Application for a project to be referred to an expert consenting panel

(Pursuant to Section 20 of the COVID-19 Recovery (Fast-track Consenting) Act 2020)

For office use only:

Project name: The Southland Wind Farm. Please note that this is an interim "working" project name and an "actual" name will be determined in consultation and partnership with Te Ao Mārama Incorporated ("TAMI") and mana whenua, primarily being Waihōpai rūnaka.
Application number: PJ-0000886
Date received: 17/03/2023

This form must be used by applicants making a request to the responsible Minister(s) for a project to be referred to an expert consenting panel under the COVID-19 Recovery (Fast-track Consenting) Act 2020.

All legislative references relate to the COVID-19 Recovery (Fast-track Consenting) Act 2020 (the Act), unless stated otherwise.

The information requirements for making an application are described in Section 20(3) of the Act. Your application must be made in this approved form and contain all of the required information. If these requirements are not met, the Minister(s) may decline your application due to insufficient information.

Section 20(2)(b) of the Act specifies that the application needs only to provide a general level of detail, sufficient to inform the Minister's decision on the application, as opposed to the level of detail provided to an expert consenting panel deciding applications for resource consents or notices of requirement for designations.

We recommend you discuss your application and the information requirements with the Ministry for the Environment (the Ministry) before the request is lodged. Please contact the Ministry via email: fasttrackconsenting@mfe.govt.nz

The Ministry has also prepared Fast-track guidance to help applicants prepare applications for projects to be referred.

Part I: Applicant

Applicant details

Person or entity making the request: Contact Energy Limited

Contact person: Matthew Cleland

Job title: Head of Wind and Solar

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Postal address:

PO Box 10742, Wellington 6143

Address for service (if different from above)

Organisation: Contact Energy Limited

Contact person: Brigid Buckley

Job title: Senior Specialist - Resource Management

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Postal address:

PO Box 10742, Wellington 6143

Part II: Project location

The application: does not relate to the coastal marine area

If the application relates to the coastal marine area wholly or in part, references to the Minister in this form should be read as the Minister for the Environment and Minister of Conservation.

Site address / location:

A cadastral map and/or aerial imagery to clearly show the project location will help.

248 Venlaw Road, Oware, Southland, 9892, New Zealand

Legal description(s):

A current copy of the relevant Record(s) of Title will help.

Refer to section 2.2 of the attached referral application document for a full list of the properties and their legal description(s).
Refer to Appendix B - Records of Title for copies of these.
The Certificates of Title:

- SL9D/824
- 407674
- SL9B/866

Registered legal land owner(s):

Refer to section 2.3 of the attached referral application document.

- Jedburgh Station - Norman James Elder and Timothy Colin Story
- Matariki (Venlaw) Forest – Matariki Forests
- Glencoe Station - Geoffrey Bruce Dodds, Kathryn Joyce Dodds

Detail the nature of the applicant's legal interest (if any) in the land on which the project will occur, including a statement of how that affects the applicant's ability to undertake the work that is required for the project:

Contact has purchased 90ha of land that will be essential to allow access to the site and provide areas that may be used as a laydown area during construction or for storage. The land may be considered for planting of native or exotic forestry following construction.

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Contact has undertaken a thorough process to assess all potential options for connection of the wind farm to the electricity network including discussions with Transpower. This work confirmed that connection to the Transpower 220kV circuit between Invercargill and Dunedin is the only feasible option for a wind farm of the size envisaged. Further work identified four potential transmission line routes between the wind farm substation and the grid injection point at the Transpower 220kV circuit. Negotiations with the transmission line landowners are advanced and anticipated to be completed for the 'preferred' route in April 2023. Contact is a Requiring Authority for the purpose of transmission infrastructure to connect its renewable energy generation.

Part III: Project details

Description

Project name: The Southland Wind Farm. Please note that this is an interim "working" project name and an "actual" name will be determined in consultation and partnership with Te Ao Mārama Incorporated ("TAMI") and mana whenua, primarily being Waihōpai rūnaka.

Project summary:

Please provide a brief summary (no more than 2-3 lines) of the proposed project.

Large-scale wind farm development (55km2) near Gore (Southland District) consisting of 55 turbines (6.6MW) with a total generation capacity of ~230-300MW (or 110,000-150,000 households).

An estimated 160-240 jobs will be created and construction can commence within 18 months of consents being granted.

The Project will contribute towards achieving the Government's goals of transitioning to renewable electricity sources and will provide significant economic and public benefits.

Project details:

Please provide details of the proposed project, its purpose, objectives and the activities it involves, noting that Section 20(2)(b) of the Act specifies that the application needs only to provide a general level of detail.

Refer to section 3.3. of the attached referral application for a detailed description of the project.

A 55 wind turbine project located in the Southland District approximately 30km southeast of Gore. The wind farm is anticipated to be between 230–300 MW and generate between 900-1200GWh/year (sufficient to power 110,000-150,000 households). The project will include the following key components:

- Construction and operation of up to 55 wind turbines, each up to approximately 6.6 MW in capacity and with a 'tip height' of up to 220m
- Construction of roading, turbine foundations and "hard stand" areas adjacent to each turbine
- Electrical reticulation, consisting of underground cables and wind turbine transformers
- A substation to collect the power generated by the wind turbines
- A switching station located adjacent to the existing North Makarewa to Three Mile Hill A Circuit Transpower 220kV circuit
- An overhead double circuit 220kV transmission line between the substation and switching station to provide connection of the wind farm to the Transpower National Grid
- An operations and maintenance building, and
- The erection of up to two permanent meteorological masts.

Wind Turbine Layout: The locations of the turbines have been determined based on efficient use of the wind resource while taking into account engineering requirements and the need to avoid or minimise environmental effects. The turbines are primarily located on the more elevated points of the site from about 380m to 630m above sea level. The turbine layout has been designed for a wind turbine envelope that has a rotor diameter of up to 170m and a tower height of up to 135m. The tip height of the wind turbines (including the height of the rotor) will be up to 220m. Each wind turbine will consist of:

- A foundation and wind turbine platform
- A tapered tubular steel tower
- A nacelle which sits on top of the tower and houses the generator, main control and safety systems, and rotor shaft which transmits the rotating energy from the wind turbine rotor
- A three bladed wind turbine rotor and nose cone

Wind turbine foundations will be either gravity pads or a piled solution, depending on the results of the geotechnical ground investigations undertaken during detailed design. Gravity pads will have a width of between 20-25m consisting of about 1000m3 of concrete with reinforcing steel. Concrete batching plants will be established on-site during construction and removed post construction. This is standard practice for large wind farms with high concrete demands.

A transformer for each wind turbine will be located either within the turbine nacelle, in the base of the wind turbine tower, or adjacent to the tower (and located outside the edge of the foundation), depending on the wind turbine model selected during tendering. Platform areas beside each wind turbine will be about 90m by 60m.

Weather monitoring stations: Up to two weather monitoring stations may be required on the wind farm site for ongoing wind and overall performance monitoring. These are about 140m high with weather monitoring instruments mounted at several levels.

Internal Roads: Within the wind farm, roads will be formed between the wind turbines to facilitate construction and operations access. The carriageway width will typically be 6.5m with localised widening on corners to accommodate the tracking of the wind turbine components. There will be drainage channels approximately 1.5m wide, on both sides. Civil design modelling indicates there will be approximately 1,300,000m3 cut, of which approximately 600,000m3 will be used as engineered fill and the balance to be deposited and recontoured on the land.

Substation: The substation site will be approximately 150mx70m (just over 1ha in area) and will include the following:

- Perimeter stock fence and security fence
- Car parking area
- Substation building of ~50mx12mx6m (height)
- Up to two gantry structures for 220kV line termination up to 30m height
- 220kV bus work, switch gear and associated equipment which may include STATCOM and Harmonic filters
- Lightning protection, communication and lighting towers up to 35m in height
- Two 33kV/220kV (or 66kV/220kV) transformers

The substation transformers will contain approximately 60,000 litres of oil each. Low level bunding will be formed around them and sized to match the volume of oil contained within the transformers in the unlikely event of a spill. Stormwater collected within the bund will be discharged via a water/oil separation system. The substation building will house 33kV (or 66kV) indoor switchgear, control panels, communications, power supply and associated equipment. The substation building will also contain office and ablution facilities for workers.

Electrical Reticulation: Each turbine will be connected to the on-site substation located within the wind farm using 33kV (or potentially 66kV) cables. The electrical reticulation will be underground with cable strings buried (approximately 0.9m depth) in or alongside the roads that will be constructed between the turbines and the substation. In some situations, such as stream crossings, overhead connections may be required. These will be supported by poles no more than 25m in height. This will be determined following detailed design investigations that are currently underway.

Operations and Maintenance (O&M) building: This will be about 1,500m2 in area (60mx25mx7m high) and will contain site offices, meeting rooms, toilets, kitchenette and a workshop. The carpark will be an additional 500m2–1000m2.

Switching Station: The switching station facilitates a reliable and controllable connection point between the substation and the Transpower grid. The 220kV switching station will be located close to the existing Transpower 220kV North Makarewa - Three Mile Hill A circuit. There are two locations currently being investigated and considered for the switching station location. The overall switching station site will be approximately 100mx100m and will consist of the following:

- Perimeter stock fence and security fence
- Car parking area
- Control building of approximately 15m by 8m and approximately 6m in height
- Up to eight gantry structures for 220kV line termination up to 30m height (includes lightning peaks)
- 220kV bus work, switch gear and associated equipment (no taller than 10m)
- Lightning protection, communication and lighting towers up to 35m in height.

The control building will house protection and control panels, communications, power supply and associated equipment. It will also contain ablution facilities for workers, and an on-site sewage system will be installed.

220kV transmission line: A new 220kV transmission line will form the connection between the wind farm substation and the switching station. The transmission line will be approximately 15-17km and will be likely be double circuit 220kV supported on steel lattice towers or poles up to 55m in height. Up to 50 towers may be required for the transmission line with an average spacing of 300-400m. The decision on whether to utilise a single or double circuit transmission line will be determined during detailed design and after the maximum output if the wind farm has been confirmed and design optimisation has been completed.

Site Access: There are two possible access routes into the wind farm site: one from the west via Thornhill Rd (off Venlaw Rd), and the other from the north through the Port Blakely property from Davidson Road West. Transportation modelling indicates some minor works are likely to be required to accommodate the tracking of wind turbine components between the port (Southport) and the site (confirmed once the final wind turbine model is selected for the project). It is likely both access options will be used during the wind farm construction.

Where applicable, describe the staging of the project, including the nature and timing of the staging:

Refer to section 3.4 of the attached referral application document.

Construction of the wind farm is anticipated to take approximately 24 months.

Turbine construction is not proposed to be staged or staggered in any way. In other words, all 55 turbines will be constructed within this timeframe.

Following completion of the wind farm construction, the wind turbines will be operational for a period of up to 30 years and then it is currently intended that they be ‘repowered’ (replacement of the wind turbines with new wind turbines) for a second 30-year period.

Consents / approvals required

Relevant local authorities: Clutha District Council, Environment Southland, Gore District Council, Otago Regional Council, Southland District Council

Resource consent(s) / designation required:

Land-use consent, Water permit, Discharge permit, Designation

Relevant zoning, overlays and other features:

Please provide details of the zoning, overlays and other features identified in the relevant plan(s) that relate to the project location.

Legal description(s)	Relevant plan	Zone	Overlays	Other features
Wind farm site. Refer to section 2.2 of the attached referral application document.	Southland District Plan	Rural Zone	The only notable features being identified on the planning maps are the Mimihau Stream south branch which runs through the site, the Mimihau Stream north branch located to the north of the site and an archaeological feature to the north of the site.	To the east of the subject site, and within the jurisdiction of the Clutha District Council, there is an area of land annotated as "Reserve and Conservation Land". This is further described in Schedule 6.1 of the Clutha District Plan as the Catlins State Forest Park, which DOC administers. The Southland Wind Farm is not physically located on this land.
Transmission Line Route (Option)	Clutha District Plan	Rural Resource Area	None.	None.
Transmission Line Route (Option)	Gore District Plan	Rural Zone	None.	None.

Rule(s) consent is required under and activity status:

Please provide details of all rules consent is required under. Please note that Section 18(3)(a) of the Act details that the project **must not include** an activity that is described as a prohibited activity in the Resource Management Act 1991, regulations made under that Act (including a national environmental standard), or a plan or proposed plan.

Relevant plan / standard	Relevant rule / regulation	Reason for consent	Activity status	Location of proposed activity
Southland District Plan	RURAL.4 - All activities associated with the construction, commissioning, operation and maintenance of the wind farm.	The project relates to the construction and operation of a wind farm.	Discretionary Activity	Within the wind farm site and proposed transmission line route.

Southland District Plan	RURAL.3 - Earthworks that exceed 1,000m3 in volume and alters the existing ground level by more than 5m in depth or 2m in height.	Earthworks associated with the construction of the wind farm will exceed 1,000m3 in volume and will alter the existing ground level by more than 5m in depth or 2m in height.	Restricted discretionary	Within in the wind farm site and proposed transmission line route.
Southland District Plan	RURAL.4 - Extraction of gravel or rock greater than 1,500m3 in any 12 month period and the material is not transported on a formed legal road.	Gravel or rock will be extracted to enable the construction of the wind. This will exceed a volume of 1,500m3 in a 12 month period. However, the material will not transported on a formed legal road	Discretionary	Within the wind farm site and proposed transmission line route.
Southland District Plan	RURAL 3 - Earthworks greater than 25m3 within a Riparian Margin.	Earthworks greater than 25m3 are likely to be undertaken within a Riparian Margin. This will be confirmed in the prior to lodgment of the application, and further project iteration. Consideration will be made to measures to avoid this where possible, however given the scale of the project this may be required.	Discretionary activity.	Within the wind farm side and potentially along the chosen transmission route.
Southland District Plan	RURAL.1(3) / The construction of a building on the site that complies with the permitted activity standards.	An operations and maintenance building will be required on the site for the operation of the wind farm.	Permitted activity	Within the wind farm site boundary.
Southland District Plan	INF/4 / The construction of a new transmission line.	A transmission line is required to provide a connection to the National Grid.	Discretionary activity.	Within in the wind farm site and proposed transmission line route.
Southland District Plan	INF.3 / The establishment of masts, poles and towers that exceed 25m.	Poles and towers that exceed 25m in height will be required for the proposed transmission line.	Restricted discretionary activity.	Within the wind farm site and proposed transmission line route.
Southland District Plan	INF.4(2) - The construction of new transformers and substations that exceed 30m3 in area.	A substation will be required to collect the output of all wind turbines and “step up” the voltage to match the voltage of the	Discretionary activity.	Within the wind farm site.

		Transpower National Grid.		
Southland District Plan	BIO.3 / The clearance or removal of indigenous vegetation that is not provided for as a permitted or controlled activity.	This is included as a precaution as where practicable, the location of the wind turbines will avoid indigenous vegetation habitats. However, indigenous vegetation may be required to be cleared on the site that exceeds the permitted or controlled activity standards. This will be confirmed following the completion of the final wind farm design and technical assessments.	Discretionary activity.	Within the wind farm site and proposed transmission line route.
Southland District Plan	HAZS.2 / The storage of hazardous substances (diesel) on the site in quantities that exceed the permitted limits.	Diesel will be required to be stored on the site for the operation of the wind farm.	Discretionary activity	Within the wind farm site.
Environment Southland Operative Regional Air Plan	5.5.2 / Concrete batching activities or onsite quarrying activities associated with the construction and roadwork activities required for the wind farm construction.	Concrete batching activities or onsite quarrying activities associated with the construction and roadwork activities will be required for the wind farm construction.	Discretionary activity.	Within the wind farm site and proposed transmission line route.
Environment Southland Operative Regional Air Plan	Rule 5.5.5 / Construction activities such as road improvement works and associated dust discharges that are not strictly provided for in the Regional Air Plan.	It is anticipated construction activities will generate dust discharges that may exceed limits provided for in the Regional Air Plan.	Discretionary activity.	Within the wind farm site and proposed transmission line rout and roading.
Environment Southland Operative Regional Water Plan	Rule 1 / Discharge of contaminants or water to a surface water body, namely sediment during construction.	Contaminants or water may be discharged to a surface water body during construction of the wind farm. However, any discharges will be managed appropriately to ensure adverse effects on the surrounding waterways are avoided.	Discretionary activity.	Within the wind farm site and proposed transmission line route.

Environment Southland Operative Regional Water Plan	Rule 18(d) / Abstraction, diversion and use of surface water.	Water take and use will be required throughout the construction of the wind farm for activities such as earthworks, aggregate crushing, concrete batching, dust control and general activities.	Restricted discretionary activity.	Within the wind farm site and proposed transmission line route.
Environment Southland Operative Regional Water Plan	Rule 20(c) / Minor stream diversions.	Minor stream diversions will be required during construction of the wind farm.	Discretionary activity.	Within the wind farm site and proposed transmission line route.
Environment Southland Operative Regional Water Plan	Rule 22(a) / The drilling and construction of a bore.	A bore may be required to be drilled on the site if a groundwater take is required.	Controlled activity.	Within the wind farm site and proposed transmission line route.
Environment Southland Operative Regional Water Plan	Rule 26(b) / The construction of bridges and any associated bed disturbance.	A bridge may be required to be constructed on the site during the construction of the wind farm.	Restricted discretionary activity.	Within the wind farm site and proposed transmission line route.
Environment Southland Operative Regional Water Plan	Rule 30(c) / The erection of erosion control structures.	Erosion control structures will be required to manage erosion and sediment throughout the construction of the wind farm.	Discretionary activity.	Within the wind farm site and proposed transmission line route.
Environment Southland Operative Regional Water Plan	Rule 41(c) / The excavation or disturbance of the bed of a river for gravel extraction at a rate greater than 120m3 per year.	The construction of the wind farm will require gravel. The source of the gravel is yet to be confirmed, however, this may be extracted from a nearby river where it is appropriate to do so. .	Discretionary activity.	Within a river near the wind farm site.
Environment Southland Operative Regional Water Plan	Rule 47 / The disturbance of the bed of any watercourse.	The bed of a watercourse may be disturbed during the construction of the wind farm. This will be appropriately managed to ensure there are no adverse effects on the waterway.	Discretionary activity.	Within the wind farm site and proposed transmission line route.
Environment Southland Operative Regional Water Plan	Rule 53(b) / The discharge of more than 500m3 of cleanfill into or onto land.	Earthworks required will involve approximately 500,000m3 of excavated material to be used as engineered	Restricted discretionary activity.	Within the wind farm site and proposed transmission line route.

		fill within the site and approximately 600,000m3 of excavated material to be reused and recontoured within the site.		
Proposed Southland Water and Land Plan	Rule 5 / Discharge of contaminants or water to a waterbody, namely sediment during construction.	Sediment will be discharged to a waterbody during construction. However, this will be appropriately managed to ensure adverse effects on the surrounding waterways are avoided.	Discretionary activity.	Within the wind farm site and proposed transmission line route.
Proposed Southland Water and Land Plan	Rule 42(b) / Discharge of cleanfill associated with the earthwork disposal sites associated with the wind farm construction greater than 500m3.	Earthworks required will involve approximately 500,000m3 of excavated material to be used as engineered fill within the site and approximately 600,000m3 of excavated material to be reused and recontoured within the site.	Restricted discretionary activity.	Within the wind farm site and proposed transmission line route.
Proposed Southland Water and Land Plan	Rule 49(ab) / The take and use of surface water for infrastructure construction (provided compliance with conditions).	The taking and use of freshwater will be required throughout the construction of the wind farm for activities such as earthworks, aggregate crushing, concrete batching, dust control and general activities. This take will be within the permitted activity volumes.	Permitted activity.	Within the wind farm site and proposed transmission line route.
Proposed Southland Water and Land Plan	Rule 51(d) / Minor diversions of water within a river that do not meet the relevant rule conditions.	Minor stream diversions may be required during construction of the wind farm.	Discretionary activity.	Within the wind farm site and proposed transmission line route.
Proposed Southland Water and Land Plan	Rule 53(a) / The drilling and construction of a bore.	A bore may need to be drilled on the site if a groundwater take is required.	Controlled activity.	Within the wind farm site and proposed transmission line route.
Proposed Southland Water and Land Plan	Rule 57(b) / The construction of bridges and any associated bed disturbance.	Bridges will need to be constructed during the construction of the wind farm.	Restricted discretionary activity.	Within the wind farm site and proposed transmission line route.

Proposed Southland Water and Land Plan	Rule 61(c) / Placement of erosion control structures in, on, under or over the bed of a river.	Erosion control structures will need to be placed to ensure erosion and sediment is appropriately managed during construction of the wind farm.	Discretionary activity.	Within the wind farm site and proposed transmission line route.
Proposed Southland Water and Land Plan	Rule 73(c) / Excavation or disturbance of a river for the purpose of extracting gravel.	The construction of the wind farm will require gravel. The source of the gravel is yet to be confirmed, however, this may be extracted from a nearby river where it is appropriate to do so.	Discretionary activity.	Within a river near the wind farm site.
Gore District Plan	7.9.3(e) / A new electricity line that will exceed 110kV.	The proposed transmission line may be located in the Gore District. Therefore consent may be required from the Gore District Council.	Discretionary activity.	Within the proposed transmission line route.
Clutha District Plan	INF.8(i)(c) / A new line for the purpose of conveying electricity.	The proposed transmission line may be located in the Clutha District. Therefore consent may be required from the Clutha District Council.	Restricted discretionary activity.	Within the proposed transmission line route.
National Environmental Standards for Freshwater	Rule 45 / Vegetation clearance, earthworks or land disturbance within 10m of a natural inland wetland for the purpose of construction specified infrastructure; The taking, use, damming or diversion of water within, or within a 100m setback from, a natural inland wetland; The discharge of water into water within, or within a 100m setback from, a natural inland wetland.	The proposed wind farm meets the definition of specified infrastructure in the NES-FW. The project may involve vegetation clearance, earthworks or land disturbance within 10m of a wetland. Further, waterbodies may be diverted during the construction of the wind farm and water may be discharged to waterways that are within 100m of a wetland. These activities will be managed in accordance with the effects management hierarchy, whereby adverse effects will be avoided where practicable.	Discretionary activity.	Within the wind farm site and proposed transmission line route.

National Environmental Standards for Freshwater	71 / The placement, use, alteration, extension of reconstruction of a culvert in, on, over or under the bed of a river that does not comply with the permitted activity conditions.	Culverts will be constructed on the site during the construction of the wind farm. Construction will be appropriately managed using best practice.	Discretionary activity.	Within the wind farm site and proposed transmission line route.
National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health	Regulation 11 - Disturbance of a piece of land.	While the site is not registered as a known HAIL site, its use for farming and forestry activities in the past could mean some of the soil is potentially contaminated. Contact has engaged a contaminated soil expert to determine the HAIL status of the site. As a precaution, Contact may require resource consent for a discretionary activity in accordance with Regulation 11 of the NES-Soil.	Discretionary activity.	Within the wind farm site and proposed transmission line route.

Resource consent applications already made, or notices of requirement already lodged, on the same or a similar project:

Please provide details of the applications and notices, and any decisions made on them. Schedule 6 clause 28(3) of the COVID-19 Recovery (Fast-track Consenting) Act 2020 details that a person who has lodged an application for a resource consent or a notice of requirement under the Resource Management Act 1991, in relation to a listed project or a referred project, must withdraw that application or notice of requirement before lodging a consent application or notice of requirement with an expert consenting panel under this Act for the same, or substantially the same, activity.

Refer to section 3.8 of the attached referral application documentation.
No previous resource consent applications or notices of requirement have been made in relation to the Southland Wind Farm. It is noted however, that an 80m wind monitoring mast was erected on the site in March 2023. This was undertaken as a permitted activity under the Southland District Plan.

Resource consent(s) / Designation required for the project by someone other than the applicant, including details on whether these have been obtained:

Refer to section 3.9 of the attached referral application documentation.
No other resource consents or designations are required for the Southland Wind Farm by someone other than Contact.

Other legal authorisations (other than contractual) required to begin the project (eg, authorities under the Heritage New Zealand Pouhere Taonga Act 2014 or concessions under the Conservation Act 1987), including details on whether these have been obtained:

Refer to section 3.10 of the attached referral application documentation.

Detailed on-site surveys will confirm the presence of indigenous fauna on the site. This will confirm whether any authorisation under the Wildlife Act 1953 is required for the proposed activity.

Construction readiness

If the resource consent(s) are granted, and/or notice of requirement is confirmed, detail when you anticipate construction activities will begin, and be completed:

Please provide a high-level timeline outlining key milestones, e.g. detailed design, procurement, funding, site works commencement and completion.

Refer to section 3.11 of the attached referral application documentation.
Contact is currently progressing with the design of the project and focusing on optimising road alignment to reduce earthwork volumes, micro-siting transmission line routes to reduce geotechnical risks. It is also obtaining wind data from multiple locations across the site to help calibrate the wind modelling and to better understand turbulence conditions which will be used to micro-site the wind turbines.
Contact has completed a suite of technical assessments to inform the resource consent application and the design of the wind farm. These include:

- Port to site transportation assessments;
- Geotechnical investigations;
- Civil design;
- Internal wind farm electrical design (including substation design);
- Transmission line route alignment and design;
- Switching station (aka Grid Injection Point) design; and
- Wind monitoring from both static masts and 'roving' LiDAR units.

A comprehensive assessment of environmental effects to support the resource consent applications is underway and will be ready for lodging shortly (by no later than August 2023).
Construction of the wind farm (including the transmission line and grid connection works) will take approximately 24 months to complete. The following contains an overview of the construction works required:

- Completion of site enabling works;
- Construction of site access tracks from the wind farm entrance to each of the turbines;
- Construction of each of the wind turbine foundations;
- Installation of the underground electrical cable and communications networks interconnecting each of the wind turbines to the wind farm substation;
- Construction of the wind farm substation and service building;
- Formation of the wind turbine platforms;
- Formation of temporary storage areas on site;
- Assembly of each of the wind turbines; and
- Commissioning of the wind turbines and electrical infrastructure to enable electricity to be exported.

It is anticipated that the construction of the wind farm can be initiated approximately 18 months following the granting of the resource consent.

Part IV: Consultation

Government ministries and departments

Detail all consultation undertaken with relevant government ministries and departments:

Department of Conservation – Contact has engaged with DOC to provide early feedback on the proposed wind farm. This has involved a preliminary meeting to discuss the proposal and DOC has provided comments on its initial thoughts on the values present at the site. Consultation with DOC will be ongoing throughout the duration of the project design and construction to ensure that any impacts on indigenous biodiversity or other conservation values are effectively managed.
Contact has informed these government ministries of the proposed Southland Wind Farm Project:

- Minister for the Environment
- Minister for Conservation
- Minister for Energy
- Minister for Climate Change
- Minister for Local Government
- Minister for Business, Innovation and Employment
- Minister for Primary Industries
- Minister for Transport

Local authorities

Detail all consultation undertaken with relevant local authorities:

Southland District Council – Contact has engaged with Southland District Council about the project. To date this has involved face to face meetings, phone conversations and email communication. Consultation with the Southland District Council will be ongoing throughout the consenting process.
Environment Southland – Contact has engaged with Southland Regional Council (Environment Southland) to discuss the project. As above, this has consisted of face-to-face meetings, phone conversations and email communication. Ongoing engagement with Southland Regional Council will also be undertaken throughout the consenting process.
Gore District Council, Clutha District Council, Invercargill City Council and Otago Regional Council – Contact will engage with these local authorities throughout the consenting phase and as the detailed design for the project is completed, and the final transmission line route confirmed (~March 2023).

Other persons/parties

Detail all other persons or parties you consider are likely to be affected by the project:

Apart from tangata whenua engagement described in the following section, other persons or parties considered to be potentially affected by the project include landowners and residents in proximity to the site, interested community groups and organisations, and those with statutory powers and roles in relation to project activities. This includes:

- The local community, including:
    - Landowners located within a close proximity to the project site, and all immediate neighbours;
    - Those identified by technical assessments as being impacted by the proposal (i.e. visual or acoustic effects);
    - Local community groups, including environmental, conservation and social groups;
- Transpower;
- Civil Aviation Authority;
- Waka Kotahi NZ Transport Agency;
- South Port;
- Southland Fish and Game Council;
- Royal Forest and Bird – Southland;
- Environmental Defence Society;
- Mana whenua (discussed in the next section);
- Treaty Settlement entities (including Ngā Rūnanga o Murihiku, Te Rūnanga o Ngāi Tahu);
- Business New Zealand;
- Employers and Manufacturers Association (Northern) Limited;
- Generation Zero Incorporated;
- Greenpeace of New Zealand Incorporated;
- Heritage New Zealand Pouhere Taonga;
- Infrastructure New Zealand Incorporated; and
- Property Council of New Zealand Incorporated.

In addition to the landowners of the subject site, Contact has commenced consultation with some of these parties to address any potential issues and assist in the detailed design of the project.

Detail all consultation undertaken with the above persons or parties:

Contact's engagement approach has to date involved, and will continue to involve, a combination of:

- Consultation and engagement to facilitate stakeholder involvement in the identification of issues/impacts, areas of interest/concern and strategies to address the issues raised; and
- The provision of information to improve knowledge and awareness of the company, its activities, the project, and key issues / impacts as they arise.

Consultation will include group discussions, face-to-face meetings, public open days, online meetings and forums, information sheets and information on Contact's website and wānanga with mana whenua.

Department of Conservation: Four-six weekly engagement meetings (December x2, January x1 and March x1) to provide project context and overview, and updates on design and ecological surveys and assessments. This has included requesting specific information from DoC around the Catlins Conservation Park, and input into the technical ecological survey methodologies.

Southland District Council / Environment Southland: Initial face-to-engagement in November 2022 to provide project context, and an overview (including consenting matters and pathway options ie Fast-track). On-going interactions via email including around the wind monitoring mast. More detailed discussions about the project including an overview of the relevant technical assessments is planned for late March/April.

Community engagement: Commence in March 2023.

Landowner engagement: Extensive engagement as the wind farm development agreements have been progressed.

Ministers: Letter and summary of project has been sent to the identified Ministers.

Te Ao Mārama / Waihōpai rūnaka: Initial engagement in November 2022 with an overview of the proposal. Hui in February 2023 providing more detail and context, and identifying how we will work with / partner with rūnaka. A wānanga is planned for 29 March 2023 to start the preparation of a cultural impact assessment.

Part V: Iwi authorities and Treaty settlements

For help with identifying relevant iwi authorities, you may wish to refer to Te Kāhui Māngai – Directory of Iwi and Māori Organisations.

Iwi authorities and Treaty settlement entities

Detail all consultation undertaken with Iwi authorities whose area of interest includes the area in which the project will occur:

Iwi authority	Consultation undertaken
Te Runanga o Ngāi Tahu (TRONT)	Ngai Tahu are the Iwi that under the Te Runanga o Ngai Tahu (TRONT) Act 1996 and Ngāi Tahu Claims Settlement Act 1998 and in the Ngai Tahu WAI 27 claim under Te Tirti o Waitangi. hold ultimate authority over the broader takiwa. Contact has a good relationship with TRONT through Ngai Tahu Holdings ltd. who have advised that they it is appropriate for Contact to deal with papatipu runaka in this instance.

Detail all consultation undertaken with Treaty settlement entities whose area of interest includes the area in which the project will occur:

Treaty settlement entity	Consultation undertaken
Ngāi Tahu ki Murihiku	Ngāi Tahu ki Murihiku is the collective of the four representatives papatipu runaka of Murihiku, namely Te Runaka o Waihōpai, Te Runaka o Awarua, Te Runaka o Oraka Aparima and Te Runaka o Hokonui. They are recognised as mana whenua under the Te Runanga o Ngai Act 1996 and Ngāi Tahu Claims Settlement Act 1998 and in the Ngai Tahu WAI 27 claim under Te Tirti o Waitangi.

	Engagement with Te Runaka o Waihōpai has been undertaken and they are aware of the project. We are working towards a wānanga at the end of March 2023 which will (most likely) result in a Cultural Impact Assessment. Contact has spoken directly with Te Ao Mārama (the subsidiary company that represents Ngai Tahu ki Murihiku tangata whenua for resource management issues) and representatives from Waihōpai Rūnaka about the proposal. Initial engagement commencing in November 2022. Both parties consider that Contact is in a good position to start developing a deeper understanding of tangata whenua cultural values, and including potential wāhi tapū and wāhi taoka, ecological perspectives and cultural impacts in the wind farm design. Contact is aware that the project may involve impacts on these values, and that measures and actions will need to be taken to minimise and/or address these and move our partnership forward. Contact is proposing to initiate these discussions and build understanding through a series of wānanga, with the first scheduled in late March 2023. It is likely that a Cultural Impact Assessment ("CIA") will be prepared as part of this engagement and partnership process.

Treaty settlements

Treaty settlements that apply to the geographical location of the project, and a summary of the relevant principles and provisions in those settlements, including any statutory acknowledgement areas:

Section 18(3)(b) of the Act details that the project **must not include** an activity that will occur on land returned under a Treaty settlement where that activity has not been agreed to in writing by the relevant land owner.

The Ngāi Tahu Claims Settlement Act 1998 gives effect to the provisions of the Deed of Settlement entered between Ngāi Tahu and the Crown in 1997. The key elements of the Ngāi Tahu settlement include apologies from the Crown, gifting of Aoraki (Mount Cook) including co-management and renaming, cultural redress, non-tribal redress and economic redress.
A key component of the Ngāi Tahu Settlement is the cultural redress which seeks to restore the ability of Ngāi Tahu to give practical effect to its kaitiaki responsibilities. This includes recognition of Statutory Acknowledgement Areas. Of relevance to the proposed wind farm site, the Mataura River is a Statutory Acknowledgement Area. The Mimihau Stream which is located in close proximity to the site is a tributary of the Mataura River. Consultation with iwi will ensure that the cultural values associated with the Mataura River, including the Mimihau Stream, are protected.
The site is not subject to any additional treaty settlement areas.

Part VI: Marine and Coastal Area (Takutai Moana) Act 2011

Customary marine title areas

Customary marine title areas under the Marine and Coastal Area (Takutai Moana) Act 2011 that apply to the location of the project:

Section 18(3)(c) of the Act details that the project **must not include** an activity that will occur in a customary marine title area where that activity has not been agreed to in writing by the holder of the relevant customary marine title order.

Refer to section 6.1 of the referral application documentation.
There are no customary marine title areas under the Marine and Coastal Area (Takutai Moana) Act 2011 that apply to the project site.

Protected customary rights areas

Protected customary rights areas under the Marine and Coastal Area (Takutai Moana) Act 2011 that apply to the location of the project:

Section 18(3)(d) of the Act details that the project **must not include** an activity that will occur in a protected customary rights area and have a more than minor adverse effect on the exercise of the protected customary right,

where that activity has not been agreed to in writing by the holder of the relevant protected customary rights recognition order.

Refer to section 6.2 of the attached referral application documentation.
There are no protected customary rights areas under the Marine and Coastal Area (Takutai Moana) Act 2011 that apply to the project site.

Part VII: Adverse effects

Description of the anticipated and known adverse effects of the project on the environment, including greenhouse gas emissions:

In considering whether a project will help to achieve the purpose of the Act, the Minister may have regard to, under Section 19(e) of the Act, whether there is potential for the project to have significant adverse environmental effects. Please provide details on both the nature and scale of the anticipated and known adverse effects, noting that Section 20(2)(b) of the Act specifies that the application need only provide a general level of detail.

Contact has commissioned a number of technical assessments to inform the Assessment of Environmental Effects for the resource consent application. The technical assessments that have been commissioned relate to the following areas:

- Landscape and visual effects
- Economic
- Ecological effects
- Transportation and traffic effects
- Noise
- Heritage and archaeological
- Hydrology
- Electro-magnetic interference
- Geotechnical and civil construction related effects
- Soil contamination

These assessments are currently being prepared and the following represents a summary of what is known with respect to the potential adverse effects being key to this proposal.

Positive effects

The proposed Southland Wind Farm will generate a number of positive effects. This includes positive economic effects and enhanced environmental outcomes.

The project stands to generate 160-240 jobs during the construction of the wind farm. This is equivalent to 2.2% to 3.3% of the current employment in the Gore District.

Once the power station is commissioned, there will be direct employment of 10-14 FTE operational staff, which is in line with the average operational FTE requirements per MW installed from five previously consented wind farms. In addition, there will be some contractor roles to support activities like site security, ongoing maintenance, cleaning and transportation of supplies. Wages to local staff and payments for contract services will be the principal means of continued injection of funding into the local economy. Based on the total operation and maintenance cost for the previously consented wind farms, the Southland Wind Farm would spend $8 million to $12 million per year on operations, of which over half would be spent locally on resident staff, contractors and other suppliers.

The wind farm will also increase the flexibility and diversity of electricity supply in New Zealand, which will provide a number of benefits, right down to the end consumer.

Further, the proposed wind farm will provide a source of renewable electricity generation that will positively contribute to the New Zealand Government's goals of transitioning to a low emissions economy. The wind farm will generate electricity sufficient to power about 150,000 households. This will therefore contribute to enabling New Zealand to transition away from carbon-emitting energy sources.

Landscape and visual effects

A preliminary landscape assessment has been undertaken for the site and is attached as **Appendix D**. Most of the visual effects will be generated from the wind turbines, which will extend up to about 220m in height, including the tip of the rotor. Other visual effects will be generated from the roading required for the works and the transmission line. The main landscape feature of the site is the back slope of a bush-clad scarp that forms part of the Catlins Conservation Park, located on the eastern boundary of the site. The wider site has an extensive pastoral rural character, while the areas closest to the Catlins Conservation Park have a greater proportion of vegetation cover. The site is not subject to any outstanding natural features or landscapes identified in the relevant District and Regional Plans.

The wind turbines will be prominent on the skyline behind the scarp in views from the south, however, they will be setback from the scarp, ridgeline features and bush. The wind farm will have potential effects on visual aspects of amenity values from rural properties to the south and east of the site. Due to the distance from the site, however, the visual impact of the wind turbines on the local residents will be reduced. The wind turbines will also be visible by some residential dwellings within close proximity (5km) of the site. The wind farm will be visible from Wyndham and Edendale, and in some locations in Mataura and Gore, although at more than 20km away, it would be difficult to discern.

Overall, it is considered that while the introduction of the wind turbines will modify the rural character of the site and immediate surrounding area and will change the view of some local residents, the effects on natural character, landscape and visual amenity values will not be extensive.

Ecology effects

Terrestrial Ecology

Wildland Consultants have completed an initial desktop review of the ecological features and values that may be present at the site and to identify any constraints to the proposed wind farm development. The report is attached in full as **Appendix E**.

The site comprises pastoral land and pine plantation forest, and as such, in general has relatively low ecological value There are discrete areas of high value vegetation including pahautea/cedar forest, southern rātā forest, red tussock grasslands, and wetland vegetation. This vegetation is primarily located on the southern part of the site and in gullies within exotic pasture. The wind farm footprint has been designed to avoid these areas.

As the site borders the Catlins Conservation Park, indigenous bird fauna at the site is typical of an area with relatively extensive and intact indigenous forest, as well as shrublands and open habitats, with 51 bird species identified within 15km of the site. Further, assessments are currently being undertaken to determine the presence of native bats at the site.

The potential effects associated with the wind farm include the clearance of indigenous vegetation and habitats for the construction of roads, turbine platforms and fill disposal sites. Further, the invasion of new weeds and greater use of the site by pests could affect the biodiversity of the site. The operation of the wind farm could also potentially result in adverse effects on the native birds which were identified at the sites, due to increased risk of bird strike on transmission wires and wind turbine blades.

Contact will adopt the effects management hierarchy in the design of the wind farm to ensure potentially adverse effects on terrestrial ecology are avoided, remedied or mitigated, and that residual effects are offset or compensated as necessary.

This approach includes in the first instance avoiding locating wind turbines and roads in areas of high value vegetation cover or habitat types of high ecological importance. These areas will be identified by technical experts. The nature of the site (primarily relatively low-ecological value pasture and plantation pine forest) means that turbines can generally be located outside of higher-value habitats.

Further, revegetation of the site, particularly the roads, following construction of the wind farm will minimise the potential for soil erosion and sedimentation of streams.

A Construction Management Plan (likely to include a specific Ecology Management Plan) will be completed to outline the strategies to manage, monitor and mitigate terrestrial ecology effects throughout the construction of the wind farm.

Further ecological assessments are underway at the site to determine the presence and extent of terrestrial biodiversity at the site, including surveys of lizards, bats and terrestrial invertebrates. While species of value are present, or likely to be so on parts of the site, expert advice has to date indicated that the potential effects on

indigenous fauna and flora is manageable at this site. Contact is working with DOC and mana whenua to discuss the survey results and appropriate management practices.
Contact is committed to managing effects and making a positive contribution to the environment, communities and society. Wildlife monitoring and planting will be implemented in accordance with the recommendations from the various technical assessments that will be prepared for the Southland Wind Farm.
Contact will ensure that there are riparian buffers retained around the waterways to minimise potential sediment inputs or pollutant runoff and will ensure that fish passage is maintained. This will include through the remediation of fish passage at identified sites and freshwater monitoring, both prior to construction, during, and post-construction. This will include fine sediment monitoring to provide a baseline reference for the site conditions to ensure any changes can be detected and immediately remedied.
As Contact will adopt the effects management hierarchy across a number of disciplines (e.g. ecological, water management), where any adverse environmental effects cannot be avoided or mitigated, these will be offset and compensated for, closely following ecological best practice and the relevant policy guidance. This may be in the form of creating new or enhancing similar habitats on the site.

Freshwater Ecology

Wildland Consultants have also completed a preliminary assessment on the freshwater ecology values of the site (refer to **Appendix F**). The report did not identify any significant constraints for the proposed wind farm in terms of the freshwater values, habitats and species observed. The wind farm layout will need to ensure that there are riparian buffers around waterways to minimise potential runoff of sediment or pollutants and ensuring that fish passage is maintained or improved.
Sites within tributaries to the Mimihau Stream were surveyed which found that the stream contains threatened galaxiid species that are abundant at some sites in the Mimihau Stream. This shows that there is important habitat for freshwater fauna present. The assessment considered five of the six sites surveyed as high-moderate value waterways. A site was also surveyed in the Kawera Stream and is of moderate ecological value. This stream had greater diversity in the fish and macroinvertebrate communities present.
Potential effects from the proposed wind farm on freshwater include sediment disturbance by earthworks associated with road and turbine construction, culvert construction for stream crossings, accidental contaminant spills from machinery and the introduction of nuisance weed/algae.
The report identifies monitoring, management and mitigation recommendations. This includes remediation of fish passage structures to increase potential habitat available to fish within the surrounding waterways. This will involve the clearance of debris from a culvert and the installation of a fish ramp or similar structure or the complete replacement of the structure to ensure the best outcomes for fish passage.
Contact will seek to employ best practice erosion and sediment control measures during the construction of the wind farm, in order to prevent any sedimentation effects on nearby waterways. This is anticipated to be managed by the application and adherence of stringent consent conditions and any contractors engaged by Contact will need to demonstrate their abilities in achieving effective erosion and sediment control during large scale construction projects. The potential for accidental spills and the introduction of pest plants will also be carefully managed.
In terms of wetlands, as noted above, Contact will apply the effects management hierarchy. In the first instance, where practicable, adverse effects on the wetlands present within the site will be avoided. Where this is not practicable, Contact will firstly minimise the footprint of any intrusion and secondly, remedy any harm caused. If residual adverse effects remain, Contact will offset and compensate for these. The ecological assessments will inform how best to undertake this offsetting/compensation work.
A detailed assessment of freshwater ecology effects will be completed at the site for the proposed activity to ensure the appropriate site management plans are in place to address the potential effects, to ensure that existing fish passage, water quality and stream habitat are not compromised, and where possible, are improved.

Cultural effects

Acknowledging that Ngāi Tahu ki Murihiku have a whakapapa connection with the site, Contact are mindful of cultural effects that may have immediate and long term impacts on tangata / people and te taiao / the natural environment. Contact understands that the protection of the values associated with these sites for the wellbeing, oranga (health), wairua (spirit), tinana (body), of both present and future generations is important to Ngāi Tahu.
The Mataura River is recognised as a Statutory Acknowledgement Area. As such, consultation with iwi will ensure that the cultural values associated with this river are upheld. The presence of taonga, including indigenous plants, birds

and fish are also considered to be an integral part of the cultural landscape. In addition to the cultural impact assessment, freshwater and terrestrial ecological assessments will be undertaken to understand the potential effects of the project on these species present at the site.

Although, as noted above, there are no known archaeological sites located on the site, an accidental discovery protocol will be in place. In the event that archaeological material is discovered during the proposed works, iwi will be notified immediately.

Contact has engaged with mana whenua in relation to the proposed wind farm, and a cultural impact assessment is likely to form part of the consent application. Ongoing consultation will ensure that any potential adverse effects on mana whenua values are appropriately avoided, remedied or mitigated.

Archaeological effects

Contact has engaged Origin Consultants to prepare an Archaeological Assessment for the site. Initial findings have noted the presence of one previously recorded archaeological site within the project area, a single artefact (adze) found in 1975, and one site adjacent to the proposed conduit alignment (refer to **Appendix G**). A further ten archaeological sites are located within the surrounding landscape but are well outside of any areas of potential impact. It is not anticipated that the proposed wind farm will result in any adverse effects on the identified features and Origin Consultants will conduct a more thorough evaluation of the project area and outline recommendations for the mitigation of impacts to and management of any archaeological sites.

Further, in the event that archaeological material is discovered on the site during construction, an accidental discovery protocol will be in place. Contact will invite mana whenua to co-develop this protocol. All works on the site will cease and the relevant authorities will be informed. Therefore, there will be no more than minor adverse archaeological effects from the proposed activity.

Aviation effects

The wind turbines will have a maximum height of 220m above ground level and will need to meet the requirements of the Civil Aviation Authority ("**CAA**"). Prior to construction of the wind farm, an application for a determination will be lodged with CAA to finalise which or the turbines will require aviation marking. CAA has a policy for the marking of wind turbines and the wind farm will be required to meet those requirements. This is likely to require a selected number of the turbines to be fitted with synchronised red flashing lights on their nacelles.

Transportation effects

A transportation assessment will be completed to identify potential effects and how these can be managed. The transportation effects associated with the wind farm will primarily be associated with the construction of the wind farm as all of the material and construction machinery will need to be transported to the site by road.

It is anticipated that with the implementation of appropriate management and roading improvements the wind farm will not generate significant adverse effects on the transportation network. The route from South Port to the site features low traffic volumes along most of its length such that oversize turbine components can readily be accommodated. However, certain timing restrictions will be in place for transport required through Invercargill to avoid potential effects on traffic through the city during peak hour. Further, a Construction Traffic Management Plan will ensure management methods are implemented in accordance with best practice to ensure there are no more than minor effects to other road users.

Further measures will be implemented including dust control, roading improvements, signage and regular inspections to avoid, remedy or mitigate the potential transportation-related effects that could otherwise arise from the construction and operation of the wind farm.

Given the above, it is considered transportation associated with the proposed wind farm can be appropriately managed.

Noise effects

The noise during the construction of the wind farm will comply with the requirements of NZS 6803:1999 Acoustics – Construction Noise. Once operational, the noise from the wind farm will meet the requirements of NZS 6808:2010 Acoustics – Wind farm noise.

An acoustic assessment will be completed for the project to determine whether there will be any noise effects associated with the construction and operation of the wind farm on the nearby dwellings and any measures recommended to mitigate potential effects.

Overall, the adoption of appropriate design and best practice management procedures will ensure the effects of the proposed activity associated with noise will be no more than minor.

Conclusion

Overall, it is considered that the proposed wind farm will generate positive social and economic benefits for the local community and New Zealand. It is also expected that the construction and operation of the proposed wind farm will be undertaken in a manner that will appropriately manage adverse effects in a manner that aligns with the management expectations outlined in the relevant statutory planning documents.

Where it is practicable, Contact intends to develop the project so as to avoid adverse effects arising in the first instance. Where that is not practicable, Contact proposes that the development of the wind farm be undertaken in accordance with a range of mitigation measures which will be proffered as consent conditions to limit the potential for adverse effects on the environment. A range of management plans will also be utilised to ensure that Contact undertake practicable measures to minimise any potential risks of adverse effects from the wind farm.

Contact has commissioned a number of detailed technical assessments which are currently being undertaken and will further inform the resource consent application and final design of the wind farm. These will also outline the appropriate management measures to avoid, remedy or mitigate any potential effects associated with the project.

Part VIII: National policy statements and national environmental standards

General assessment of the project in relation to any relevant national policy statement (including the New Zealand Coastal Policy Statement) and national environmental standard:

Refer to section 8 of the attached referral application documentation.

The following are considered relevant to this project:

- National Policy Statement for Renewable Electricity Generation;
- National Policy Statement for Freshwater Management;
- National Policy Statement for Highly Productive Land;
- National Environmental Standards for Freshwater;
- National Environmental Standards for Electricity Transmission Activities; and
- National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health.

National Policy Statement for Renewable Electricity Generation

Policies A, B and C1 of the NPS-REG are considered most relevant to the proposed 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 proposed wind farm is consistent with, and is strongly supported by, the NPS-REG as it will provide a significant source of renewable energy. Meeting the New Zealand Government's target for the generation of electricity from renewable resources will require significant development of renewable electricity generation activities. The proposed wind farm will contribute to this, with a potential generation capacity of between 230-300MW, sufficient electricity to power 110,000 – 150,000 households. The site has been identified as suitable for a wind farm and will be consistent with the relevant regional and district policies and plans.

Policy C1 of the NPSREG recognises the practical implications and locational constraints associated with the development of renewable electricity generation activities. There are a number of factors that influence the identification of a site as being suitable for the development of a wind farm – not least being the quality / consistency of the wind resource and proximity to transmission infrastructure. Contact consider this site to be suitably located in terms of these factors, having regard to its wind quality and accessibility to the transmission network.

National Policy Statement for Freshwater Management

The NPS-FM sets out objectives and policies that direct local authorities to manage water in an integrated and sustainable way, while providing for economic growth within set water quantity and quality limits. Central to the NPS-

FM is the concept of Te Mana o Te Wai. The NPS-FM is relevant to the project as some activities have the potential to impact on freshwater (and wetlands), including:

- The discharge of contaminants to surface water bodies, namely sediment during construction;
- The take and use of water from the Mimihau Stream;
- The temporary diversion of water during the construction phase to construct bridges and culverts; and
- Potential impacts on natural inland wetlands.

The policies of the NPS-FM considered to be of most relevance to the proposal are Policies 1, 2, 3, 6, 7, 9 and 11. With respect to these policies, the following points are noted:

- Contact has engaged with iwi in relation to the Southland Wind Farm and understands that maintaining the quality of the surrounding freshwater bodies and habitats and wetland environments is important to preserving the cultural association with these environments;
- Recommendations from technical reports prepared for the Southland Wind Farm will ensure there is a condition framework for the management of activities with the potential to impact freshwater environments, to ensure all actual and potential adverse effects are appropriately managed;
- Where practicable, the location of the wind turbines will seek to ensure the values of the wetlands are protected and restoration is promoted. Where adverse effects on wetlands cannot be practicably avoided, Contact will ensure these effects are minimised, remedied and/or appropriately offset and compensated for, through the restoration or creation of similar habitats on or near the site. That approach is available and consistent with the NPS-FM, because the wind farm is 'specified infrastructure' for the purposes of clause 3.21 and 3.22 of the NPS-FM;
- The proposed activity will not result in the loss of river extent;
- The assessments on freshwater ecosystems will inform the best management of these areas to ensure habitats of indigenous freshwater species, such as the galaxiid, are protected and not adversely affected by the proposed activities d; and
- The proposed take will be from the Mimihau Stream which is not identified as over-allocated.

For the reasons detailed above, it is considered the Southland Wind Farm is consistent with the objectives and policies of the NPS-FM.

National Policy Statement for Highly Productive Land

The NPS-HPL provides protection of highly productive land from inappropriate subdivision, use and development and to ensure its availability for food and fibre production. The policies of most relevance to the proposed wind farm are:

- Policy 1: Highly productive land is recognised as a resource with finite characteristics and long-term values for land-based primary production.
- Policy 8: Highly productive land is protected from inappropriate use and development.

The location of the wind turbines will primarily avoid land that is identified as arable. The wind turbines will be located outside of any Class 1-3 areas. A portion of the transmission line route(s) may be located on land that is within Class 3. However, it is considered that the location of the transmission line in this area will not prevent other activities such as farming, forestry and horticulture from co-existing on this site. There is also an operational and functional need for the infrastructure to traverse this land. As such, the transmission line is not considered to be an inappropriate use and development of the site.

Given the above, it is considered the proposed activity is consistent with the NPS-HPL. Combining a wind farm with ongoing pastoral farming is a particularly efficient use of this class of land.

National Environmental Standards for Freshwater

The NES-FW regulates activities that pose risks to the health of freshwater and freshwater ecosystems. Of particular relevance to the proposed wind farm are rules relating to activities that may affect natural wetlands and culverts. Resource consent will be required for activities relating to the construction and alteration of culverts and potentially for activities within, or within 100m of, natural wetlands.

The NES-FW specifies rules relating to the construction of specified infrastructure. This includes the requirement of the adoption of the effects management hierarchy. As outlined above, Contact will apply the effects management hierarchy to the proposed activity. As wetlands are present on the site, where practicable, adverse effects on wetlands will be avoided. However, where effects cannot be avoided or mitigated, offsetting and compensation for these effects will be implemented. This may be in the form of enhancing other existing wetlands on the site or re-creating similar habitat elsewhere on the site.

National Environmental Standards for Electricity Transmission Activities

The proposed activity includes the construction of a new transmission line to convey the electricity generated from the wind farm to the National Grid. The Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2009 only apply to existing high voltage electricity transmission lines. Therefore, these standards do not apply to the proposed activity.

National Environmental Standards for Assessing and Managing Contaminants in Soil to Protect Human Health

The NES-Soil outlines the standards relating to the disturbance of soil at sites that are potentially contaminated. Although the site is not listed as contaminated on the Environment Southland contaminated land database, Contact has commissioned a soil expert to confirm whether activities listed on the Hazardous Activities and Industries List have occurred on the site. This will confirm whether resource consent is required under the NES-Soil.

Part IX: Purpose of the Act

Your application must be supported by an explanation how the project will help achieve the purpose of the Act, that is to "urgently promote employment to support New Zealand's recovery from the economic and social impacts of COVID-19 and to support the certainty of ongoing investment across New Zealand, while continuing to promote the sustainable management of natural and physical resources".

In considering whether the project will help to achieve the purpose of the Act, the Minister may have regard to the specific matters referred to below, and any other matter that the Minister considers relevant.

Project's economic benefits and costs for people or industries affected by COVID-19:

Refer to section 9.1 of the attached referral application documentation.

The proposed wind farm will provide a significant contribution to economic growth. This includes the generation of employment throughout the construction and operation of the wind farm and the purchase of goods and services bought from local suppliers in the Southland region. It will also have a positive impact on the electricity market, reducing prices for consumers, particularly in the surrounding areas.

Based on the estimated construction cost, approximately s 9(2)(b)(ii) will be spent within the New Zealand economy during construction of the wind farm. Much of this amount will be spent within the local area on contractors directly involved in the wind farm, transmission line and grid connection construction.

An expert report from NZIER shows that the project will generate 158 - 237 jobs during the construction of the wind farm. This is equivalent to 2.2% to 3.3% of the current employment in Gore.

Once the power station is commissioned, there will be direct employment of 10-14 FTE operational staff, which is in line with the average operational FTE requirements per MW installed from five previously consented wind farms. In addition, there will be some contractor roles to support activities like site security, ongoing maintenance, cleaning and transportation of supplies. Wages to local staff and payments for contract services will be the principal means of continued injection of funding into the local economy. Based on the total operation and maintenance cost for the previously consented wind farms, the Southland Wind Farm would spend s 9(2)(b)(ii) of which over half would be spent locally on resident staff, contractors and other suppliers.

New investments during the recovery from the Covid-19 global pandemic would provide a boost to local economic growth and employment. The Southland economy relies heavily on primary industry, however, sectors such as construction and tourism in Southland have been significantly affected by the Covid-19 global pandemic. The project will entail significant investment in making the wind farm operational and following the construction of the wind farm, which will create economic stimulus for the region. As such, the provision of infrastructure associated with the proposed activity will contribute to improving economic and employment outcomes and providing increased resilience to the Southland economy.

This project will also have a positive impact on wholesale electricity prices, particularly in the region surrounding this new development. In recent years, wholesale electricity prices have risen sharply, and the futures market predicts they will get higher. This is largely due to a significant increase in the cost of fossil fuels. This project will mean that less coal and gas is burnt, not only will that help the environment, but it will also help bring down prices. This positive effect will be felt particularly in the local area, as it will significantly reduce line losses. Lower prices will in turn make decarbonisation projects more viable for our customers, multiplying the positive environmental impact.

The local area will also benefit from increased electricity supply resilience. We have seen in recent weeks how critical this can be to adapt to the effects of climate change. In 2022, an extremely dry inflow sequence into the lower South Island hydro catchments, meant electricity generation struggled to meet demand as transmission into the region became constrained. This in turn required the Tiwai Point aluminium smelter to reduce demand through turning off potlines. Additional generation in this region will help increase security of supply, reducing the need for demand response, which comes at an economic cost.

Project's effects on the social and cultural wellbeing of current and future generations:

Refer to section 9.2 of the attached referral application documentation.

The Southland Wind Farm will provide a number of positive social and cultural wellbeing benefits.

Prolonged and sustainable employment is a significant positive outcome. The construction of the wind farm is anticipated to take 24 months and will require involvement across a number of industries. This will positively contribute to the social wellbeing of people in the Southland region.

The project will contribute to positive relationship building with iwi and create opportunities for mana whenua engagement. Contact will continue to engage with iwi in relation to the proposed activity and the identification of measures to avoid, remedy or mitigate potential effects on environmental or cultural values of significance.

Furthermore, New Zealand is currently experiencing a significant increase in the cost of living and increased electricity scarcity. As noted above, as New Zealand transitions to a low emissions economy, the demand for electricity will only increase. The proposed wind farm will increase supply and help bring wholesale prices down. This will have a positive impact on the end consumer, and social wellbeing.

Further, the provision of a source of renewable energy will support New Zealand's transition to a low greenhouse gas emissions economy which will benefit the wellbeing of both current and future generations.

Whether the project would be likely to progress faster by using the processes provided by the Act than would otherwise be the case:

Refer to section 9.3 of the attached referral application documentation.

This project would progress more than two years faster by using the determination processes provided for by the Act. Under the normal statutory tests of the Resource Management Act 1991 ("**RMA**"), it is highly likely that the resource consent applications required would be publicly notified and would involve public submissions and a hearing process. As such, Council processing timeframes for the proposed wind farm are anticipated to take 12-18 months.

Further, as with all large-scale infrastructure projects, there would also be a high likelihood of a subsequent appeal to the Environment Court. Any such appeal would add further delay (around 1.5 – 3 years) to the consenting timeframe. A further 18 month period for detailed design and contract tendering would be required for construction to commence. The removal of the uncertain appeal period from the consenting process provided for by the Act creates the opportunity for the economic benefits of the project to be realised more quickly.

The consenting process associated with the Act is anticipated to be completed within 4-5 months. It is therefore anticipated that the project could commence construction within 22-23 months of resource consent applications being lodged under the Act (being 4-5 months for the consent process and 18 months for detailed design and tendering). This compares to anticipated timeframes under the RMA of up to 54 months. As such, the project would progress significantly faster under the Act.

Whether the project may result in a 'public benefit':

Examples of a public benefit as included in Section 19(d) of the Act are included below as prompts only.

Employment/job creation:

Refer to section 9.4.1 of the attached referral application documentation.

The project stands to create 158 - 237 jobs additional jobs in the region during construction. Further, on-going employment will be provided throughout the operation of the wind farm, which will provide 10-14 full time equivalent jobs.

It is anticipated most of the workforce associated with the wind farm would likely live permanently within Southland during this period. In addition, the purchase of goods and services from local suppliers will also contribute to wider employment and economic stimulus in the Southland region.

Housing supply:

Refer to section 9.4.2 of the attached referral application documentation.
The provision of electricity contributes to the functioning of urban environments. As noted above the 'energy transition' will require significantly more electricity to reduce emissions and bring down prices for consumers. It will be important that this comes from a range of sources to increase resilience.

Contributing to well-functioning urban environments:

Refer to section 9.4.2 of the attached referral application documentation.
The provision of electricity contributes to the functioning of urban environments. As noted above the 'energy transition' will require significantly more electricity to reduce emissions and bring down prices for consumers. It will be important that this comes from a range of sources to increase resilience.

Providing infrastructure to improve economic, employment, and environmental outcomes, and increase productivity:

Refer to section 9.4.3 of the attached referral application documentation.
The proposed wind farm will be a facility which generates electricity, and as such, meets the definition of infrastructure as defined in the RMA (section 2).
As noted above, the wind farm will contribute to improving economic, employment and environmental outcomes.

Improving environmental outcomes for coastal or freshwater quality, air quality, or indigenous biodiversity:

Refer to section 9.4.4 of the attached referral application documentation.
The design and construction of the wind farm will be informed by a suite of high-level technical assessments to ensure environmental outcomes for freshwater quality, air quality and indigenous biodiversity are provided for. This will ensure that any potential adverse effects on the environment generated from the proposed activity are appropriately managed and provided for.
As noted above the wind farm will also help to decarbonise the economy by replacing other forms of energy generation which cause negative environmental effects, including on air quality, such as burning coal.
Contact is committed to managing effects and making a positive contribution to the environment, communities and society. Wildlife monitoring and planting will be implemented in accordance with the recommendations from the various technical assessments that will be prepared for the Southland Wind Farm.
Contact will ensure that there are riparian buffers retained around the waterways to minimise potential sediment inputs or pollutant runoff and will ensure that fish passage is maintained. This will include through the remediation of fish passage at identified sites and freshwater monitoring, both prior to construction, during, and post-construction. This will include fine sediment monitoring to provide a baseline reference for the site conditions to ensure any changes can be detected and immediately remedied.
As Contact will adopt the effects management hierarchy across a number of disciplines (e.g. ecological, water management), where any adverse environmental effects cannot be avoided or mitigated, these will be offset and compensated for, closely following ecological best practice and the relevant policy guidance. This may be in the form of creating new or enhancing similar habitats on the site.

Minimising waste:

Refer to section 9.4.5 of the attached referral application documentation.
The construction of the wind farm will be in accordance with a Construction Management Plan. This will include the implementation of waste management measures to ensure waste is minimised and the site is returned to a tidy and stable state following completion of the works.
Further, the wind farm will generate renewable electricity, which will support the transition to a low-emissions economy. This will contribute to minimising the waste generated from other energy sources.

Contributing to New Zealand's efforts to mitigate climate change and transition more quickly to a low-emissions economy (in terms of reducing New Zealand's net emissions of greenhouse gases):

Refer to section 9.4.6 of the attached referral application documentation.

The wind farm will positively contribute to New Zealand's efforts to mitigate climate change by providing a new source of renewable energy.

The New Zealand Government has set a target of achieving 50% of total final energy consumption from renewable sources by 2035 and reducing New Zealand's net carbon emissions to zero by 2050. To achieve this goal, we will need to electrify large parts of our economy, such as electric vehicles and industrial activities that are currently dependent on fossil fuels.

To meet the growth in demand and phase down fossil-fuelled thermal generation, new renewable generation sources will need to be developed at an unprecedented rate. Recent analysis from Boston Consulting Group indicates that to reach net zero by 2050 the country will require 5,700MW of new wind generation capacity (https://www.bcg.com/publications/2022/climate-change-in-new-zealand). This equates to about 20-25 wind farms the size of this application - almost one per year. To reach this goal New Zealand needs to keep a robust pipeline of new developments and increase the pace of new development coming on to the market.

However, the pipeline of currently consented wind sites is low. Contact count only nine wind farm projects with consents that are not currently under construction. Of those, five have consent lapse dates within the next two years and are considered extremely unlikely to be constructed within this time frame due to the limited time available and the conditions of consent that limit the wind turbine dimensions to models that are either unavailable on the current market or inefficient to deploy. In total, Contact's assessment is that there is less than 400MW of potential developments in the pipeline. Accelerating the consenting process for the Southland Wind Project will provide a significant boost and contribute to keeping New Zealand on track to meet decarbonisation goals.

Promoting the protection of historic heritage:

Refer to section 9.4.7 of the attached referral application documentation.

The site is not subject to any known archaeological sites. However, an archaeological expert will be contracted to confirm there are no archaeological sites present on the site. In the event of the discovery of archaeological material on the site, this will be considered in the design of the proposed wind farm and works will be undertaken to ensure it is protected. Further, the relevant authorities and iwi will be informed of the discovery immediately.

Strengthening environmental, economic, and social resilience, in terms of managing the risks from natural hazards and the effects of climate change:

Refer to section 9.4.8 of the attached referral application documentation.

The wind farm will contribute to strengthening resilience as it will provide an additional source of renewable electricity for the region and wider National Grid.

Other public benefit:

As above.

Whether there is potential for the project to have significant adverse environmental effects:

Refer to section 9.4.9 of the attached referral application documentation.

It is not anticipated that the project will have significant adverse environmental impacts. It is expected that any potential adverse effects can be appropriately managed and avoided, remedied or mitigated, and where required, offset and compensated for. Contact has engaged technical experts to provide recommendations to ensure any potential adverse environmental effects are identified and managed. A number of these reports are currently underway and will inform the final wind farm design, management and ongoing monitoring that will occur.

Further, the proposed wind farm will positively contribute toward reducing New Zealand's greenhouse gas emissions through the generation of renewable electricity.

Part X: Climate change and natural hazards

Description of whether and how the project would be affected by climate change and natural hazards:

Refer to section 10 of the attached referral application documentation.

The main risks to the Project from climate change and natural hazards are from seismic events. The site is not subject to any additional natural hazard overlays on the Environment Southland natural hazard database. The wind farm design and construction methodology will be informed by multiple engineering design reports to ensure the risks from natural hazards are managed to acceptable levels.

Contact will ensure any potential risks due to natural hazards are managed by:

- Undertaking robust design and site management, including permitting, operational management, monitoring and reporting;
- Conducting regular auditing of conformance with internal standards and consent requirements; and
- Independent reviews by third-party independent experts.

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

Part XI: Track record

A summary of all compliance and/or enforcement actions taken against the applicant by a local authority under the Resource Management Act 1991, and the outcome of those actions:

Local authority	Compliance/Enforcement Action and Outcome
Waikato Regional Council	Contact has extensive environmental offset and restoration conditions associated with its Ohaaki Geothermal Power Station, including in relation to wetland areas. In April 2021 it received an abatement notice from Waikato Regional Council in relation to aerial (helicopter) boom spraying of pest plants and weeds in the Torepatutahi Wetland in February 2020. The spraying was conducted in accordance with Contact's consents and permitted activity guidelines, however, it also resulted in kill of non-target species. The abatement notice directed Contact to be more selective in conducting pest control methods. Contact has undertaken a full review of the ecological restoration programme in communication with mana whenua and stakeholders and prepared an Annual Work Plan to inform interested parties and guide activities in and around the wetland.
Waikato Regional Council	In February 2019, a geothermal reinjection well on Contact's Wairākei geothermal steamfield over-pressurised, causing geothermal water to be discharged into a nearby soakage pond not intended to store such volumes. Consequently, the pond gave way, causing soil and geothermal water to flow into the nearby Waipuwerawera Stream. Contact was prosecuted and participated in an ā kanohi restorative justice process with the affected hapū of Ngāti Tūwharetoa, culminating in a comprehensive cultural impact assessment, formal apology and full suite of long-term mitigations agreed with tangata whenua and the Court. An important outcome was the development of a much stronger and deeper understanding by Contact of Ngāti Tūwharetoa and their relationship to the whenua and awa, and their role as kaitiaki and mana whenua.
Otago Regional Council	In July 2022, Otago Regional Council (ORC) issued Contact with an abatement notice directing it to submit to ORC a revised Landscape and Visual Amenity Plan ("LVAMP") for the Kawarau Arm of Lake Dunstan. The LVAMP manages the landscape and visual amenity effects associated with the on-going operation of the Clyde Dam as they occur in the Kawarau Arm (near Cromwell). The condition requires Contact to reassess the LVAMP every five years. The draft of the 2019 to 2024 reassessment was forwarded to the ORC and Central Otago District

	Council for consultation and mistakenly approved. A further draft of the reassessed LVAMP was submitted in June 2022, however, ORC considered that the new LVAMP did not appropriately cover key matters such as plant pest management and driftwood accumulation and requested further assessment. Contact has worked proactively with the Councils and key stakeholders over the last eight months to prepare a new LVAMP. This was submitted to ORC for approval, and subsequently the abatement notice was uplifted in March 2023.

Part XII: Declaration

I acknowledge that a summary of this application will be made publicly available on the Ministry for the Environment website and that the full application will be released if requested.

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.

Matthew Cleland	15/03/2023
Signature of person or entity making the request	**Date**

Important notes:

- Please note that this application form, including your name and contact details and all supporting documents, submitted to the Minister for the Environment and/or Minister of Conservation and the Ministry for the Environment, will be publicly released. Please clearly highlight any content on this application form and in supporting documents that is commercially or otherwise sensitive in nature, and to which you specifically object to the release.
- Please ensure all sections, where relevant, of the application form are completed as failure to provide the required details may result in your application being declined.
- Further information may be requested at any time before a decision is made on the application.
- Please note that if the Minister for the Environment and/or Minister of Conservation accepts your application for referral to an expert consenting panel, you will then need to lodge a consent application and/or notice of requirement for a designation (or to alter a designation) in the approved form with the Environmental Protection Authority. The application will need to contain the information set out in Schedule 6, clauses 9-13 of the Act.
- Information presented to the Minister for the Environment and/or Minister of Conservation and shared with other Ministers, local authorities and the Environmental Protection Authority under the Act (including officials at government departments and agencies) is subject to disclosure under the Official Information Act 1982 (OIA) or the Local Government Official Information and Meetings Act 1987 (LGOIMA). Certain information may be withheld in accordance with the grounds for withholding information under the OIA and LGOIMA although the grounds for withholding must always be balanced against considerations of public interest that may justify release. Although the Ministry for the Environment does not give any guarantees as to whether information can be withheld under the OIA, it may be helpful to discuss OIA issues with the Ministry for the Environment in advance if information provided with an application is commercially sensitive or release would, for instance, disclose a trade secret or other confidential information. Further information on the OIA and LGOIMA is available at www.ombudsman.parliament.nz.

Checklist

Where relevant to your application, please provide a copy of the following information.

Yes	Correspondence from the registered legal land owner(s)
No	Correspondence from persons or parties you consider are likely to be affected by the project
No	Written agreement from the relevant landowner where the project includes an activity that will occur on land returned under a Treaty settlement.
No	Written agreement from the holder of the relevant customary marine title order where the project includes an activity that will occur in a customary marine title area.
No	Written agreement from the holder of the relevant protected customary marine rights recognition order where the project includes an activity that will occur in a protected customary rights area.