

## Response ID ANON-URZ4-5FQS-M

Submitted to Fast-track approval applications  
Submitted on 2024-05-03 16:15:13

### Submitter details

Is this application for section 2a or 2b?

2A

#### 1 Submitter name

Individual or organisation name:  
Mercury NZ Limited ('Mercury')

#### 2 Contact person

Contact person name:  
Ryan Piddington

#### 3 What is your job title

Job title:  
Strategic Consents 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:  
  
Tauranga Mail Centre  
Private Bag 12023  
Tauranga 3143

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

Yes

Organisation:  
Mercury NZ Limited ('Mercury')

Contact person:  
Howard Thomas

Phone number:  
s 9(2)(a)

Email address:  
s 9(2)(a)

Job title:  
General Counsel

Please enter your service address:

The Mercury Building, 33 Broadway, Newmarket, Auckland

### Section 1: Project location

Site address or location

Add the address or describe the location:

The Puketoi Wind Farm ("PWF") is a 53-turbine wind farm development on the Puketoi Range approximately 25 minutes east of Pahiatua. The development is to be built on private land along the top of the Puketoi range from Towai Road in the north to south of Pahiatua – Pongaroa Road in the south. The 37km 220kV transmission line connects the PWF to the recently constructed Turitea wind farm transmission line which connects to the Linton Transpower substation.

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

Yes

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Combined Title file Puketoi Windfarm landowners.pdf was uploaded

Who are the registered legal land owner(s)?

Please write your answer here:

Maree Brown, Richard Brown & SHB Trustees  
Crossland Trust  
H Ridge  
SG McIntyre H Ridge  
NG & WJ Burn  
JM & MB Scott & LD & P Trustees No 5 Ltd  
PAChampion & PWJameson  
JW Cuttance, PA Cuttance and MCI Trustees Limited  
WH & CE Keltie  
RHP Perry & Puketoi Trustees Ltd  
J & PV Champion, MCI Trustees 2013 Ltd  
Ngarakau 278 Limited  
AAF Fetch  
LCM & RA Tylee, BJR Davey  
DS, RA & LM Tylee, BJR Davey  
PM & WJ Wallace, PM Luoni  
RG & KS Champion, Osborne Group Trustee Ltd  
Otapawa Station Ltd

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:

Mercury has Wind Farm Option Agreements with each of the landowners of the project site. The Wind Farm Option Agreements allow Mercury to construct, operate, and maintain the wind farm and associated infrastructure. At the commencement of construction Mercury will exercise the options and lease the relevant land from the landowner.

## Section 2: Project details

What is the project name?

Please write your answer here:

Puketoi Wind Farm (PWF)

What is the project summary?

Please write your answer here:

Mercury NZ Ltd ("Mercury") is proposing to establish the PWF comprising 53 wind turbine generators with a nominal installed capacity of 228 MW and an associated c.37 km transmission line and associated infrastructure with an estimated capital cost of \$680m. Variations to existing, and applications for new, resource consents are sought to optimise and enable this nationally and regionally significant development.

What are the project details?

Please write your answer here:

The purpose of the PWF is to increase the supply of renewable generation of electricity and enhance the energy security of the country, while diversifying New Zealand's energy portfolio. PWF will generate electricity and connect into the national grid (thereby reducing transmission losses) to ensure generation stability.

The proposed PWF would comprise 53 wind turbine generators with a nominal installed capacity of 228 MW and production of an estimated 1040 GWh of renewable electricity per year, enough to power around 140,000 average New Zealand households or 520,000 electric vehicles. The PWF also involves:

- c.37 km of external transmission line and associated infrastructure;
- Construction of >40 km of internal access roads; and
- Earthworks.

Variations to existing, and applications for new, resource consents are sought to optimise and enable this development. Changes being proposed include the relocation of turbines and access tracks into more accessible locations, thereby reducing the overall volumes of earthworks required and the potential for habitat disturbance. The proposed changes will also significantly reduce the overall construction schedule.

Additional authorisations are also required from the Department of Conservation (DoC) by way of concessions (land access and airspace occupation) and Wildlife Authorisations for operational monitoring. A further approval is required from the Tararua District Council for the occupation and potential closure of a paper road under Schedule 10 of the Local Government Act (1974).

PWF is a nationally and regionally significant development and material contributor to New Zealand's ability to meet its greenhouse gas emissions targets and the provision of a secure supply of electricity.

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

Please write your answer here:

Construction of wind farms typically involves the mobilisation of significant plant and machinery for activities involved with civil construction and turbine erection. For reasons of efficiency and cost, the construction of wind farms is usually not staged due to the implications of mobilising and demobilising of plant.

That said, for a development the size of the PWF staging may be considered due to market conditions and other factors such as equipment supply.

Geographically, PWF is split into two sections with 43 turbines north of Pahiatua-Pongaroa Road and 10 turbines to the south. It is possible that the development could be 'staged' across these two sections.

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

Please write your answer here:

Resource Management Act 1991

- Variations to existing, and applications for new, resource consents are sought to optimise and enable this development within the jurisdictions of Horizons Regional Council, Tararua District Council and Palmerston North City Council.

Conservation Act 1987 / Reserves Act 1977

- Easements by way of Concession are required for turbine blade 'oversail' and for road widening and bridge strengthening works in or over Conservation Estate and DoC Reserve.

Wildlife Act 1953

- Wildlife Authorisations are required in relation to the monitoring and management of bats and the potential relocation of lizards from within the project site.

Heritage New Zealand Pouhere Taonga Act 2014

- An archaeological authority may be required under the Heritage New Zealand Pouhere Taonga Act in relation to the potential damage of any heritage sites within the project site.

Local Government Act 1974

- An approval under Schedule 10 of the Local Government Act 1974 may be required for the occupation and/or stopping of a paper road.

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

Please write your answer here:

- Horizons Regional Council
- Tararua District Council
- Palmerston North City Council

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

Please write your answer here:

Original consent applications were granted by Independent Commissioners in 2012, with final consents confirmed by way of Consent Order in May 2013.

A ten-year lapse period was granted for all the consents (to May 2023).

An application to extend the lapse period was granted by an Independent Commissioner in 2021 extending the lapse to May 2031.

Variations to existing, and applications for new, resource consents are sought to optimise and enable this development.

Concessions have also already been granted for works spanning over the Makuri Stream.

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

No

Please explain your answer here:

Mercury does not require any approvals from third parties to build the PWF. All necessary access agreements are in place to enable construction to commence once resource consents, concessions, wildlife permits and archaeological authorities (if needed) are granted.

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

Please write your answer here:

Assuming consent is granted for the project by mid-2025:

- Detailed Design (complete end 2025)
- Procurement (complete mid 2026)
- Funding/Business Case Approval (complete end 2026)
- First generation 12 months (complete end 2027)
- Length of entire site works to completion 36 months (complete end 2029)

### Section 3: Consultation

Who are the persons affected by the project?

Please write your answer here:

Local Authorities:

- Horizons Regional Council;
- Tararua District Council;
- Palmerston North City Council

Iwi Authorities:

- Rangitāne o Tāmaki nui ā Rua
- Kahungunu o Tāmaki nui ā Rua
- Rangitāne o Manawatū (transmission line only)

Treaty Settlement Entities:

- Rangitāne Tū Mai Rā Trust
- Ngāti Kahungunu ki Wairarapa Tāmaki nui-a-Rua Settlement Trust
- Rangitāne o Manawatū Settlement Trust (transmission line only)

Other:

- Dept of Conservation

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:

- During the original resource consenting process in 2013 a relationship with Rangitāne o Tāmaki nui ā Rua and Ngāti Kahungunu o Tāmaki nui ā Rua was established. MOUs were drafted at this stage with both entities; however these were not finalised. This conversation has been recommenced as part of Mercury's commitment to enduring relationships with iwi within rohe where Mercury has a presence.
- Since the initial Resource Consent was granted there has been a Variation submitted and granted relating to the rotor diameter of the turbines and improvement to the transmission line design. All three iwi who have an interest in the area were consulted in relation to the Variation at that time.
- Mercury has remained in communication with iwi in the recent years to provide updates on the progress of the PWF and ensure iwi are informed of any works being undertaken on the site as part of the preconstruction compliance monitoring. This work includes bat monitoring, water quality monitoring, bird surveys, bridge and roading assessments and geotechnical investigations.
- A Memorandum of Understanding was entered into with Rangitāne o Manawatū in 2008 in relation to the construction of the Turitea wind farm and establishes a platform for an enduring relationship between Mercury and Rangitāne o Manawatū. The MoU is currently being reviewed to ensure it remains relevant the context of today's environment.
- Mercury has had several meetings with the Dept of Conservation, most recently in October 2023 to discuss the project optimisations and interaction with Department-administered reserves and stewardship land along the Puketoi ridgeline. Recent advice from the Dept of Conservation has confirmed that the concession process would be the appropriate mechanism for this to be authorised.
- Mercury has engaged with Tararua District Council roading and property teams regarding the occupation of the paper road to enable the optimisation of the project. A willingness towards finding a solution has been expressed and work is progressing to ascertain the appropriate process from here.
- Over the life of the project, additional meetings have also been held with Horizons Regional Council and Tararua District Council to keep them broadly appraised of project developments.

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

Please write your answer here:

N/A

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

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

Please write your answer here:

Rangitāne o Wairarapa and Rangitāne Tamaki nui-ā-Rua Settlement

The Crown and Rangitāne o Wairarapa and Rangitāne Tamaki nui-ā-Rua signed a Deed of Settlement in 2016 that includes:

- An agreed historical account, Crown acknowledgments and apology
- Cultural, financial and commercial redress.

The Settlement includes a Statutory Acknowledgement over the Manawatu River and its tributaries within the Area of Interest (including the Makuri River).

No land interests relating to the project are affected.

Ngāti Kahungunu ki Wairarapa Tāmaki nui-a-Rua Settlement

The Crown and Ngāti Kahungunu ki Wairarapa Tamaki nui-ā-Rua signed a Deed of Settlement in 2021 that includes:

- An agreed historical account, Crown acknowledgments and apology
- Cultural, financial and commercial redress.

No land interests relating to the project are affected.

Rangitāne o Manawatū Settlement

The Crown and Rangitāne o Manawatū signed a Deed of Settlement in 2015 that includes:

- An agreed historical account, Crown acknowledgments and apology
- Cultural, financial and commercial redress.

The Settlement includes a Statutory Acknowledgement over the Manawatu River and its tributaries within the Area of Interest.

No land interests relating to the project are affected.

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:

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 original Decision from the Independent Hearings Commissioners in 2012 (as confirmed by way of Consent Order from the Environment Court) found:  
In relation to visual and landscape effects:

- A preference was expressed for the turbines to be placed on the ridgeline in preference to the downslope on the basis that the values that support the ridgeline being an ONL/ONF are best preserved and supported by placing the turbines on the ridgeline.
- Due to the topography, little would be seen of the turbines from relatively close distances when viewed from the west. Having regard to the low population generally and the character of the wider area as a working environment, the overall visual and landscape effects were still assessed as being significant.
- Despite effects on the ONL/ONF qualifying as a s6(b) matter, other sub-sections of s6 are well-supported by the PWF particularly when the proposed conditions (inclusive of mitigation measures) are considered, and therefore findings under s6(b) do not amount to some kind of veto.
- The balance of the proposal and/or activities (e.g. transmission) occurring on the Puketoi Range will not give rise to significant visual and landscape effects.

In relation to noise effects:

- The wind farm can be operated and maintained in compliance with the relevant limits from NZS6808:2010, and the conditions as proposed would ensure that any noise effects generated by the wind farm were acceptable.

In relation to ecological values:

- The ecological issues concerned primarily terrestrial, aquatic and avian ecological issues.
- By virtue of the conditions imposed, adequate safeguards would exist in terms of sediment controls, particularly having regard to freshwater risks.
- In relation to bats and falcons, the level of risk to this avian fauna was seen as being low to very low. Conditions that deal with bird strike and bat strike were seen as adequate to address potential effects on the bats and falcons.
- The ecological mitigation and offset as proposed was considered to (more than) offset any potential effects on ecological values arising from the construction and operation of the PWF.
- For these reasons, the effects on ecological values were considered acceptable.

In relation to cultural effects:

- A cultural impact assessment presented on behalf of Rangitāne did not draw attention to specific cultural issues.
- The focus of the cultural impact assessment revolved around the establishment of protocols to follow in the unlikely event that any Maori archaeological material was unearthed during excavations for turbine sites, road construction, and other earthworks.

In relation to transportation effects:

- Traffic and transportation effects were assessed as minimal and can be appropriately handled by mitigation measures.

In terms of changes to the PWF being proposed (requiring variations to existing, and applications for new, resource consents), these involve the relocation of turbines and access tracks into more accessible locations, thereby reducing the overall volumes of earthworks required and the potential for habitat disturbance.

In terms of effects:

- The reduction in the overall volume of earthworks will reduce the risks from sedimentation-related impacts;
- Whilst realignment of access tracks will reduce disturbance effects on certain habitats, it will introduce effects on new areas that need to be assessed (including natural inland wetlands); and
- The relocation of turbines will not give rise to new or additional landscape, visual or noise effects.

In considering those effects, it is noted that they will now need to be considered in terms of national planning instruments that have come into force since the time of the original Hearing, including:

- National Policy Statement for Freshwater (2020); and
- National Environmental Standard for Freshwater.

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

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

Please write your answer here:

National Policy Statement for Renewable Electricity Generation

The 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 electricity sources increases to levels that meet or exceed the Government's national target for renewable electricity generation.

The PWF 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 PWF 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 noted that 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 several 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.

The PWF is considered to be consistent with the stated objective and policy directives of the NPSREG.  
National Policy Statement for Freshwater

The primary concept of the NPSFM is Te Mana o te Wai which refers to the importance of water to the health and wellbeing of the wider environment, presenting a water-centric approach to freshwater management.

The 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 PWF is the potential for the construction activities to impact on freshwater resources (including wetlands) via the potential discharge of sediment to surface water bodies during construction activities. Whilst the wind farm is 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 Mercury. These mitigation / compensation measures form part of the existing consent conditions and management plans proffered as part of the original resource consent process.

Overall, it is considered that with careful design and management of the construction of the PWF 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 PWF 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 earthworks, within, or within 100 m of natural wetlands and the establishment of culverts.

Mercury 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. These measures will ensure that any adverse effects are no more than minor.

National Policy Statement for Highly Productive Land

The NPSHPL is potentially relevant in relation to limited aspects of the wind farm construction and parts of the transmission corridor. The PWF qualifies as specified infrastructure deeming it a use of highly productive land that is not inappropriate, allowing for it to occur.

For completeness, it is noted that the National Policy Statement for Indigenous Biodiversity is not relevant to the PWF as clause 1.3(3) of the NPS states: “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’.

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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:

Consideration of the PWF application under the fast-track provisions will likely result in a more timely and cost-efficient way to confirm the authorisations necessary for the proposed wind farm for the following key reasons:

Multi-agency authorisations

Authorisations are required under:

- Resource Management Act (variation to existing and applications for new resource consents)
- Conservation Act and Reserves Act (concessions)
- Wildlife Act (Wildlife Authorisations for potential disturbance of lizard and bat habitat)
- Potentially, Heritage New Zealand Pouhere Taonga Act (archaeological authority), and
- Local Government Act (for the occupation and/or stopping of a paper road).

Consideration of the requirements of these various authorisations through one process reduces the risks of delays (applications being considered sequentially) and provides greater visibility of process and clarity of outcomes. Both the DoC concession and road stopping approvals required for the PWF are separate processes each requiring full public notification. This carries the risk of adding significant additional time and cost to the traditional RMA consenting process that would be required to enable the optimised PWF.

Cross-jurisdictional considerations

Elements of the PWF are located within the jurisdiction of:

- Horizons Regional Council
- Taranaki District Council

• Palmerston North City Council.

The fast-track provisions enable a process similar to holding of a joint hearing ensuring integrated consideration of matters across different jurisdictions. Geographical Scale

The PWF is made up of approximately 21 individually owned properties with a combined area of 4,890 ha. A further 28 landowners own property through which the c.37 km of transmission lines cross. Across such a broad catchment, there is a heightened possibility that when making a notification assessment the relevant local authority may seek public notification of any application. Public notification could result in significant delays and increased consenting costs.

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

Please write your answer here:

The PWF is a nationally significant renewable electricity project that will have an installed capacity of up to 228 MW. It meets the eligibility criteria and it will benefit from the cost and process efficiencies of the fast-track process's 'one stop shop' approach. It is, simply put, the exact type of application that the fast-track process is intended to apply to.

The effects of establishing the PWF have previously been assessed by Independent Commissioners, with their Decision ratified by way of Consent Order by the Environment Court. Through a process of project optimisation, a pathway to achieve variations to the existing consents and applications for new resource consents is being sought through this process. Expert assessments have been initiated in relation to the changes in design that are being proposed and, as a result, the PWF 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.

Mercury is not aware of any consenting issue that would materially negatively impact on the efficient processing of an application for the PWF in line with the timeframes and processes set out in the Bill.

Mercury is one of New Zealand's largest electricity generators and retailers, providing energy and other services to homes, businesses and industrial consumers throughout New Zealand. Mercury's Waikato Hydro Scheme which was constructed between 1929 and 1971, is made up of eight dams, nine power stations and the Taupō Control Gates.

Over the last 20 years, Mercury has invested significantly in geothermal power development, and now operates five geothermal power stations in the Taupō Volcanic Zone. In relation to wind generation, Mercury is the largest owner and operator of wind farms across New Zealand – which includes the Waipipi, Turitea, Taranua, Mahinerangi and Kaiwera Downs Wind Farms.

Mercury has an experienced team with years of wind farm development and consenting experience. Mercury builds assets to own and operate for the long term and as such sees its role as a long-term member of the community. Applications from Mercury through the fast-track process will be to a high standard and presented with professionalism and a high level of experience, ensuring the efficient operation of the fast-track process.

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

Other

Please explain your answer here:

The PWF is not specifically identified as a priority project, however renewable electricity 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.

A review of the New Zealand Energy Strategy is currently being advanced and through the Climate Response Act 2002. New Zealand has committed to reaching net zero emissions by 2050. . PWF will have a material role in contributing to that target for renewable electricity.

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>).

PWF's nominal capacity of 228 MW will contribute positively and materially to the target of Electrify New Zealand. Accelerated electrification through renewable electricity generation represents New Zealand's best opportunity to meet our international and statutory climate change commitments, including as now set under the Climate Change Response Act 2002.

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. PWF is consistent with that recommendation. The Commission's demonstration pathway for actions identified as being critical for meeting the 2050 targets, assumes 3.8TWh of currently committed generation projects being built between 2020 and 2024, followed by 1TWh per year of additional wind, solar and geothermal generation from the late 2020s.

The Commission recommends enabling a "fast paced and sustained build of low emission electricity generation and infrastructure by ensuring resource management processes, other national and local government instruments, and settings for transmission and distribution investment decisions, are aligned to the required pace for build".

To achieve accelerated electrification at the necessary scale and pace, Transpower has estimated that New Zealand will need 20 new grid connected generation projects by 2035, and 30 by 2050. In other words, it would be necessary to build generation greater than New Zealand's largest windfarm every year from the late 2020's to supply an additional 1TWh to meet the 2050 electrification target.

Renewable energy is central to any reduction plan because, unlike other decarbonisation options, the technology is mature, cost-effective and has broad social acceptance, with well understood and mitigable environmental impacts.

Will the project deliver regionally or nationally significant infrastructure?

National significant infrastructure

Please explain your answer here:



The PWF will be nationally significant infrastructure.

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.

By generating an estimated 1040 GWh of renewable electricity per year, enough to power around 160,000 average New Zealand households, PWF will be recognised as significant infrastructure both nationally and regionally.

Will the project:

contribute to a well-functioning urban environment

Please explain your answer here:

To the extent that the site will provide additional reliable and renewable electricity to the National Grid, it will add to the security of electricity supply to New Zealand's urban areas, and in turn, contribute to the overall function and resilience of these areas.

Will the project deliver significant economic benefits?

Yes

Please explain your answer here:

The New Zealand electricity system needs new generation plant to cater for growth, replace old plant, and reduce use of plant with higher cost characteristics. The PWF fits the current strategic priorities for renewable plant which reduce reliance on thermal plant that face rising costs for fuel and greenhouse gas emissions. It provides a range of benefits across the electricity system for Mercury and consumers.

The capital expenditure to deliver the project is estimated at \$680 m with approximately 40% or \$270 m of this being spent within in New Zealand and locally.

The PWF will create a stream of economic benefits for the owners and the community for years to come. The sources of that benefit are:

- a) Enhanced profitability for those connected with the production of electricity, principally Mercury as plant operator but also landowners who receive rental from the occupation of the windfarm. These are private benefits for the parties concerned, and can be presumed to be beneficial as they are freely entered into;
- b) Benefits, likely of substantial value, from the displacement of thermal generation and avoidance of greenhouse gas emissions;
- c) Benefits for power consumers, through restraint on price rises over time because of less recourse to use of higher cost generation;
- d) Benefits to other aspects of the electricity system, in particular reducing transmission losses compared with some other options for expanding generation, and reducing the probability of power shortages;
- e) Positive stimulus to economic activity in the district, particularly during the construction stage, and if construction is undertaken during a period of low economic activity; and
- f) It is estimated some 200 jobs will be provided for during peak construction.

Will the project support primary industries, including aquaculture?

Yes

Please explain your answer here:

The project will support primary industries via the provision of the additional income stream for those landowners whose properties the turbines will be located on. In addition, through upgrades to transport routes and farm accessways, PWF is compatible with and will augment ongoing farming land use including stock grazing (sheep and bulls). In effect, the wind farm will co-exist with existing farming on the site.

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

Yes

Please explain your answer here:

PWF Farm will utilise the world class wind resource that is present at Puketoi to generate an estimated 1040 GWh of renewable electricity each year, providing enough electricity for approximately 140,000 standard households, or 520,000 electric vehicles.

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

Yes

Please explain your answer here:

By generating an estimated 1040 GWh of renewable electricity per year, evidence presented to the original hearing confirmed that PWF will act to displace thermal generation and avoid associated greenhouse gas emissions. If that generation was from coal, the equivalent emissions would be in excess of 900,000 to 1 M tonnes CO<sub>2</sub> per year; if from gas, the equivalent emissions would be in excess of 450,000 tonnes CO<sub>2</sub> per year.

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

Yes

Please explain your answer here:

To the extent that electricity generated by PWF improves security of supply through fuel diversification, the project will add to local and national resilience and recovery in the event of a major natural hazard event.

Will the project address significant environmental issues?

Yes

Please explain your answer here:

Climate change presents an existential threat to people and their communities. The PWF will help address this issue by contributing to New Zealand's renewable electricity targets and its decarbonisation journey.

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 Manawatu/Whanganui 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.

Elements of the PWF are located within the jurisdiction of Horizons Regional Council, Tararua District Council and Palmerston North City Council (the latter in relation to transmission line elements only).

The Horizons One Plan remains relevant to PWF and includes provisions relevant to PWF that include:

Objective EIT-02: Energy

An improvement in the efficiency of the end use of energy and an increase in the use of renewable energy resources within the Region.

NFL-O1: Outstanding natural features and landscapes, and natural character

The characteristics and values of:

- a) the Region's [identified] outstanding natural features and landscapes and
  - b) the natural character of the coastal environment, wetlands, rivers and lakes and their margins
- are protected from inappropriate subdivision, use and development.

ECO-O1: Indigenous biological diversity

Protect areas of significant indigenous vegetation and significant habitats of indigenous fauna and maintain indigenous biological diversity, including enhancement where appropriate.

The Regional plan elements of the Horizons One Plan regulate these provisions through imposition of rules that require such activities be assessed as discretionary or non-complying activities.

The Tararua District Plan (2012) remains relevant to PWF and provides:

Standard 5.3.7.2(b)

The construction, operation and maintenance of renewable electricity generation facilities, including wind farms, not otherwise provided for as permitted activities, shall be considered as discretionary activities in all Management Areas.

No change is proposed to the Palmerston North District Plan elements.

Conclusion

The PWF remains consistent with the local or regional planning documents of Horizons Region and Tararua District.

Anything else?

Please write your answer here:

Mercury's view is that the PWF project is exactly the type of project that the fast-track process has been designed to enable. Amongst other factors, the project will deliver regionally and nationally significant infrastructure, support the development of natural resources (wind), support climate change mitigation and address significant environmental issues. It is consistent with local and regional planning documents and doesn't include any activity which would make it ineligible.

PWF is a \$680 m capital expenditure project located on one of New Zealand's best wind sites, with exceptional wind speeds and capacity factor.

Optimisations for a project of the scale are necessary to enable its efficient and cost-effective construction. The project is facing the administrative burden of multiple publicly notified processes (DoC concession and paper road closure) and is an ideal candidate to benefit from the one stop shop nature of the fast-track legislation.

The PWF project has been requested to be listed under Schedule 2A. If the project is unsuccessful for Schedule 2A Mercury requests that it is considered for Schedule 2B.

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

No

If yes, please explain:

Mercury confirms that PWF 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?

No

If yes, please explain:

The primary risks to the PWF project from climate change and natural hazards are from extreme rainfall events and seismic events. The project site is not subject to any other natural hazard overlays.

Mercury will ensure that any potential risks are managed by:

- Undertaking robust design and site management, including permitting, operation management, monitoring and reporting (and the incorporation of contingency in sediment control design etc);
- Ensuring 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:

Nil

Load your file here:

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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:

Ryan Piddington

Important notes