

Response ID ANON-URZ4-5F11-J

Submitted to Fast-track approval applications
Submitted on 2024-05-03 12:00:24

Submitter details

Is this application for section 2a or 2b?

2A

1 Submitter name

Individual or organisation name:

Tararua Wind Power Limited (a wholly owned subsidiary of Mercury Wind Limited, which itself is a wholly owned subsidiary of 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

Contact person:

Howard Thomas

Phone number:

s 9(2)(a)

Email address:

general.counsel@mercury.co.nz

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 Waikokowai Wind Farm is to be located on private farmland near the small settlements of Glen Afton and Pukemiro, and 10 km to the west of Huntly, in the Waikato District.

Primary access to the site of the proposed wind farm site is via Rotowaro Road.

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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:

- S 9(2)(a) and S H & P Trustees (Normans) Limited
- DI Cathcart Limited
- Killura Farms Limited
- Llednarddot Farms Limited

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 entered into investigation agreements with the landowners listed above that include the option to construct, operate and maintain a wind farm on their properties. This is through a mix of easement and lease agreements with the landowners.

Section 2: Project details

What is the project name?

Please write your answer here:

Waikokowai Wind Farm

What is the project summary?

Please write your answer here:

Mercury is proposing to establish a large-scale wind farm approximately 10 km west of Huntly near the small settlements of Glen Afton and Pukemiro. The expected generation output of the wind farm is currently forecast to be approximately 650 GWh per annum. The project will involve environmental monitoring, civil construction, establishment of electrical equipment and the installation of up to 51 wind turbine generators (with a maximum tip height of up to 220 m) within a project envelope, and associated access roads and electrical transmission equipment.

What are the project details?

Please write your answer here:

The primary purpose of the Waikokowai Wind Farm is to deliver reliable low carbon renewable electricity for Aotearoa New Zealand. The objective for the project is to deliver this purpose while effectively avoiding, minimising or remediating any adverse environmental effects. In this regard, the project will be designed to be sensitive to the surrounding environment while also seeking to realise the opportunities a project such as this offers to mana whenua, the community and the region.

The project will be seeking consent for the establishment of up to 51 turbines with a maximum tip height of up to 220 m. Construction will include the establishment of an internal road network, underground 33 kV transmission network to an on-site substation and an above ground 220kV transmission line connecting to the National Grid.

Construction may require the import of aggregate from local quarries and onsite concrete batching plant(s). Surplus fill will be disposed of on-site as much as possible and post-construction rehabilitation of these sites and other worked areas will occur to return the site to as close to the pre-construction landform as possible.

More specifically, the project involves the following.

- The installation of up to 51, three-bladed wind turbines. Each turbine will have a maximum height of up to 220 metres to blade tip above existing ground level;
- On-site aggregate crushing and concrete batching;

- The installation of meteorological monitoring masts of up to 100 metres in height;
- New and upgraded internal access roads, including culverts;
- Underground electricity and fiber optic cables running between the turbines to the central hub and substation;
- The inclusion of ancillary infrastructure including:
 - o A switch room building; and
 - o An operations and maintenance building;
- Temporary laydown areas for construction purposes;
- Earthworks to form platforms for the turbines, crane pads beside the turbines, and to construct/ upgrade access roads and surplus fill disposal sites;
- Installation of temporary erosion and sediment control measures; and
- An overhead 220 kV transmission line to connect 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:

This application does not require staging.

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 Waikokowai Wind Farm will require authorisation 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 Waikokowai Wind Farm will require resource consents pursuant to section of the Act for a number of activities including the following:

- Land use consents under s.9 from the Waikato District Council for the establishment of wind turbines, anemometers, substation / switchyard infrastructure, transmission lines, operations buildings, access tracks, earthworks, vegetation clearance, temporary construction compounds, and the storage and use of hazardous substances.
- Land use consents under s.9 from the Waikato Regional Council for vegetation clearance and soil disturbance activities, including adjacent to natural inland wetlands;
- Land use consents under s.13 from the Waikato Regional Council for the construction and use of culverts and erosion control structures in waterbodies;
- A water permit under s.14 from the Waikato Regional Council for the diversion of water;
- A water permit under s.14 from the Waikato Regional Council for the diversion of groundwater during the construction of the wind farm;
- A discharge permit under s.15 from the Waikato Regional Council for the discharge of water and contaminants into land and/or water;
- A discharge permit under s.15 from the Waikato Regional Council for the deposition of fill to land; and
- A discharge permit under s.14 from the Waikato Regional Council for treated wastewater to land (domestic).

The construction and operation of the Waikokowai Wind Farm will also likely 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 relocation of lizard on the project site.

The construction of the Waikokowai Wind Farm will also require an archaeological authority under the Heritage New Zealand Pouhere Taonga Act 2014 in relation to the potential discovery of previously unidentified heritage sites within the project site.

An approval under Schedule 10 of the Local Government Act 1974 will also 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:

Waikato Regional Council
Waikato District 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 in lodged by Mercury NZ Limited with the relevant local authorities in relation to the Waikokowai Wind Farm.

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 Waikokowai Wind Farm.

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

Please write your answer here:

If approvals are granted, Mercury anticipates the following project timeframes:

Consenting: 2025

Detailed Design/ procurement: 2025 – 2026

Funding/ Financial Investment Decision: 2026

Construction: 2026

First Generation: 2028

Completion: 2029

Section 3: Consultation

Who are the persons affected by the project?

Please write your answer here:

The persons potentially affected by the project are:

- Waikato District Council;
- Waikato Regional Council;
- Waikato-Tainui (Te Whakakitenga o Waikato Incorporated); and
- Waahi Whaanui Trust, (covering a number of hapuu areas including Ngaati Whawhaakia & Ngaati Mahuta).

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:

Mercury introduced the project to members of Waikato-Tainui, Waahi Whaanui Trust, and Tainui Group Holdings in April 2024.

This initial consultation's purpose was to introduce the project and to hear from the groups how they wish to be engaged moving forward and what particular interest they have in the project. Waikato-Tainui and Tainui Group Holdings both expressed how their involvement would be to support mana whenua (being Waahi Whaanui Trust) in navigating the consenting process and to communicate with hapuu.

Feedback was given to request that Mercury undertakes sufficient environmental investigations to ensure clarity as to any potential impact on the whenua, the awa and any wetlands, including resident fauna. It was recommended that when the time is right, Mercury and Waahi Whaanui should work together to understand cultural heritage and cultural values to support the project shaping. Mercury and the project team welcomed this opportunity. The key outcome from the hui was the establishment of purposeful commitment from Mercury to engage with transparency and to deliver a consent application that is technically robust through a detailed suite of environmental, social and cultural investigations, and to do this in consultation with mana whenua.

The opportunity to consider social enterprise opportunities and to work together to provide opportunities for upskilling hapu members through the construction and into operation is an opportunity Mercury intends to explore.

Overall, the participants in the hui were pleased to be engaged early in the process.

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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 process 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 Waikokowai 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:

The treaty settlements relevant to the Waikokowai Wind Farm are:

- Waikato Raupatu Claims Settlement Act 1995; and
- Waikato-Tainui Raupatu Claims (Waikato River) Settlement Act 2010.

The Waikato Raupatu Claims Settlement Act 1995 includes an agreed historical account of the breaches of Te Tiriti o Waitangi that occurred, the Crown acknowledgments and apology, and cultural redress. The Act does not impose any statutory acknowledgements relevant to the project site.

The Waikato-Tainui Claims (Waikato River) Settlement Act 2010 applies to the project site as it is located in the Waikato River Catchment. The overarching purpose of the settlement is to restore and protect the health and wellbeing of the Waikato River for future generations. The Act establishes a Vision and Strategy for the Waikato River (Te Ture Whaimana).

The Vision and Strategy for the Waikato River applies to the area of the Waikato River from Huka Falls to Te Puuaha o Waikato (Port Waikato) and the Waipā River from its junction with the Pūniu River to its confluence with the Waikato River at Ngāruawāhia.

The Vision for the Waikato River is: "...for a future where a healthy Waikato River sustain abundant life and prosperous communities who, in turn, are all responsible for restoring and protecting the health and wellbeing of the Waikato River, and all it embraces, for generation to come."

There are thirteen objectives included to realise the above Vision, which contain the desired outcomes for the management of the Waikato River, and which will be relevant to consideration of any water-related effects associated with this proposal. A concept of betterment prevails throughout the objectives, meaning that any proposals in the catchment require additional consideration to be able to demonstrate an overall environmental improvement associated with a project (e.g. improvements in stream health/ planting, retiring of degraded area).

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 activities associated with construction, operation and maintenance of the Waikokowai Wind Farm are similar to other wind farms consented around the Waikato Region. This familiarity with the actual effects of wind farm projects provides Mercury with confidence that any potential adverse effects of this wind farm project can be appropriately managed and mitigated.

Whilst the technical assessments for the Waikokowai Wind Farm are currently being commissioned, it is expected that the suit of technical assessments required will be not dissimilar to those for other wind farms consented within the region. The assessments are likely to include:

- Landscape and visual amenity;
- Ecology;
- Cultural and Heritage;
- Civil design;
- Transportation;
- Radio and telecommunications;
- Aviation;
- Economic effects; and
- Shadow flicker effects.

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

- Landscape and visual effects;
- Bat and avifauna effects;
- Noise effects;
- Freshwater effects;
- Wetland effects;
- Wider ecological effects; and
- Construction and stormwater management effect.

The potential of these adverse effects is further discussed below.

Visual and Landscape Effects

Wind farms in rural environments inevitably introduce some change to the surrounding landscapes and lead to 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 project site is not located in an area of outstanding natural landscape/ feature under the Operative or Proposed Waikato District Plans or the Waikato Regional Policy Statement, and it is considered that a wind farm on the site can be developed without interfering with the values and characteristics of the nearest outstanding landscapes / features (approximately 10 km).

The location of the project site is largely remote and there are very few dwellings adjacent to the proposed wind farm. Whilst those few adjacent to the project site will experience a change in 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 of the project.

Overall, it is considered that any adverse visual amenity and landscape effects can be appropriately managed.

Bat and Avifauna Effects

A preliminary desktop identification of potential avifauna constraints has been undertaken by Boffa Miskell for the project site.

In relation to avifauna, vegetation in the middle of the site could potentially form a fragmented habitat for North Island kaka, long-tailed cuckoo, North Island robin and bush falcon to transverse the site. Further detailed avifauna surveys will inform potential operational risks of the wind farm, although it is noted that many wind farms co-exist with multiple avifauna species.

The project site is relatively close to a mosaic of open waters and wetland habitat in between Raglan and Kawhia Harbours. Given this there is potential for some seasonal movements of avifauna to transverse the site. There is also potential for domestic migrants to transverse the site including South Island Pied Oystercatcher and other domestic migrants to and from North Island harbours, specifically birds that migrate from the Firth of Thames and Tauranga. In order to understand the migratory movements, targeted surveys, acoustic monitoring and point counts will be completed.

With regard to bats, the presence of long-tailed bats is yet to be confirmed on the project site. The location of project site is, however, identified in the Waikato Region's Catchment Management Plan as an area of "unconfirmed potential habitat" for long-tailed bats. Further assessments and acoustic surveys will be completed to understand how the wind farm might interact with any bat populations and potential measures to mitigate for any potential adverse effects. In order to manage any potential adverse effects from the wind farm, once operational, monitoring of the wind farm and predator control can be undertaken to protect wider population.

Terrestrial Ecology Effects

Whilst several significant natural areas are present within the project site, the construction envelope is largely within a series of working farms where disturbance activities are occurring on a regular basis. The predominant vegetation type within the site is pasture with mature remnant native vegetation. The project footprint will be designed around these areas.

However, the presence of lizards is not uncommon or unique in these landscapes. If lizard species that have a threatened status are identified on the site, then several established mitigation and management measures will be considered to address potential adverse effect on the lizard species. These measures may include trapping and relocation of lizards from disturbed areas and creating new habitat outcrops 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 which mask the operation of wind farm noise. This operation of the wind farm will be able to comply with the relevant noise standards for wind farms in NZ6808:2010 and the Proposed Waikato District Plan (in part due to the distance of the project site from nearby dwellings).

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

Freshwater Effects

The construction of the wind farm and ancillary structures involve substantial earthworks, and such works have the potential to result in discharge of sediment to waterbodies.

Assessments of the ecological values of the waterbodies around the site will be required and will need to consider how construction effects, particularly sediment, can be appropriately managed on site. Based upon these, it is considered that appropriate sediment controls and discharge standards that can be implemented to ensure sediment runoff from site into waterways is appropriately controlled and the requirements of the Vision and Strategy for the Waikato River to achieve betterment are implemented.

Wetland Effects

An assessment of natural inland wetlands will be completed by a technical specialist. The finding of the assessment will inform the project envelope as to ensure that wetlands are avoided as far as practicable. In addition, if wetlands cannot be avoided due to the functional needs of the wind farm, a suitable wetland mitigation package will be developed in accordance with the National Policy Statement on Freshwater Management.

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

Construction and Stormwater Management Effects

The construction activities on site will be managed by implementation of a suite of environmental control and discharge standards by a way of consent conditions, such process ensures construction activities on the site do not adversely affect surrounding environments and waterbodies – and the requirements of the Vision and Strategy for the Waikato River to achieve betterment are implemented. These measures (which by way of example include stormwater management, erosion and sediment control, dust control and site rehabilitation measures) will be implemented with a suite of approved construction management and erosion and sediment control plans.

Overall, it is considered that the Waikokowai Wind Farm will generate positive social and economic benefits for the broader community and can be constructed and operated in a manner that will, as far as practicable avoid, remedy or mitigate potential adverse effect 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 relevant to Waikokowai Wind Farm include:

- National Policy Statement for Renewable Electricity Generation 2011 (NPSREG);
- National Policy Statement on Freshwater Management (2023) (NPSFM); and
- National Environmental Standard on Freshwater Management (NESFM); and
- National Policy Statement for Highly Productive Land (NPSHPL).

The National Policy Statement of Indigenous Biodiversity does not apply to Waikokowai 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.”

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

National Policy Statement for Renewable Electricity Generation

The NPSREG seeks to enable the sustainable management of renewable energy generation under the RMA.

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.

Policies A, B and C1 of the NPSREG are considered most relevant to the Waikokowai Wind Farm as they seek to ensure decision makers:

- Recognise the benefits of renewable electricity generation activities;
- Acknowledge the practical implications of 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.

The Waikokowai Wind Farm will provide additional renewable electricity generation capacity and contribute to the strategic target in the NPS-REG that 90% of electricity generated in New Zealand be derived from renewable energy sources by 2025 (based on delivered electricity in an average hydrological year). The Waikokowai Wind Farm will efficiently contribute to this goal and the decarbonisation of the New Zealand economy.

It is noted, the practical implication of wind generation means that potentially suitable sites for wind farms are limited and infrastructure required to harness the wind resource will inevitably generate some adverse effects on the environment.

The development of the Waikokowai Wind Farm is also considered to be consistent with clause (c) of Policy B, which notes that meeting or exceeding the Government's strategic target for the generation of electricity from renewable resources will require the “significant development” of renewable electricity generation activities.

Policy C1 of the NPSREG recognises the practical implications and locational constraints associated with the development of renewable electricity generation activities. There are several factors that influence the identification of a site as being suitable for development of a wind farm, including quality / consistency of wind resource and proximity to transmission infrastructure. The project site has been identified as an excellent wind resource located near to significant demand centres.

In light of the assessment above, it is concluded that the construction and operation of the Waikokowai Wind Farm will be consistent with the stated objective and policy directives of the NPSREG.

National Policy Statement on 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 and 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 resources 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.

Recently announced reforms to the RMA are intended to make it clear that, while the NPS-FM is being reviewed and replaced, resource consent applicants no longer need to demonstrate their proposed activities follow the Te Mana o te Wai hierarchy of obligations. Of relevance to the Waikokowai

Wind Farm, the NPSFM is relevant to the potential impacts of construction activities to impact on freshwater resources (including wetlands) via potential sediment discharge to surface water bodies (namely sediment during construction) and impacts on the natural inland wetlands and streams from the configuration of internal roading networks and culverts if necessary. Whilst the wind farms will be designed to avoid adverse effects on the freshwater values as far as practicable, the policy expectation of the NPSFM with respect to applying an effects management hierarchy and mitigation/ compensation measures will also be followed by Mercury. This mitigation / compensation will form part of the consent conditions and management plans proffered as part of the resource consent application.

Overall, it is considered that with careful design and management of the construction of the Waikokowai Wind Farm the policy directives of NPSFM which set specific instructions for how adverse effects on wetlands and streams should be managed and prioritised can be complied with.

National Environmental Standard for Freshwater

The NESF regulates activities that pose risks to health of freshwater and the freshwater ecosystems. Of particular relevance to the Waikokowai Wind Farm are the rules in the NESF relating to activities that may affect natural inland 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.

The effects management hierarchy under the NPSFM will be applied by Mercury 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. The adverse effect on wetlands can be avoided by the configuration of the wind farm 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.

National Policy Statement for Highly Productive Land

The NPSHPL is applicable to the Waikokowai Wind Farm as the project site includes three limited areas of LUC Class 3 land at its northern, western and southern most boundaries.

Clause 3.9 of the NPSHPL identifies that the use or development of highly productive land is available for the operation of specified infrastructure (which in this instance includes the Waikokowai Wind Farm), and where measures are taken to minimise or mitigate any loss of the productivity capacity of the highly productive land. Whilst the wind farm may include upgraded access tracks and hard stands for the wind turbines within the LUC Class 3 land, existing primary production activities will be able to continue to occur within this part of the project site. In this regard, the wind farm will provide a diversification of income for the farming landowners. Fill material will be stored during construction and retained on the site at the completion of construction. Other measures to minimise potential effects on the soils will also be investigated in line with the expectations of the NPSHPL.

Furthermore, the upgrading of accesses to facilitate the wind farm will not cause reverse sensitivity effects on land-based primary production given that Mercury has agreements with the relevant landowners.

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Section 7: Eligibility

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

Yes

Please explain your answer here:

In Mercury's considerable experience, consenting a new wind farm often takes multiple years. It is a costly, lengthy and challenging process. Consent applications for wind farms are generally publicly notified, attracting submissions from a range of parties in opposition. Hearings for consent applications for wind farms are inevitable, and require an applicant to provide extensive evidence and legal submissions. A de novo appeal in 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 (by around three and a half years) and the cost of consenting the Waikokowai Wind Farm under the RMA process, including by making the following key changes to that process:

- More efficient timeframes are provided under the fast-track process than those that would otherwise be applicable for the Waikokowai Wind Farm.
 - No limited or full notification of the application. Under the traditional RMA process, the Waikokowai Wind Farm would almost certainly be fully notified, adding significant costs and delays to the project.
 - No de novo appeal to the Environment Court, with appeals under the fast-track process being available to the High Court on points of law only.
- An additional important aspect of the fast-track process enables the securing of approvals under several different pieces of legislation. As noted in section 2 of this document, approvals for the Waikokowai 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. Obtaining those approvals under traditional approval processes without the benefit of a 'one-stop shop' approval process would add considerable uncertainty, delay and complexity to the process. As a result, the Waikokowai Wind Farm project will benefit considerably through the fast-track process, especially since the approvals under the Wildlife Act do not have a defined timeframe.

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

Please write your answer here:

In regards to the Waikokowai Wind Farm's impact on the efficient operation of the fast-track process, the project is a nationally significant renewable energy project that will have an output of approximately 650 GWh per annum. The project meets the eligibility criteria and will significantly benefit from the cost and process efficiencies of this fast-track process.

The effects of establishing a wind farm are well known. Technical assessments required to describe and assess these will be advanced by Mercury and it is anticipated that the application will be ready to be considered under the fast-track process. 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. 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, Tararua, 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. The listing of this project in Schedule 2A or 2B of the Bill will not adversely affect the efficiency of the fast-track application process nor the efficient operation of the process.

Mercury is not aware of any negative consenting issues that would impact on the application for the Waikokowai 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 Waikokowai Wind Farm is not specifically identified as a priority project, however the project aligns with the Government's plans and strategies to increase renewable electricity generation capacity, reduce carbon emissions, and deliver a low carbon economy for Aotearoa – New Zealand.

The NPSREG 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.

The Waikokowai Wind Farm will have a material role in contributing to that target for renewable electricity. Currently the MBIE is 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. A renewable energy generation project like Waikokowai Wind Farm will have a role in displacing reliance on non-renewable electricity sources and therefore a reduction in greenhouse gas emissions from the electricity sector.

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 Waikokowai Wind Farm's MW installed capacity will contribute positively and materially to the target of Electrify New Zealand.

Furthermore, the Waikokowai Wind Farm is consistent with the recommendations of 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 which recommended building new wind projects in the first, second, and third emission budget periods.

Will the project deliver regionally or nationally significant infrastructure?

National significant infrastructure

Please explain your answer here:

The Waikokowai Wind Farm is nationally significant infrastructure, as it is a renewable electricity generation activity where the supply is to the National Grid or local distribution network.

As noted in the NPSREG, 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 Waikokowai Wind Farm is expected to generate up to 650 GWh of renewable electricity per annum which will be connected into the National Grid adjacent to the project site.

Will the project:

Please explain your answer here:

N/A

Will the project deliver significant economic benefits?

Yes

Please explain your answer here:

Building the Waikokowai Wind Farm would have economic impacts on spending, employment and incomes in the local economy.

The Waikokowai 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.

The overall construction spend will be in the order of \$660 million over approximately two and a half years. Approximately \$260 million will be spent within the New Zealand economy.

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 reduced reliance on imported fossil fuels.

The Waikokowai Wind Farm is located close to major load centres in New Zealand meaning line losses will be minimised, providing efficient energy to the system. It is also geographically diverse to other wind farms in New Zealand, increasing the diversity of the wind supply which increases security of supply to the market.

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 obligation for reducing greenhouse gas emission and addressing climate change.

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 on whose properties the turbines will be located. 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:

The Waikokowai Wind Farm will utilise wind resource prevalent on the hills around Glen Afton to generate electricity. The project will generate up to 650 GWh of energy sufficient to provide electricity for up to 90,000 standard households or provided enough electricity for 320,000 electric vehicles.

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

Yes

Please explain your answer here:

The Waikokowai Wind Farm will have significant climate change mitigation benefits, including the reduction of greenhouse gas emissions. In this regard, the Waikokowai Wind Farm will deliver an estimated installed capacity of approximately 650 GWh per annum.

Generating electricity when the wind is available can assist in conserving stored hydro electricity 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 Waikokowai Wind Farm has an important role in achieving New Zealand's 2050 targets in the Climate Change Response Act 2002. The Waikokowai 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. The Waikokowai Wind Farm will displace approximately 600,000 tonnes of carbon annually if the equivalent generation output was from a coal-fired power station. This calculation is based on the carbon emissions per GWh from a coal-fired power station in New Zealand.

The NPSREG, Policy A, provides for renewable electricity generation as a matter of national significance, 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 Waikokowai 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 Waikokowai 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 aid the resilience and recovery from natural hazards by diversifying electricity supplies that may be available during natural hazard events. In this regard, natural hazard events can cause continuity of supply issues for different forms of generation (i.e. during floods).

In addition, the project itself will be designed and constructed to minimise any potential effects from natural hazards in the surrounding environment. This matter is discussed further in section 8 below.

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 new thermal generation. In this regard, the project will provide up to 650 GWh of new renewable generation and will provide a diverse electricity supply profile from other wind in New Zealand.

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 Waikato 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 Operative and Proposed Waikato District Plans. The site is not subject to any landscape overlays in these plans and is set back a suitable distance from adjacent dwelling. The Waikato District Plan recognises that infrastructure has 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 Waikokowai Wind Farm will be consistent with the objectives and policies of the Waikato District Plan.

With respect to the Waikato Regional Policy Statement, it provides direction on the management of infrastructure that is of 'regional or national importance'. The Regional Policy Statement directs that decision makers considering infrastructural activities of regional or national importance consider the locational need of such activities when they need to locate within sensitive environments.

The Waikato Regional Policy Statement also requires potential adverse effects to be appropriately managed within sensitive environments, with a focus on avoiding adverse effects on matters captured under section 6 of the RMA. In addition, some provision is made for compensation of adverse effects in appropriate circumstances.

Anything else?

Please write your answer here:

Mercury's view is that the Waikokowai Wind Farm project is exactly the type of project that the fast-track process has been designed to enable. The fast-track process will enable this project to be consented more efficiently as the current consenting process which will likely take more than three years from lodgement to obtaining consent (presuming there is an appeal).

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.

Mercury requests that the Waikokowai Wind Farm project is 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:

No. Mercury confirms that the Waikokowai 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?

No

If yes, please explain:

The primary risks to the Waikokowai Wind Farm from climate change and natural hazards are from seismic events. The project site is not subject to any other natural hazard overlays on the Waikato Regional Council Natural Hazard Viewer.

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

Mercury will ensure that any potential risks are managed by:

- Undertaking robust design and site management, including permitting, operation management, monitoring and reporting;
- 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 an excellent 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