



12 MAY 2025

Hon Chris Bishop  
Minister for Infrastructure  
Parliament Buildings  
Wellington

## Four Fast-track Approvals Act referral applications:

Dear Chris

Thank you for the opportunity to comment on four applications for referral under the Fast-track Approvals Act (FTAA):

- Out of Scope [REDACTED]
- [REDACTED]
- Southland Wind Farm, FTAA-2504-1041
- Out of Scope [REDACTED]

This letter provides comments in my capacity as Minister for Economic Growth. I have considered whether these applications are likely to have 'significant economic benefits', as provided for under s22(2)(iv) of the FTAA, based on the information provided in the applications. I will leave it to you and other relevant Ministers to assess the other criteria.

Out of Scope [REDACTED]

Out of Scope [REDACTED]

Out of Scope

***Southland Wind Farm, FTAA-2504-1041***

This proposed construction of a wind farm in Slopedown Hill, Southland would be the largest wind farm planned for New Zealand to date. The project is estimated to generate 160-240 direct FTE jobs in the Southland region during the construction phase, which is approximately 80 to 120 direct jobs annually. During its operation, it is estimated to directly employ 10-14 FTE jobs, with operational and maintenance costs of up to \$8-\$12 million per year.

This project will also increase the supply of renewable electricity which would support a growing economy. Increasing electricity supply could put downward pressure on prices and address security of supply concerns. This would also have economic benefits.

Given that this would increase renewable electricity generation, this application may be better assessed in terms of supporting climate change mitigation and reduction or removal of greenhouse gas emissions (under 22(2)(a)(vii) of the Act).

Out of Scope

Sincerely

A handwritten signature in blue ink, appearing to read 'Nicola Willis', with a stylized flourish at the end.

Hon Nicola Willis

**Minister for Economic Growth**

## Your written comments on a project under the Fast Track Approvals Act 2024

<b>Project name</b>	<b>Southland Wind Farm- Contact Energy – FTAA 2504-1041</b>
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Before the due date, for assistance on how to respond or about this template or with using the portal, please email [contact@fasttrack.govt.nz](mailto:contact@fasttrack.govt.nz) or phone 0800 FASTRK (0800 327 875).

All sections of this form with an asterisk (\*) must be completed.

1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
<b>Organisation name (if relevant)</b>	<b>Southland Regional Council</b> (brand name Environment Southland)		
<b>*First name</b>	Bruce		
<b>*Last name</b>	Halligan (Strategic Regulatory Advisor)		
<b>Postal address</b>	Private Bag 90116, Invercargill		
<b>*Contact phone number</b>	0800 768 845	<b>Alternative</b>	s 9(2)(a)
<b>*Email</b>	s 9(2)(a)		

2. Please provide your comments on this application
If you need more space, please attach additional pages. Please include your name, page numbers and the project name on the additional pages.

Note: All comments will be made available to the public and the applicant when the Ministry for the Environment proactively releases advice provided to the Minister for the Environment.

Thank you very much for the opportunity to comment on the above Referral Application of Contact Energy for its proposed Southland Wind Farm project.

For your information, Environment Southland was closely involved with the previous Covid -19 application which was declined by the EPA panel in March 2025, including providing substantive comment and feedback on draft conditions, and regular dialogue with the applicant. Various changes were made to the original proposal to reflect Environment Southland technical feedback.

More recently, Contact Energy representatives met in person with Environment Southland staff on 9<sup>th</sup> April 2025 in Invercargill to discuss this current referral application. It is noted that the current application is substantially unchanged in terms of nature and scale from that which was previously considered by the previous panel in its last iteration.

Insert Fast-track logo

**Environment Southland comments in relation to the current referral application:**

The request for comment received under Section 17 of the Act seeks Environment Southland comment on the following three matters:

**1) Advice of any applications that have been lodged with the Council that would be a competing application or applications if a substantive application for the project were lodged. If no such applications exist, please also confirm this in writing.**

I confirm that at the date of provision of these comments, there are no such competing applications in the Environment Southland Consents system.

**2) In relation to projects seeking approval of a resource consent under Section 42(4)(a) of the Act, whether there are any existing resource consents issued where Sections 124(1)(c) or 165ZI of the Resource Management Act 1991 could apply, if the project were to be applied for as a resource consent under the RMA. If no such consents exist, please also confirm this in writing.**

I confirm that at the date of the provision of these comments, there are no existing resource consents where Section 124(1)(c) or Section 165ZI could apply.

**3) Whether the Council considers the project would have significant regional or national benefits, along with any comments on alignment with the relevant regional plans, policies and / or strategies.**

The Council considers that the project is likely to have significant regional and/or national benefits through the provision of additional renewable energy generation capacity; and the flow-on socio-economic opportunities that such additional capacity may enable - including opportunities for existing industries to commence or continue decarbonisation initiatives.

The Council considers that the project generally aligns with the renewable energy provisions of the operative Southland Regional Policy Statement.

While noting this general alignment, Environment Southland also notes that there are some elements of the existing regional planning and policy framework which a new panel would need to consider closely, particularly those provisions relating to ecology, wetlands and landscape.

In that regard, it is noted that the previous fast-track process extensively traversed the relevant policy framework and the panel from that process sought an independent review of the policy framework and associated plan provisions and other related matters. This can be accessed at the attached link:

<https://www.epa.govt.nz/assets/Uploads/Documents/Fast-track-consenting/Southland-Wind-Farm/Expert-conferencing/Southland-Wind-Farm-JWS-Planning-4.2.25.pdf>

While not a participant in this conferencing, Environment Southland notes the content of this Planning joint witness statement of 4 February 2025.

It is noted that there were a series of other joint witness statements created during this previous process which also touch on the regional planning framework. These are accessible here:

<https://www.epa.govt.nz/fast-track-consenting/referred-projects/southland-wind-farm/expert-conferencing/>

**Additional comments:**

Environment Southland advises that it is not opposed to this application being approved to progress through the substantive process under the Fast Track Approvals Act 2024.

Environment Southland is aware that there are some local community concerns with respect to this project and would expect that those would be traversed through this substantive process.

Environment Southland also advises that it has engaged with Te Ao Marama Incorporated as authorised representative of mana whenua during the preparation of these comments. The applicant had been made aware that this engagement would be occurring.

Environment Southland would intend to take the opportunity to provide further substantive comment if this referral application is approved by the Minister.

These comments have been circulated to, and endorsed by, Environment Southland elected representatives prior to being forwarded to the EPA.

If any additional information is required in relation to these, please contact **Bruce Halligan** in the first instance via the contact details above.

Thanks again for the opportunity to provide these comments.



**Wilma Falconer**  
**Chief Executive**  
Date 22 May 2025



26 May 2025

Hon Chris Bishop  
Minister for Infrastructure  
Parliament Buildings  
[c.bishop@ministers.govt.nz](mailto:c.bishop@ministers.govt.nz)

## **Fast-track Approvals Act referral application – Southland Wind Farm (FTAA-2504-1041)**

Dear Minister

Thank you for the opportunity to comment on the Southland Wind Farm project application for referral under the Fast-track Approvals Act (FTAA 2024).

This letter provides comments in my capacity as Minister for Regional Development. Based on Section 22 of the FTAA 2024, I have considered the project based on whether the project:

- a. will deliver new regionally or nationally significant infrastructure or enable the continued functioning of existing regionally or nationally significant infrastructure
- b. will deliver significant economic benefits.

The Southland Wind Farm project proposes to construct and operate a 250-350 megawatt wind farm comprising up to 55 wind turbines. Public media items suggest the proposed wind farm could be one of the largest of its kind in New Zealand.

The project could offer notable economic benefit to the Southland region, including adding an estimated \$230 million to \$280 million into the economy, and construction generating an estimated 80-120 FTE jobs annually. Operation of the wind farm would offer some direct benefit to the region – direct employment of 10-14 FTE, and an annual operational spend of \$8 million to \$12 million.

The regional – and potentially national – significance of the infrastructure would likely come from the opportunity it poses to attract and support wider investment and industry, for example ongoing discussions of a large data centre near Invercargill which would require significant energy input.

While comment on the project's impact on the energy system should come from the Minister for Energy, I note that an increase in generation capacity could have positive implications regionally by increasing the supply and reducing the cost of power for consumers.

Yours sincerely

A handwritten signature in blue ink, appearing to be 'Shane Jones'.

Hon Shane Jones  
**Minister for Regional Development**



## Heritage New Zealand Pouhere Taonga comments on Southland Wind Farm referral application

Application name	Contact Energy Limited
EPA reference	FTAA-2504-1041
Applicant/s	Southland Wind Farm
Comments due by	26 May 2025

Organisation name	Heritage New Zealand Pouhere Taonga		
*First name	Angelica		
*Last name	Pablo		
Postal address	PO Box 2629 Wellington 6140		
*Home phone/Mobile phone	N/A	*Work Phone	s 9(2)(a)
*Email	fasttrack@heritage.org.nz		
Submission prepared by	James Sutherland - Planner		
Contact details	<a href="mailto:fasttrack@heritage.org.nz">fasttrack@heritage.org.nz</a>		

### General comment on application and recommendations

Thank you for the opportunity to comment on the referral application for Contact Energy Limited, Southland Wind Farm Fast Track Project. Heritage New Zealand Pouhere Taonga (HNZPT) has assessed the application, with input from specialist regional heritage staff, including those with Māori heritage, planning and archaeological expertise.

Based on the information provided, if the project is referred by the Minister, we recommend the following:

- An Archaeological Authority may be required for any proposed earthworks around known and unknown archaeological sites, subsequent the findings of the archaeological assessment,
- HNZPT should be invited to comment further in the substantive phase of the Fast-track Approvals process in relation to archaeological sites within the project area,
- HNZPT can confirm that the applicant has consulted with us in the pre-application stage.

### Cultural heritage values





There are no historic places within the proposed application site, or within the transmission corridors, that are listed on the New Zealand Heritage List Rārangī Kōrero.

The Project Site is within the takiwā of Ngāi Tahu ki Murihiku and encompasses the interests of four papatipu rūnaka. We understand the applicant has had an ongoing dialogue with Te Ao Mārama Incorporated, as representatives of Ngāi Tahu ki Murihiku, who have prepared a summary Cultural Impact Assessment and values document. We support manawhenua aspirations and recommendations.

We note the applicant has made a commitment to continuing collaboration with mana whenua to ensure the project is undertaken in a culturally appropriate way.

## Archaeology

The applicant commissioned an archaeological assessment which has identified one archaeological site (G46/13) lying within the area of proposed works and two lying outside but within proximity (F46/24 and G47/17). G46/13 and F46/24 are sites of interest to Māori, an adze/toki find spot and a recorded midden.

The applicant is aware of the potential for their works to impact known and unknown archaeological sites, and they have confirmed that they intend to apply for an archaeological authority. Therefore, any impact to the archaeological values within the project area can be managed through the archaeological authority process.

We consider that an archaeological authority is required for the project. This is a legal requirement. We recommend that the applicant include in their substantive application the intention and appropriate documents to obtain an archaeological authority. The applicant must be aware that they will be required to apply separately under the Heritage New Zealand Pouhere Taonga Act 2014.

## Recommendations

If the project is referred, the following information should be provided by the applicant in their substantive application:

- Confirmation that an archaeological authority will be obtained before commencement of works.

If the project is referred, the panel should invite the following persons to comment on the application:

- Heritage New Zealand Pouhere Taonga
- Aukaha,
- Te Ao Marama Inc.

The applicant has consulted with HNZPT regional staff at a pre-application meeting held at the Heritage New Zealand Pouhere Taonga Dunedin office 15 April 2025 with the Southern Regional Archaeologists Rebecca Benham, Jasmine Weston, Senior Pouārahi Huia Pacey, and Planner James Sutherland. We recommend that if the project is referred, that the applicant continue to consult with HNZPT regional staff where appropriate.



Comments on a project under the Fast Track Approvals Act 2024

Project name	Southland Wind Farm
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1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
Organisation name (if relevant)	Department of Conservation (acting under delegation from the Minister of Conservation)		
First name	Asher		
Last name	Cook		
Postal address			
Contact phone number	s 9(2)(a)	Alternative	
Email	fast-track@doc.govt.nz; s 9(2)(a)		

2. Please provide your comments on this application
Comments follow overleaf.

Note: All comments will be made available to the public and the applicant when the Ministry for the Environment proactively releases advice provided to the Minister for the Environment.

Manager’s signoff

Jenni Fitzgerald

# Comments on a referral application: Section 17 of the Fast-track Approvals Act 2024

To	Hon. Chris Bishop, Minister for Infrastructure
From	Director-General of Conservation
Regarding fast-track project	Southland Wind Farm

## 1.0 General Comment

1.0.1 Contact Energy Limited has lodged an application for referral of the Southland Wind Farm project under the Fast-track Approvals Act 2024 (the Act).

1.0.2 The project proposes to construct and operate up to 55 wind turbines, producing up to 385 MW (maximum instantaneous rate) of electricity with associated ancillary infrastructure including to connect to and supply electricity to the national grid.

1.0.3 In accordance with section 17(1)(c) of the Act, the Director General of Conservation has been invited to comment on the referral application as the administering agency for the Conservation Act 1987, the Freshwater Fisheries Regulations 1983 and the Wildlife Act 1953.

1.0.4 The project intends to make some use of public conservation land, via easement(s) for culvert(s) and an airspace easement. In accordance with section 19(1) of the Act, the Director-General has been invited to comment on the use of public conservation land. The response to that invitation is in a separate report.

1.0.5 The project was considered but declined on 25<sup>th</sup> March 2025 by the Expert Panel under the Covid-19 Recovery (Fast Track Consenting) Act 2020 (Covid Fast Track Act). The Panel noted the project's ability to support the Government's commitment to double the volume of electricity, its consistency with the National Policy Statement on Renewable Generation (NPS RG) and transmission to a low-emissions future and contribute to reducing NZ's greenhouse gas emissions through the generation of renewable electricity. However, some of their reasons for refusing consent included:

- The impact on the Jedburgh wetland, which could not be offset or compensated for
- The significant value of the Slopedown Outstanding Natural Feature (ONF)

- The failure to meet Resource Management Act 1991 tests, in terms of effects that are more than minor and are contrary to the relevant policies and objectives of the statutory documents.

1.06 Contact have appealed this decision to the High Court in an Appeal dated 28<sup>th</sup> March 2025.

## **2.0 Engagement before lodgement of the referral application**

2.0.1 DOC engaged with the applicant on their application under the Covid Fast Track Act. DOC provided comments on that application on 29 November 2023, and 25 July and 27 November 2024.

2.0.2 The applicant indicates that the project now applying for referral under the Fast-track Approvals Act is the same project as it was refined through the Covid Fast Track Act process, with some refinement of the conditions.

## **3.0 Ecological context**

3.0.1 The application has already undertaken significant ecological investigations as part of their application under the Covid Fast Track Act.

### **3.1 Avifauna**

3.1.1 Windfarms are a known hazard to birds worldwide. When windfarms are operational, flying birds are at risk of collision with rotating turbine blades, with less risk of collision when blades are static.

3.1.2 A total of 16 species of native birds have been found at the project site during daytime surveys. However, up to 51 native bird species have been recorded within 15 km of the wind farm. Threatened bird species known to be present in the proposed wind farm site include:

- Kārearea/Eastern falcon (Threatened – Nationally Vulnerable),
- Pīhoihoi/New Zealand pipit (At Risk – Declining),
- Koekoeā/Long-tailed cuckoo (Threatened – Nationally Vulnerable) and
- Mātātā/South Island fernbird (At Risk – Declining).

3.1.3 As the applicant only undertook monitoring in summer daylight hours, there is still uncertainty regarding collision risk from the proposed transmission line and turbines on species present at other times of year, as well as for crepuscular, nocturnal and migratory species. There are also uncertainties about visitation rates of rare birds that may intermittently visit the site (e.g. Matuku hūrepo/Australasian bittern). These uncertainties include flight heights and the number of birds that pass through the site annually.

3.1.4 An Avian Management Plan (AMP) should be developed that includes monitoring of bird collisions. This should include monitoring throughout the year to account for seasonal variation in bird use of the project site. The AMP should also include monitoring of collisions associated with the proposed transmission lines to be constructed.

3.1.5 There are potential adverse effects from habitat fragmentation on mātātā/South Island fernbird on the Jedburgh plateau, and also habitat fragmentation and territorial severance in the rātā-kāmahī and mānuka shrub habitat for resident avian species.

3.1.6 The bird mortality monitoring method (carcass detection) can only be reliably undertaken at turbines in pastoral grass vegetation. Other sites are increasingly unreliable as vegetation height and complexity increases, i.e. it is likely to be moderately reliable in low stature seral wetland vegetation but unreliable in mature native forest and tall exotic pine forest. This is due to the increasing difficulty in detecting bird carcasses (or parts of bird carcasses) as vegetation complexity increases. At this site, the turbines most likely to have a greater adverse effect on birds also coincide with greater vegetation complexity (i.e. wetlands and mature native and exotic forest, particularly near the escarpment). Turbines that are best suited for detecting bird carcasses (e.g. in pastoral farmland or grassland) generally have lower levels of native avian species. Therefore, if this method is only used at the most suitable turbines, there is considerable risk that the impact of bird collision with turbines will be considerably underestimated.

3.1.7 Artificial lighting should be avoided wherever possible during both construction and operation.

3.1.8 Proposed mitigation measures such as on-site pest control will not be effective for migratory and highly mobile species that are adversely affected by the windfarm, as they do not breed at the site.

3.1.9 The effect of any fire on the avifauna values at the site should be acknowledged and prevention and containment actions for any fire should be considered in the development of the proposed Fire Management Plan, to take account of avifauna values.

## 3.2 Bats

3.2.1 The proposed wind farm site supports a significant population of long-tailed bats (Threatened – Nationally Critical). The application includes an assessment of the effects of the project on bats which showed they were present throughout the proposed project site. The applicant's bat ecologists<sup>1</sup> noted that the operation of turbines in the area of highest bat activity could pose an ongoing risk to the local bat population. This is by direct strike and barotrauma (pressure change due to blade sweep).

3.2.2 The simplest way to avoid a substantial proportion of the risk to long-tailed bats is to remove the eight turbines where there is the highest bat activity (MAT-01, MAT-02, MAT03, MAT-04, MAT-06, MAT-07, MAT-12, MAT-16 and MAT-17). These were tagged in the high usage 'Bat Risk Area' identified by the applicant's ecologists and stated in their proposed condition (EC66a) for their Covid Fast Track application (i.e. only consent 47 of 55 proposed turbines).

3.2.3 If a consent for all turbine locations is granted, then curtailing (i.e. feathering and halting) turbine activity just when bats are present at each turbine is global best practice to reduce risks significantly for bats. It is this option that the applicants came to in their proposed conditions (EC66 - 'live curtailment').

3.2.4 Curtailing activity at turbines does not remove the risks to bats based on overseas studies, it only reduces it. Therefore, residual effects (that is, bats that are still killed during the slow-down of blades, and times of the night and year and at turbines when curtailment might not be active), still need to be addressed.

3.2.5 By the time the applicants offered their proposed conditions for their application under the Covid Fast Track Act, they had proposed a range of compensatory measures to deal with residual risks to long-tailed bats (their proposed conditions EC75-79). The primary focus was on providing c. 10,000 ha of predator control in the Catlins forest, a priority site for long-tailed bat recovery.

3.2.6 By the time the applicants submitted their application under the Covid Fast Track Act, DOC was satisfied that the conditions proffered would avoid, remedy, mitigate and compensate the residual risks to long-tailed bats. DOC would be comfortable if the same long-tailed bat related conditions were used in the current application.

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<sup>1</sup> Addendum Report – Assessment of effects on the pekapeka-tou-roa (long-tailed bat) and its habitat at the proposed Southland Wind Farm [Southland-Wind-Farm-Bat-Report-Addendum.pdf](#)

### 3.3 Invertebrates

3.3.1 If Stag Beetles (Threatened – Nationally Critical) are found on site, then they should be salvaged and moved to a site containing suitable habitat where rats and mice are continuously controlled to low levels for the duration of the consent. The release site should also be surveyed for the presence of stag beetles prior to the translocation.

3.3.2 There are potential adverse effects on stag beetles (and other invertebrates) from fragmentation mainly due to roading development.

3.3.3 We recommend further surveying for invertebrates across the entire site (not just the construction area) to gain a better understanding of potential effects. These should also be undertaken at different times of the year to capture seasonal differences.

3.3.4 Soil deposition sites need to be checked for existing invertebrate communities. Ideally, sites with the lowest species diversity and highest proportion of introduced invertebrates ought to be targeted for soil dumping.

3.3.5 We recommend that sufficient invertebrate baseline data should be collected with which to compare over time, to demonstrate any quantifiable benefits to invertebrates from the proposed mitigation measures, and to measure the invertebrate response to pest control.

### 3.4 Herpetofauna

3.4.1 Potential adverse effects on herpetofauna are likely to be confined to sites of habitat disturbance, primarily forest and wetland vegetation that is to be removed, and grassland or rough pasture that will be subject to earthworks.

3.4.2 Fragmentation of lizard habitat by roading could also have an impact – particularly on the Jedburgh plateau.

3.4.3 Surveys have not been designed or implemented to detect all lizard species that may be present or to indicate their abundance. More surveys should be undertaken for lizards across a wider geographic area, and survey intensity should be increased.

3.4.4 If Green skink (Threatened – Nationally Critical) or Tautuku gecko (At Risk – Declining) are found, they will need full protection for each individual – such as the development of a fully pest-free fenced enclosure of at least 5ha of suitable habitat while the wind farm is operative, or translocation to a suitable pest-free offshore island.

3.4.5 A wind farm footprint (not envelope) approach should be undertaken in order to have more certainty about avoidance and minimisation of potential effects on herpetological values.

### 3.5 Indigenous vegetation and wetlands

3.5.1 The applicant notes that the project will result in unavoidable loss of areas of indigenous vegetation, including wetlands and habitat for indigenous fauna.

3.5.2 In particular, the project would result in the fragmentation and loss of complex ecologically significant indigenous vegetation and wetlands including bog and fen wetland on the Jedburgh Station plateau. This ecosystem is ecologically significant, meeting the criteria in the National Policy Statement for Indigenous Biodiversity (NPS-IB).

3.5.3 The removal of seral or regenerating indigenous shrublands and forest will turn back the clock on successional processes. This could lead to increased habitat fragmentation and edge effects such as vulnerability to weed invasion, temperature changes and storm events which can lead to a reduction of indigenous cover.

3.5.4 Avoidance and minimisation need to be properly assessed before biodiversity offsetting can be proposed. The applicant has proposed to minimise the effects on bog and fen wetland, however there will still be a loss of 0.72 ha of bog wetlands and 1.97 ha of fen wetlands. However, they have not proposed to compensate for this loss and have instead proposed biodiversity offsetting. Proposed enhancement of copper tussock wetlands is inadequate as it would not be a “like for like” offset. The applicants' ecologists (Wildlands Consultancy) need to reassess the ecological / biodiversity values on site and reconsider how the applicant will avoid, minimise, compensate and possibly offset for the loss of these values.

## 4.0 Consistency with DOC’s strategies, obligations, and roles

### 4.1 Consistency with the Southland Murihiku Conservation Management Strategy

4.1.1 The proposed activity is located within the Lowlands Te Rā a Takitimu Place under the Southland Murihiku Conservation Management Strategy 2016. The outcome for this Place includes enhancing conservation values of all areas.

4.1.2 The proposal will not be inconsistent with the provisions of the Southland Murihiku Conservation Management Strategy provided there are no adverse effects on threatened or at-risk species (Policy 2.7.7).



4.1.3 If the application progresses it should further address the protection and persistence of any Threatened or At-Risk species related to the culvert construction.

## 4.2 DOC obligations under the Treaty and Treaty settlements

4.2.1 Based on the referral application, DOC has not identified any issues inconsistent with DOC's obligations to give effect to the principles of the Treaty of Waitangi, as required under the Conservation Act 1987, which states, "This Act shall so be interpreted and administered as to give effect to the principles of the Treaty of Waitangi".

4.2.2 Based on the referral application, DOC has not identified any issues inconsistent with DOC's obligations under the Ngāi Tahu Claims Settlement Act 1998. DOC notes species known or likely to be present on the project area include Taonga Species listed in a schedule to the Ngāi Tahu Claims Settlement Act and that Act requires DOC work together with Te Rūnanga to discuss the approach to resource management issues. DOC also notes the agreement between the applicant and Ngāi Tahu, as attached to the referral application.

## 4.3 Consistency with National Direction under the RMA

4.3.1 Under the Conservation General Policy DOC has a role in ensuring that species, habitats and other resources of interest to DOC, including the national priorities for biodiversity, are recognised in RMA decision making.

4.3.2 The application is inconsistent with the National Policy Statement for Renewable Electricity Generation (NPS-REG), in particular, Policy C2 which requires regard to be given to offsetting and compensatory measures of environmental compensation. The Expert Consent Panel found the application under Covid Fast Track Act did not offset or compensate adequately and/or that compensation was inappropriate for the loss of natural landscape and wetland values. However, given the overall objective of the NPS REG, the Expert Consent Panel found the application consistent overall with this NPS.

4.3.3 The application is inconsistent with the National Policy Statement for Freshwater Management. This is because the application does not meet two of the four requirements of Policy 6. Firstly, the offset and compensation package does not meet the "*no net loss*" test of extent of natural wetlands as they are significant and irreplaceable, and secondly, it has not demonstrated a functional need for its location on this site.

4.3.4 The Expert Consent Panel found that as the grid injection point is located on Class 3 land, it will result in a minor loss of soils. The Expert Consent Panel found that as the functional need

test has not been met, the application is an inappropriate use and development and therefore inconsistent with Policy 8 of the National Policy Statement for Highly Productive Land.

## **5.0 Relevant permissions applied for**

5.0.1 The referral application envisions that the project will require approvals relating to the Resource Management Act 1991 and:

- Concession for an airspace easement for the proposed transmission line (relating to the Conservation Act 1987); and
- Concession for a right of way for the construction of a culvert (relating to the Conservation Act 1987); and
- Wildlife approvals for the disturbance of lizards and terrestrial invertebrates (relating to the Wildlife Act 1953).

5.0.2 In addition to these approvals, the applicant identified a complex freshwater fisheries activity approval (relating to the Freshwater Fisheries Regulations 1983) may be required. DOC anticipates the applicant can readily, prior to lodgement of the substantive application, resolve whether the related activity is standard or complex.

5.0.3 DOC has not identified any additional conservation approvals required for the project's construction or operation and relevant to assessing the referral application.

## **5.1 Applicant's conservation approvals history**

5.1.1 DOC has not identified any issues with the applicant's past or current conservation approvals relevant to assessing the referral application.

5.1.2 DOC's internal Permissions database shows that, across New Zealand, the applicant has active conservation approvals and has previously held others which have now expired. There are no known issues with the applicant's history of compliance with conservation approvals indicated in the Permissions database.

## **6.0 Conclusion**

6.0.1 The Southland Wind Farm project will have significant adverse effects on the ecological values of the area.

6.0.2 If referred, an improved conditions package will be required to sufficiently address these concerns. DOC would anticipate further engagement with the applicant to discuss these conditions.

6.0.3 The project is also likely to be inconsistent with the National Policy Statement for Renewable Electricity Generation, National Policy Statement for Freshwater Management and the National Policy Statement for Highly Productive Land. If referred, the substantive application should ensure alignment with these areas.

Jenni Fitzgerald  
Fast-Track Applications Manager

Acting pursuant to delegated authority on behalf of Penny Nelson, Director-General of  
Conservation / Tumuaki Ahurei

Date: 26/5/2025

Note: A copy of the Instrument of Delegation may be inspected at the Director-General's office  
at Conservation House Whare Kaupapa Atawhai, 18/32 Manners Street, Wellington 6011

# Your written comments on a project under the Fast Track Approvals Act 2024

26 May 2025

Project name	Southland Wind Farm (Project) - Contact
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Before the due date, for assistance on how to respond or about this template or with using the portal, please email [contact@fasttrack.govt.nz](mailto:contact@fasttrack.govt.nz) or phone 0800 FASTRK (0800 327 875).

All sections of this form with an asterisk (\*) must be completed.

1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
Organisation name (if relevant)	Transpower New Zealand Limited (Transpower)		
*First name	Jo		
*Last name	Mooar		
Postal address	PO Box 1021 Wellington 6011		
*Contact phone number	s 9(2)(a)	Alternative	
*Email	s 9(2)(a)		

2. Please provide your comments on this application
<p>Transpower has been identified as an “other person” for the purpose of section 17(5) of the Fast-track Approvals Act 2024 (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 Project as it proposes renewable electricity generation and will support climate mitigation (section 22(2)(a)(vii) of the Act). The Project will also deliver new regionally or nationally significant infrastructure (section 22(2)(a)(ii) of the Act).</p> <p>The applicant proposes to connect to the National Grid via a Grid Injection Point adjacent to the North Makarewa to Three Mile Hill A line. Transpower and the applicant have discussed the Project, and agreed an acceptable connection arrangement.</p> <p>Transpower is not aware of any barriers to the applicant delivering the Project.</p>

Note: All comments will be made available to the public and the applicant when the Ministry for the Environment proactively releases advice provided to the Minister for the Environment.

## Your written comments on a project under the Fast Track Approvals Act 2024

<b>Applicant</b>	Contact Energy Limited
<b>Project name</b>	Southland Wind Farm

Before the due date, for assistance on how to respond or about this template or with using the portal, please email [contact@fasttrack.govt.nz](mailto:contact@fasttrack.govt.nz) or phone 0800 FASTRK (0800 327 875).

All sections of this form with an asterisk (\*) must be completed.

1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
<b>Organisation name (if relevant)</b>	Southland District Council		
<b>*First name</b>	Adrian		
<b>*Last name</b>	Humphries		
<b>Postal address</b>	Group Manager Regulatory Services Southland District Council PO Box 903 Invercargill 9840		
<b>*Contact phone number</b>	0800 732 732	<b>Alternative</b>	
<b>*Email</b>	s 9(2)(a)		

2. Please provide your comments on this application
<p>1. <i>Any applications that have been lodged with the Council that would be a competing application or applications if a substantive application for the project were lodged. If no such applications exist, please also confirm this in writing</i></p> <p>Southland District Council currently (as of 8<sup>th</sup> May 2025) have no lodged applications of which would be in competition with the Southland Wind Farm application.</p> <p>It is noted that under the Natural and Built Environment Act 2023 (NBEA), the Jericho Wind Farm project referral application was accepted by the Minister for the Environment (prior to the Act being repealed on the 24 December 2023) and referred the project to a panel under clause 19 schedule 10 of the NBEA. This application has yet to be formally submitted by the applicant (Pioneer Energy), but Southland District Council has been working through pre-application consultation with the applicant and consultant.</p>

Jericho Wind Farm project proposes the construction of a new wind farm at the southern (Blackmount) end of Jericho Station (14/153 Jericho Road, 3312 Blackmount Redcliff Road and 3023 Blackmount Redcliff Road, Blackmount). The site has been identified as suitable for up to 8 turbines which would generate approximately 125GWh of electricity annually. Energy generated will connect to existing powerlines via a local substation constructed onsite along with a small control room and office/workshop building.

2. *In relation to projects seeking approval of a resource consent under section 42(4)(a) of the Act, whether there any existing resource consents issued where sections 124C(1)(c) or 165ZI of the Resource Management Act 1991 (RMA) could apply, if the project were to be applied for as a resource consent under the RMA. If no such consents exist, please also confirm this in writing.*

No such consents exist with Southland District Council.

3. *Whether the Council considers the project would have significant regional or national benefits, along with any comments on alignment with the relevant District plans, policies, and/or strategies.*

Southland District Council wishes to confirm its position on the Southland Wind Farm proposal is one of neutrality, reflecting the mixed views of Southland residents and the restriction the Fast Track Act has on the Notification process. Council's neutral position is based on the understanding the effects of the proposal can be managed, the anticipated local economic and social benefits the development and ongoing operation of the windfarm will provide for the district, and the contribution additional sources of renewable energy will make to reducing our carbon emissions.

This position is based on the proposal closely consistent with the application and additional submitted documentation, declined under the COVID-19 Fast Track process.

The Infrastructure Chapter of the Southland District Plan identifies that infrastructure provides services essential to the maintenance and enhancement of social and economic well-being at local, regional and national levels and it is vital that infrastructure if developed, operated, maintained and upgraded in a safe, effective and efficient manner. Objective INF-01 and Policies INF-P1 and INF-P2 identify that specific infrastructure may have a functional, technical of operation need for a particular location, but activities must take place in a way that ensures the adverse effects on the environment are avoided, remedied or mitigated.

Note: All comments will be made available to the public and the applicant when the Ministry for the Environment proactively releases advice provided to the Minister for the Environment.

#### **Managers signoff**

**Adrian Humphries**



**Date 20<sup>th</sup> May 2025**

## Your written comments on a project under the Fast-track Approvals Act 2024

<b>Project name</b>	Contact Energy Southland Windfarm
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Before the due date, for assistance on how to respond or about this template or with using the portal, please email [contact@fasttrack.govt.nz](mailto:contact@fasttrack.govt.nz) or phone 0800 FASTRK (0800 327 875).

All sections of this form with an asterisk (\*) must be completed.

### 1. Contact Details

Please ensure that you have authority to comment on the application on behalf of those named on this form.

<b>*Portfolio</b>	Climate Change / Energy
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### 2. Officials advise you provide a comment on this application for referral

From a preliminary review, officials consider that you may like to provide a comment on the climate mitigation and energy aspect of the application

### 3. If recommended, please provide your comments on this application

The Minister of Climate Change and Energy considers that the project will support climate change mitigation and that this factor should be taken into account in your consideration of whether the project is an infrastructure or development project that would have significant regional or national benefits.

If constructed this project would make a significant contribution to renewable electricity supply and provide geographic diversity in NZ's wind generation capacity – adding to the resilience of the energy system.

This project is therefore considered to deliver new regionally or nationally significant infrastructure, as per s22(2)(a)(ii) of the FTAA, in the form of large-scale energy generation.

### Minister's signoff



Hon Simon Watts

**Minister of Climate Change  
Minister for Energy**

Date

**23 MAY 2025**



## APPENDIX 1 – SUPPLEMENTARY ADVICE

Project	Adaptation and Mitigation		Possible comment to enter in fast-track portal	Due date
	Mitigation comment	Adaptation comment		
<p>The proposed Southland Wind Farm comprises two main components - a Wind Farm, where the wind turbines, wind farm substation, and wind farm roads are located - and the Grid Connection works – being the infrastructure required to connect the wind farm to the Transpower National Grid. This comprises a high voltage (220kV) overhead transmission line and a switching station, also known as the grid injection point (GIP).</p>	<p><i>As part of your consideration of whether the project is an infrastructure or development project that would have significant regional or national benefits you may consider whether the project will support climate change mitigation, including the reduction or removal of greenhouse gas emissions (s 22(2)(vii)) of the Fast-track Approvals Act 2024).</i></p> <p>The generation capacity for the project is intended to be between approximately 250-350MW with a generation output in the range of 900-1,200GWh/annum. This project is expected to deliver significant renewable electricity generation capacity to the national grid, which will help reduce the overall dependence on fossil fuels for electricity generation.</p>	<p><i>As part of your consideration of whether the project is an infrastructure or development project that would have significant regional or national benefits you may consider whether the project will support climate adaptation, reduce risks arising from natural hazards, or support recovery from events caused by natural hazards (s 22(2)(viii)) of the Fast-track Approvals Act 2024).</i></p> <p>The project does not significantly support climate change adaptation, reduce risks arising from natural hazards, or support recovery from events caused by natural hazards.</p>	<p>The Minister of Climate Change considers that the project will support climate change mitigation and that this factor should be taken into account in your consideration of whether the project is an infrastructure or development project that would have significant regional or national benefits.</p>	