

16 February 2023

4Sight Consulting Ltd  
Level 1, 17 Grey Street  
Tauranga 3110

s 9(2)(a)

Attention: Ryan Piddington

Teena koe Ryan

**Proposed Waiuku Wind Farm – Preliminary information request**

1. Thank you for your email dated 9 December 2022 with attached memo detailing the preliminary project description for the proposed Waiuku Wind Farm (“WWF”).
2. We understand 4Sight Consulting on behalf of its client, LET Capital Ltd, has requested data and/or information from monitoring programs the Department has been involved in, particularly for Australasian bittern, other domestic migrants, and any information the Department has on godwits and turnstones, both in the area and beyond.

We have considered the attached memo and provide the following information and comments:

**NZCPS Policy 11 – Indigenous biological diversity (biodiversity)**

3. Policy 11 of the New Zealand Coastal Policy Statement provides:

*To protect indigenous biological diversity in the coastal environment:*

*(a) avoid adverse effects of activities on:*

*(i) indigenous taxa that are listed as threatened or at risk in the New Zealand Threat Classification System lists.*

4. The Contact HMR windfarm consent evidence shows species, which include those classified as Threatened or At Risk, use flyways within or near the proposed WWF project area. These are shown in Table 1 (below).

**Australasian bittern**

5. The Threatened – Nationally Critical Australasian bittern is found within and near the proposed WWF project area. There are less than 1000 individuals in New Zealand and disturbance to the birds’ habitat, including flyways, presents a significant risk to this threatened species.

**Department of Conservation Te Papa Atawhai**

Waikato District Office

5 Northway Street, Te Rapa, Hamilton 3200

[www.doc.govt.nz](http://www.doc.govt.nz)

- An Assessment of Environmental Effects (“AEE”) will require a thorough investigation into, and understanding of, the birds’ locations and seasonal behaviours within and beyond the proposed project area to enable an accurate assessment of effects and, subsequently, application of the effects management hierarchy.

**Domestic migratory species**

- There are several domestic and international migratory bird species using the flyway within and nearby the proposed WWF project area. There are also a large number of wetland and sea bird species recorded from the area. These include but are not limited to species listed in Table 1.

<p><b>National (NZ) migrants and coastal seabirds</b></p> <p>South Island pied oystercatcher (Declining)  Variable oystercatcher  Wrybill  NZ dotterel  Banded dotterel (Declining)  Pied stilt  Royal spoonbill  White-faced heron  Reef heron (Nationally Endangered)  White heron (Nationally Critical)  Pied shag  Little pied shag (Relict)  Black shag (Relict)  Little black shag (Naturally Uncommon)  Caspian tern (Nationally Vulnerable)  White-fronted tern (Declining) – significant location for this species  Black-fronted tern (Nationally Endangered)  Little tern  Red-billed gull (Declining)  Black-billed gull (Declining)  Australasian gannet  Fluttering shearwater (Relict)  Arctic skua</p>
<p><b>International migrants</b></p> <p>Bar-tailed godwit (Declining)  Red knot (Declining)  Red-necked stint  Ruddy turnstone  Little curlew  Oriental plover</p>

*Table 1 National and international migrant species known within and near the proposed WWF project area.*

- This information is available in eBird and accessible to the public. The list is not comprehensive, and repeat surveys (i.e., during all seasons) will need to be done for accurate data capture.
- For the Contact HMR windfarm consent, a large survey effort was undertaken along the coastline just south of the WWF site. Measurements from this consent showed

how migrating birds used this area and the significance of it to these species. Any application should consider the results from the Contact HMR windfarm application.

### Other species

10. The Threatened – Nationally Critical long-tailed bat may be present in the proposed WWF project area. Long-tailed bats are under increasing pressure from habitat destruction through deforestation and urban development, including loss of foraging and commuting areas.

Monitoring of this species within and near the proposed WWF area by an experienced bat ecologist is required to inform an accurate AEE. Long-tailed bats are a highly philopatric species whose activities are seasonally constrained, and this should be reflected in a monitoring plan. Monitoring for a continuous three-week period repeated at different times of year is necessary for obtaining accurate data.

11. Lizards in the proposed WWF project footprint should be surveyed and considered in the AEE. Two species, Pacific gecko and emerald gecko (Declining) have been recorded from this area. However, there are no published surveys from the area encompassed within the WWF project area.

12. Forest and wetland birds in the proposed WWF project area should be surveyed and considered in the AEE. These include, but are not limited to, species listed in Table 2.

NZ pipit (Naturally Uncommon)
Welcome swallow
Australasian harrier
Silvereye
Sacred kingfisher
Grey warbler
Shining cuckoo
NZ fantail
Tui
NZ pigeon
NZ dabchick
Pukeko
Eurasian coot
NZ fernbird (Declining)
Grey teal
Mallard
Grey duck (Nationally Vulnerable)
Australian shoveler
Paradise shelduck
NZ scaup

Table 2. Forest and wetland bird species likely to be present in the WWF project area.

13. Any SNAs in the footprint should be surveyed and considered in the AEE. There are threatened plant species within the proposed WWF project area. A vegetation survey to identify areas containing threatened plant species should be undertaken for an accurate AEE.

### Other considerations

14. We note the absence of a Cultural Impact Assessment in the list of assessments commissioned by the applicant. There are several sites of cultural importance (paa sites with pits and terraces) which may fall within the proposed WWF project area. The area may also be subject to Treaty settlements.

Based on the presence of Threatened, including Nationally Critical, species at this site and the potential risks posed to them by a wind farm I do not support this application proceeding through a fast-track process.

If you have any further questions, please get in touch.

Ngaa mihi nui

A handwritten signature in black ink, appearing to be 'Tinaka Mearns', written in a cursive style.

Tinaka Mearns  
Operations Manager, Waikato District Office