

RURAL CITY LIVING



13 October 2025

Jane Borthwick

Panel convener for the purpose of the Fastrack Approvals Act 2024(FTAA)

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Dear Jane,

Minute No. 2 of the Panel Convenor – FTAA-2508-1095 – Southland Wind Farm - Notification of Convenor's Conference Date

Thank you for your minute dated 3 October 2025 concerning the Southland Wind Farm proposal.

Gore District Council (GDC) confirms that the representatives listed below will be available to attend the Convenor's Conference on 15 October 2025.

- Mishka Banhidi (Senior Planner)

Please find below GDC's response to the request outlined in the above-referenced minute concerning Schedules 1 and 2. GDC trusts this information will assist the Panel Convenor in making determinations. Should you require any further clarification regarding the matters raised, please don't hesitate to get in touch. We look forward to engaging with you at the Convenor's Conference.

Schedule 1 - Matters to consider when preparing for conference:

Approvals

- [4] The number and range of approvals sought.

A number of approvals are sought under the RMA which would ordinarily be subject to the Operative Gore District Plan. For clarity it is noted that the Proposed Gore District Plan has been notified with hearings held, however no decisions have been issued and no rules with immediate legal affect apply to this proposal. For clarity I have triggered the relevant rules from the notified proposed district plan below, depending on the timing of the decision process and parallel district plan decisions, this rule may not have effect. Either way the objectives and policies of the Proposed District Plan are relevant.

Operative Gore District Plan:

Discretionary - 7.93(e) - A new Electricity line that will exceed 110Kv
Restricted Discretionary - 7.9.4(b) – A new electricity substation

Restricted Discretionary – 4.13.1(1) - A land use activity that involves earthworks where the period of commencement until rehabilitation exceeds 12 months

Proposed District Plan

Discretionary - ENRG R2 – Large scale renewable Electricity Generation construction, operation, maintenance, repairs and upgrading (including structures and associated buildings)

Complexity

[2] The level of complexity will have a bearing on the appropriate frame for decision making and may include:

- (c) Legal Complexity: novel or difficult legal issues -
 - (i) involve untested law or interpretation of statute;
 - (ii) involve application for multiple approvals;
 - (iii) interface with two or more statutes; and
 - (iv) engage constitutional law and public law.
- (d) Evidentiary Complexity: stemming from the volume, type, or technical nature of evidence -
 - (i) includes challenges like managing expert reports or dealing with conflicting factual or opinion evidence; and
 - (ii) often involve technical or scientific analysis.
- (e) Factual Complexity: arises from the volume and nature of evidence -
 - (i) requires careful management of extensive information or reports, including expert opinion in specialised fields; and
 - (ii) necessitates analysis of technical, scientific, or highly specialised subject matter are involved.

2(c)(i) GDC does not consider the proposal to involve untested law or interpretation of statute
2(c)(ii) As outlined above and within the applicants substantive application multiple approvals are required.

2(c)(iii) The following statutes are relevant to the application:

- National Policy Statement for Renewable Electricity Generation 2011
- National Policy Statement for Freshwater Management 2020
- National Policy Statement for Highly Productive Land 2022
- National Environmental Standards for Freshwater
- Southland Regional Policy Statement
- Proposed Southland Water and Land Plan (Partially Operative)
- Regional Air Plan 2026

- Operative Gore District Plan
- Proposed Gore District Plan
- Subdivision and Land Development Bylaw 2019

2(c)(iv) GDC does not consider that the proposal will engage constitutional or public law

2(d)(i) GDC has maintained ongoing consultation with the applicant and is supportive of the proposal. Minor clarifications have largely been resolved. While further discussions may be required should there be changes to the application, GDC considers that, at this stage, there are no significant outstanding issues.

2(d)(ii) The substantive application is thorough, with time having been spent reviewing the information provided in relation to the completeness check and preparation for feedback. The application is substantial and the evidence proportionally complex.

2(e)(i)&i(ii) As above the application is substantial and will require further technical analysis, that said the form of the proposal is very similar in nature to that applied for under the Covid Fasttrack legislation, and therefore key parties are familiar with the proposal.

Issues

[3] In addition to the matters noted in the Minute, describe:

- a. the issues that have arisen during pre-lodgment and post-lodgment consultation and engagement.
- b. if the application concerns an activity the same or similar to one previously lodged with a consent authority, state how requests for information pursuant to section 92 of the RMA have been addressed in this application.
- c. any statutory process that coincides with the 30-working day period (if proposed).

Potential issues in the Covid Fast Track Application included transportation routes and the physical ability for existing roading infrastructure to support the proposal. It is my understanding that these matters were largely resolved through the proposed conditions of consent related to the previous application.

No consent under the RMA has been received by GDC in relation to this proposal. GDC is not aware of any statutory process that coincides with the 30 working day period.

Panel membership

[4] Consider:

- a. the knowledge, skills and expertise required to decide the application under clause 7(1) of Schedule 3.
- b. whether there are factors that warrant the appointment of more than four panel members, such as:
 - i. the circumstances unique to a particular district or region; or
 - ii. the number of applications that have to be considered in that particular district or region; or
 - iii. the nature and scale of the application under consideration; or
 - iv. matters unique to any relevant iwi participation legislation.

In relation to item 4(a), GDC considers the following skills and areas of expertise to be beneficial for inclusion on the Panel:

- 1. Legal and RMA expertise
- 2. Experience in condition drafting, to ensure any proposal is accompanied by conditions that are both monitorable and enforceable.
- 3. Infrastructure and renewable energy knowledge included associated transport matters.
- 4. Expertise in landscape and ecology.
- 5. Cultural understanding

GDC does not consider there are any factors that warrant the appointment of more than 4 panel members. If a recommendation for panel members is required, the authority to make a recommendation sits with the Chief Executive Debbie Lascelles.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Mishka Banhidi', with a stylized, flowing script.

Mishka Banhidi
Consultant Planner