towards addressing the effects of climate change plays a vital role in the wellbeing of New Zealand, its people and the environment". The Kaihiku Wind Farm is entirely consistent with that national direction.

On 12 December 2023, the Minister of Climate Change released the Climate Change Commission/He Pou a Rangi final advice to inform the Government's plan to meet New Zealand's greenhouse gas reduction goal for 2026-2030. 27 recommendations were made, including building more renewable electricity such as wind and solar. The Commission's Final Report, 2023 Advice on the direction of policy for the Government's second emissions reduction plan noted (at Chapter 13) that "building renewable generation can cut electricity emissions in the first emissions budget, and maintaining build during the second and third budgets will keep the system low emissions" and that "increasing wind and solar generation can reduce the amount of time that fossil generation is required, and flexible gas and hydro generation can provide support during periods of intermittency". The Commission concluded that "the build of renewable generation needs to continue into the second and third emissions budgets to minimise the use of fossil gas generation and to meet new demand from transport electrification, heating, and industrial load". The Kaihiku Wind Farm is again entirely consistent with those recommendations.

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

Yes

Please explain your answer here:

The project will be designed and constructed to minimise any potential effects from natural hazards in the surrounding environment and it contributes positively to reducing greenhouse gas emissions. This matter is discussed further in section 8 below.

The provision of a diverse electricity supply also aids in the resilience and recovery from natural hazards, via providing multiple generation options in the event of a natural hazard event (e.g. a flood, landslide) rendering other generation sources or transmission connections available.

Will the project address significant environmental issues?

Yes

Please explain your answer here:

The project will contribute to addressing New Zealand's response to climate change by providing renewable electricity and displacing the need for both existing and new thermal generation. In this regard, the project will provide up to 300 MW of new renewable generation which will contribute to ensuring security of supply in New Zealand, helping increase New Zealand's security margins and provide greater head room to get through droughts in hydro catchments.

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

Yes

Please explain your answer here:

The need for new electricity generation infrastructure, and where it should be located, is not addressed in any regional or district wide spatial strategies in the Otago Region. Decisions regarding the location and form of this infrastructure are effectively left to electricity industry participants to consider for themselves, recognising that locating new infrastructure requires consideration of a complex set of factors (including access to, and quality of, the resource, access to transmission, constructability and roading connections). The resource consenting process also provides a framework for considering the appropriateness of a site for new electricity infrastructure.

The project site consists of land zoned for rural purposes in the Clutha District Plan. The site is not subject to any landscape or biodiversity overlays in these plans and is setback a suitable distance from adjacent dwellings. The Clutha District Plan recognise that renewable electricity generation activities have significant positive effects on the wider environment and that such activities may need to be located in the rural environment.

In light of the above, and on the basis that the potential adverse effects of the project on the surrounding environment are being appropriately managed, it is considered that the Kaihiku Wind Farm will be consistent with the objectives and policies of the Clutha District Plan.

With respect to the Otago Regional Policy Statements, they provide direction on the management of infrastructure that is of 'regional or national importance'. The Regional Policy Statements directs that decision makers considering infrastructure activities of regional or national importance consider the locational needs of such activities when they need to locate within sensitive environments, as well as functional needs.

The Otago Regional Policy Statements also require an effects management hierarchy be applied to infrastructure activities within sensitive environments, with a focus on avoiding adverse effects as far as practicable. In addition, provision is made for offsetting and compensation of adverse effects in appropriate circumstances.

As noted in the section of the potential effects of the Kaihiku Wind Farm, Lochindorb Wind Limited Partnership is preparing its application to include ecological mitigation / compensation where necessary in order to satisfy the likes of the Otago Regional Policy Statement.

Anything else?

Please write your answer here:

Lochindorb Wind Limited Partnership would like to emphasise that the consenting process under the conventional process is costly, inefficient and protracted. Should the Kaihiku Wind Farm project consent be appealed under a conventional process, then Lochindorb Wind Limited Partnership would likely spend up to s 9(2)(b)(iv) post lodgement (in addition to in excess of s 9(2)(b) pre-lodgement) and result in a time delay of more than three years from lodgement to obtaining consent. That is for a site that has effects that are well understood. The RMA process is extremely inefficient for critical infrastructure such as this project, and Lochindorb Wind Limited Partnership seeks that the project be listed in the Bill to make use of the fast-track process for this reason.

Kaihiku Wind Farm being listed in the Bill would enable Lochindorb Wind Limited Partnership to have the confidence to further commit to building this critical infrastructure as soon as possible, and this would assist New Zealand with meeting its energy, climate and other objectives.

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

No

If yes, please explain:

No. Ineligible projects are set out in Clause 18(a)-(l) of the Fast-track Approvals Bill. Lochindorb Wind Limited Partnership confirms that the Kaihiku Wind Farm does not involve any of the activities listed in Clause 18(a)-(l) of the Fast-track Approvals Bill.

Section 8: Climate change and natural hazards

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

Yes

If yes, please explain:

The primary risks to the Kaihiku Wind Farm from climate change and natural hazards are from seismic events (noting that the site is no more susceptible to seismic events than other generation facilities in the South Island).

The design and construction methodology of the Kaihiku Wind Farm will be informed by engineering design reports to ensure the risks from seismic instability are managed to acceptable levels.

Lochindorb Wind Limited Partnerships will ensure that any potential risks are managed by:

- Undertaking robust design and site management, including permitting, operation management, monitoring and reporting;
- Ensuring wind turbines and associated infrastructure are appropriately located to ensure they are away from possible estimate zone of tectonic ground surface deformation;
- Conducting regular auditing of conformance with internal standard and consent requirements; and
- Independent review by third party experts.

With respect to climate change, it is noted that the project site is a Class 1 wind resource and expected changes in weather patterns over the life of the project are not forecast to impact on the viability or efficiency of the project.

Therefore, it is considered the project is not subject to significant risks associated with climate change and natural hazards.

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 is no record of compliance or enforcement action taken against the Lochindorb Wind Limited Partnership. The entity is a 50/50 partnership between Manawa Energy Limited (formerly Trustpower) and Pioneer Energy Limited. The compliance track records of the two companies are below.

Manawa Energy:

Across the country our power schemes operate within the constraints of approximately 500 consents and ~3,500 resource consent conditions that govern operations, monitoring and maintenance, and ensure we operate in an environmentally sustainable and legally compliant way. Trustpower / Manawa Energy has typically had a positive record of compliance with our consents, with up to 99 percent compliance across our consent conditions. Most non-compliances received have related to minor technical incidents that have been quickly addressed. In the last 30 years Trustpower / Manawa Energy has also received a handful of abatement or infringement notices. These lower-level enforcement actions have always been promptly addressed to a high standard and no further action has been taken by the regulators.

Trustpower / Manawa Energy has only been prosecuted by a regulator once in 30 years. Otago Regional Council brought a prosecution against Trustpower for a discharge of sediment from Beaumont Race at our Waipori Scheme into the Beaumont River. We plead guilty to the offence and while we are disappointed this occurred, the Judge complimented Trustpower on its response to the incident, particularly the open and collaborative approach to engagement with the investigating council and expression of remorse through a public apology, self-initiated environmental monitoring and participation in restorative justice process.

Pioneer Energy:

Pioneer Energy Ltd owns and operates renewable energy generation in the form of hydro power and wind power along with thermal boilers throughout New Zealand. Pioneer has generally had a very good compliance record. Non-compliances that have been received tend to be technical or minor in nature with little actual effect. When non-compliances have been received, they have generally been quickly addressed. Pioneer has never had any abatement notices issued or prosecutions taken against it.

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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:

Chris Baldwin

Important notes