

## **Southland Wind Farm**

### **West Catlins Preservation Response to Minute 7 of the Panel**

Thank you for the opportunity to provide further comment on the amendments listed in Minute 7.

#### **National Policy Statement for Freshwater Management Amendment 2025**

1. The addition of the words 'operational need' in the two sections listed don't add anything to the application in our opinion. The amendments are in relation to quarrying and mining. Correct us if we are wrong – but Contact aren't going to be quarrying the roading material from wetlands are they? If this is the case, the addition of the words 'operational need' does not mean Contact can automatically say let's do this. The Southland Wind Farm Project is Contacts preferred site and operational need is not the same as preference. There is still a requirement to manage adverse effects.
2. We would just like to highlight the following policies of the National Policy Statement for Freshwater Management:

Policy 6: There is no further loss of extent to the natural inland wetlands, their values are protected, and their restoration is promoted.

Policy 7: The loss of river extent and values is avoided to the extent practicable.

Policy 9: The habitats of indigenous freshwater species are protected.

Policy 11: Freshwater is allocated and used efficiently.

As the panel will be well aware, the wetland loss on Jedburgh contravenes policy 6 and the mitigation is not like for like. This project will require careful consideration of the other policies listed.

#### **Resource Management (National Environment Standards for Freshwater) Amendment Regulations 2025.**

3. Section 45A sets out a class of discretionary activities for certain wetland impacts that are connected with quarrying activities. Again the addition of the words 'operational need' appear to make it an easier threshold for Contact to meet. However, it is Contacts preference for the project to be at this site, and thus any wetland clearance is actually just that – 'their preference' to destroy highly sensitive areas. There must be other options, or configurations of turbines and tracks that can occur, rather than using the easiest logistics for Contact. Cost convenience is not enough. It is hard to comment here without having evidence based operational constraints prepared by Contact to review and thus dispute their legitimacy. Dispite this, even if Contact now pass the operational

test – it still doesn't mean consent must be granted. The Panel must weigh up the numerous environmental effects.

#### **National Policy Statement for Renewable Electricity Generation Amendment 2025**

4. Policy A: *Decision-makers must recognise that the benefits of REG activities include the listed benefits. We dispute that the following benefits will be realised with this project as discussed below:*

*2 (b) contributing to the security, resilience and independence of electricity supply at local, regional and national scales through diverse REG sources and electricity storage in diverse locations.* As already presented in our previously submitted comments, Southland sits second on regional statistics for the number of windfarms, and there are 5 more wind projects in the pipeline. These are potentially on far more suitable sites in terms of ecological and environmental impact.

*2 (c) providing for the social, economic and cultural well-being of people and communities and for their health and safety.* This community has been divided with this proposal which in effect has been ongoing for 20 years. This project will have negative impacts on the social and cultural well being of the communities it affects, but in particular Redan, Mokoreta, Mimihau and Glenham. Health and Safety has already been negatively affected. The constant anxiety is all pervading and the long nights reading and preparing reports, after we have finished our day jobs, is not conducive to refreshed and concentrated workers.

*2 (f) the temporary and reversible nature of adverse effects on the environment of **some** REG technologies* (emphasis added). This proposal will remove fen and bog wetlands. This is not reversible. The 30 year (plus 30 year) period for this project cannot be seen as temporary, even for the families that have farmed in this area for over 100 years. It is a generation lost that cannot be replaced. It is also the potential for the loss of the Conservation Park if a fire was to rip through it as a result of the windfarm activities. The guaranteed loss of birds and bats, compounded by the then reduction in breeding, will never be able to be regained.

*(g) reducing electricity losses by locating REG activities close to electricity demand and existing electricity networks.* This project contravenes this benefit completely. As we showed in our original comments, the electricity demand is not in Southland or Otago. Kaiwera Stage 2, under construction and ignored by Contacts expert electricity reports, will cover the current Southland electricity deficit. (Not a further stage as Contact disingenuously raises in their response to comments). Growth in electricity demand in these regions (if it does occur) can be met by proposed projects in preferable locations, including Contact's Kaihiku wind farm.

5. Policy B:

This is a 'have regard to' rule which means although this project would add to the cumulative increase in REG, the Panel does not have to give approval regardless of effects. Declining a new wind farm is not the same as causing a loss of existing generation capacity.

6. Policy C:

Operational or functional need for REG to be in that location. Our original submission comments cover our belief that this is not the case in this instance. Again we note that operational or functional need does not automatically outweigh environmental effects. Its just part of the balancing exercise for the Panel to review. We still strongly believe the adverse effects on the environment in this particular case are too strong to grant consent.

7. Policy D:

Decision-makers must protect existing REG assets and activities, to the extent reasonably possible, from the adverse effects of new activities including by avoiding reverse sensitivity effects. We believe new activities includes other REG projects. Saying that, this project could have adverse effects on the existing REG at the Kaiwera Wind Farm due to:

- a) the close proximity resulting in reverse sensitivity because of the two projects creating an industrial scale wind farm on an outstanding natural landscape;
- b) the excess in electricity in Southland, which could result in curtailment and will result in transmission line losses;
- c) the ability of the transmission lines to cope with both of these projects.

8. Policy F:

While subsection 1 appears helpful to the Applicant - "Must enable REG activities in all locations and environments". Subsection 2 provides for Outstanding Natural Landscapes, the preservation of the natural character of wetlands, and the protection of significant indigenous vegetation and significant habitat of indigenous fauna. All of which are important for the Southland Wind Farm site on Pawakataka and the Jedburgh Plateau. We believe this is a clear signal to the Panel that policy writers were noting that not all environments are equal. The Panel must recognise the higher sensitivity of this environment and apply a more stringent approach to managing effects.

This is still the wrong place for a project of this scale.