

2022-03-02

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Dear Stephanie

COVID-19 Recovery (Fast Track Consenting) Act 2020: Response to the Request (RFI) for Further Information – Te Rere Hau Wind Farm Repowering Project

Thank you for your letter requesting further information in relation to Te Rere Hau Wind Farm Repowering Project (the Project). The following information is provided in response to the RFI dated 17 February 2022. The questions contained in the RFI are shown in *blue italics* with the responses shown in black.

1. *The application lists both regional and national jobs which will be created as a result of the project. Please confirm whether the national job figures include the local figures, or if the total jobs created will include both figures.*

The following response has been provided by Jason Leung-Wai of MartinJenkins:

'National jobs are the jobs created across all of New Zealand so includes local jobs, which are jobs in the Palmerston North-Manawatu-Taranaki area. Total jobs do not include both figures, but are a sum of the direct, indirect and induced jobs at either the regional or national level. However, total local jobs can be considered a subset of total national jobs.'

2. *The shapefile provided includes Crown-owned land (mostly roads) and does not include six existing turbines, which are to the north of the identified project site. Please confirm the project scope, particularly whether these turbines will be removed as part of the project scope, and whether the project site includes Crown land.*

Aurecon have checked the shapefile provided and can confirm that the THR_property_footprint.SHP file only includes the private land and excludes road reserve and Airways Radome land, as shown in Figure 1 below.

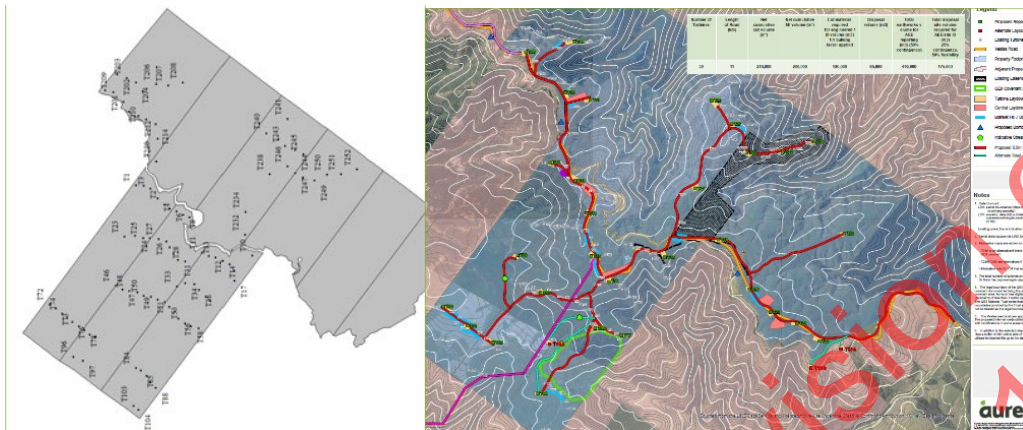


Figure 1: Existing turbine locations; property boundaries (Left) and Proposed turbine locations and property boundaries (Right)

All existing turbines are within the project boundary, and all existing turbines will be removed. It has been further clarified that the six turbines referred to belong to the Tararua Wind Farm (northeast of Te Rere Hau) and do not form part of the Project scope.

It is also understood that MfE's query is to understand whether the Project involves any works to public roads which would require additional approvals.

The Project would include upgrades to existing public roads within the road reserve, in particular, North Range Road (refer to Figure 2) and the two points where the privately owned road intersects with a paper road that runs through the NZ Windfarms property (refer to Figure 3). The upgrades to North Range Road are from the southern access point (as shown by the black line in Figure 2) (and to some of the alternative options for T23) (as shown in Figure 2 below). There is also the potential that the southern section of North Range Road may not need to be upgraded if all large components are able to be transported through the neighbouring Tararua Wind Farm (located to the northeast).

It is considered that any upgrades to public roads would not require additional approvals beyond the resource consent approvals sought. Typically, upgrades to public roads go through a Design Works Approval (DWA) process with the local authority but when they occur as part of a resource consent application, then can be approved through a condition of consent. NZ Windfarms are planning to continue actively working with the local authorities on the proposed conditions for the Project prior to submitting a resource consent application.

The proposed plans provided in Appendix A of the referral application are the key plans that can be relied upon to confirm the Project scope.



Figure 2: North Range Road Upgrades (note: the black line shows the proposed road upgrades, the yellow line shows the new Vestas road alignment, and the white line shows the local authority boundary (which largely follows North Range Road))

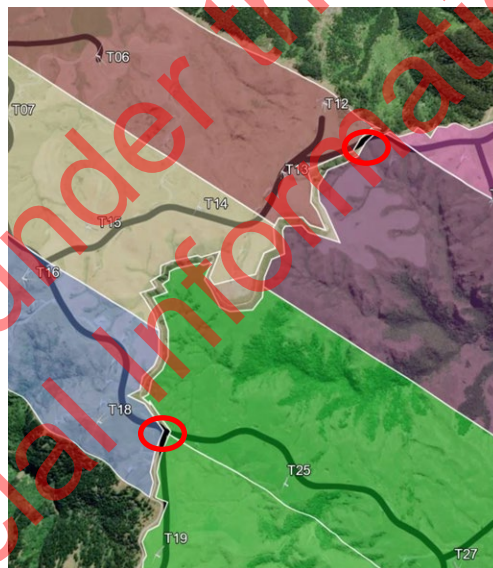


Figure 3: Paper Road, including locations where the proposed road upgrades would cross (marked in red circles)

3. *Additional information on how you expect the project to pass the “gateway tests” in s104D of the RMA.*

As indicated in the referral application, there are two potential non-complying activity rules that may get triggered by the Project. These are:

- Rule R9.9.3 of the Palmerston North District Plan (PNDP) for Windfarms that do not comply with the Discretionary Activity Performance Standards in R9.8.6. These performance standards relate to compliance with noise limits. It should be noted that early assessments have shown compliance with all relevant standards. As such, this rule has only been included for precautionary reasons.
- Rule R9.9.1 of the PNDP for Other Activities within the Rural Zone. This consent may be required, if it is determined that grid connection Option 2 is preferred. This rule relates to

activities that are not provided for within the rural zone. Transmission lines not proposed by a Network Utility Provider are not provided for, and, as such, consent would be required as a non-complying activity. As stated in the referral application, Transpower (via a notice of requirement) or NZ Windfarms could consent this option (to Transpower's standards). Therefore, this rule only applies if Option 2 is preferred, and if NZ Windfarms consent the option.

It is acknowledged that given the interrelated and overlapping nature of the activities, if a non-complying resource consent is required, it would be appropriate for the resource consent applications to be 'bundled' and considered jointly as a non-complying activity.

It is understood that in determining an application for a non-complying activity, the decision maker must first consider whether one of the two tests under section 104D of the RMA can be met. In summary these tests are:

- Whether the adverse effects of the activity on the environment will be minor (section 104D(1)(a)); or
- Whether the application for an activity will not be contrary to the objectives and policies of relevant plans and proposed plans (section 104D(1)(b)).

The potential for a non-complying activity status has been considered from a planning strategy point of view and, if it is triggered, the project is expected to be able to pass both of the "gateway tests".

Whether the adverse effects of the activity on the environment will be minor (section 104D(1)(a))

As discussed within Part VII of the referral application, a number of technical environmental assessments have been commissioned by NZ Windfarms to confirm whether there is the potential for the Project to have significant adverse effects. It has been concluded within the application that any actual or potential adverse effects could and would be appropriately avoided, remedied or mitigated. Consequently, any actual or potential adverse effects will be minor or less than minor.

On this basis, it is considered that the Project can pass the section 104D(1)(a) gateway test ("effects gateway test").

Whether the application for an activity will not be contrary to the objectives and policies of relevant plans and proposed plans (section 104D(1)(b))

In addition, it is considered that the Project can pass the second gateway test under section 104D(1)(b). Considering the application in respect of section 104D(1)(b) is a test of whether the application is "contrary" to relevant objectives and policies following a balanced assessment of the objectives and policies of a plan as a whole.

As a broad overview, all relevant plans are supportive of renewable electricity generation, and recognise its importance towards achieving long-term sustainability. While the non-complying activity status only applies to two potential consenting requirements pursuant to the PNDP (as listed and described above), the Manawatū-Whanganui Regional Council (Horizons) One Plan and relevant district and regional plans are briefly assessed below for completeness.

One Plan

The One Plan is a combined regional policy statement and regional plan. Chapter 3 of the RPS outlines regionally significant issues in respect of infrastructure and energy and contains broad guidance for managing activities associated with these.

Objective 3-1 and Policy 3-1 require recognition to be given to the benefits of regionally and nationally important infrastructure (which includes renewable energy facilities such as Te Rere Hau) by providing for their establishment, operation, maintenance and upgrading. Objective 3-2 seeks an improvement in the efficiency of the end use of energy and an increase in the use of renewable energy resources.

Policy 3-1 in the One Plan includes facilities that generate more than 1 MW of electricity where the electricity generated is supplied to the electricity distribution and transmission networks within their definition of a physical resource of regional and national importance. Based on 30 x 4.3 MW turbines, the Project would fit within this definition. Consequently, the Project would enable the development of infrastructure of regional and national importance while increasing renewable energy capacity within the Region.

Policy 3-2 of the One Plan requires councils to ensure that the adverse effects of other activities on regionally or nationally important infrastructure are avoided as far as reasonably practicable. Policy 3-3, in addition, establishes a framework for the management of adverse effects arising from the establishment, operation, maintenance and upgrading of infrastructure of national importance. This framework provides for minor adverse effects to be allowed, and more than minor effects to be avoided, remedied or mitigated – taking into account particular items. As such, Policy 3-3 seeks to ensure that any adverse effects of infrastructure are weighed up with the associated benefits. It is considered that the Project would be consistent with this policy direction, based upon the outcome of the technical environmental assessments undertaken to date.

Furthermore, Policy 3-6 requires Regional Council and Territorial Authorities must have particular regard to the logistical requirements of renewable energy generation the need to be located in particular locations and the benefits of the increased generation capacity. As an existing wind farm, it is logical and efficient for repowering to take place at Te Rere Hau, and for a greater amount of renewable energy to be able to be generated on largely the existing site area.

Chapter 6 of the One Plan relates to the preservation of natural features, landscapes and natural character. Policy 6-1 seeks that the characteristics and values of outstanding natural features and landscapes (ONFL) are protected from inappropriate subdivision, use and development. Policy 6-6 furthers this, by seeking that development avoids significant adverse cumulative effects on the characteristics and values of ONFLs as far as reasonably practicable and then remedies and mitigates adverse effects. As discussed within the preliminary Landscape and Visual Assessment provided within the referral application, it is not considered that the Project will result in significant effects on landscape and visual qualities. The presence of the existing wind farm, surrounding wind farms, together with intervening forestry and landforms helps to limit the scale of effects on the character, as it is considered a landscape that is highly modified and developed already. In addition, as the site is located amongst other windfarms that contain the updated (larger) turbines, the repowering project will create a more visually cohesive across the environment. Overall, it is considered that the Project is consistent with the objectives and policies within Chapter 6.

There are a range of other objectives and policies that are considered relevant within the One Plan relating to land use, vegetation removal, earthworks, associated discharges to land and water and maintenance of water quality (refer to Chapters 4, 5, 13, 14). An initial screening of the relevant objectives and policies in these chapters alongside the preliminary assessments undertaken (in particular those relation to Erosion and Sediment Control and Ecology) finds that the Project is consistent with them.

Palmerston North City District Plan

The PNDP aims “to recognise and provide for the benefits and national significance of renewable electricity generation activities and the renewable energy resources to long term sustainability” (Rural Zone - Objective 9) and to “to avoid, remedy or mitigate the adverse effects of renewable

electricity generation activities on the natural and physical resources of the rural environment” (Rural Zone - Objective 9). Furthering this, Policy 9.1 enables the facilitation of appropriate and well-designed upgrades of existing and consented renewable electricity generation and aims to ensure that where avoidance, remediation or mitigation of adverse effects is not possible, to take into account any proposed offsetting measures or environmental compensation. It is considered that the Project would be consistent with these objectives and policies, particularly as the Project results in a long-term investment by NZ Windfarms to improve the existing wind farm and generate greater levels of renewable electricity. The redesign of the repowering has also focused on avoiding adverse effects, and where this is not possible, to look at remediation or mitigation of environmental effects.

Further to this, technical assessments undertaken to date have indicated that some potential effects associated with the Project will reduce compared to those that exist for the current wind farm operation. This is particularly relevant when considering the preliminary noise and landscape and visual assessments, where offsite noise emissions will greatly reduce, and the Project will result in a more visually cohesive environment for receivers when viewed in the context of surrounding / neighbouring windfarms.

Section 6 of the PNDP provides for general rules relating to earthworks. Objective 1 provides for earthworks where effects are able to be avoided, remedied or mitigated. Policy 1.1 seeks limitations to earthworks, Policy 1.2 outlines what effects must be managed, and Policy 1.3 aims to avoid adverse effects on the National Grid. Provided appropriate ESC measures are implemented, it is considered that any actual or potential adverse effects can be appropriately avoided, remedied or mitigated. As stated above, the ESC report assessed that the Project's earthworks are of a scale and nature that can be appropriately managed by best practise ESC measures.

Tararua District Plan

The Tararua District Plan seeks to recognise the potential of the rural management area for renewable electricity generation, and, in particular wind farms (Objective 2.8.4.1). Relevant policies aim to recognise the local, regional and national benefits of renewable energy resources and wind farms (Policy 2.8.4.2(a)), while remedying, mitigating, or avoiding, *where possible*, the actual and potential adverse effects on the environment (Policy 2.8.4.3(b) – emphasis added). It is considered that the Project is consistent with these objectives and policies as the repowering could help to capture the potential of the Site, and there are no significant adverse effects on the environment anticipated.

Based on the above summary it is clear that the policy direction in the three relevant plans are considered to strongly support the Project.

Consequently, it is considered that the Project will be able to pass both of the gateway tests in s104D of the RMA in the event a non-complying activity consent is required.

4. *Do you anticipate being able to confirm which transmission line option will be utilised prior to project referral, or will both options need to be included in the project scope?*

The options are currently being progressed in consultation with Transpower. At present, Transpower are assessing Option 1, and Aurecon is undertaking preliminary assessment work on Option 2 before providing this to Transpower to consider. Once this is completed, it is anticipated that a discussion and subsequent decision will be able to be made in April 2022. The outcome of this work may not be able to be confirmed prior to project referral therefore both options should be included in the project scope in the report you are preparing for the Minister.

We trust that there is now sufficient information provided in order for the Minister to make the decision as to whether to refer the project. If you have any queries on this information, please do not hesitate to contact Claire Steele (at s 9(2)(a) or on s 9(2)(a)

Yours sincerely

A handwritten signature in dark ink, appearing to read 'C Steele'.

Claire Steele
Manager, Aurecon

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