

Jacob Paget

From: Ian Smallburn s 9(2)(a)
Sent: Monday, 17 April 2023 10:28 am
To: Fast Track Consenting
Cc: Tommy Lai; James Dowding
Subject: FW: [COMMERCIAL]COVID-19 Recovery (Fast-Track Consenting) Act 2020 – Waiuku Wind Farm

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Hi Jacob,

Having reviewed the proposal, and recognising the vast majority of the proposal and matters of consideration sit in the Waikato Region, I can confirm that we have no concerns with this proceeding through the COVID F/T process.

Ngā mihi | Kind regards

Ian Smallburn | General Manager, Resource Consents
Auckland Council
Ph 09 352 2600 | Extn (46) 5600 | s 9(2)(a)
Auckland Council, Level 6, 135 Albert Street, Auckland
Visit our website: www.aucklandcouncil.govt.nz

From: Fast Track Consenting <fasttrackconsenting@mfe.govt.nz>
Sent: Thursday, 13 April 2023 12:54 PM
To: Jim Stabback s 9(2)(a)
Cc: Ian Smallburn s 9(2)(a); Fast Track Consenting
<fasttrackconsenting@mfe.govt.nz>
Subject: [COMMERCIAL]COVID-19 Recovery (Fast-Track Consenting) Act 2020 – Waiuku Wind Farm

Tēnā koe Jim

Attached is a letter inviting your comment on the following application that has been made to the Minister for the Environment under the COVID-19 Recovery (Fast-Track Consenting) Act 2020.

- Waiuku Wind Farm – Out of Scope

NOTE: This information is provided to you in confidence and as part of the statutory process set out in the FTCA. Please do not forward the application or the request for comments to anyone outside your organisation, including any Crown Entity or statutory body.

Many thanks

Jacob

Fast Track Consenting

Ministry for the Environment | Manatū Mō Te Taiao
fasttrackconsenting@mfe.govt.nz | mfe.govt.nz

This email account is monitored by several members of the team, to ensure responses are managed in a timely manner.



Ministry for the
Environment
Manatū Mō Te Taiao



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Comments on applications for referral under the COVID-19 Recovery (Fast-track Consenting) Act 2020

This form is for persons requested by the Minister for the Environment to provide comments on an application to refer a project to an expert consenting panel under the COVID-19 Recovery (Fast-track Consenting) Act 2020.

Organisation providing comment	Counties Energy Limited
Contact person (if follow-up is required)	Adrian Nadan, Network Development Manager
	s 9(2)(a)
	s 9(2)(a)

Comment form

Please use the table below to comment on the application.

Project name	Waiuku Wind Farm
General comment	No comment
Other considerations	No other considerations.
Q1. What additional approvals will the applicant require from Counties Energy Limited to connect to Counties Energy Limited assets?	<p>The applicant's design is in a very early phase and has not yet advanced to a detailed concept. No approvals have been provided to date, and any necessary approvals remain uncertain until detailed investigations in our network's ability to handle the connection is completed.</p> <p>In broad terms, the approvals required to connect to Counties Energy's assets would include (but not limited to):</p> <ol style="list-style-type: none"> A detailed rating study on our network, including capacity checks and modelling. Proposed designs for any line upgrades, and development of detailed designs. Deconflicting of any new lines with Counties Energy's existing assets. Consenting checks relative to unitary plans and requirements. Landowner approvals for works on private land, including where Counties Energy's assets already exist. The use of Counties Energy's existing landowner agreements/statutory rights to facilitate a 33kV line upgrade up to 60MW back to our Waiuku substation will likely result in roadblocks. Similarly, a new 33kV 80MW line back to our Waiuku substation would likely result in similar roadblocks. The design and construction of the point of connection is subject to certain requirements under the EIPC, specifically with regards to metering. CEL must receive certain compliance documentation and/or witness certain tests to our satisfaction before we connect the network on our end.
Q2. Will obtaining the above approvals likely impact on project delivery or timing as outlined in the referral application(s)?	<p>The project timeline provided by the applicant identifies 16 months for "Counties Energy Design and Acceptance". It's difficult to comment on the impact of the above approvals to the project timeline until the design of the work is further progressed.</p> <p>However, we note several issues of potential complexity:</p>

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| | <ul style="list-style-type: none">a) There are existing Counties Energy assets (11kV or 22kV and 400V) along some of the proposed routes. Establishment of a new line might require these existing assets to be relocated. This activity could add complexity and delays to the projects proposed timeline.b) For any work on Counties Energy’s assets, the upgrades are likely to necessitate increasing the size of power poles and conductors along the route. Furthermore, it is expected that at 33kV, a double 33kV circuit will be required to handle 60MW or 80MW. Where routes run through private property, Counties Energy’s existing landowner agreements/statutory rights may not be adequate to facilitate any upgrades and new agreements may be required from the impacted landowners. Historically, such agreements have been difficult and time consuming to obtain.c) The application for fast-track consent appears to be limited to the applicant’s site at Otatau, and excludes the line route where it passes through areas covered by the Waikato District Plan and the Auckland Unitary Plan. CEL wish to clarify that should any consents be required over the line; these are the responsibility of the applicant to obtain and may put their project timeframe at risk. Installation of assets in the roadway is a permitted activity in both Waikato and Auckland regions but without knowing the concept design of the line – for example whether it is overhead or underground, and the height of any poles – it is difficult to know whether the work is a permitted activity and therefore whether consenting represents a risk. |
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Note: All comments, including your name and contact details, will be made available to the public and the applicant either in response to an Official Information Act request or as part of the Ministry’s proactive release of information. Please advise if you object to the release of any information contained in your comments, including your name and contact details. You have the right to request access to or to correct any personal information you supply to the Ministry.

Jacob Paget

From: Paul Blue s 9(2)(a)
Sent: Monday, 15 May 2023 4:16 pm
To: Fast Track Consenting; Jennifer Valentine; s 9(2)(a)
Cc: Andrew Toop
Subject: FW: Waiuku Wind Farm - further transmission response required by MfE

Importance: High

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Counties Energy confirms this paragraph to be correct "The Project Team met with Counties Energy on Friday 5 May and Monday 8th to discuss its comments on the Referral Application. While there is a difference in opinion on the scope of work that can be undertaken under the Electricity Act 1992, Counties Energy have confirmed there are options available for a transmission line for the Project including ones put forward by the Project Team."

We would however state our position that a preferable solution would be a dedicated line from the wind farm site to the Transpower substation (GXP). We cannot guarantee that a wind farm of this magnitude could connect with the Counties Energy substation at Waiuku, as this substation was designed for 40MW.

Regards



Comments on applications for referral under the COVID-19 Recovery (Fast-track Consenting) Act 2020

This form is for persons requested by the Minister for the Environment to provide comments on an application to refer a project to an expert consenting panel under the COVID-19 Recovery (Fast-track Consenting) Act 2020.

Organisation providing comment	Transpower New Zealand Limited
Contact person (if follow-up is required)	Jo Mooar
	Senior Corporate Counsel
	s 9(2)(a)

Comment form

Please use the table below to comment on the application.

Project name	Waiuku Wind Farm (LET Capital Ltd)
General comment	<p>Transpower has been identified as an “other person” for the purpose of section 21(3) of the COVID-19 Recovery (Fast-Track Consenting) Act 2020 (Act). Thank you for the opportunity to provide comments about the Project, and its potential impact on National Grid assets.</p> <p>Transpower supports the application as it “<i>contribut[es] 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)</i>” (section 19(d)(vii) of the Act).</p> <p>Transpower is not aware of any reason for the application to be declined. However, some potential impacts on the Grid will need to be managed in order to connect to the Grid.</p> <p>The applicant proposes to connect to the existing National Grid Glenbrook Substation via:</p> <ul style="list-style-type: none"> • an upgrade to an existing overhead line owned by Counties Power; or • if considered more viable, a new overhead line installed in road reserve between the site and Glenbrook. Parts of any new line that go through settlement and urban zoned areas are proposed to be underground. <p>Transpower has had preliminary discussions with Counties Power about the proposed connection.</p>

	<p>Transpower operates a Queue Management Framework, for managing investigations into generation connection. The Project is not yet in the queue. However, the connection via the existing Counties Power line appears to require no upgrade to Transpower assets, as so would not need to enter the queue. Instead, Counties Power would have an obligation to work with Transpower in relation to protection co-ordination and power quality requirements.</p> <p>The alternative option of constructing a new line to connect to the Glenbrook Substation would need to enter Transpower's queue.</p>
Other considerations	N/A.
[Insert specific requests for comment]	<p>The following questions have been asked of Transpower:</p> <ol style="list-style-type: none"> 1. What additional approvals will be applicant require from Transpower New Zealand Limited to connect to the national electricity grid? <p>The applicant will need to obtain generating commissioning approval from the System Operator, which is required before generation can occur.</p> <ol style="list-style-type: none"> 2. Will obtaining the above approvals likely impact on project delivery or timing as outlined in the referral application? <p>Connection to the Grid via Powerco's existing line would not impact on project delivery or timing as outlined in the application.</p> <p>Connection via a new line may possibly (but not necessarily) impact on construction. If an application was made, and accepted, for this option to enter our queue, connection could potentially occur within the 3-year timeframe set out in the application. Further, there is the potential for connection to occur in a staged manner, via the existing line initially, and the new line subsequently.</p>

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Your Ref

In reply please quote

If calling, please ask for
Summer Salmon

Postal Address

Private Bag 544, Ngaruawahia
3742
New Zealand

0800 492 452

www.waikatodistrict.govt.nz

27 October 2022

Fast Track Consenting Team
Ministry for the Environment
fasttrackconsenting@mfe.govt.nz

To whom it may concern

RE: COMMENT ON FAST TRACK APPLICATION – WAIUKU WIND FARM

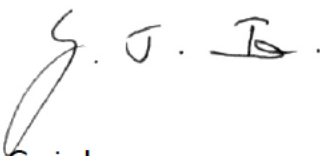
Thank you for the invitation to comment on the Waiuku Wind Farm application to refer to an expert consenting panel under the Covid-19 (Fast-track Consenting) Act 2020.

The land subject to the proposed application is wholly located within Waikato District Council (**WDC**) jurisdiction. The application advises that land use resource consent is required from WDC under both the Operative District Plan 2013 and the Proposed District Plan – Appeals Version 2022. WDC agrees that consents under both District Plans is required.

From a customer and economic development perspective, WDC do not oppose the application being processed as a fast-track consent and would like to continue to work closely with the Applicant prior to any consent application.

Please find attached our response to the questions you have set out. I trust the information contained in this response is adequate for your current purposes. Please do not hesitate to contact me if you have any further questions.

Yours faithfully



Gavin Ion
Chief Executive

Comments on applications for referral under the COVID-19 Recovery (Fast-track Consenting) Act 2020

This form is for local authorities to provide comments to the Minister for the Environment on an application to refer a project to an expert consenting panel under the COVID-19 Recovery (Fast-track Consenting) Act 2020.

Local authority providing comment	Waikato District Council
Contact person (if follow-up is required)	Summer Salmon
	Principal Planner
	s 9(2)(a)

Comment form

Please use the table below to comment on the application.

Project name	Waiuku Wind Farm
General comment – potential benefits	<p>WDC recognises the importance of renewable electricity generation and the social and economic benefits of this at a local, regional, and national level in the post- Covid-19 era.</p> <p>Job creation during construction and ongoing operation and maintenance, ideally using the local work force.</p> <p>Benefits to air quality by reducing reliance on fossil fuels for energy generation thereby contributing to efforts to mitigate climate change.</p> <p>Ecological and landscape enhancements that will be undertaken as part of the Project (e.g. through planting and environmental enhancement areas and ecological mitigation and enhancement work).</p>
General comment – significant issues	<p>Not necessarily significant, but potential issues include:</p> <ul style="list-style-type: none"> • Increase in traffic volumes on, and associated damage to, Council roads, especially during construction phase • Upgrades to Council roads as a result of the proposal • Erosion & sedimentation into waterways during construction • Stormwater management and impacts on waterways/waterbodies • Ecological impacts having regard to climate change and how it impacts on emissions reduction requirements • Cultural & archaeological impacts associated with any works near archaeological sites/sites of significance to Maaori • Managing people’s expectations in relation to an unanticipated activity in this area, especially in consideration of the size and scale of the activity • Environmental effects including reverse sensitivity, amenity (including visual amenity), landscape & character effects especially in relation to existing land use activities in the vicinity of the site • Loss of highly productive land
Is Fast-track appropriate?	Waikato District Council does not oppose the application being processed as a fast-track consent.
Environmental compliance history	Waikato District Council is not aware of the applicant or company owned by the applicant as having any past or current breaches/notices or litigation related to environmental regulatory compliance.

Reports and assessments normally required	Stormwater Management Plan, Integrated Traffic Assessment, Ecological Assessment, Landscape & Visual Assessment, Cultural Impact Assessment, Archaeological Assessment, Acoustic Assessment, Assessment of the proposal against the National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health, Assessment of Natural Hazards having consideration to Climate Change, A property scale site specific assessment Land Use Capability Classification. All assessments to be prepared by a suitably qualified person
Iwi and iwi authorities	Waikato-Tainui is the relevant iwi authority and the mandated representative(s) from, but not limited to, Ngaati Te Ata, Ngaati Tamaoho
Relationship agreements under the RMA	Waikato River Joint Management Agreement under the RMA 1991 between Waikato Tainui and Waikato District Council
Insert responses to other specific requests in the Minister's letter (if applicable)	Nil
Other considerations	In regard to use of Council roads consideration should be given to the following matters: <ul style="list-style-type: none"> • Safety when taking over dimension loads • Structural Capacity of Bridges • Accelerated Road Damage • Traffic management <p>Further engagement is required with Councils Roading Manager.</p>

Note: All comments, including your name and contact details, will be made available to the public and the applicant either in response to an Official Information Act request or as part of the Ministry's proactive release of information. Please advise if you object to the release of any information contained in your comments, including your name and contact details. You have the right to request access to or to correct any personal information you supply to the Ministry.

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This form is for local authorities to provide comments to the Minister for the Environment on an application to refer a project to an expert consenting panel under the COVID-19 Recovery (Fast-track Consenting) Act 2020.

Local authority providing comment	Waikato Regional Council (WRC)
Contact person (if follow-up is required)	Dawn Pritchard
	s 9(2)(a)
	s 9(2)(a)

Comment form

Please use the table below to comment on the application.

Project name	Waiuku Windfarm
General comment – potential benefits	<p>Waikato Regional Council (WRC) appreciates the opportunity to provide comments on this application and it is understood that WRC will be invited a further opportunity to provide comments should this application be referred to the Expert Consenting Panel.</p> <p>The proposal to establish and operate the Waiuku wind farm in Otaua has the potential to deliver benefits for the Waikato region. This includes climate and resilience-related benefits associated with the provision of renewable energy infrastructure and wider socio-economic benefits associated with job creation and likely revenue stream for the landowners. However, we have identified some issues with the application for MfE’s consideration, thus further consultation is considered to be implicit.</p>
General comment – significant issues	<p>WRC staff have reviewed the documents submitted by the applicant and via the Ministry for Environment. Whilst we acknowledge it is not a requirement for the applicant to provide a full AEE to support an application seeking referral, our comments highlight that the Minister consider the need for further information to be provided to enable our full support for a fast-track consent application.</p> <p>1. We have considered the proximity of the windfarm location to priority biodiversity sites and impacts on native species and provide you with the following comments:</p> <ul style="list-style-type: none"> - We note that the proposed windfarm is not located within an SNA, however it is immediately adjacent to a Priority Biodiversity Site referenced LW-001 - South Awhitu Cluster. - Our spatial information shows two forest remnants areas, one of which represents highest priority for protection and restoration (shown as red in Figure 1 further below) in close proximity to the windfarm location. It is our opinion that that any potential disturbance of the SNA and these forest remnant areas should be sufficiently considered due to the presence of kauri, podocarp and tararire forest, regionally rare for the Waikato. In addition, any species within them, particularly, mobile species that will possibly be impacted by the disturbance of construction (and any ongoing disturbance including but not limited to overland flow from the new roads entering waterways) should also be considered.

- There are numerous wetlands on the site which will require ground truthing to identify if they fall under the natural inland wetland definition under the NPS-FM and whether they contain threatened flora and fauna.
- Further assessment of the proposal and its impacts on nearby forest remnants and wetlands is recommended.
- A map or plan showing the proposed location of the wind turbines, access and other infrastructure on the site in relation to Significant Natural Areas (SNAs) is recommended to confirm actual locations.
- A key matter of concern relates to long-tailed bats which are a critically endangered species. The ecological assessment included with the application confirms their presence at the site. The report notes that a bat management plan will be prepared to mitigate what is understood to be a moderate to high risk of turbine strike for bats. We consider this to be an insufficient tool to properly mitigate the risk of impact. The application also makes an assumption that no roosts are present within the site following surveying over one month. The lack of study to draw upon this conclusion is not sufficient.
- It is imperative that further research and monitoring of bats and the proposed amelioration measures be required to justify the construction of wind turbines in this location. Consideration of effects on foraging and commuting bat habitat should be included with the further research in a revised ecological report.
- The Avifauna report concludes *“We are satisfied at this stage that effects will not be significantly adverse based on the thresholds used. However, for some species there will be low to moderate levels of adverse effects which need to be confirmed through further site investigation”*. We agree that further site investigation is necessary. Any modelling and estimates generated will need to be supported through robust field data as opposed to anecdotal observations from the general public as presented. A higher level of confidence in the modelling will be particularly important to enable a more accurate analysis of effects on species such as the Australian bittern that number <1000 individuals.
- It is reasonable to assume that the coast may be a dispersal path for seabirds travelling from the Tasman to the Hauraki Gulf or Bay of Plenty. There is no mention of this potential bird migratory pathway, rather the avifauna report is largely modelled based on sightings within 10km of the site which is considered insufficient. The applicant will need to undertake survey work to sufficiently support that birds will not be adversely affected.
- We suggest amending a likely administrative error within the Department of Conservation letter. Reference of the emerald gecko be changed to the elegant gecko, *Naultnus elegans*. Pacific geckos (and forest geckos) may be present, and of greater concern is the likely presence of Muriwai gecko (Threatened-nationally vulnerable). We recommend further investigation, given the likelihood to find the Muriwai gecko within the footprint of the proposed windfarm location, due to sighting at Port Waikato and their preferred habitat being coastal duneland and rocky areas. Of note, skink species including copper, ornate and Tatahi skinks may also be present.

2. Natural hazards

- From a natural hazards perspective, our maps confirm that the proposal is outside of Aka Aka/Otaua drainage scheme therefore have no drainage concerns.
- The natural hazards and climate change information does not mention geology hazards, however, the suitability of the geology to support the wind turbines and potential risk from liquefaction can be addressed through the building consent process to ensure structure integrity.

3 A preliminary meeting between WRC consenting staff and the Waiuku Windfarm consultants occurred 21 December 2022. The following matters were discussed and are reiterated here:

- Water discharge permits required – The applicants have identified in the documents list of 14 Waikato Regional Plan rules that may be triggered. It is acknowledged that further detailed design of the project would be required before finalising consenting

	<p>requirements. This is acceptable. We acknowledge the two consents that may be triggered under the NES-FW are identified by the applicants.</p> <ul style="list-style-type: none"> - Earthworks – The applicants will need to confirm size, scale and volume of earthworks and disposal methods at time of consent being applied for. - The civil infrastructure report prepared by BBO is missing from the application and should be provided to the ECP if referred for fast-tracking. <p>4. We acknowledge the comments of the route feasibility study undertaken by BBO and that an Integrated Transport Assessment will be prepared. There are no transportation matters to be addressed.</p>
Is Fast-track appropriate?	<p>WRC wish to highlight that there are potential risks regarding biodiversity, and in particular we found the information provided to be insufficient, in particular for birds and bats. Therefore, we ask that the Minister recommends further information to address these concerns.</p> <p>WRC can support the fast-track process and would be prepared to provide input on the conditions prior to the application being granted.</p>
Environmental compliance history	<p>There is no record of any regulatory compliance issues associated with LET Capital Number 3 Limited Partnership.</p>
Reports and assessments normally required	<ol style="list-style-type: none"> 1. A map showing the location of SNAs and identified remnants in the vicinity. 2. The applicant is aware of the relevant rules in the WRP triggering the need for water discharge permits and consents under the NES-FW. The applicants will need to undertake further design definition, consultation, investigation and assessment of effects to support consent application should be progressed before lodgement. 3. An Erosion and Sediment Control is expected with an application for earthworks. 4. An ecological assessment and proposed management plans including for effects on vegetation remnants, wetlands, long-tailed bats and their habitat. 5. Complete field surveys and survey work for birds and bats. 6. Evidence of consultation with relevant iwi. 7. Evidence of consultation with affected neighbours or other parties including Department of Conservation.
Iwi and iwi authorities	<p>The relevant iwi authorities with interests in the subject site and its wider surrounds include Ngāti Te Ata Wahohua, Ngāti Tamaoho, Waikato-Tainui, Te Ākitai Waiohua, Ngāti Tahina and Ngāti Kārewa.</p> <p>The Tāmaki Collective area of interest has some overlap in the project area, although the scope and nature of this Treaty settlement is likely to preclude any substantial need for further engagement.</p> <p>WRC commends the mutual commitment already made by the applicant and Ngāti Te Ata Waiohua working together on cultural impact assessments and realising positive community outcomes. Continuous engagement with those other iwi identified will be expected.</p>
Relationship agreements under the RMA	<p>The overlapping interest associated with Waikato Tainui Waikato River Treaty settlement legislation and the resulting joint management agreement for Area A is relevant in this instance.</p>
Insert responses to other specific requests in the Minister’s letter (if applicable)	<p>N/A</p>
Other considerations	<p>National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health (NES-CS).</p> <ul style="list-style-type: none"> - The application mentions HAIL activities being identified in the windfarm area. A Preliminary Site Investigation (PSI) prepared by 4Sight is also mentioned, albeit, not provided. - The application suggests a future Detailed Site Investigation (DSI) will be provided and notably is also absent from the application submitted.

- An assessment under NES-CS is required.
- A copy of the PSI and DSI for review is requested.

National Policy Statement on Highly Productive Land (NPS-HPL)

The application identifies the NPHS-HPL as relevant consideration for the proposal due to the site containing high class soils (LUC Class 3).

Recreational activities

An understanding of any potential impacts upon recreational activities such as paragliding and their existing access arrangements is encouraged. For context Figure 2 shows the paragliding flight path potentially within or close to the windfarm location.

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Figure 1: Spatial information – SNA map showing regionally rare vegetation remnants (red denotes highest priority for protection remnants comprising top 5% representativeness of their vegetation type). Bold red outline denotes boundaries for SNA LW-001.



Figure 2: Paragliding photograph.