



HOKONUI HILLS WIND FARM LIMITED
PARTNERSHIP

HOKONUI WIND FARM

Fast-track Approvals Act Referral
Application

5 June 2026

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DOCUMENT STRUCTURE

This document has been structured in general accordance with the referral application form to use the fast-track process under the Fast-track Approvals Act 2024.

1. APPLICANT

1.1 APPLICATION INFORMATION – REFERRAL

Referral Application Unique Reference Number: FTAA-2604-1213

Project Name: Hokonui Wind Farm

Project Description: The Hokonui Wind Farm Project (“**the Project**”) involves the construction, operation and maintenance of up to 83 wind turbines and associated infrastructure in the Hokonui Hills, located approximately 20km west of Gore in Southland. The Project is described in full in Section 2.2 of this document.

1.2 APPLICANT DETAILS

Person or entity making the request: Hokonui Hills Wind Farm Limited Partnership

Hokonui Hills Wind Farm Limited Partnership (“**HHWFLP**”) is a partnership between Hokonui Energy Limited and the Hokonui Rūnanga, formed to promote the development of efficient, affordable and sustainable renewable energy in the Hokonui Hills of Southland. By advancing the development of this Project, the entities aspire to deliver a net environmental gain, create jobs in Southland and underpin economic prosperity through energy abundance. The Hokonui Energy Limited founder was raised in the Hokonui Hills of Southland where his family have farmed for generations, while the Hokonui Rūnanga are the Rūnanga closest to the Project with deep connections to the land, environment and people. They have offices in Gore and have long promoted jobs, growth and development in their rohe making them a natural partner to help with the establishment of the Project and their staff have been directly involved in the environmental and cultural workstreams required to prepare this application.

Key members of the Rūnanga were also involved with the establishment of the Murihiku Regeneration initiative following the announcement that Tiwai Point Aluminium smelter may close (<https://www.murihikuregen.org.nz/>). Murihiku Regeneration aims to develop a long-term regeneration plan that meets whanau aspirations of the Four Pou: social, cultural, economic and environment. Leveraging Southland's renewable energy resources to drive jobs, growth and sustainable industry has been a big focus of their work. The HHWFLP and this renewable energy project is directly responding to the opportunity identified in through



the Murihiku Regeneration kaupapa and has been developed in accordance with the aspirations of the Four Pou.

Contact Person: Danny Garrett

Organisation: Hokonui Hills Wind Farm Limited Partnership

NZBN: 9429052090875

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Email: s 9(2)(a)

Preferred method of service: Email

Email address for service – Applicant: s 9(2)(a)

Is there an agent acting on behalf of the Applicant?

Yes, see details below.

Organisation: Mitchell Daysh Limited

Contact Person: Megan Hankey

Job Title: Senior Consultant

Phone: s 9(2)(a)

Email: s 9(2)(a)

Postal Address: PO Box 489, Dunedin, 9054

1.3 COMPLIANCE AND ENFORCEMENT HISTORY

No compliance or enforcement action has been taken against Hokonui Hills Wind Farm Limited Partnership.

2. REFERRAL APPLICATION SUMMARY

2.1 PROJECT NAME

Hokonui Wind Farm

2.2 PROJECT DESCRIPTION AND LOCATION

2.2.1 Project Description

2.2.1.1 Summary

HHWFLP is proposing to develop a wind farm with a generating capacity of up to 500MW located in the Hokonui Hills, 20km west of Gore in Southland (“**Hokonui Wind Farm**” or the “**Project**”).

The Hokonui Wind Farm covers an area of approximately 11,000 ha in the Hokonui Hills to the south-west of Mandeville and west of the INV-ROX-B 220kV transmission line. The Project site is predominantly located within the Southland District and Southland Region, with a small portion of the transmission line and connection to the National Grid being located in the Gore District. Key components of the Project include:

- > Construction and operation of up to 83 wind turbines;
- > Electrical reticulation, consisting of both 33kV underground and over-head cables and wind turbine transformers;
- > Two substations to collect the power generated by the wind turbines, connecting into the existing 220kV network;
- > A new switching station adjacent to the INV-ROX-B 220kV transmission line;
- > Two new 220kV transmission lines to provide connection to the National Grid;
- > Construction of roading, turbine foundations and hard-stand areas adjacent to the wind turbines; and
- > Ancillary activities associated with the construction, operation and maintenance of the wind farm.

2.2.1.2 Layout and Wind Resource

The Hokonui Wind Farm will be constructed in the Hokonui Hills, which are a series of elevated ridges striking northwest to southeast, separating the Southland Plains from the Waimea Plains. Being elevated, the ridges are well exposed, and turbines will be sited on high points to maximise energy production.

The Hokonui Wind Farm is located in a region with a well-known and excellent wind resource. Measurements of the wind resource at the Hokonui Wind Farm have been made using a combination of meteorological masts and lidar. The measurements show the wind farm will experience predominantly north-westerly winds with frequent south-westerlies.

The layout has been designed to ensure the minimum spacing between turbines is greater than three rotor diameters, with larger spacing along a northwest-southeast and northeast-southwest axes.

The wind resource at the Hokonui Wind Farm is good by New Zealand standards and generally suitable for wind turbines that comply with an IEC – 1A certification. The mean hub-height wind speed at turbine locations is estimated to range from 8 to 11 ms⁻¹, with an average of approximately 9 ms⁻¹.

2.2.1.3 Land Use

Most of the footprint of the Hokonui Wind Farm is currently pastoral farmland used for sheep and beef grazing, with a significant portion forested in a variety of exotic tree species. The land use across parts of the site is in a state of change, with pastures being developed into forestry, mainly planted with *Pinus Radiata*. Clearance of exotic plantation trees will be required during the construction of the Project and vegetation will be managed within up to 300m of the wind turbines.

2.2.1.4 Wind Turbines

The Hokonui Wind Farm will comprise up to 83 wind turbines across the proposed wind farm site. Each wind turbine will have a maximum capacity of between 6.25MW and up to 8MW, and with the number of wind turbines installed sufficient to achieve a grid export capacity for the wind farm of up to 500MW. The Hokonui Wind Farm will generate approximately 1,905 GWh pa.¹

Each wind turbine will be comprised of a rotor with three blades, a sectional tubular steel tower, a nacelle containing a generator and power conversion equipment, and a concrete gravity pad foundation.

The wind turbine blades are the longest component, up to 90m in length, and will be manufactured and transported in a single piece. The wind turbine tower will likely be made up of six tubular steel sections, combining to form a tower height of up to 150m. The turbines will have a maximum hub height of up to 150m (expected to be 130m), rotor diameter of between 160m and 180m and a maximum potential blade tip height up to 240m above ground level.

The nacelle houses the gearbox, generator, and power-conditioning equipment and sits atop the tower. Nacelles typically have a rectangular box shape, with the nacelle for the class of

¹ The capacity factor is the ratio of the wind farm's actual energy output over a given period to the theoretical maximum output if it operated at full capacity continuously.

turbines to be used at the wind farm having a length of up to approximately 15m, a width of 5m, and a height of 5m. The nacelle may be furnished with cooling radiators, anemometry, and aviation lighting. The nacelle is the heaviest turbine component and weighs up to 160 tonnes but may be broken into parts for shipment with the drive train assembly weighing 100 tonnes, and nacelle structure up to 60 tonnes.

The turbines will be lit in accordance with the requirements of the Civil Aviation Authority (“CAA”). It is anticipated this will involve a certain number of the wind turbines to be lit with a medium intensity Aviation Obstruction Warning Light that will be mounted on the top of the nacelle. HHWFLP is consulting with the CAA on the lighting requirements for the wind farm, as discussed further below.

The indicative wind farm layout has been determined based on a number of factors including operational requirements, civil design requirements, the availability of the wind resource, and managing environmental effects, including ecological values of the site. HHWFLP is seeking approval for a project envelope based on an indicative layout within a 200m radius around where the wind turbine sites are consented to be located.

The indicative layout of the wind turbines is shown in **Figure 1** below.

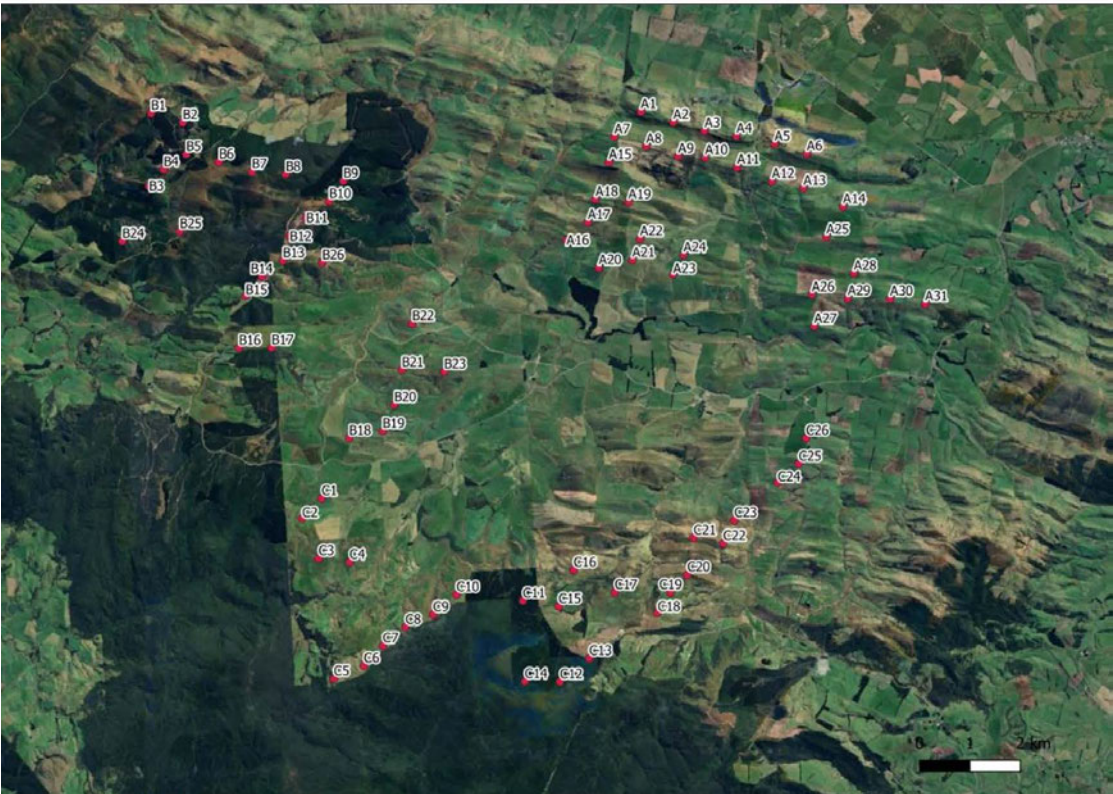


Figure 1: Indicative layout of the proposed wind turbines (identified by the red dots).

2.2.1.5 Wind Turbine Foundation

The wind turbine foundations are likely to comprise an octagonal concrete pad approximately 25m in diameter and 4m deep. The foundation may incorporate piles or rock anchors to reduce the mass of concrete. The concrete pad will be reinforced with a steel mesh cage, into which a turbine bolt cage will be tied, on which the turbine tower is mounted. The turbine pad will have conduits for electrical cables and communications.

The concrete used for turbine foundation pads is required to meet the specifications of the foundation design. While a geological survey of the wind farm site will be undertaken to determine whether there is a suitable source rock for the production of concrete aggregate on site, it is unlikely this will be found. Hence, it is likely the aggregate for concrete production will be imported from a suitable quarry within Southland.

The turbine components will be lifted onto the foundation, with tower sections followed by the nacelle, hub and blades.

2.2.1.6 Wind Monitoring Towers

To assist with the control and operational performance of the wind farm, wind monitoring towers will be erected at strategic locations across the wind farm site. The wind monitoring towers will be in areas where measurements are not unduly affected by wind turbine wakes and are able to provide an estimation of the free-stream wind speed. The wind monitoring towers will be guyed tubular lattice structures up to 150m in height, and equipped with anemometers, and wind vanes mounted on booms extending several meters from the mast. The wind monitoring towers will sit on concrete foundation pads and have anchor blocks at the foot of guys.

2.2.1.7 Electrical Reticulation and Connection

Switching Station

The connection of the wind farm to the National Grid will be made by a switching station located adjacent to the existing INV-ROX-B 220kV transmission line south-west of Reaby Downs in the Cone Burn. The switching station will cover an area of approximately 1ha and comprise of structures to convey transmission lines, bus bars, high-voltage switching and protection equipment. The switching station will have single circuit lines entering from the south and north (INV-ROX-B circuit), a dual circuit transmission line entering from the west, and a dual circuit transmission line entering from the east.

Transpower have completed a Concept Assessment, which indicated the capacity available at the proposed point of connection to the INV-ROX-B transmission line is approximately 350 MW, with several upgrade options available to provide export capacity of 500MW. The

preferred option requires a 'link' connection to be made to the INV-ROX-A 220 kV circuit. This connection will require a 220 kV transmission line to be constructed from the proposed switching station to the Tee of the INV-ROX-B 220 kV circuit, located south of Upper Charlton.

Substations

The substations will house equipment for switching electrical circuits, transformers to convert voltage from 220kV to 33kV, and protection and control equipment. Power storage and smoothing equipment such as switched capacitors, batteries, condensers, or Static Condensor's ("**StatCon**") may be located within the substation compounds.

Substation A

Substation A will be located adjacent to the switching station described above, and may share the same foundation, earth mat, and security perimeter. The substation will have transformers to convert power between 33kV and 220kV. There will also be metering, protection, switching and other outdoor electrical components located within the substation compound. A control room will house Supervisory Control and Data Acquisition ("**SCADA**") systems, back-up power supplies, Low Voltage (400V supply), drawings, and facilities. 33kV switch gear and a StatCon may also be enclosed within a building connected to the control room.

Substation B

Substation B will be located in the Otamita Valley, near the confluence of the Moss Burn and Otamita Stream. The substation will have transformers to convert power between 33kV and 220kV. There will also be metering, protection, switching and other outdoor electrical components in the substation compound. A small control room, which will also house 33kV switch gear and other electrical equipment will be located in the substation.

2.2.1.8 Transmission Infrastructure

The Hokonui Wind Farm will require two overhead 220kV transmission lines, which will comprise of double circuits on steel poles. Access to pole locations will be made over existing terrain, or via construction of small tracks suitable for offroad vehicles. Where access is difficult poles may need to be erected with the use of heavy lift helicopters. Wires will be strung between poles typically by hanging a guide cable and then pulling the conductor along. The guide cable is likely to be lifted using helicopters.

One transmission line will be located between Substation A and Substation B, and the other between Substation A to the Tee, to connect the wind farm substations to the National Grid. These transmission lines will be approximately 11km and 12km in length respectively.

The transmission line will be supported on steel lattice towers or mono-poles, which will be up to 45 m in height, and spaced approximately 300m-400m apart.

The indicative layout of the electrical design and transmission infrastructure is shown in **Figures 2 and 3** below.

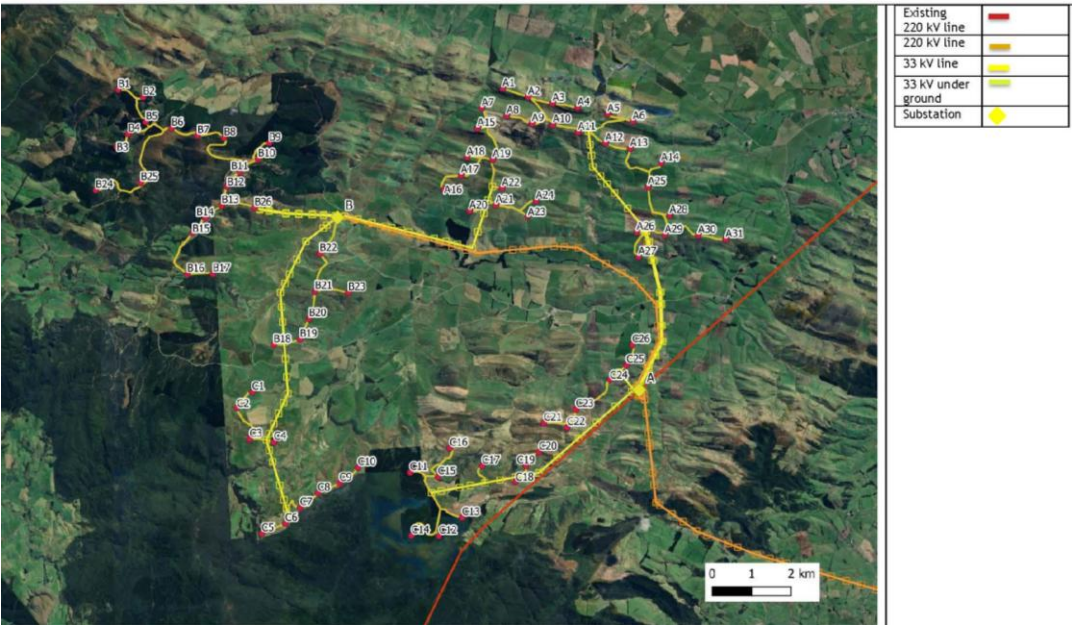


Figure 2: Indicative electrical design of the Hokonui Wind Farm.

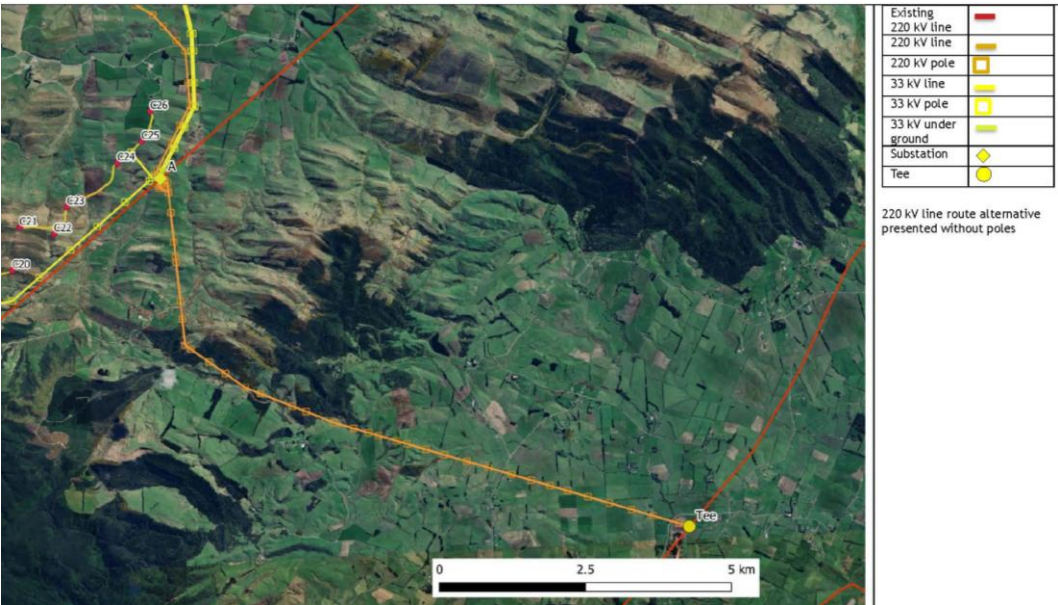


Figure 3: Proposed 220kV transmission line route connecting Substation A to the Tee (INV-ROX-A 220 kV Circuit).

2.2.1.9 Electricity Distribution

Each wind turbine will be connected to one of the two wind farm substations that will be located within the wind farm site using 33kV cables. The electrical reticulation will primarily be underground with cables buried in, or alongside, the roads that will be constructed between the turbines and the substation. However, in some cases it will not be possible to use underground cables, such as in locations where the cables need to cross streams, and in these situations overhead lines will be used. The cabling between the wind turbines and the wind farm substations will also include a fibre optic network that will allow remote control to each of the wind turbines, as well as the transfer of operational data.

The network of overhead 33kV lines will total up to approximately 40km of double circuit lines on poles up to 35m in height.

2.2.1.10 Permanent on-site Facilities

Permanent facilities, service and maintenance compounds required for the operation and control of the wind farm will be located adjacent to Substation A. The permanent facility will be the primary base for staff and contractors during the operation of the wind farm and will include a building approximately 400m² in area and up to 7m in height. The facilities will include offices, rest rooms, and IT infrastructure. The facilities will service up to 20 workers, including site management, caretakers, turbine technicians, and other maintenance staff. The work force will vary seasonally and in response to wind farm works as maintenance tasks require.

Water supply for the permanent facility will be provided via drinking water and stormwater from the hard surfaces associated with it will be collected and discharged to land.

Wastewater generated will be connected to a septic tank system and will be treated and disposed of on-site to land in accordance with Sections 5 and 6 of NZS AS/NZS 1547:2012 – On-site Domestic Wastewater Management.

Permanent parts stores and facilities will be located at marshalling yard locations.

2.2.1.11 Transportation Route to Site

Wind turbine components and transformers will be transported to the site from South Port in Bluff via the route identified in **Figure 4** below. The transportation to the site will be periodic and spread throughout the construction period. Most oversized loads will occur at night and will be accompanied by pilot vehicles and may require some temporary road closures. The route from the Port to the site is approximately 150km, and follows State Highway 1 from Bluff to Invercargill, State Highway 6 from Invercargill to Josephville, along Josephville-St

Patricks Road, onto State Highway 94 to Mandeville, and Waimea Valley Road to the site entrance.

All roads to the site are therefore State Highway except Josephville-St Patricks Road, and Waimea Valley Road. Minimal alterations will be required to roads along the route, with minor changes to road furniture and strengthening of hard shoulders on corners anticipated. The entire route is hard surfaced.

Some oversized loads, such as for the transformers to be delivered to Substation A, will take different routes. The route to Substation A will depart State Highway 94 at Kingdon Road, take Kingdon Road to Reaby Road, then Dolamore Park Road to site entrance S-C1 (identified in **Figure 5** below). The route is hard surfaced, except for Dolamore Park Road beyond the entrance to Dolamore Park. An additional tractor unit may be attached for the climb from Dolamore Park to Substation A.



Figure 4: Indicative Port to Site route.

2.2.1.12 Site Entrances

The main site entrance will be off Waimea Valley Road. All over dimension wind turbine components and the transformers for Substation B will be delivered through this entrance.

The site entrance will comprise a set of security gates with CCTV monitoring, and a manned gatehouse to ensure site visitors and workers are inducted onto the site safely. The gate house will be removed after construction. A layby area will be formed immediately inside the gate, with sufficient space to allow tractor units to be attached to over-sized transporters to assist haulage to the marshalling yards and across the site.

A site entrance will also be established near Substation A, and six other entrances will be located around the site for the delivery of smaller components during construction, as shown on **Figure 5** below.

2.2.1.13 Internal Roding Network

An internal roding network will be established within the wind farm site to enable the construction and operation of the Hokonui Wind Farm. This will provide access to the wind turbines, substations and associated infrastructure. The internal access tracks will be designed to accommodate oversized wind turbine components, vehicles and other machinery. The access tracks will be up to 9m in width and will be approximately 92km in length. The access tracks will have a drainage system in place to ensure stormwater generated from the tracks is appropriately managed.

The internal roding alignment has been designed to reduce hard surfacing and avoid stream crossings, wetlands and gullies to the extent practicable. The indicative alignment of the internal access tracks is shown in **Figure 5**. The internal access track alignment will intercept with streams in some instances. Therefore, to enable vehicle movement across these streams, stream crossings will be constructed primarily as culverts.



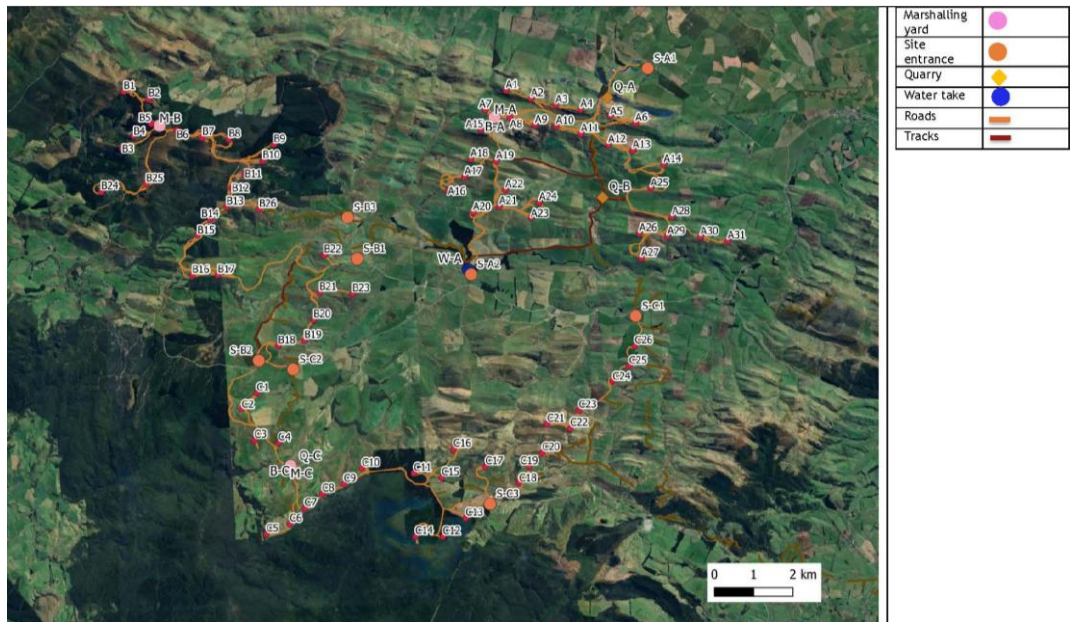


Figure 5: Indicative design of the civil infrastructure for the proposed Hokonui Wind Farm.

2.2.1.14 Geotechnical Surveys

Prior to the completion of detailed design, a survey of the geology and bearing capacities will be undertaken across the site. This will involve drilling bore holes and digging test pits. This will require a drilling rig at each turbine location and at strategic sites across the wind farm. The drilling rig may require excavation of minor roads and a pad.

2.2.1.15 Earthworks

Large quantities of earthworks are required to enable the construction of the Hokonui Wind Farm. This includes the construction of the internal access road network, wind turbine foundations and hard stand areas, laydown areas and the transmission line. Anticipated earthwork volumes based on the indicative wind farm layout are as follows:

- > Cut volume: approximately 4.5Mm³;
- > Volume of cut used as engineered fill: approximately 2.6Mm³; and
- > Surplus fill volume: approximately 1.8Mm³.

2.2.1.16 Quarrying

The construction of the Hokonui Wind Farm, in particular the internal roading network will require large volumes of suitable aggregate. Fill will be preferentially sourced from excavations within the site. In addition, HHWFLP has identified three sites within the

proposed wind farm site that may be suitable for quarrying to supply aggregate and reduce the need to import aggregate from off-site (identified in **Figure 5** above). Any on-site quarrying will be managed in accordance with good industry practice.

2.2.1.17 Surplus Fill Disposal

As noted above, approximately 1.8Mm³ of surplus fill material will need to be disposed of within the site during the construction of the Hokonui Wind Farm. The areas where fill will be disposed of within the site are still being investigated and are therefore not yet confirmed. However, surplus fill disposal sites will be selected in consideration of a number of important factors including ecological constraints, identified archaeological sites, proximity to waterways, landscape effects, geotechnical stability and proximity to the worked areas to minimise haul distances. This will include avoiding disposing of surplus fill in areas identified as wetlands or streams and in erosion prone land. Appropriate erosion and sediment control measures will be implemented for all fill disposal activities and sites will be rehabilitated following the completion of works.

2.2.1.18 Turbine Laydown Areas

Temporary laydown areas will be established prior to the delivery of wind turbine components to the site and located in proximity to the turbine sites. Laydown areas will be used for the temporary storage of wind turbine components and associated equipment / material during the construction of the wind farm, prior to the installation of wind turbines. The laydown areas will be appropriately rehabilitated following the completion of the construction of the wind farm.

2.2.1.19 Marshalling Yards

Marshalling yards will be located strategically to allow for just-in-time turbine component deliveries and construction equipment storage and maintenance. Site offices, car parking, and facilities needed for staff and contractors will be located within the areas. Sewage will be collected in tanks and trucked offsite for disposal.

The marshalling yards will be flat areas constructed of the fill excavated from cuts needed to make roads and turbine foundations. The marshalling yards will have provision for fuel storage, explosives storage, and may site other hazardous materials necessary for construction, in accordance with best practice.

2.2.1.20 Concrete Batching Plants

Up to three temporary concrete batching plants will be established within the proposed wind farm site during the construction of the Hokonui Wind Farm. The concrete batching



plants will provide the supply of concrete required for the construction of the wind farm and will be located at the marshalling yard locations.

The concrete batching plants will be approximately 4000m² in area and will comprise of batching plant units, water storage, tanks and temporary office buildings. The batching plant units will be approximately 20m in height.

Water supply for the concrete batching plants is described in the following section.

Following the completion of the construction of the Hokonui Wind Farm, the concrete batching plants will be removed, and the sites will be appropriately rehabilitated.

2.2.1.21 Water Supply and Use

Water will be required during the construction of the Hokonui Wind Farm, including for dust suppression and wetting roads, concrete batching, wash down, earthworks activities and other general construction activities.

A water take will be established from the Otamita Stream near the ford that crosses the stream at Glen Islay Road. The take will be located upstream of the ford and pump water into storage bladders or tanks sited in the paddock on the south side of the stream, west of Glen Islay Road, and transported by tanker to batching plants and other sites as required during construction.

The water take will not exceed 150,000 litres per day, with the takes limited in intensity and frequency so that stream flows are not unduly impacted. The water take will cease following the completion of construction.

2.2.1.22 Construction Phases

The construction of the proposed wind farm project will occur across a period of approximately three years, with wind turbines installed in tranches as electrical infrastructure is commissioned. Major components in electrical infrastructure delivery are the commissioning of the 220/33kV transformers in Substation A and Substation B, and the 220kV transmission line between these two substations.

The staging of construction has been developed such that the completion of the construction of Substation A allows the first two construction phases to occur, followed by three further phases following the construction of Substation B.

It is noted that the phases are not temporally distinct, and activities may overlap or be commenced alongside earlier works, to ensure construction is efficiently programmed. A list of the primary activities involved with each of the phases is provided below.



Phase 1

Establish primary site entrance (S-A1), office, and compound off Waimea Valley Road,

- > Establish site entrances (S-C1) at Substation A and S-A2;
- > Establish quarry (Q-A) at Observation Creek;
- > Establish water take (W-A) from Otamita Stream at Glen Islay Road;
- > Establish water take (W-B) from Coneburn;
- > Earthmoving for site access and construction of Marshalling Yards (M-A);
- > Earthmoving for wind turbine access and installation for Construction Group 1 wind turbines (CG1);
- > Establish Batchling Plant A (B-A);
- > Construction of switching station and connection to INV-ROX-B circuit;
- > Construction of Substation A;
- > Installation of No. 1 x 120 MVA transformer at Substation A;
- > Construction of 33kV Over Head circuits A1 and A2;
- > Installation of 33 kV Under Ground cabling for A1A, A1B, A2A, and A2B strings;
- > Transportation of wind turbine components from South Port to site entrance S-A1 and delivery from marshalling yards to turbine locations; and
- > Installation of CG1 wind turbines (No. 18 wtgs).

Phase 2

- > Construction of access road from Turbine A8 (Waimea Hill) to Turbine C11 (top of Bushy Park Road);
- > Establish site entrances (S-B1, S-B3, S-C2, and S-C3);
- > Establish quarry at top of Retreat Road (Q-C);
- > Establish marshalling yards (M-C);
- > Earthmoving for wind turbine access and foundation for Construction Group 2 wind turbines (CG2);
- > Installation of 1 x 120 MVA transformer at Substation A;
- > Construction of 33kV Over Head circuits A3 and A4;

- > Installation of 33kV Under Ground cabling for A3A, A3B, and A4 strings; and
- > Installation of wind turbines in Construction Group 2 (No. 18 wtgs).

Phase 3

- > Earthmoving for wind turbine access and foundation for Construction Group 3 wind turbines;
- > Establish site entrance S-B2;
- > Construction of Substation B;
- > Installation of 1 x 105 MVA transformer at Substation B;
- > Construction of 220kV transmission line between Substation A and Substation B;
- > Construction of 33kV Over Head circuits B1;
- > Installation of 33kV Under Ground cabling for B1A, B1B, and B5 strings; and
- > Installation of wind turbines in Construction Group 2 (No. 16 wtgs).

Phase 4

- > Earthmoving for wind turbine access and foundation for Construction Group 4 wind turbines;
- > Establish Marshalling Yards B;
- > Establish Batching Plant B;
- > Construction of 220kV transmission line from Substation A to Tee (connect to INV-ROX-A circuit);
- > Construction of 33kV Over Head circuits B2 and B3;
- > Installation of 1 x 105 MVA transformer at Substation B;
- > Installation of 33kV Under Ground cabling for B2A, B2B, B3A and B3B strings; and
- > Installation of wind turbines in Construction Group 4 (No. 16 wtgs).

Phase 5

- > Earthmoving for wind turbine access and foundation for Construction Group 5 wind turbines;
- > Installation of 1 x 105 MVA transformer at Substation B;
- > Construction of 33kV Over Head circuits B4 and B5;

- > Installation of 33kV Under Ground cabling for B4A, B4B; and
- > Installation of wind turbines in Construction Group 5 (No. 15 wtgs).

Commissioning

As the wind farm progresses through construction phases, wind turbines will be commissioned sequentially. Wind turbines will be commissioned and export power as soon as practical following the completion of construction of the turbines as outlined in the phases above. The commissioning process will involve running the turbines through a programme of power set points and control actions (including emergency stops) to ensure performance complies with manufacturers specifications, grid export requirements, and consent conditions.

Decommissioning

At the end of life of the Hokonui Wind Farm, the wind turbines will be decommissioned and dismantled. Components will be removed from site and recycled insofar as practicable. Following removal of all wind turbines from the site, turbine foundations, laydown areas and roads will be appropriately rehabilitated. These areas will then be planted to blend with like for like vegetation. Decommissioning (and repowering activities) will require activation of a full construction team and require facilities and marshalling yards to be re-established.

2.2.1.23 Mixed-Use Industrial Area

In addition to the wind farm and electrical infrastructure already described, the Project includes the establishment of a Mixed-Use Industrial Area to enable the co-location of complementary industrial and/or energy-related activities that can directly utilise the renewable electricity generated by the Hokonui Wind Farm. The Mixed-Use Industrial Area has the potential of supporting the efficient use of the wind resource, reducing reliance on the National Grid for end-use load, and unlocking economic development opportunities.

The Mixed-Use Industrial Area will cover an area of approximately 30 ha and will be located at an appropriate area within the wind farm site. A number of sites have been identified as suitable, and the final location will be further assessed and confirmed as part of the substantive application.

Proposed Activities

The Mixed-Use Industrial Area will accommodate a defined range of industrial and energy-related activities that are functionally connected to, and reliant on, the renewable electricity generated by the Project. These activities may include (but are not limited to):

- > Data storage and processing facilities (including data centres);
- > Battery energy storage systems and associated grid support infrastructure;
- > Electricity-intensive processing or manufacturing activities;
- > Renewable energy conversion activities; and
- > Supporting industrial and logistics facilities directly associated with the above activities.

Approval is sought for an envelope of activities within defined scale-and-effects parameters, with the detailed mix of end-users to be determined. All activities within the Mixed-Use Industrial Area will operate within the effects envelope assessed for the Project and will not exceed the servicing and infrastructure capacity established in this application.

The Mixed-Use Industrial Area will be subject to a defined set of consent conditions which will specify the types of activities, scale of development, and performance standards that must be complied with. Any activity that does not meet these conditions or falls outside the assessed effects envelope will be required to either obtain separate approvals or be modified to comply with the approved parameters.

Servicing

The Mixed-Use Industrial Area will be serviced as follows:

- > Electricity supply will be drawn directly from Substation A via dedicated 33kV connections, allowing on-site renewable generation to be used in preference to grid-sourced electricity;
- > Water supply will primarily be provided via on-site rainwater collection from building roofs;
- > Wastewater generated will be connected to a septic tank system and treated and disposed of on-site to land in accordance with standard On-site Domestic Wastewater Management practices; and
- > Stormwater from hard-surfaced areas will be collected, treated through appropriate stormwater treatment devices, and discharged to land in a manner consistent with the Southland Regional Council's stormwater management requirements.

Construction and Operation

Construction of the Mixed-Use Industrial Area will be staged alongside the construction of the broader wind farm. Earthworks for the Mixed-Use Industrial Area are anticipated to be undertaken as part of the Phase 1 works, with built form and end-user fit-out occurring progressively as commercial users are confirmed.

The use and development of the Industrial Area will be controlled through consent conditions that restrict activities to those assessed as part of the Project and within the defined effects envelope. Any activity that does not comply with these conditions will require further assessment and approval or will need to be modified to achieve compliance.

2.2.2 Project Site Description

The Hokonui Wind Farm covers an area of approximately 1100ha, in the Hokonui Hills to the south-west of Mandeville and west of the INV-ROX-B 220kV transmission line (refer to **Figure 6** below). The wind farm is located across 12 properties. The Project site is predominantly located within the Southland District and Southland Region, with a small portion of the transmission line and connection to the National Grid being located in the Gore District.

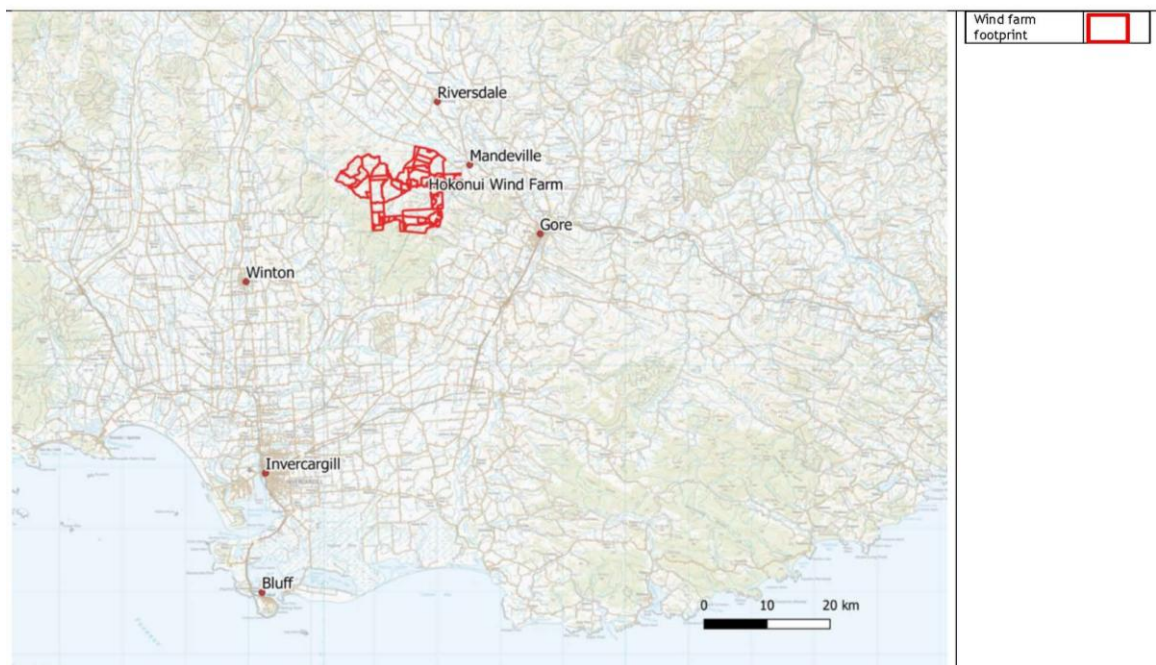


Figure 6: Location of the proposed Hokonui Wind Farm.

The land holdings that form the Hokonui Wind Farm site are identified in **Figure 7** and listed below and the relevant Record of Titles (“RT”) are attached as **Appendix A**:

- > Section 31 Block I Waimumu Hundred, RT SL9B/148;
- > Section 27 Block I Waimumu Hundred, RT SL9B/405;
- > Lot 1 Deposited Plan 14919, RT SL12A/303;
- > Section 1096 Block LXVI Hokonui Survey District and Lot 1 Deposited Plan 14920, RT SL12A/304;

- > Lot 1 Deposited Plan 12118 and Lot 1 Deposited Plan 12360, RT SL12A/729;
- > Part Section 17 Block I Waimumu Hundred and Part Section 1 Block II Waimumu Hundred and Part Section 14 and Part Section 16 Block II Waimumu Hundred and Part Lot 1 Deposited Plan 7027 and Section 1 Survey Office Plan 9607 and Section 1-2, RT SL6B/208;
- > Lot 5 and Lot 8 Deposited Plan 5208, Lot 1 Deposited Plan 14129 and Section 22 Block II Waimumu Hundred, RT SL11B/666;
- > Section 627 Block XVII Forest Hill Hundred, RT SL6B/583;
- > Lot 1 Deposited Plan 9755, Lot 2 Deposited Plan 7027, Lot 3 Deposited Plan 7026 and Section 1-3 Survey Office Plan 9606, RT SL6A/993;
- > Section 279, Part Section 139 and Part Section 280 Block LVIII Hokonui Survey District, Section 640 and Part Section 177 Block LXVI Hokonui Survey District and Section 314 and Part Section 311 Block LXVII Hokonui Survey District, RT SL6A/914;
- > Lot 1 Deposited Plan 10082, RT SL6A/125;
- > Section 136 Block XVII Forest Hill Hundred, RT SL9B/404;
- > Lot 1 Deposited Plan 621771 and Section 1071 Block LVII Hokonui Survey District and Section 1073-1076 Block LVI Hokonui Survey District, RT 1258525;
- > Lot 2 Deposited Plan 621771 and Lot 9 Deposited Plan 305851 and Section 1002, 297 Block XLVII Hokonui Survey District, RT 1258526;
- > Part Section 17 Block I Waimumu Hundred, RT SL5A/228;
- > Section 869 and Section 1080 Block LVII Hokonui Survey District, RT SL3A/646;
- > Lot 1-4 Deposited Plan 10604, RT SL6B/1350;
- > Part Lot 22 Deposited Plan 353, RT SL6B/1351;
- > Lot 1 Deposited Plan 2523, RT SL122/164;
- > Section 19 and Section 32 Block I Waimumu Hundred, RT SL4A/1411;
- > Section 26 Block I Waimumu Hundred and Section 55 Block XVII Forest Hill Hundred, RT SL197/43;
- > Section 300 Block LVII Hokonui Survey District, RT SL229/36;
- > Section 238, Section 254-255, Section 1237-1238, Section 1419, Part Section 237 and Part Section 267 Hokonui Survey District, RT SL7A/818;
- > Country Section 253 Hokonui Survey District, RT SL21/92;

- > Lot 1-2 and Lot 7 Deposited Plan 14813, RT SL12A/126;
- > Lot 10-11 Deposited Plan 305851 and Lot 4 Deposited Plan 14813, RT 23288;
- > Lot 1-4 Deposited Plan 602110 and Part Section 17 Waimumu Hundred and Lot 6-7 Deposited Plan 5208 and Section 1 Survey Office Plan 10288, RT 1175056;
- > Lot 4, 12-13 Deposited Plan 619504, RT 1248754;
- > Lot 5 Deposited Plan 619504 and Section 105, 170, 277, 296, 299 Block LVII Hokonui Survey District and Part Section 425 Block LVII Hokonui Survey District and Part Section 425 Block LVII Hokonui Survey District, RT 1248755;
- > Lot 6 Deposited Plan 619504 and Lot 7 Deposited Plan 619504, RT 1248756;
- > Lot 11, 14 Deposited Plan 619504 and Section 166, 173, 294-295, 298, 424, 437-438, 543 Block LVI Hokonui Survey District, RT 1248758;
- > Lot 10 Deposited Plan 619504, RT 1248759;
- > Lot 1 Deposited Plan 14591, RT SL11C/627;
- > Lot 1 Deposited Plan 13237 and Part Lot 2 Deposited Plan 12413, RT SL10C/817;
- > Part Lot 19 Deposited Plan 132, RT SL9B/965;
- > Lot 1 Deposited Plan 300877 and Lot 2 Deposited Plan 14268, RT 4165;
- > Part Lot 15 Deposited Plan 132, RT SL9B/998;
- > Lot 1 Deposited Plan 432201, RT 524081;
- > Lot 1 Deposited Plan 303955, RT 15879; and
- > Lot 1 Deposited Plan 489826, RT 705862.



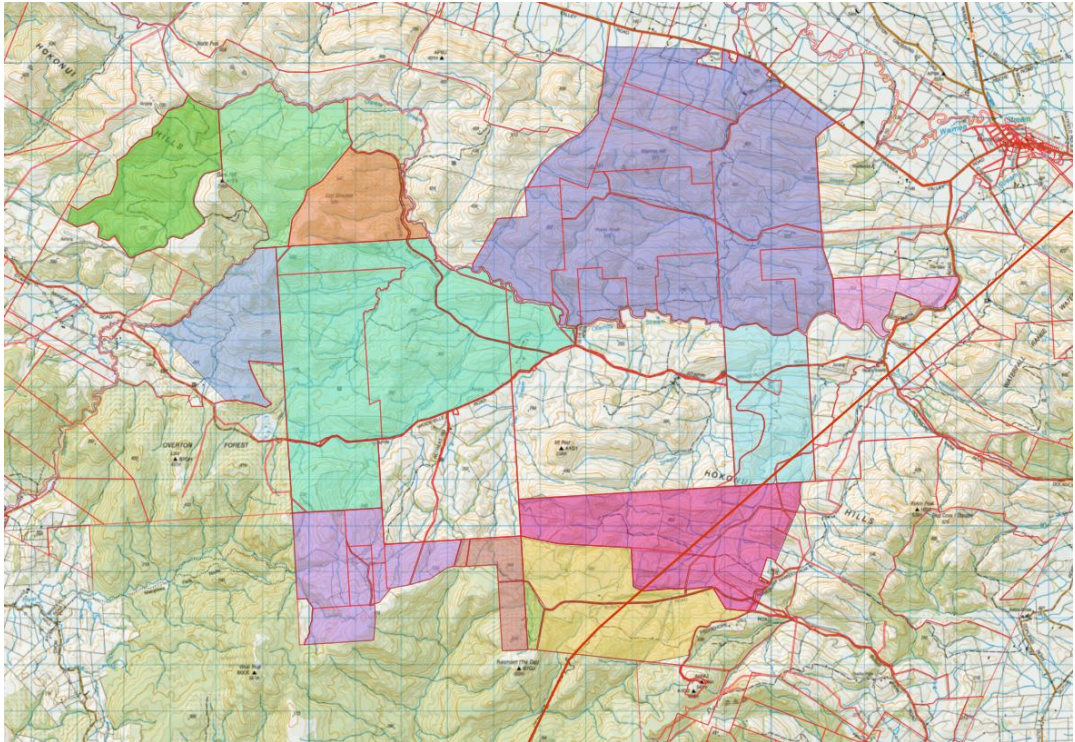


Figure 7: Landholdings that comprise the wind farm site (highlighted).

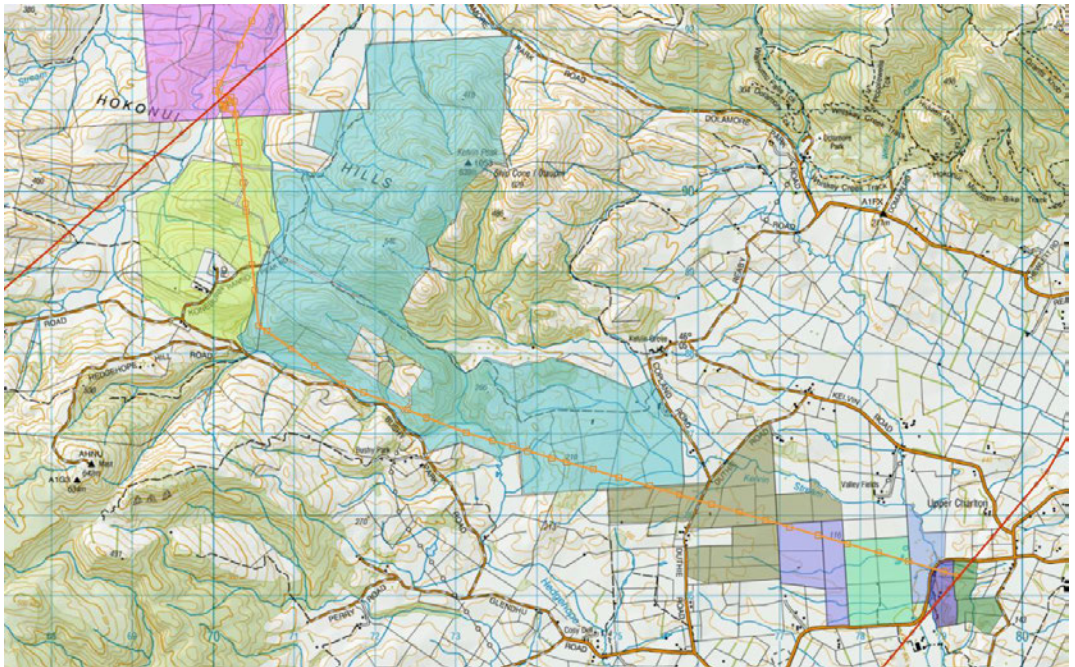


Figure 8: Landholdings associated with the transmission line route to the Tee (highlighted).

2.3 INELIGIBLE ACTIVITIES

In accordance with section 5 of the Fast-track Approvals Act 2024 (“**FTAA**”), the Project does not meet the definition of an ineligible activity as the Project:

- > Will not occur on identified Māori land;²
- > Will not occur in a customary marine title area;
- > Will not occur in a protected customary rights area;
- > Will not occur on Māori customary land;
- > Will not occur on land set apart as a Māori reservation as defined in section 4 of Te Ture Whenua Māori Act 1993;
- > Is not an aquaculture activity or an activity that is incompatible with aquaculture activities;
- > Does not require an access arrangement under the Crown Minerals Act 1991;
- > Is not an activity that would be prevented under section 165J, 165M, 165Q, 165ZC or 165ZDB of the Resource Management Act 1991;
- > Will not occur on land that is listed in Schedule 4 of the FTAA;
- > Will not occur on a national reserve held under the Reserves Act 1977;
- > Will not occur on a reserve held under the Reserves Act that is managed by someone other than the Department of Conservation or a local authority;
- > Is not a prohibited activity under the Exclusive Economic Zone and Continental Shelf (Environmental Effects) Act 2012 or regulations made under that Act;
- > Is not an activity that is prohibited by section 15C of the RMA;
- > Is not a decommissioning-related activity as described in section 38(3) of the Exclusive Economic Zone and Continental Shelf (Environmental Effects) Act 2012; and
- > Is not an activity undertaken for the purposes of an offshore renewable energy project.

Therefore, the Project is eligible to use the FTAA consenting process.

² For completeness, there is a parcel of identified Māori land located adjacent to the Project Site, however, the Project will not be located on this land.

2.4 EXEMPTIONS FROM REQUIREMENTS TO PROVIDE AGREEMENT

2.4.1 Mining Activities under section 5(2)

The Project is not for an activity that is prospecting, exploration, mining or mining operations of Crown-owned minerals undertaken below the surface of any land or area.

2.4.2 Activities on land proposed to be the subject of a land exchange

Approval for a land exchange is being sought as part of the application, however, the land subject to this application is not identified Māori land, the land is currently administered by the Department of Conservation (“DoC”), as discussed further below.

2.5 MINISTERIAL DETERMINATIONS UNDER SECTIONS 23 AND 24

The Project is not an activity that is seeking a ministerial determination under section 23 or 24 of the FTAA.

2.6 APPROPRIATENESS FOR FAST-TRACK APPROVALS PROCESS

2.6.1 Criteria for Assessing Referral Application

Referring the Project to the fast-track approvals process will meet the criteria outlined in section 22, as described in the following sub-sections.

2.6.2 The Project is an infrastructure or development project that would have significant regional or national benefits

The Hokonui Wind Farm will generate a nationally significant source of renewable electricity, which will provide a significant contribution to increasing New Zealand’s renewable electricity supply. The Project will therefore be an infrastructure project that will have significant regional and national benefits, including assisting in meeting the predicted increase in New Zealand’s electricity demand, as well as supporting New Zealand in achieving its decarbonisation targets.

The Project’s benefits are detailed in the report prepared by New Zealand Institute of Economics Research (“NZIER”), included as **Appendix B** to this application, and further summarised below.

The Project will also generate significant economic benefits, both regionally and nationally. The construction phase of the Project is projected to add \$455 million into the local economy, whilst the operation of the wind farm will add a further \$18 million into the local economy annually. The Project is expected to create approximately 198-250 full-time



equivalent (“**FTE**”) jobs during construction, and an additional 24-33 FTE jobs during the operation of the wind farm.

The Project is anticipated to have a generation capacity of up to 500 MW, with an annual expected output of 1,905 GWh. This is sufficient electricity to power approximately 238,000 households and will provide a significant contribution to the security of New Zealand’s future electricity supply and will have benefits right down to the end consumer. The Project will therefore assist the New Zealand Government in reaching its goal of doubling the overall volume of electricity from renewable sources by 2050 and transitioning to a low-emissions future.

NZIER estimates that if the proposed Hokonui Wind Farm’s annual output of 1,905 GWh were generated using gas, this would lead to an additional 971,000 tonnes of CO₂e per year and 1,922,000 tonnes of CO₂e per year if generated using coal. The Project will therefore provide a significant contribute to achieving New Zealand’s decarbonisation goals.

Electricity demand is expected to increase as New Zealand transitions from carbon-emitting energy to renewable energy sources. The Ministry of Business, Innovation and Employment (“**MBIE**”) project that electricity demand will increase from Electricity Demand and Generation Scenarios projected 2026 levels by between: 3,800 and 7,400 GWh (8.9 to 16.4%) by 2030, 13,500 and 21,400 GWh (31.9 to 47.6%) by 2040 and 19,700 to 27,100 GWh (46.4 to 60.2%) by 2050.³ In addition, a recent discussion paper released by Transpower outlining the urgency of increasing renewable electricity generation activities forecasted that New Zealand is expected to dip below one of its key security standards (the New Zealand Winter Energy Margin) as early as 2026.⁴ Transpower note that there is a tightening of the balance between supply and demand of electricity due to a faster than expected decline in gas availability for electricity generation.

The NZIER report notes that if the development of new generation such as this Project does not proceed, existing electricity generation will not be able to keep up with the anticipated demand growth which will result in:

- > On average, the economy will face an energy supply gap, which will constrain economic activity and increase reliance on coal and imported natural gas to partially meet excess

³ Electricity Demand and Generation Scenarios, The Ministry of Business, Innovation and Employment, 2024.

⁴ Building the renewable generation we need to deliver New Zealand’s energy future. A discussion document for consenting authorities, Transpower, July 2025.



electricity demand.⁵ This energy supply gap will increase energy prices and also constrain the decarbonisation of industrial process heat and private transport; and

- > During dry years, the frequency of very high prices, supply rationing and the risk of widespread electricity rationing or power outages will increase.

At a regional level, the output from the Hokonui Wind Farm would help to meet Southland's regional electricity demand. Over the past five years annual load in the Southland region has exceeded annual generation. The outlook for the balance between local generation and supply over the next ten years is uncertain. Output will be increased by other renewable energy projects under construction or recently consented (if constructed). However, demand is also likely to increase due to the electrification of process heat for dairy processing and will increase further if the Datagrid data processing centre that has recently been consented is constructed.

This therefore emphasises the importance of projects such as this in ensuring both Southland and New Zealand is sufficiently equipped to meet future electricity demand and contribute to the decarbonisation of New Zealand's economy.

The referral of the Project under the FTAA will therefore be consistent with the purpose of the FTAA, facilitating an infrastructure project with significant national and regional benefits.

2.6.3 Would facilitate the project, including by enabling it to be processed in a more timely and cost-effective way than under normal processes and is unlikely to materially affect the efficient operation of the fast-track approvals process

The FTAA established a streamlined decision-making process for development and infrastructure projects that deliver significant regional and national benefits. The Project involves approvals that would otherwise need to be applied for under a number of different legislative processes (e.g. resource consents, wildlife permits, archaeological authorities, concessions and land exchange). Given the number of approvals required to authorise the Project, the use of the FTAA to authorise the Project will facilitate the delivery of the Project in a more timely and cost-effective manner than would otherwise occur under the standard legislative processes.

Further, due to the scale of the Project, under the standard RMA process it would likely be publicly notified. This would result in submissions from a number of parties, and it is highly

⁵ The capacity of existing thermal generation plant to meet the forecast supply gap beyond the early 2030's is questionable to the projected increase in demand relative to a static supply of thermal generation and the age of the existing plant.



likely that this would lead to a hearing process and likely appeal to the Environment Court. This would add additional time and cost to the consenting process. The FTAA process will therefore significantly reduce the processing timeframe for the Project and the associated cost that would occur with consenting under the standard RMA process.

The Project is a large-scale infrastructure project that will deliver significant national and regional benefits. However, the Project is not overly complex in that it is for the development of a wind farm, of which the effects are largely understood and can be addressed through the implementation of appropriate management measures, as has occurred for the development of other wind farms around the country. HHWFLP has commissioned independent technical reports that will support the substantive application for the Project and is committed to engaging with key stakeholders throughout the preparation of the substantive application which will ensure the application can be processed in an efficient manner and will therefore not materially affect the efficient operation of the fast-track approvals process.

2.6.4 Has the Project been identified as a priority project in a central government, local government, or sector plan or strategy (for example, in a general policy statement or spatial strategy), or a central government infrastructure priority list

Whilst the Hokonui Wind Farm Project itself has not been identified as a priority project, the Hokonui Wind Farm will make a significant contribution to objectives as set out in central government policies and plans, including meeting the greenhouse gas emission reduction target of net zero by 2050 for long-lived gases, which was established in the Climate Change Response Act 2002. In addition, the electricity generated from the Project will contribute to the objective to double renewable energy generation by 2050 as set out in the Electrify New Zealand policy.

Further, as discussed in more detail in Section 3.9.1 of this report, the Project is consistent with, and supported by, the objectives and associated policies of the National Policy Statement for Renewable Electricity Generation 2011, including in that it will contribute to increasing renewable electricity generation capacity and output, increase resilience and security of electricity supply, and reducing New Zealand's carbon emissions.

2.6.5 Will the Project deliver new regionally or nationally significant infrastructure or enable the continued functioning of existing regionally or nationally significant infrastructure

The Hokonui Wind Farm will generate a new nationally significant source of renewable electricity, with an annual expected output of 1,905 GWh, which is sufficient to power up to 238,000 homes. The Project will meet the definition of both nationally and regionally



significant infrastructure in the Southland Regional Policy Statement.⁶ Therefore, the Project will deliver new regionally and nationally significant infrastructure.

2.6.6 Will the Project increase the supply of housing, address housing needs, or contribute to a well-functioning urban environment (within the meaning of Policy 1 of the National Policy Statement on Urban Development 2020)

The Project will not directly contribute to the supply of housing and is not located within an urban environment. However, electricity is of critical importance to contributing to housing needs and the functioning of urban environments, both of which are reliant on electricity, and therefore, the Project's contribution to increasing renewable electricity generation in New Zealand will positively contribute to well-functioning urban environments.

2.6.7 Will the Project deliver significant economic benefits

The Project will deliver significant economic benefits both at a regional level and national level, as described in the NZIER report. The most enduring economic benefit from the Hokonui Wind Farm is the utilisation of the wind resource to produce electricity. This output will contribute to the increase in renewable electricity capacity required to meet the expected rise in electricity demand driven by the electrification of the economy, including light vehicles transport and industrial process heat.

The construction and operation of the Hokonui Wind Farm will also have significant economic benefits for local communities, including:

- > The construction phase will inject⁷ \$455 million into the local economy; and
- > Operating the wind farm will inject up to \$18 million into the local economy.

New electricity generation is also needed for other development projects in the region to proceed and contribute to the economy. For example, the Datagrid data centre in Southland that has recently been granted consent will require a large amount of electricity, second only to the Tiwai Point aluminium smelter. The new electricity generation from the Hokonui Wind Farm is therefore required to unlock the value of other economic investments.

2.6.8 Will the Project support primary industries, including aquaculture

New Zealand's primary industries rely heavily on having a secure supply of electricity in order to operate. This is expected to become even more important in the near future as New

⁶ Glossary and Definitions, Southland Regional Policy Statement.

⁷ This value is gross spending. The contribution to GDP is about 30 percent of the gross spending.



Zealand's primary industries decarbonise, reducing reliance on fossil fuels and convert process heat and other energy needs to electricity, which will result in an increased use and demand of renewable electricity.

NZIER notes that electricity plays a critical role in Southland's energy system, including the region's industrial activities. This includes Mataura Valley Milk which has converted its dairy processing plant from coal to electricity, installing a large electric boiler that eliminates around 22,000 tonnes of CO₂ emissions annually.

The shift toward renewable energy is expected to create a widening supply gap unless new energy generation is developed. The Project will therefore significantly increase the supply of renewable electricity, which will subsequently contribute to supporting primary industries, which will be particularly important in Southland.

2.6.9 Will the Project support development of natural resources, including minerals and petroleum

The Hokonui Wind Farm will utilise wind to generate electricity and therefore is an efficient use of natural resources. Further, as with the primary sector noted above, the extractive industries also require access to a reliable supply of electricity in order to operate, and therefore, the Project will support the development and operation of extractive industries in New Zealand.

2.6.10 Will the Project support climate change mitigation, including the reduction or removal of greenhouse gas emissions

The Project will substantially support climate change mitigation, including the reduction or removal of greenhouse gas emissions.

NZIER estimate that if the proposed Hokonui Wind Farm's annual output of 1,905 GWh were generated using gas, this would lead to an additional 971,000 tonnes of CO₂e per year and 1,922,000 tonnes of CO₂e per year if generated using coal. The Project will therefore provide a significant contribute to reducing greenhouse gas emissions in New Zealand.

The New Zealand Government has set a target of achieving 50% of total final energy consumption from renewable sources by 2035 and reducing New Zealand's net carbon emissions to zero by 2050. To achieve this goal, large parts of the economy that are currently dependent on fossil fuels, such as transport and industrial activities, will need to be electrified. To meet the predicted growth in demand, new renewable generation sources will need to be developed at an unprecedented rate. Boston Consulting Group indicates that to reach net zero by 2050 the country will require 5,700MW of new wind generation capacity. To



reach this goal, New Zealand needs to maintain a robust and steady pipeline of new wind farm developments and increase the pace of new development coming onto the market.

The Hokonui Wind Farm will therefore positively contribute to New Zealand's efforts to mitigate climate change by providing a nationally significant new source of renewable energy. The Project stands to generate an annual output of up to 1,905GWh of renewable electricity.

Further, the renewable electricity generated from wind farms assist in displacing baseload thermal generation at the margin, either directly when generating at the same time thermal generation would otherwise be dispatched, or indirectly by enabling greater conservation of stored hydro generation, which has greater flexibility in responding to short-term electricity demand. Displacing thermal generation will therefore result in a reduction of greenhouse gas emissions in New Zealand relative to the counterfactual of having less new wind generation.

2.6.11 Will the Project support climate change adaptation, reduce risks arising from natural hazards, or support recovery from events caused by natural hazards

The Project will contribute to strengthening New Zealand's resilience to the effects of climate change as it will contribute to increasing the supply and diversity of New Zealand's electricity generation sites. This will be critical in the recovery from events caused by natural hazards.

2.6.12 Will the Project address significant environmental issues

Climate change is a significant environmental issue that New Zealand faces. The Project will provide a significant new source of renewable electricity, which is urgently needed in New Zealand to support the decarbonisation of the economy and reduce reliance on coal, thereby contributing to efforts to combat the effects of climate change.

2.6.13 Will the Project promote competition in the grocery industry

The Project will not directly promote competition in the grocery industry; however, the grocery industry is reliant on access to electricity to operate and will therefore contribute to the continued efficient operation of the grocery industry.

2.6.14 Is the Project consistent with local or regional planning documents, including spatial strategies

The Project will seek approvals for resource consents that would otherwise be applied for from the Southland Regional Council, Southland District Council and Gore District Council. A brief assessment of the Project against the relevant planning documents is provided



below. It is noted that in giving effect to the National Policy Statement for Renewable Electricity Generation (also assessed further below), the relevant planning documents all recognise the regional and national significance of renewable electricity generation activities, and therefore, provide for activities such as the Hokonui Wind Farm.

Southland Regional Policy Statement (“Southland RPS”)

As noted above, the Hokonui Wind Farm will meet the definition of both regionally and nationally significant infrastructure in the Southland RPS.⁸ Given the nature of the Project, the provisions of the Energy chapter of the Southland RPS are particularly relevant. These include direction to increase the generation and use of renewable energy resources,⁹ recognise and provide for the national significance of renewable electricity generation activities¹⁰ and ensure the use and development of energy resources is undertaken where the adverse environmental effects are avoided, remedied, mitigated, or where appropriate, offset and compensated for.¹¹ These provisions therefore provide support for the Project, noting that HHWFLP will appropriately apply the effects management hierarchy to the managements of effects associated with the Project.

In addition, the Southland RPS seeks to ensure that cultural sites of significance are appropriately managed and protected¹² and that mauri and wairua are sustained or improved where degraded.¹³ In accordance with this policy direction, Hokonui Rūnanga is a partner of the Project and the implementation of the project will ensure cultural values are appropriately recognised and provided for.

Further, the Southland RPS seeks to ensure water quality in the region safeguards the life-supporting capacity of water and related ecosystems¹⁴ and that the allocation and use of Southland’s water resources is efficient.¹⁵ Any discharges will be appropriately managed during the construction of the Hokonui Wind Farm and HHWFLP will ensure the water quality of the waterbodies within and surrounding the Project area is maintained through the implementation of best practice erosion and sediment control measures.

⁸ Glossary and Definitions, Southland Regional Policy Statement.

⁹ Objective ENG.3, Southland Regional Policy Statement.

¹⁰ Objective ENG.4, Southland Regional Policy Statement.

¹¹ Objective ENG.2, Southland Regional Policy Statement.

¹² Objective TW.4, Southland Regional Policy Statement.

¹³ Objective TW.3, Southland Regional Policy Statement.

¹⁴ Objective WQUAL.1, Southland Regional Policy Statement.

¹⁵ Objective WQUAN.2, Southland Regional Policy Statement.



Objectives RURAL.1 and RURAL.2 seek to achieve sustainable use of Southland’s rural land resource and to safeguard the life-supporting capacity, mauri and health of soils in rural areas, preventing or minimising soil erosion and sedimentation from land use soil disturbance. The Hokonui Wind Farm will be an efficient use of the land within the Project area through enabling the continued productive use of the land for pastoral farming and forestry activities, whilst also enabling the generation of renewable electricity. The implementation of best practice erosion and sediment control measures will ensure the properties of the soil are safeguarded.

In addition, consistent with the provisions of the biodiversity chapter of the Southland RPS, HHWFLP has commissioned an ecological assessment to assess the potential effects of the project on indigenous ecosystems and habitats and recommend appropriate measures to implement to ensure indigenous biodiversity within the Project site is maintained.¹⁶ The ecological scoping report prepared for the Project (attached as **Appendix C**) provides a high level overview of the existing ecological values of the Project site and a more detailed assessment will be prepared for the substantive application which will involve further ecological surveys. In accordance with the policy direction of the Southland RPS, the ecological effects associated with the Project will be avoided, remedied, mitigated, and where required, offset and compensated for.¹⁷

The Southland RPS also seeks to identify and protect Southland’s Outstanding Natural Features and Landscapes from inappropriate subdivision, use and development¹⁸ and to identify and manage Southland’s locally distinctive and values natural features so that any subdivision, use and development is consistent with their values.¹⁹ The Project Site is not located in a scheduled Outstanding Natural Landscape (“**ONL**”) or Outstanding Natural Feature (“**ONF**”), nor is the Project Site identified as a locally distinctive and valued natural feature or landscape in any statutory document. Brown has prepared an initial high level assessment of the site which confirms that the development of the Project at this site is suitable from a landscape and visual amenity perspective. It is therefore considered the Project is suitable for this location from a landscape and visual amenity perspective.

The Project is therefore consistent with the relevant provisions of the Southland RPS.

¹⁶ Objective BIO.1 and BIO.2, Southland Regional Policy Statement.

¹⁷ Policy BIO.9, Southland Regional Policy Statement.

¹⁸ Objective LNF.1; Policy LNF.1, Southland Regional Policy Statement.

¹⁹ Objective LNF.2; Policy LNF.2, Southland Regional Policy Statement.



Proposed Southland Water and Land Plan (operative in part)

The region-wide objectives of the Proposed Southland Water and Land Plan (“**SWLP**”) of most relevance to the Hokonui Wind Farm seek to:

- > Sustainably manage land and water and associated ecosystems as integrated natural resources;²⁰
- > Ensure the mauri of water provides for te hauora o te taiao (health and mauri of the environment), te hauora o te wai (health and mauri of the waterbody) and te hauora o te tangata (health and mauri of the people), including by identifying tangata whenua values and interests and reflect these in the management of freshwater and associated ecosystems and recognising and providing for taonga species;²¹
- > Recognise water and land as enablers of economic, social and cultural wellbeing in the region;²²
- > Maintain or enhance water quality and avoid further over-allocation of freshwater within the identified Freshwater Management Units;²³
- > Manage the quantity of water in surface bodies to safeguard the life-supporting capacity and aquatic ecosystem health, and sustainably manage surface water to support the reasonable needs of people and communities to provide for their economic, social and cultural wellbeing, including through the efficient allocation and use of water;²⁴
- > Recognise the importance of Southland’s regionally and nationally significant infrastructure, including enabling its sustainable and effective development and operation;²⁵ and
- > Enable the development of land and soils, provided the quantity, quality and structure of soils are not degraded and the health of people and ecosystems are safeguarded.²⁶

HHWFLP will ensure the Project meets the objectives and associated policies through the implementation of best practice construction management, including erosion and sediment control measures, water quality monitoring to ensure the relevant water quality standards

²⁰ Objective 1, Proposed Southland Water and Land Plan.

²¹ Objective 2; Objective 4; Objective 15, Proposed Southland Water and Land Plan.

²² Objective 3, Proposed Southland Water and Land Plan.

²³ Objective 5, Proposed Southland Water and Land Plan.

²⁴ Objective 9/9A; Objective 11, Proposed Southland Water and Land Plan.

²⁵ Objective 9B, Proposed Southland Water and Land Plan.

²⁶ Objective 13, Proposed Southland Water and Land Plan.



set out in the SWLP are met, and appropriate rehabilitation of sites following the completion of construction activities. Further, HHWFLP will ensure any discharges are appropriately managed so that they do not adversely affect the health of people and communities or the life-supporting capacity of freshwater bodies within the Project site.

Further, the SWLP recognises the importance of Southland's regionally and nationally significant infrastructure, of which the Hokonui Wind Farm will meet the definition, and seeks to enable its sustainable development and operation. The effects of the Hokonui Wind Farm will be appropriately managed in a way that is sustainable and consistent with the relevant policy direction provided for in the SWLP. This includes the management of any effects of the Project on wetlands and streams for which HHWFLP will apply the effects management hierarchy. This is a pathway that is provided for through the policy direction in both the SWLP and the National Policy Statement for Freshwater Management. It is also noted the Project has a functional need to be in this location and HHWFLP will avoid adverse effects on wetlands and streams to the greatest extent practicable, however, it is possible that effects will not be able to be completely avoided due to the nature of the Project. If this is the case, HHWFLP will ensure that unavoidable residual effects are appropriately offset and compensated for. This will be detailed further in the ecological assessment submitted with the substantive application.

Given the above, the Project is consistent with the SWLP.

Regional Air Plan

The relevant provisions of the Regional Air Plan seek to avoid, remedy or mitigate any adverse effects upon the localised air quality environment from the discharge of contaminants to air and ensure compliance with the National Environmental Standards for Air Quality ("NES-AQ"). The Project will be consistent with these provisions through the implementation of best practice measures such as dust management, to ensure the discharge of dust to air during construction of the Project does not result in adverse effects beyond the Project site boundary and complies with NES-AQ requirements. The Project will therefore be consistent with the Regional Air Plan.

Environment Southland Renewable Energy Position Statement

In September 2025 Environment Southland released its position statement in relation to renewable energy. The document notes that renewable energy will play a critical role in Southland's future and acknowledges the wide-ranging benefits of renewable energy to accelerate the transition from fossil fuels to renewable sources. The document reflects the policy direction of the RPS in relation to renewable electricity generation activities, noted above. This includes acknowledging the national and regional significance of renewable



energy, and committing to enabling its development, maintenance, and upgrading, with a preference for renewables over non-renewable alternatives, where appropriate. The document recognises that the generation, transmission, distribution, and use of renewable energy can give rise to a range of impacts and commits to ensuring these are effectively identified and appropriately managed. The Project is therefore consistent with the Environment Southland renewable energy position statement, noting that it will generate a significant amount of renewable electricity and will contribute to the decarbonisation of the economy. HHWFLP will ensure the effects of the Project are appropriately managed in accordance with the relevant national and regional policy direction.

Southland District Plan (“SDP”)

The SDP includes specific provisions that recognise the regional and national significance of renewable electricity generation activities and provide guidance for the management of effects associated with the development and operation of renewable electricity generation activities. In particular, Objective EM-O1 and Policy EM-P1 seek to enable electricity generation in a manner that avoids, remedies or mitigates the adverse effects on the environment. In addition, Objective EM-O2 seeks to recognise that energy resources are important to the current and foreseeable needs of Southland and New Zealand. Further, the SDP recognises the functional, technical and operational need that activities associated with the development of the generation of electricity have to be sited at a particular location. This policy direction therefore supports the development of the Hokonui Wind Farm. HHWFLP will avoid, remedy and mitigate any environmental effects associated with the Project, and where required, will offset and compensate for any residual adverse effects, in accordance with the relevant policy direction.²⁷

In regard to indigenous biodiversity, the SDP seeks to ensure indigenous vegetation and habitats of indigenous fauna are maintained so that the overall life supporting capacity of ecosystems is safeguarded.²⁸ Further, the SDP seeks to avoid, remedy or mitigate the adverse effects of land use and development on indigenous vegetation and habitats of indigenous fauna.²⁹ As noted previously, HHWFLP will implement appropriate management measures during the construction and operation of the Hokonui Wind Farm to ensure the indigenous biodiversity of the Project site is maintained.

Further, due to the nature of the Project, it is acknowledged the wind farm will result in effects on visual amenity values. As noted above, the site is not located within a scheduled

²⁷ EM-P8, Southland District Plan.

²⁸ ECO-O1; ECO-P2, Southland District Plan.

²⁹ ECO-P3, Southland District Plan.



ONF or ONL in the SDP. The Project site is appropriate for the development of a wind farm as it is located in the General Rural Zone, which is characterised by a mix of productive land uses, including agriculture and plantation forestry as well as renewable electricity generation activities.³⁰ The Project can also co-exist with the existing rural land uses practices that occur within the site, and as such, is a productive use of the site.³¹ It is therefore considered the development of a wind farm at this site is consistent with the rural character of the area and will maintain the rural amenity value of the site. This is confirmed in the conclusions of the landscape and visual amenity effects report prepared by Brown NZ Limited (“**Brown**”) (included as **Appendix E**), who considers the development of a wind farm at this site is appropriate.

The Project is therefore consistent with the SDP.

Gore District Plans

A very minor part of the Project will be located in the Gore District, being a small section of the transmission line connecting the INV-ROX-B transmission line to the Tee. Therefore, these activities need to be considered against the relevant provisions in the operative and proposed Gore District Plan.

Proposed Gore District Plan

The most relevant provisions for the proposed activities in Gore District of the Proposed Gore District Plan are within the Energy Chapter. These provisions seek to recognise and provide for the significant local, regional and national benefits derived from the development of renewable energy resources and enable the development, operation and maintenance of renewable electricity generation activities.³² The provisions also seek to manage the effects from electricity generation activities and avoiding locating these activities in areas such as outstanding natural features and landscapes, significant natural areas and areas of indigenous biodiversity.³³ This policy directive therefore supports the proposed Project activities in the Gore District, noting they will enable the development of the Hokonui Wind Farm, in particular the transport of the electricity generated at the wind farm to the National Grid. Further, these activities will not be located in areas identified in the Proposed Gore District Plan as ONFs/ONLs or significant natural areas/areas of indigenous biodiversity.

³⁰ GRUZ-O2; GRUZ-P1; GRUZ-P2, Southland District Plan.

³¹ GRUZ-P4, Southland District Plan.

³² ENRG-O1; ENRG-O2; ENRG-P1; ENRG-P2; ENRG-P5, Proposed Gore District Plan.

³³ ENRG-O3; ENRG-P5; ENRG-P7; ENRG-P10; ENRG-P11, Proposed Gore District Plan.



In addition, the proposed activities in the Gore District will be located within the General Rural Zone. The relevant provisions seek to provide for non-primary production activities that rely on a rural location, while managing the nature, scale and location of such activities³⁴ and not compromise the purpose and predominant character of the General Rural Zone by non-rural activities.³⁵ The activities will be compatible with the existing rural nature of the surrounding environment, noting that there is already an existing National Grid transmission line located within the Gore District and therefore these activities are already anticipated in this environment.

The Project is therefore consistent with the relevant provisions of the Proposed Gore District Plan.

Operative Gore District Plan

The provisions of the Utilities chapter of the Operative Gore District Plan are most relevant to the proposed Project activities in the Gore District. These seek to:

- > Ensure that utilities are provided for so as to meet the economic, social, health and safety needs of individuals and the community;³⁶
- > Ensure the location and design of utilities avoids significant adverse effects on identified sites and values, and avoid remedy or mitigate any other adverse effects of the provision of utilities, including visual effects, where practicable;³⁷
- > Provide for the sustainable, secure and efficient use, operation, maintenance, upgrading and development of the electricity transmission network within the Gore District, while seeking to avoid, remedy or mitigate adverse effects on the environment to the extent practicable;³⁸
- > Recognise the importance of the electricity transmission network to the social and economic wellbeing of the Gore District, Southland Region and the nation;³⁹
- > Consider the constraints imposed by the technical and operational requirements of the electricity transmission network when considering measures to avoid, remedy or mitigate adverse environmental effects of transmission activities and recognise the

³⁴ GRUZ-O3, Proposed Gore District Plan.

³⁵ GRUZ-O4, Proposed Gore District Plan.

³⁶ Objective 7.3(1); Policy 7.4(1), Operative Gore District Plan

³⁷ Objective 7.3(2); 7.3(3); Policy 7.4(4); Policy 7.4(5), Operative Gore District Plan

³⁸ Objective 7.3(7); Policy 7.4(10), Operative Gore District Plan.

³⁹ Objective 7.3(8); Policy 7.4(12), Operative Gore District Plan.



national, regional and local benefits of sustainable, secure and efficient electricity transmission;⁴⁰ and

- > Avoid locating new transmission infrastructure in the Hokonui Hills Significant Landscape area, areas of significant indigenous vegetation and habitats of indigenous fauna as shown on the planning maps and urban environments.⁴¹

The proposed activities are therefore consistent with the above policy directive, in particular noting that the activities will enable the connection of the Hokonui Wind Farm to the National Grid, have been sited to minimise effects on the environment, and are not located in the Hokonui Hills Significant Landscape area, areas of significant indigenous vegetation and habitats of indigenous fauna as shown on the planning maps or urban environments.

The Project is therefore consistent with the relevant provisions of the Operative Gore District Plan.

3. PROJECT DETAILS

3.1 TIMING OF CONSTRUCTION

It is anticipated that construction of the Hokonui Wind Farm will commence in 2029 and be completed in 2032. An approximate construction timetable is shown in **Table 1** below.

Table 1: Approximate construction timetable.

Phase	Initiation	Duration (months)	Completion
1	1 Apr 2029	18	1 Oct 2030
2	1 Oct 2029	18	1 Apr 2031
3	1 Apr 2029	18	1 Oct 2031
4	1 Oct 2030	18	1 Apr 2032
5	1 Apr 2031	18	1 Oct 2032

⁴⁰ Policy 7.4(11); 7.4(12), Operative Gore District Plan.

⁴¹ Policy 7.5(16), Operative Gore District Plan.

3.2 APPROVALS REQUIRED

3.2.1 Resource Management Act 1991 (“RMA”)

A summary of the resource consents required from the Southland Regional Council, Southland District Council and Gore District Council are outlined below.

Resource consents required from the Southland Regional Council

Rule	Rule Summary	Project Activity	Activity Status
Regional Air Plan 2016			
5.5.2(5)	Discharges of contaminants into air from any mineral processes involving the extraction from the surface of the ground of minerals, or the size reduction, screening, storage, drying or heating of minerals.	Discharge of contaminants into air, primarily dust, from onsite quarrying activities required to source aggregate for the construction of the internal access roads.	Discretionary
5.5.5	Any industrial or trade processes that are not strictly provided for in the Regional Air Plan.	The potential discharge of dust from other construction activities including road construction and discharge of contaminants to air from the onsite concrete batching facilities.	Discretionary
Proposed Southland Water and Land Plan (operative in part)			
Rule 5	Discharge of contaminants or water to a waterbody, namely sediment during construction, that meet the rule conditions.	As the Project will involve activities near waterways, including the construction of stream crossings, as a precaution, HHWFLP is seeking resource consent to discharge sediment to surface water bodies during construction activities. Any discharge will meet the relevant water quality standards.	Discretionary
Rule 42(b)	Discharge of cleanfill associated with the earthwork disposal sites associated with the wind farm construction greater than 500m ³ .	The construction of the Hokonui Wind Farm will involve the discharge of cleanfill to land in volumes greater than 500m ³ .	Restricted discretionary

Rule	Rule Summary	Project Activity	Activity Status
Rule 49(b)(ii)	Non-consumptive take of water where the total volume of water taken or diverted is returned within 100m of the take or diversion point.	The temporary diversion of water may be required during the construction of stream crossings.	Restricted discretionary
Rule 49(c)	The taking, use and diversion of surface water for construction.	The maximum volume of take per day will be 150,000 litres, which will exceed the permitted water take volumes for infrastructure construction. The proposed take will comply with the primary allocation specified in Appendix K of the SWLP.	Discretionary
Rule 53(a)	The drilling and construction of a bore.	Geotechnical investigations will be required prior to the completion of detailed design and will include the drilling of a bore at each of the proposed wind turbine sites. The activity will comply with the conditions of the Rule.	Controlled
Rule 59(b)	The placement and erection of culverts in, on, under or over the bed of a river and any associated bed disturbance and discharge resulting from carrying out the activity that does not meet one or more of the conditions of Rule 59(a).	Culverts will be designed in accordance with the New Zealand Fish Passage Guidelines and the National Environmental Standards for Freshwater, however, some of these culverts may exceed the 1,200mm limit specified by Rule 59(a) of the SWLP and some culverts may be designed to impede passage for exotic fish to protect upstream indigenous fish populations, in accordance with the guidelines outlined in the National Policy Statement for Freshwater Management 2020.	Controlled
Rule 69	Any use, erection, maintenance, placement of any structure in, on, or over the bed of a river or wetland, not provided for by a rule in the Plan.	The Project involves activities within streams and wetlands, including the construction of a bridge, culverts and access road. As a precaution, for any activities that are required that are not otherwise covered by another rule in the SWLP, consent is being sought under this rule.	Discretionary



Rule	Rule Summary	Project Activity	Activity Status
Rule 74(c)	The use of land within a natural wetland that is not for the purposes listed in Rule 74(a).	The Project footprint may encroach into a natural wetland(s). Therefore, consent is being sought under this rule.	Non-complying

Resource consents required from Southland District Council under the Southland District Plan

Rule	Rule Summary	Project Activity	Activity Status
Ecosystems and Indigenous Biodiversity			
ECO-R3	The clearance, modification or removal of indigenous vegetation that is not provided for as a permitted or controlled activity.	The Project will involve the clearance of indigenous vegetation, primarily to enable the construction of the access tracks and wind turbine foundations.	Discretionary
Infrastructure			
INF-R4(1)	The construction of a new transmission line that is not provided for by another rule.	The construction of two new 220kV transmission lines to form the connection between Substations A and B and between Substation A and the Tee transmission line. In addition, 33kV overhead transmission lines will be constructed within the site.	Discretionary
INF-R4(2)	The construction of new transformers, substations and switching stations that distribute electricity (including their ancillary buildings) that exceed 30m ³ in area.	Two new substations will be constructed as part of the Project and will exceed 30m ² in area.	Discretionary
General Rural Zone			
GRUZ-R3(1)	Earthworks within a riparian margin.	The Project will require earthworks exceeding 25m ³ within a riparian margin during the construction of access roads and wind turbine platforms.	Restricted discretionary



Rule	Rule Summary	Project Activity	Activity Status
GRUZ-R4(1)	Any activity that cannot be undertaken as a permitted, controlled, or restricted discretionary activity and is not listed as a non-complying or prohibited activity.	The construction and operation of the Hokonui Wind Farm involves a range of activities that are not provided for under any other rule in the General Rural Zone, including the construction of the wind turbines and associated infrastructure, earthworks activities, the extraction of gravel associated with the quarrying activities and the Mixed-Use Industrial Area, and resource consent is sought under this rule for any activities that are not otherwise provided for by any other rule in the General Rural Zone chapter of the Southland District Plan.	Discretionary

Resource consents required from Gore District Council under the Gore District Plans

A small portion (approximately 3.3 km) of the 220kV transmission line connecting Substation A to the Tee transmission line is located within the Gore District.

Rule	Rule Summary	Project Activity	Activity Status
Operative Gore District Plan			
7.9.3(e)	A new electricity line that will exceed 110kV.	The construction of a 220kV transmission line to form the connection between substation A and the Tee transmission line will be partly located within the Gore District.	Discretionary
4.13.1(1)	A land use activity that involves earthworks where the period of the commencement until of such earthworks until the completion of rehabilitation work exceeds 12 months.	Earthworks activities will be required for the construction of the transmission line, including associated poles, and these activities may exceed a period of 12 months.	Restricted discretionary
Proposed Gore District Plan			
ENRG-R2(2)	Renewable Electricity Generation – Large Scale in the General Rural Zone – Upgrading of existing, or construction and operation of new activities.	The proposed Project activities in the Gore District meet the definition of a large-scale renewable electricity generation	Discretionary



Rule	Rule Summary	Project Activity	Activity Status
		activity ⁴² , and as such, any activities associated with the construction and operation of the Hokonui Wind Farm, including the transmission line and GIP, are provided for under this rule.	

Resource Management (National Environmental Standards for Freshwater) Regulations 2020 (“NES-FW”)

Rule	Rule Summary	Project Activity	Activity Status
45	Vegetation clearance, earthworks or land disturbance within, or within a 10m setback from, a natural inland wetland for the purpose of construction specified infrastructure. The taking, use, damming or diversion of water within, or within a 100m setback from, a natural inland wetland.	The Project meets the definition of specified infrastructure ⁴³ and the Project footprint may encroach into areas of natural inland wetland, and require vegetation clearance, earthworks and land disturbance within the wetland. Culverts may need to be constructed within wetlands to maintain wetland hydrology, which may involve the diversion of water.	Discretionary
71	The placement, use, alteration, extension or reconstruction of a culvert in, on, over or under the bed of a river that does not comply with the permitted activity conditions of regulation 70(2).	It is possible some of the proposed culvert crossings may be designed to impede the passage of exotic fish to protect the upstream indigenous fish populations, in accordance with the policy direction of the National Policy	Discretionary

⁴² Means electricity generation activities utilising renewable energy sources with a capacity of 20kW or greater for the purpose of exporting electricity directly into the distribution network or National Grid. It includes all ancillary components, structures and activities such as substations, climate/environmental monitoring equipment, earthworks, roading, maintenance buildings, temporary concrete batching plants, internal transmission and fibre networks, vegetation clearance, and site rehabilitation works.

⁴³ Being infrastructure that delivers a service operated by a lifeline utility, as defined in the Civil Defence Emergency Management Act 2002 (Contact is an entity that “generates electricity for distribution through a network or distributes electricity through a network” as listed in Part B of Schedule 1 of that Act) and is infrastructure that meets the definition of regionally significant infrastructure, as defined in the Southland Regional Policy Statement and the SWLP.



Rule	Rule Summary	Project Activity	Activity Status
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Statement for Freshwater
Management 2020.

Resource Management (National Environmental Standard for Electricity Transmission Activities) Regulations 2009 (“NES-ETA”)

The NES-ETA came into force in January 2010 and applies to activities that relate to the operation, maintenance, upgrading, relocation, or removal of an existing transmission line, including construction activities. The regulations do not apply to the construction of new transmission lines or substations. The NES-ETA defines upgrading as increasing the carrying capacity, efficiency, security, or safety of a transmission line. The Project may involve activities relating to the upgrading of the existing transmission lines to provide for the required connections, including the deviation of the INV-ROX-B circuit into the new switching station and diversion of the INV-ROX-A circuit from the Tee to Substation A. These activities are not specifically provided for by any other rule in the NES-ETA, and therefore, it is anticipated that resource consent will be required for a discretionary activity under regulation 39 of the NES-ETA.

3.2.2 Conservation Act 1987

Concessions

In accordance with section 42(4)(e), the Project will involve approvals for a concession that would otherwise be applied for under the Conservation Act 1987 (“**Conservation Act**”).

As part of the Project, HHWFLP is required to construct and upgrade the internal access tracks within the site in order to enable the transport of wind turbine components. This includes a stream crossing over the Otamita Stream. The Otamita Stream is subject to Part 4A (Marginal Strips) of the Conservation Act. Therefore, HHWFLP is seeking an easement for a right of way to construct the culvert over this section of the Otamita Stream as part of the Project.

In addition, the 220kV transmission line between substation A and substation B will cross the Otamita Stream at the confluence of the Dornoch Burn and approximately midway between Glen Islay Road and Otamita Valley Road. As such, HHWFLP will require a concession for an airspace easement to enable the transmission line to cross this stream at these locations.



In addition, HHWFLP is also considering two options for approval for the location of three proposed wind turbines located at the southern end of the wind farm site. These are turbines C7, C8 and C9 as identified in **Figure 9** below. The land highlighted in purple is currently public conservation land, administered by DoC. This land forms part of the Hokonui Forest Conservation Park. However, this area of land is currently separated from the conservation park by the fenceline which separates the conservation park from the adjacent private property. As such, this land is currently (and historically) used for pastoral farming. The area highlighted in green in **Figure 9** below is the opposite, and is currently privately owned land, however, is located on the side of the fence that falls within the conservation park, and therefore, is essentially part of this conservation area (i.e. is not grazed farmland).

Therefore, as part of this application HHWFLP is seeking approval for either a land exchange for these two parcels of land (described further below) to align the ownership of this land with the existing land use and fenceline boundary, or for a concession for the use of this land for the construction and operation of three wind turbines and associated infrastructure within this area. HHWFLP is seeking scope for both approvals as part of this referral application, however, the final approval (concession or land exchange) will be confirmed prior to the lodgement of the substantive application, noting there is an additional process that is required to be undertaken prior to lodging a substantive application that involves approval for a land exchange.⁴⁴

⁴⁴ As outlined in sections 32-36 of the FTAA.





Figure 9: The indicative location of proposed wind turbines C7, C8 and C9 on public conservation land (highlighted in purple).

Land Exchange

As described above, one of the options HHWFLP is considering for the development of wind farm infrastructure within the area outlined in **Figure 9** above is seeking approval for a land exchange under section 42(4)(f) of the FTAA. The land exchange will involve exchanging a portion of privately owned land with land identified as conservation land, administered by DoC, located at the southern border of the Project area to align the boundaries with the existing land use and fenceline that separates the two properties. The land that will be subject to the proposed land exchange is identified in **Figure 10** below. The area of land that is currently privately owned (the green area) is approximately 11.67ha in area, and the public conservation land that is proposed to be exchanged with (the purple area) is approximately 22.02ha in area. The conservation land is currently primarily extensive-grazing pastoral farmland, and the privately owned land is mānuka and gorse regenerating indigenous shrubland.

Three wind turbines and part of the internal roading network are proposed to be located within the public conservation land, as such, the land exchange will enable the development of the Project within this area.

Further details of the conservation values associated with the land subject to the land exchange application are described in Section 3.9.2 of this report.





Figure 10: The areas that will be the subject of the land exchange application (the purple area is currently public conservation land owned by the Crown and the green area is currently privately owned land).

3.2.3 Wildlife Act 1953

Approvals are required under the Wildlife Act 1953 for the intentional disturbance of wildlife, including for the purposes of catching, holding and releasing. HHWFLP is therefore seeking an approval(s) for a Wildlife Act Authorisation for any activities relating to the disturbance of lizards and potentially terrestrial invertebrates. This will likely involve searching for certain lizard and terrestrial invertebrate species prior to earthworks or vegetation clearance activities taking place in areas that have either confirmed or expected presence of these animals and translocating them to new habitats.

In addition, it is anticipated bird collision monitoring will be required for a period of time following the commencement of the operation of the Hokonui Wind Farm. HHWFLP is therefore seeking a wildlife approval for handling of any dead protected bird species for the purposes of performing necropsy.

3.2.4 Heritage New Zealand Pouhere Taonga Act 2014

The initial desktop archaeological assessment for the Project has identified one archaeological site within the Project area and the conclusions of the report consider it is possible there are additional unrecorded archaeological sites that may be discovered following further assessment of the Project area or during construction. Therefore, as a



precaution, HHWFLP is seeking to obtain an approval for a 'global' archaeological authority for the Project, that covers the entirety of the Project Site for the duration of the construction of the Hokonui Wind Farm.

3.2.5 Freshwater Fisheries Regulations 1983

The Project involves constructing culverts within streams. The initial freshwater ecology assessment has identified that, in certain watercourses within the Project Site, it is likely to be necessary to prevent exotic fish from passing through in order to protect the threatened indigenous fish populations upstream. The FTAA includes specific approvals for complex freshwater fisheries activities that would otherwise be granted under the Freshwater Fisheries Regulations 1983. Therefore, HHWFLP will seek approval to exclude fish passage at identified culverts.

3.2.6 Other Approvals

No other approvals, including consents, certificates, designations, concessions or other legal authorisations (other than contractual authorisations or the proposed approvals) are required to authorise this Project.

3.3 PROJECT STAGES

Construction of the wind farm is anticipated to take approximately three years to complete and is not proposed to be staged or staggered in any way (i.e. all turbines and associated infrastructure will be constructed within this timeframe).

3.4 ALTERNATIVE PROJECT

No part of the Project is proposed as an alternative project.

3.5 ADVERSE EFFECTS

3.5.1 Summary of Adverse Effects

3.5.1.1 Cultural Effects

Hokonui Rūnanga represents Te Rūnanga o Ngāi Tahu within the Māruawai area (the region centred on the floodplains of the Maitai River) and has shared interests in the lakes and mountains between Whakatipu-Waitai (near Martins Bay) and Tawhitarere with other Murihiku Rūnanga and those located from Waihemo southwards. Hokonui Rūnanga hold mana whenua status for the area of which the Project site is located within and exercise rangatiratanga and kaitiakitanga for te taiao in this area. As described above, Hokonui



Rūnanga are a partner of the Project, and therefore, have an active role in the development of the Project.

It is for mana whenua to describe any cultural or historical associations with the Project Site. Hokonui Rūnanga Kaupapa Taiao has prepared a Cultural Values Statement (“**CVS**”) for the area where the proposed wind farm will be located (attached as **Appendix D**). This notes Ngāi Tahu’s view the environment as an inseparable whole, being a connected system of lakes, rivers, wetlands, soils, plants, animals (including humans), winds, tides, mountains and other landform, along with the relationships that link them. The CVS identifies the concepts that reflect a blend of core values, beliefs, principles and behaviours that are maintained through Ngāi Tahu’s associations, uses and practices with the natural environment. These are whakapapa, te ao Māori, kaitiakitanga, mauri, mahinga kai, ki uta ki tai.

The CVS notes that Ngāi Tahu ki Murhiku have a long history in the area and there are a number of cultural uses and values associated with the Hokonui Hills, including tuku iho, sites, ara tawhito (ancient trails) and resources that pass through the region and mahinga kai sites, as well as a strong connection with the Taiao and the landscape. Therefore, the proposed activity will need to consider these values to ensure cultural values are appropriately provided for.

HHWFLP will continue to engage with mana whenua throughout the development of the substantive application to ensure the effects of the Project on cultural values are appropriately addressed. This will include the completion of a cultural impact assessment for the Project that will be prepared by Te Ao Mārama Inc (who acts on behalf of Ngāi Tahu on resource management and environmental matters in this area).

3.5.1.2 Landscape, Visual Amenity and Natural Character Effects

HHWFLP has engaged Brown NZ Ltd (“**Brown**”) to prepare a preliminary assessment of the effects the Project may have on landscape and visual amenity values. This assessment is included as **Appendix E** to this application. A full landscape, visual amenity and natural character assessment that will be undertaken and submitted with the substantive application for the Project.

Brown notes that whilst the Hokonui Hills retain the value of their distinctive geomorphological structure, the Hokonui Hills are also very much defined by a distinctly modified rural character associated with farming and forestry activities. Brown notes the proposed wind farm would be located within this modified landscape, but that there would remain a level of visual interaction between the proposal and nearby reserves/parks. The Hokonui Hills clearly remain a key landmark for the Waimea and other nearby plains, but



Brown concludes the range is neither ‘outstanding’ nor ‘sufficiently natural’ to be considered an Outstanding Natural Landscape (“**ONL**”) or Outstanding Natural Feature (“**ONF**”) and is not considered aesthetically or recreationally appealing.

Brown identifies three potential effects of the most relevance to the proposal:

- > Landscape effects: recognising that the proposed wind turbines have the potential to affect perception of the Hokonui Hills as a whole, together with the Dunsdale Recreation Reserve and Dolamore Park more specifically.
- > Amenity effects: focused on the rural character of the Hokonui Hills and their margins; and
- > Amenity effects: pertaining to surrounding farm properties and towns.

Brown provides an assessment on the level of visibility and potential effects on landscape and amenity values from nine viewing sectors in the area. These viewing sectors were decided as the most likely to be exposed to the proposed wind farm, based upon the site visit and a mapping of Zone of Theoretical Visibility (“**ZTV**”) undertaken. The key findings are as follows:

- > All of the identified landscape and amenity effects ratings sit within the range of Very Low level to Moderate-High level. None are determined to be of a ‘Significant’ level. In particular, all local towns sit within the lower end of this scale. The most pronounced effect is on the approach roads to the Dunstable Recreation Area and Makarewa Falls Reserve (a Moderate-High effect);
- > It is acknowledged that the turbines are substantial structures with kinetic-dynamic qualities that is in contrast to the surrounding, much more static, landscape; and
- > Proposed transmission corridors are to be either mostly fragmented, or both physically enclosed and visually screened by the features on the outer edge of the hills from all external viewing sectors. Furthermore, much of the 33kV internal transmission network will be located underground.

Moreover, Brown summarises a range of factors that limit the effects of the Project, some of which include:

- > Despite their size, the turbines and 220kV towers have a lightweight and skeletal profile that will ‘float’ above the landscape, rather than disrupting or sitting ‘in front of’ it;
- > Existing landforms at either end of the Hokonui Hills already diminish the visual presence of the range and, inversely, the range will have a limited effect on them;



- > Views towards the proposed wind farm may be adequately constrained through shelterbelts, stands of pines, amenity planting and other vegetation within the surrounding rural landscape;
- > Low angled views of the Hokonui Hills from the surrounding environment and close-up views are restricted by the convex profile of the features on the outer edge of the Hokonui Hills and the forest. The greater bulk of the proposed turbines in either case are therefore not imposing or visually screened; and
- > The rural production context in which the Hokonui Hills landscape is situated somewhat complements the wind turbines and other wind farm elements proposed;
- > Brown identifies two residential properties located within the basin at the core of the proposed wind farm site. Of relevance to these, Brown notes:
 - The proposal's effect on the amenity values of the property and its two dwellings at 1077 Otapiri-Mandeville Road would be moderate-high; and
 - The proposal's effect on the amenity values of the property and dwelling at 2369 Otapiri-Mandeville Road would be low to low-moderate.

Brown also considers the potential effects associated with night-time lighting at the proposed wind farm and concludes that any effects generated by lighting will be low.

Overall, the assessment concludes that the Hokonui Wind Farm Project site is suitable for the development of a wind farm in terms of both landscape and amenity effects.

In addition, the Project includes the establishment of a Mixed-Use Industrial Area within the wind farm site. The Mixed-Use Industrial Area will occupy an area of approximately 30 hectares and will be located within a modified rural production landscape. The area is an integrated component of the Project and has been assessed as part of the overall effects of the wind farm development.

The establishment of the Mixed-Use Industrial Area will introduce built form, including buildings, structures and associated infrastructure, into a currently modified rural landscape. These effects will be localised and contained within a discrete area of the wider Project site.

The Hokonui Hills are characterised by a modified rural production landscape with existing forestry and farming activities. The Industrial Area will be located within this context and in proximity to existing wind farm infrastructure.

The scale of buildings within the Industrial Area will be modest in comparison to the wind turbines and transmission infrastructure, which will remain the dominant vertical elements



within the landscape. Consequently, the Industrial Area will not materially alter the overall landscape character or significantly increase visual effects beyond those identified for the wind farm. The area will also be screened from public viewpoints to the extent practicable, likely through the use of landscaping around the area.

Overall, landscape and visual amenity effects associated with the Mixed-Use Industrial Area are anticipated to be low to moderate and consistent with the findings of the preliminary landscape assessment. It is also anticipated that it will be subject to standards/conditions relating to built form, such that the effects arising from buildings and structures within the site are appropriately sized and scaled.

HHWFLP acknowledges that the Project will result in unavoidable effects on visual amenity values for local residents who will be able to see the wind farm from their properties. HHWFLP is committed to engaging with the community in relation to the Project. In order to address potential effects of the Project on local residents, HHWFLP is considering establishing a community fund for this Project that will provide funding to projects in the community for the duration of the Project. In addition, HHWFLP is investigating options to mitigate effects of the Project on local residents through the provision of discounted power to those affected. These initiatives are still being developed; however, it is envisaged that these will be confirmed prior to the lodgement of the substantive application for the Project and will deliver benefits to the local community.

3.5.1.3 Terrestrial and Wetland Ecology Effects

Hokonui Energy Limited (“**HEL**”) has completed an Ecological Scoping Assessment for the Hokonui Wind Farm site (attached as **Appendix C**), and this is summarised below.

The Hokonui Wind Farm Project area includes some areas of high ecological values; however, these areas are highly fragmented and degraded due to the existing land use of the Project site (primarily pastoral farming and plantation forestry). As a result, the terrestrial ecological value of the Project area is predominantly low to negligible.

The scoping assessment identifies the following values within the Project site:

- > Some remnant high to medium ecological value indigenous ecosystems are present within the Project area, including sub-alpine wetlands and rocky outcrop communities, however, the Project will have limited impacts on these features;
- > Some areas of indigenous ecosystem regeneration and some significant areas of scattered indigenous vegetation are present;
- > Majority of the terrestrial ecology areas and surface-water features projected to be impacted by the project are assigned low / negligible combined ecological value;



- > High-value lizard habitat within areas of the Project site;
- > Limited avifauna diversity; and
- > Reasonable diversity of indigenous terrestrial invertebrates, though none of critical and endangered conservation status have been found to date.

As is common with Projects of this scale, the Hokonui Wind Farm will result in ecological effects during both the construction and operation of the wind farm. Potential ecological effects during construction of the HWF will include vegetation clearance and the associated permanent loss or fragmentation of habitats, including terrestrial vegetation and potentially wetlands and disturbance to indigenous fauna, including invertebrates, herpetofauna and birds as a result of earthworks and vegetation clearance activities. Further, operational effects of the wind farm will primarily relate to the potential for bird collision with the wind turbines and transmission line.

HEL recommends further refinements of the wind farm footprint to avoid areas of high ecological value, including significant indigenous vegetation and habitats of indigenous fauna, to the furthest extent practicable. In the case where operational constraints prevent avoidance, mitigation measures will be implemented. This may include measures such as the salvage and relocation of lizards prior to vegetation clearance activities. Where adverse effects cannot be avoided, remedied or mitigated, offsetting and compensation will be implemented. HEL notes the restoration and enhancement of ecologically significant features and ecosystems currently in a state of degradation and fragmentation within the site could yield significant ecological gains for the wider area. This may also include the controlling of pests present in the area, which would positively benefit both the native vegetation and herpetofauna within and surrounding the site.

The development of the Mixed-Use Industrial Area will involve vegetation clearance and ground disturbance within its defined footprint. Consistent with the ecological scoping assessment, the majority of the Project area comprises modified land of low to negligible ecological value.

The location of the Industrial Area will be refined to avoid areas of higher ecological value, including significant indigenous vegetation, wetlands, and identified habitats of indigenous fauna to the extent practicable, and will most likely be located on the flat, currently grazed areas of the site. Any ecological effects associated with the Industrial Area will be consistent with, and no greater than, those identified for the wider Project and are not expected to result in significant adverse effects on ecological values.

Where ecological effects cannot be avoided, they will be managed in accordance with the effects management hierarchy, including:



- > Minimisation and mitigation of effects; and
- > Offsetting and compensation where required.

In addition to the ecological scoping assessment, Davidson-Watts Ecology (Pacific) Ltd (“**DWEP**”) has completed an assessment on the effects of the Project on native long-tailed and (lesser) short-tailed bat species (pekapeka). This assessment is attached as **Appendix F** and confirms that there are no bats within or adjacent to the proposed wind farm. DWEP considers it is likely that bats in the Southland region are more vulnerable to predation events due to the climate and high / persistent pest and predator presence, explaining the absence of bats from the Hokonui Hills in general. This is especially so as uncontrolled podocarp forests are likely to support substantial pest / predator populations.

HHWFLP has engaged e3scientific to undertake further detailed ecological assessments for the Project. Most of the fieldwork has been completed and the complete assessment of ecological effects will be submitted with the substantive application for the Project.

3.5.1.4 Freshwater Ecology Effects

The ecological scoping assessment prepared by HEL also considers the potential effects of the Project on freshwater ecology (**Appendix C**). The effects of the Hokonui Wind Farm on freshwater will primarily occur during construction and include potential discharge of sediment to waterways, effects associated with the proposed take of water, effects on freshwater ecology values, the construction of new watercourse crossings and the risk of contaminants and new pest species entering watercourses.

The implementation of best practice construction and erosion and sediment control measures will ensure appropriate management measures are in place to protect the surrounding freshwater bodies during construction of the Project. The Project area is predominantly located within the Maitara 3 water quality catchment, and therefore, HHWFLP will ensure the relevant receiving water quality standards for this catchment as set out in Appendix E of the SWLP are met.

There are a series of streams which dissect the Hokonui Wind Farm Project area of which the Lora Stream and Otamita Stream are the most significant (both of which are subject to Marginal Strip provisions). The proposed Hokonui Wind Farm footprint has a very small impact on waterbodies within the Project area as the proposed internal access road primarily follows the existing tracks within the site, including the existing stream crossings. However, it is anticipated that some of these existing crossings will need to be upgraded to enable the transport of the wind turbine components within the Project site, including a crossing over the Otamita Stream. New culverts or stream crossings will be designed in accordance with the New Zealand Fish Passage Guidelines. Any loss of stream extent



associated with the construction of new stream crossings will be appropriately offset in accordance with the policy direction of the National Policy Statement for Freshwater Management.

The scoping assessment completed by HEL notes that the Otamita Stream has high rare species and ecological diversity. Species present in the waterways within the site include *Geotria australis* (Pouched Lamprey, culturally significant, Threatened-Nationally Vulnerable) and potentially other galaxias species such as *Galaxias* “southern” (southern flathead galaxias) and *Galaxias* aff. *paucispondylus* “Southland” (alpine galaxias (Southland)) may also be present. New Zealand longfin eel (At Risk-Declining) also occurs within the waterways in the Hokonui Wind Farm Project area. The statement in the scoping assessment indicating that the existing ford present over the Otamita Stream may be acting as a selective fish barrier, has been shown to be incorrect by subsequent detailed ecological assessment. However, there are under-road pipes that are highly likely to be fish barriers within the project area, protecting the indigenous species upstream of these crossings from the predation of exotic species such as trout. It is therefore considered that it may be beneficial to restrict the passage of exotic fish where these proposed crossings will be upgraded, to maintain this barrier and protect the upstream indigenous fish populations. As a precaution, HHWFLP is seeking approval for a complex freshwater fisheries activity to impede passage of exotic fish at these crossing as part of this application.

HHWFLP has a suitably qualified freshwater ecologist to undertake surveys of the waterbodies in the Hokonui Wind Farm area to further understand the freshwater ecology values of the Project area and inform the management measures that will be implemented during construction of the Project. The results of these surveys will be detailed in a freshwater ecology assessment that will be submitted with the substantive application for the Project.

3.5.1.5 Construction Effects

Potential effects associated with the construction of the Hokonui Wind Farm will include effects associated with surplus fill disposal, activities within or near streams or wetlands, stormwater runoff, erosion and sediment effects, generation of dust and storage and use of hazardous substances.

It is anticipated that construction effects associated with the Project will primarily be managed through a Construction Environmental Management Plan which will be prepared by a Suitably Qualified and Experienced Person and outline the measures that will be implemented to appropriately avoid, remedy, or mitigate any adverse environmental effects of the construction of the Project.



Erosion and sediment control will be managed in accordance with industry best practice (e.g. Auckland Council's Guideline Document 2016/05 "Erosion and Sediment Control Guidelines for Land Disturbing Activities in the Auckland Region"). This will include the use of erosion and sediment control devices in and around the works areas, minimising sediment generation and sediment-laden runoff and discharges, implementing dust management measures, and ensuring exposed areas are appropriately rehabilitated and revegetated as soon as practicable.

The construction management measures will be further developed and described in the technical assessment for construction effects that will be provided with the substantive application for the Project. This will ensure that the appropriate measures are in place to manage the potential effects of the construction of the Project and will also inform the proposed resource consent conditions.

3.5.1.6 Geotechnical Effects

HHWFLP engaged GeoSolve to conduct a preliminary geological and geotechnical review of the proposed wind farm (attached as **Appendix G**). More detailed investigation and engineering assessments will be undertaken to inform design requirements for the substantive application. GeoSolve note that a regional seismic risk is present, as per the wider South Island, however, no significant site-specific natural hazards have been identified that would preclude development, or which cannot be addressed by standard engineering assessment.

GeoSolve recommends the following preliminary engineering considerations for the wind farm development:

- > Wind turbines should be located on or close to ridge crests, with foundations targeting un-weathered to slightly weathered in-situ bedrock;
- > Batter stability will need to be considered, particularly in relation to access roads meant to traverse steeper terrain. Existing batter cuts indicate that stable cut slopes are achievable;
- > Drainage may be required in specific locations to control shallow seepages and maintain long term batter performance;
- > The design of structures, foundations, and earthworks should consider the severe seismic risk present in the wider region;
- > Site won crushed sandstone is recommended for earthworks construction based on crushing resistance but blending of mudstone layers may also be suitable; and



- > Geotechnical rock parameters for design and aggregate quality for construction may change depending on the grading of sedimentary beds from north to south.

Overall, GeoSolve concludes that the proposal is feasible from a geotechnical perspective and that any issues can be fully addressed by standard geotechnical engineering and assessment practice.

3.5.1.7 Hydrology Effects

Water take will be required during construction to enable activities such as concrete batching, wash down, dust suppression and wetting roads. It is anticipated that this will involve a water take from the Otamita Stream which will be established upstream of the Glen Islay Road ford and a smaller take from upstream of the bridge located near where the INV-ROX-B transmission line crosses the Cone Burn which will primarily provide for operational needs. HHWFLP will engage a suitable technical expert to undertake an assessment on the effects of the proposed water take. This will ensure the proposed volume of take is appropriate to maintain the existing values of the streams and outline any recommendations that HHWFLP will implement to avoid, remedy or mitigate any potential effects associated with the water take.

3.5.1.8 Archaeological Effects

HHWFLP engaged New Zealand Heritage Properties to undertake a desktop review of the archaeological values of the proposed wind farm site and the surrounding area (refer to **Appendix H**). There is one recorded archaeological site identified in the Southland District Plan and ArchSite maps within the Project area, Site F45/5 which is a midden oven site. There is also a protective covenant across part of the western area of the site that requires the Historic Places Act 1980 (now superseded by the HNZPT Act) be observed in relation to any archaeological site, historic place, historic area or traditional site. No known sites are listed in the schedule, however.

There are also additional recorded archaeological sites surrounding the Project area. A further detailed assessment of the archaeological values of the Project site will be undertaken for the substantive application which will outline the recommended management measures to appropriately manage any archaeological material that may be found within the Project site.

As a precaution, HHWFLP is seeking to obtain approval for a general site-wide archaeological authority for construction of the Project. This will ensure that the appropriate protocols are in place to protect existing archaeological material within the Project site, as well as in the event of the discovery of any archaeological material during construction, in

accordance with best practice. These measures will be set out in an Archaeological Management Plan for the Project.

3.5.1.9 Traffic Effects

Kina Consulting Engineers and Smith Crane and Construction have been engaged to conduct a feasibility study for the transport of wind turbine components to the Hokonui Wind Farm (refer to **Appendix I**). The assessment recommends transport of turbine components from South Port, through State Highway 1 in Invercargill, onto State Highway 6, Josephville-St Patrick Road, SH94 and then onto Waimea Valley Road, where the site entrance is located. The assessment identifies locations on this route where there may be potential restrictions and ways to address these. Overall, it is concluded that with the appropriate measures in place, transport via this route is feasible.

A further detailed transportation assessment will be completed to identify potential effects and how these can be appropriately managed. The traffic effects associated with the Project will occur during construction and primarily relate to changes in traffic volumes, transportation of over-weight and over-dimension loads, likely resulting in mobile road closures, and having the potential to cause damage to the road pavement. It is anticipated that with the implementation of appropriate management measures the Project will not result in adverse effects on the transportation network. Management measures will likely include timing restrictions for the transport of oversized and overweight turbine components (i.e. overnight), roading improvements where required, signage and regular inspections to identify any damage to the roads caused by the transport of wind turbines components to the site.

Further, traffic generated from the operation of the Mixed-Use Industrial Area will be further assessed as part of the substantive application and appropriately managed through consent conditions applied to the Project.

It is therefore anticipated the traffic effects associated with the proposed wind farm development can be appropriately managed.

3.5.1.10 Noise Effects

Powell Fenwick was engaged by HHWFLP to prepare a provisional noise assessment and provide design advice for the proposed wind farm, included as **Appendix J** to these application documents.

In relation to wind turbine noise, Powell Fenwick calculates worst-case scenario noise levels to be below the limit set out in NZS 6808:2010 and state that the wind farm can be designed to meet acceptable noise criteria whilst achieving the required capacity rating.



Powell Fenwick also identify transformers, turbine maintenance/ maintenance facilities, and vehicle access for maintenance as operational noise generating activities and determine that noise from these activities can be compliant with the rural zone noise limits set out in the Southland District Plan as:

- > Transformers can be located sufficiently clear of residential dwellings to remain below day / night-time noise limits;
- > Turbines are located sufficiently far from residential dwellings; and
- > Vehicle movements (associated with maintenance) on public roads will be infrequent and will not significantly increase background noise levels.

In relation to construction noise, Powell Fenwick identify the construction of turbine foundations, operation of concrete batching plants, construction of new internal roads and use of public roads, and the transportation of equipment / components as expected noise generating activities. They conclude that noise from activities associated with construction can comply with the requirements of NZS 6803:1999 and any effects can be managed through good management.

Overall, Powell Fenwick determines that, based on initial modelling, the proposal can be designed to meet the requirements of NZS 6808: 2010 Acoustics – Wind Farm Noise, NZS 6803: 1999 Acoustics – Construction Noise, and the underlying zone limits of the Southland District Plan. Furthermore, in the cases where noise level may approach any limits, the effects can be managed through the implementation of appropriate management practices.

A detailed acoustics assessment will be completed for the Project to determine whether there will be any noise effects associated with the construction and operation of the Hokonui Wind Farm on any nearby dwellings and to outline any measures recommended to mitigate potential effects. The assessment will also include an assessment of potential noise generated from the Mixed-Use Industrial Area. It is considered that the adoption of suitable design and best practice management procedures will ensure the effects of the proposed activity associated with noise will be appropriately managed.

3.5.1.11 National Grid Effects

HHWFLP has consulted with Transpower in relation to the Hokonui Wind Farm Project. The proposed Hokonui Wind Farm will be designed in accordance with Transpower's 'Guidance for developers establishing Wind Farms near Transpower Assets' document and in consultation with Transpower. This will ensure the wind farm and connection to the National Grid will not adversely impact the operation and function of the existing National Grid assets.



3.5.1.12 Shadow Flicker Effects

Shadow flicker effects occur as shadows of moving wind turbine blades create shadows which move across the ground. When the shadows pass over buildings, they can have an impact on the occupants within the buildings. The outside light entering a building through the windows can create a flickering effect each time a moving shadow passes over a window. This can lead to annoyance effects on affected parties, or, in extreme scenarios, adverse health effects. HHWFLP will commission an assessment on the potential shadow flicker effects associated with the proposed Hokonui Wind Farm; however, it is noted that due to the distance of the proposed wind turbines from the nearest dwellings it is considered there will be no shadow flicker effects associated with the Hokonui Wind Farm.

3.5.1.13 Radio Communication Services

The wind farm has the potential to cause interference to wireless communications and navigation systems. HHWFLP will engage a specialist to undertake an assessment of the proposed Hokonui Wind Farm and identify any potential effects on radio communication services. Any potential effects identified will be appropriately managed to ensure there are no adverse effects on the licensed radio communication services within the vicinity of the wind farm.

3.5.1.14 Aviation and Lighting Effects

For aviation safety purposes it is anticipated that the Civil Aviation Authority (“**CAA**”) will require a selected number of the turbines to be fitted with an Aviation Obstruction Warning Light System which will be synchronised red flashing lights located on top of the nacelle. Mike Haines Aviation (“**MHA**”) was engaged by HHWFLP to undertake an aviation assessment to examine potential impacts on aircraft operations in navigable airspace and identify any lighting requirements for the wind turbines (attached as **Appendix K**). MHA confirms that the Director of Civil Aviation will require marking / lighting of some taller wind turbines (and other tall structures) and that a site-specific wind farm lighting plan should be developed.

MHA concludes that the proposed wind farm is remote from most major aviation activity. There are three aerodromes and one heliport close to the proposed location. However, the Invercargill Airport and other local aerodromes are limited to day-time operations. The Gore hospital heliport does operate at night, but MHA determines the flight routes to be well away from the proposed site. In light of this, MHA identifies low residual risk and no impacts on aviation based on this assessment, provided appropriate mitigations (e.g. notification and appropriate lighting) are implemented, especially given the low level of aircraft traffic.

Additionally, Brown assessed the lighting effects associated with the Project and suggests the use of modern LED hazard lights will minimise light pollution and generally result in beams cast well above the surrounding areas. However, Brown notes the lights will remain apparent in distant views, appearing as a string of red lights and this may lead to potential effects on the relative solitude, rural nature and dark sky qualities of the surrounding environment and of light spill and glow. These effects will be limited by the difference in elevation of where the lights sit and where they might be visible from and the highly directional nature of the lights. Brown indicates that there is a low likelihood that downward reflected light will generate enough glare to bother the human eye. Furthermore, due to the surroundings being shrouded in darkness at night-time, the proposed lighting will have a limited impact on landscape values. Brown concludes that the lighting is considered to generate low effects overall.

HHWFLP will continue to engage with the CAA in relation to the Project. This will include determining the required lighting of turbines to ensure that risks to aircraft are suitably minimised and meet the requirements of the CAA.

3.5.2 Prohibited Activities

No activities involved in the Project are prohibited activities under the RMA.

3.6 PERSONS AFFECTED

HHWFLP considers the following persons, groups and entities are likely to be affected by the Project:

- > Papatipu Rūnaka ki Murihiku, including Te Rūnanga o Ngāi Tahu, Hokonui Rūnanga and Te ao Mārama Incorporated (who acts on their behalf on resource management and environmental matters);
- > Southland District Council;
- > Southland Regional Council;
- > Gore District Council;
- > Department of Conservation;
- > Heritage New Zealand Pouhere Taonga;
- > Adjacent landowners as identified in the visual effects assessment;
- > Transpower;
- > Civil Aviation Authority;



- > NZ Transport Agency;
- > Invercargill City Council; and
- > South Port.

3.6.1 A summary of any consultation undertaken with or notification given to the above persons and/or groups who are considered likely affected by the Project and how the consultation and responses to notification have informed the project

HHWFLP has engaged with the relevant parties listed in section 11(3) and provided written notification of its intention to lodge this referral application. A summary of the consultation undertaken with these parties and how this has informed the Project is provided below.

Te Rūnanga o Ngāi Tahu and Papatipu Rūnaka ki Murihiku (as the relevant iwi authorities and Treaty settlement entity)

As noted previously, the Project will be developed alongside Hokonui Rūnanga, who are a partner of the Project. Hokonui Rūnanga has prepared the CVS for the Project (attached to this application), and this has provided an indication of the cultural values that will need to be considered for the Project, described in Section 3.5.1.1 above.

Further, HHWFLP has commenced engagement with TAMI in relation to the Project. This has included the preparation of an agreement for TAMI to undertake a Cultural Impact Assessment for the Project. HHWFLP intends to continue to engage closely with TAMI throughout the development of the substantive application for the Project to ensure cultural values are appropriately considered.

For completeness, HHWFLP has also engaged with Te Rūnanga o Ngāi Tahu in relation to the Project, and Te Rūnanga o Ngāi Tahu confirmed that primary engagement for the Project sits with the relevant Papatipu Rūnaka and their Regional Environmental Entities, being Hokonui Rūnanga and Te Ao Mārama Inc.

HHWFLP has provided written notification to Te Rūnanga o Ngāi Tahu and TAMI (on behalf of Papatipu Rūnaka ki Murihiku) of its intention to lodge this referral application in accordance with section 11 of the FTAA.

Southland District Council (as a relevant local authority for the Southland District)

HHWFLP has consulted with the Southland District Council in relation to the Project. This included a meeting on 2 February 2026 to discuss the Project, and a presentation was shared to provide an overview of the Project and the further technical investigations that will be completed to support the application. This consultation has helpfully informed the Project, including with regards to the approvals sought, the process for the preparation of

the substantive application documents and further engagement with the local authorities. HHWFLP has also engaged with the Southland District Council roading team regarding the proposed transport route. HHWFLP will continue to engage with the Southland District Council throughout the preparation of the substantive application.

Southland Regional Council (as a relevant local authority for the Southland Region)

HHWFLP has engaged with Southland Regional Council (Environment Southland) regarding the Project. This included a meeting that was held with key staff from Environment Southland on 27 January 2026. At this meeting HHWFLP provided an overview of the Project and the findings of the technical assessments completed at that point. Environment Southland provided helpful comments on the application, including highlighting the Environment Southland position statement for renewable energy, which was subsequently shared with HHWFLP, the processes for Environment Southland throughout the fast-track process, and the key effects that Environment Southland will be interested in that should be addressed in the application, including wetlands and biodiversity effects.

Gore District Council (as a relevant local authority Gore District)

A small portion of the transmission line and connection to the INV-ROX-A circuit transmission line will be located within the Gore District. Consultation undertaken between Gore District Council and HHWFLP in relation to the Project to date has included a meeting held on the 25th of February, where HHWFLP presented an overview of the Project. HHWFLP has provided further updates to Gore District Council in relation to the proposed transportation route and transmission line route. The Gore District Council provided useful information for the Project, particularly in relation to the proposed transportation routes and potential sources of aggregate in the area.

Department of Conservation (as the administering agency for the Conservation Act, Wildlife Act 1953 and Freshwater Fisheries Regulations 1983)

Approvals will be sought that are relevant to the Department of Conservation, including wildlife approvals, concessions, land exchange and complex freshwater fisheries approvals. As such, HHWFLP has consulted with DoC in relation to the Project. This has included an initial meeting with the DoC fast-track approvals team on 11 February 2026 where HHWFLP provided an overview of the Project and the approvals sought that are relevant to DoC. A further meeting was held with the relevant DoC staff to discuss the proposed land exchange application on 20 March 2026.

DoC has subsequently provided detailed comments in relation to the application, including initial comments from its technical team on the potential ecological effects of the Project that should be considered in the substantive application, as well as the approvals sought.



These matters will be addressed in the substantive application, including the detailed ecological assessment. HHWFLP will continue to engage with DoC throughout the substantive application phase.

Heritage New Zealand Pouhere Taonga (as the administering agency for the Heritage New Zealand Pouhere Taonga Act 2014)

Approval for an archaeological authority is being sought as part of the application, and therefore, HHWFLP has consulted with Heritage New Zealand Pouhere Taonga (“**HNZPT**”) in regard to the application. HHWFLP provided HNZPT with a description of the Project and a meeting was subsequently held on 5 December 2025 to discuss the proposed activities relevant to HNZPT. HNZPT outlined the FTAA information requirements and details of documents that are typically included with the substantive application. HHWFLP has subsequently provided a draft of the preliminary desktop archaeological report for consultation on 12 March 2026. No feedback has been received to date, however, HHWFLP will continue to engage with HNZPT through the preparation of the substantive application for the Project.

Ministry for the Environment

For completeness, HHWFLP has informed the Ministry for the Environment (“**MfE**”) of its intention to submit a referral application for the Project on 26 January 2026. MfE responded with a letter confirming that following the amendments to the FTAA that came into force in December 2025, MfE is no longer an administering agency for the RMA and applicants are therefore no longer required to consult with MfE. However, MfE outlined the relevant national direction that should be considered in the application and HHWFLP will ensure these are addressed in the application.

3.6.2 Treaty settlements that apply to the project area and a summary of the relevant principles and provisions in those settlements

As set out in the cultural values statement (**Appendix D**), Te Rūnanga o Ngāi Tahu is the tribal representative body of Ngāi Tahu whānui, established under the Te Rūnanga o Ngāi Tahu Act 1996. There are 18 Rūnanga Papatipu that form the membership of Te Rūnanga o Ngāi Tahu. The Te Rūnanga o Ngāi Tahu Act 1996 and the Ngāi Tahu Claims Settlement Act 1998 acknowledge the status of Rūnanga Papatipu as holders of the kaitiaki and manawhenua roles of Ngāi Tahu Whānui over the natural resources within their takiwā boundaries.

Ngāi Tahu ki Murihiku is the collective of the four representative papatipu rūnaka of Murihiku, namely Waihōpai Rūnaka, Te Rūnanga o Awarua, Te Rūnanga o Ōraka / Aparima



and Hokonui Rūnanga. They are recognised as mana whenua under the Ngāi Tahu Claims Settlement Act 1998 and in the Ngāi Tahu WAI 27 claim under Te Tiriti o Waitangi.

Te Rūnanga o Ngāi Tahu Act 1996 (“**TRONT Act**”) was enacted in 1996 to provide a legal identity to the Ngāi Tahu iwi. The TRONT Act establishes the body corporate of Te Rūnanga o Ngāi Tahu as the tribal representative body of Ngāi Tahu Whānui.

Ngāi Tahu and the Crown signed a Deed of Settlement on 21 November 1997. The Ngāi Tahu Claims Settlement Act 1998 gives effect to the Deed of Settlement.

The Ngāi Tahu settlement includes:

- > Apology: Crown apologises unreservedly to Ngāi Tahu Whānui for the suffering and hardship caused to Ngāi Tahu;
- > Aoraki/Mount Cook: gifting of Aoraki, co-management and renaming;
- > Cultural Redress: restores effective Kaitiakitanga;
- > Non-Tribal Redress: provides certainty and results; and
- > Economic Redress: income generated by tribal assets provides funds for social and cultural development.

The Crown apology recognised Ngāi Tahu as *"the tāngata whenua of, and as holding rangatiratanga within, the Takiwā of Ngāi Tahu Whānui."*

The most relevant principles and provisions in the settlement in respect of the Project include cultural redress concerning conservation management strategies, taonga species, recognition of mana, management input and nohoanga entitlements.

Conservation Management Strategies

The Treaty settlement provides redress to Ngāi Tahu relevant to conservation management strategies and plans. The Southland Murihiku Conservation Management Strategy (“**CMS**”) was prepared in consultation with Ngāi Tahu. This redress is not directly relevant to the Project as:

- > Te Rūnanga o Ngāi Tahu is a statutory adviser to the Minister of Conservation in respect of specific sites. As a statutory adviser, Te Rūnanga o Ngāi Tahu may provide advice directly to the Minister of Conservation when they are considering any draft conservation management plan or conservation management strategy under the Conservation Act 1987 in respect of a specific site. The Minister of Conservation must have particular regard to the advice given by Te Rūnanga o Ngāi Tahu. The Project does



not involve any sites for which Te Rūnanga o Ngāi Tahu has a role as a statutory advisor;
and

- > The Director-General of Conservation must consult with, and have particular regard to the views of, Te Rūnanga o Ngāi Tahu in respect of the preparation of every conservation management strategy or conservation management plan that affects any of the leaseback conservation areas or the gift areas. The Project does not involve any of the leaseback conservation areas or the gift areas.

Taonga Species

In the Treaty settlement the Crown acknowledges the cultural, spiritual, historic and/or traditional association of Ngāi Tahu with each of the taonga species, and taonga fish species. Some of the species identified within the Project Site are taonga species or taonga fish species under the settlement. It is noted this Project is a joint venture with Hokonui Rūnanga, and HHWFLP intends to engage closely with Te Ao Mārama Inc, and this continued collaboration throughout the development of the Project will ensure any effects on taonga species and taonga fish species are appropriately addressed.

Overall, the views of Te Rūnanga o Ngāi Tahu and Papatipu Rūnaka ki Murihiku in respect of taonga species are directly relevant to the FTAA process. The settlement provides Te Rūnanga o Ngāi Tahu with a voice concerning the management of taonga species and taonga fish species:

- > The Minister of Conservation is required to consult with, and have particular regard to, the views of Te Rūnanga when making policy decisions concerning the protection, management or conservation of that taonga species;
- > Te Rūnanga o Ngāi Tahu is appointed as an advisory committee to provide advice to the Minister of Conservation on all matters concerning the management and conservation by the Department of Conservation of freshwater fisheries within the Ngāi Tahu Claim Area; and
- > In all matters concerning the management and conservation by the Department of Conservation of taonga fish species within the Ngāi Tahu Claim Area, the Minister of Conservation must consult with, and have particular regard to, the advice of that advisory committee.

Recognition of Mana

Ngāi Tahu's mana is recognised in the Treaty settlement through statutory acknowledgements, deeds of recognition, Tōpuni and place names. There are no statutory acknowledgements within the Project area. However, there is a statutory acknowledgement



for the Mataura River, located to the north / east of the Project, of which streams within the Project Site are tributaries of.

The Crown agency responsible for the management of a site or area subject to a statutory acknowledgment was required to enter into a deed of recognition, providing for agreed input by Te Rūnanga o Ngāi Tahu into management processes. The settlement includes a deed of recognition for the Mataura River.

Tōpuni provide an overlay of the cultural, spiritual, historic, and traditional association of Te Rūnanga o Ngāi Tahu, on certain areas of land managed by the Department of Conservation. The Ngāi Tahu values of the Tōpuni are a mandatory consideration in approving management policies, plans and strategies under the Conservation Act. Te Rūnanga o Ngāi Tahu must also be consulted in the preparation of those documents. There are no Tōpuni within the Project Site.

The settlement also amended the place name of various locations in the takiwā. No names within the Project area were amended, however, Ship Cone Mountain / Ōtaupiri, located to the east of the Project Site was included.

Management Input

Te Rūnanga o Ngāi Tahu has the right to nominate persons to dedicated seats on the following statutory bodies:

- > One seat on the New Zealand Conservation Authority; and
- > Two seats on each Conservation Board wholly within the Ngāi Tahu Takiwā.

The New Zealand Conservation Authority and relevant Conservation Boards must be invited to provide written comments.

There are a range of protocols that have been developed with the Department of Conservation, setting out:

- > The ways in which the Department of Conservation will exercise its functions, powers and duties in relation to specified matters within the Ngāi Tahu Claim Area; and
- > How the Department of Conservation will, on a continuing basis, interact with Te Rūnanga o Ngāi Tahu and provide for Te Rūnanga o Ngāi Tahu's input into its decision-making process, including in respect of freshwater fisheries and RMA involvement.

The protocols are required to be noted in conservation management strategies, conservation management plans and national park management plans affecting the Ngāi



Tahu Claim Area. The CMS refers to the Department of Conservation and Ngāi Tahu protocols, including at pages 28 and 306–314.

Nohoanga

The Treaty settlement provides nohoanga entitlements for the purpose of permitting members of Ngāi Tahu Whanui to temporarily occupy land close to the waterways on a non-commercial basis, so as to have access to the waterways for lawful fishing and gathering of other natural resources. There are no nohoanga entitlements within the Project Site.

3.6.3 Any principles or provisions in the Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019 that would be invoked by the project

Not relevant to the Project.

3.6.4 Treaty Settlement Land

The Project will not be located on land returned under a Treaty settlement.

3.6.5 Public Works Act 1981

No processes have been undertaken under the Public Works Act 1981 in relation to the Project.

3.6.6 Māori Land, Marae, or Identified Wāhi Tapu within the Project Area

As mentioned above, of relevance to the proposed Project site, the Mataura River is a Statutory Acknowledgement Area. The Otamita Stream, which runs through part of the Project Site, is a tributary of the Mataura River. The engagement HHWFLP has undertaken with mana whenua has informed the management of effects on this tributary to ensure that the cultural values associated with the Mataura River, including the Otamita Stream and other tributaries, are protected.

In addition, there is a parcel of Māori freehold land located adjacent to the southern boundary of the Project area. This land is legally described as section 13 Block I Waimumu Hundred and Section 225 Block LXIV Hokonui Survey District. The land is approximately 806 ha in area and is administered by the Hokonui Endowment Trust.

There is no marae or other identified wāhi tapu within the Project Site.

3.7 LEGAL INTERESTS

HHWFLP has secured wind farm development licences for the majority of the landholdings that will be utilised for the development of the Project and will finalise the agreements with the remaining landowners in due course.



3.8 OTHER MATTERS

3.8.1 Have any activities included in the project, or any that are substantially the same as those involved in the project, been the subject of an application or a decision under a specified Act?

No application has been made under a specified act for this Project.

3.8.2 Climate Change and Natural Hazards

The main risks to the Project from climate change and natural hazards are from seismic events. The site is not subject to any additional natural hazard overlays on the Environment Southland natural hazard database. The wind farm design and construction methodology will be informed by multiple engineering design reports to ensure the risks from natural hazards are managed to acceptable levels. Therefore, the Project is not subject to significant risks associated with climate change and natural hazards.

3.9 SPECIFIC PROPOSED APPROVALS

3.9.1 Approvals under the Resource Management Act 1991

The Project is seeking approvals for activities that would otherwise be applied for under the RMA (resource consents). An assessment against any relevant national policy statements and national environmental standards is provided in the sections below.

3.9.1.1 National Policy Statement for Renewable Electricity Generation 2011 (“NPS-REG”)

The NPS-REG sets out the national policy direction relevant to renewable electricity generation (“**REG**”) activities. The NPS-REG came into effect in May 2011 and was most recently amended in December 2025.

The objective of the NPS-REG is to:

- a) ensure the national, regional and local benefits of REG are provided for;*
- b) enable REG capacity and output to significantly increase;*
- c) enable REG to support the social, economic and cultural wellbeing of people and communities, and for their health and safety;*
- d) enable REG to provide greater security of electricity supply and resilience to supply disruptions to all people and communities;*
- e) enable REG to support achieving New Zealand’s emission reduction target and implementation of the emissions reduction plan under the Climate Change Response Act 2002; and*



- f) *ensure REG is developed and operated in a safe, efficient and effective manner while managing the adverse effects from or on REG activities.*

The objective of the NPS-REG therefore recognises the regional and national significance of renewable electricity generation activities and seeks for the associated benefits of these activities to be enabled and provided for. The proposed Hokonui Wind Farm is therefore clearly supported by this objective, noting that it is a renewable electricity generation activity that will generate a significant amount of electricity and will inject a significant amount of money into the economy. The provisions of this policy therefore also demonstrate that the Project is highly aligned with the purpose of the FTAA.

Policy A of the NPS-REG requires decision makers to recognise and provide for the national significance and the national, regional and local benefits of renewable electricity generation, including the following benefits of these activities:

- > Avoiding, reducing and displacing greenhouse gas emissions;
- > 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;
- > Providing for the social, economic and cultural wellbeing of people and communities and for their health and safety;
- > Using renewable rather than finite sources of energy;
- > Avoiding reliance on imported and domestic fossil fuels for the purposes of generating electricity;
- > The temporary and reversible nature of adverse effects on the environment of some REG technologies;
- > Reducing electricity losses by locating REG activities close to electricity demand and existing electricity networks; and
- > Reducing adverse effects by:
 - Co-locating REG with other appropriate REG assets and activities and other appropriate infrastructure and activities; and
 - Locating REG activities to minimise adverse effects on other activities.

The Project will give rise to the benefits listed above, noting that the Project stands to generate up to 1,905GWh of electricity annually, sufficient to power up to 238,000 households. This will provide a significant contribution to increasing the security of electricity supply in New Zealand, and support New Zealand's decarbonisation.



The NPS-REG further supports the Project in that it:

- > Seeks to enable the cumulative increases in REG capacity and output at any scale, of which the Project will be a wind farm with an output capacity of up to 500MW;⁴⁵
- > Recognises the functional and operational need of these activities, including:⁴⁶
 - To be located where the renewable electricity resource is located, noting that the site has been identified as an exceptional wind resource;
 - Being able to connect to the electricity networks and nearby to electricity demand, noting that the Project site is located in close proximity to the INV-ROX-B 220kV National Grid transmission line, and Southland has been identified as a net importer of electricity;
 - Having sufficient land available to support all associated REG activities in that location, of which HHWFLP is securing relevant agreements with the landowners to enable the development of the Project;
- > The Project is a partnership with Hokonui Rūnanga and will be developed in consultation with Rūnanga to ensure cultural values associated with the site are appropriately addressed;⁴⁷ and
- > The effects associated with the Project will be managed in accordance with the relevant policy direction, based on the advice of the technical reports that have been commissioned by HHWFLP to assess the effects of the Project, including avoiding, remedying or mitigating effects of the Project, and where residual adverse effects remain, offsetting and compensating for these.⁴⁸

The Project is therefore consistent with, and supported by, the relevant provisions of the NPS-REG.

3.9.1.2 National Policy Statement for Electricity Networks 2008 (“NPS-EN”)

The NPS-EN amended the National Policy Statement for Electricity Transmission 2008 in December 2025 and sets out the relevant provisions for the management of the electricity network. Electricity network (“**EN**”) includes the electricity transmission network (“**ETN**”), which refers to the National Grid.

⁴⁵ Policy B, NPS-REG.

⁴⁶ Policy C, NPS-REG.

⁴⁷ Policy E, NPS-REG.

⁴⁸ Policy F, NPS-REG.



Of relevance to the Project, the proposed upgrades to the existing National Grid transmission line, and the construction and operation of the part of the new switching station that will be connected to the INV-ROX-B transmission line (which will be owned and operated by Transpower) meet the definition of electricity transmission network. As such, the NPS-EN is applicable to these aspects of the Project.

The objective of the NPS-EN is as follows:

The national significance of the electricity network is recognised, protected and provided for, so that the network:

- a) is upgraded, improved and resilient to provide for the social, economic and cultural wellbeing of present and future generations and their health and safety;*
- b) is developed and operated in a timely, efficient and ongoing manner while managing adverse effects from or on the EN; and*
- c) supports achievement of New Zealand's climate change mitigation and renewable energy targets.*

In accordance with the relevant policies that give effect to this objective, the proposed Project activities relevant to the EN will:

- > Recognise and provide for the national significance of the EN and ensure the Project is compatible with its continued operation;⁴⁹
- > Enable the development of the Hokonui Wind Farm and the continued efficient operation of the EN, which will contribute to a number of benefits, including providing for the social, economic and cultural wellbeing of people and communities, providing services essential to support human life and the growth, development and functioning of New Zealand, and providing for the efficient storage and transfer of electricity;⁵⁰
- > Be designed in consultation with mana whenua to ensure cultural values are appropriately recognised and provided for;⁵¹
- > Be designed in consultation with Transpower to ensure the most appropriate site, route and method is selected;⁵²

⁴⁹ Policy 1, NPS-EN.

⁵⁰ Policy 2, NPS-EN.

⁵¹ Policy 3, NPS-EN.

⁵² Policy 4, NPS-EN.



- > Seek to avoid adverse effects on outstanding natural features and landscapes, areas of high natural character, and areas of high recreation value and amenity;⁵³
- > Have an operational and functional need to be located at these sites, given the location of the existing National Grid transmission lines, which will further enable the effective and efficient operation of the EN and enable the Hokonui Wind Farm to connect to the EN;⁵⁴ and
- > Ensure any potential environmental effects associated with the proposed activities are appropriately managed.⁵⁵

The proposed activities will therefore be consistent with the NPS-EN.

3.9.1.3 National Policy Statement for Freshwater Management 2020 (“NPS-FM”)

The NPS-FM sets out objectives and policies that direct local authorities to manage water in an integrated and sustainable way, while providing for economic growth within set water quantity and quality limits. The NPS-FM came into force on 3 September 2020 and was most recently amended in December 2025.

The objective of the NPS-FM is:

‘...to ensure that natural and physical resources are managed in a way that prioritises:

- a) first, the health and well-being of water bodies and freshwater ecosystems*
- b) second, the health needs of people (such as drinking water)*
- c) third, the ability of people and communities to provide for their social, economic, and cultural well-being, now and in the future.’*

In accordance with the policies that give effect to this objective, the Project will:

- > Ensure the health and wellbeing of waterbodies and freshwater ecosystems is prioritised through the implementation of best practice construction management measures, including the implementation of erosion and sediment control measures and any required associated water quality monitoring;⁵⁶

⁵³ Policy 6, NPS-EN.

⁵⁴ Policy 7, NPS-EN.

⁵⁵ Policy 8, NPS-EN.

⁵⁶ Policy 1, NPS-FM.



- > Be developed alongside mana whenua to ensure cultural values associated with the freshwater bodies within the Project site are appropriately identified and provided for;⁵⁷
- > Manage freshwater in an integrated way that considers the effects of the use and development of land on a whole-of-catchment basis, including the effects on receiving environments;⁵⁸
- > Generate a significant amount of renewable electricity, which will subsequently support New Zealand's response to climate change;⁵⁹
- > Be located within the Maitai Freshwater Management Unit ("FMU") and therefore any project activities, such as the proposed water take, will be managed in accordance with the relevant provisions relating to this FMU;⁶⁰
- > Manage any impacts of the Project in accordance with the policy direction provided in the NPS-FM, including clause 3.22(1)(b), which provides specific direction for specified infrastructure, of which the Hokonui Wind Farm meets the definition of. This will include applying the effects management hierarchy to manage the effects of the Project on wetlands. HHWFLP will avoid the impact of the Project footprint on wetlands to the greatest extent practicable, primarily through the re-design of the Project layout, and where it is not possible to avoid wetlands, effects will be appropriately remedied, mitigated, offset and compensated for;⁶¹
- > Apply the effects management hierarchy to manage the effects of any new or upgraded stream crossings required to enable the transport of wind turbine components and other infrastructure within the Project site, including effects on stream extent and values. This will involve appropriately offsetting any loss of stream extent in accordance with the direction provided in Policy 7 and clause 3.24 of the NPS-FM;
- > Ensure the appropriate management measures are in place, such as erosion and sediment controls, to protect the habitats of indigenous vegetation.⁶² Further, the stream crossings will be designed to provide for fish passage in accordance with the New Zealand Fish Passage Guidelines.⁶³ HHWFLP is seeking approval for a complex freshwater fisheries activity as part of this application to impede passage of exotic fish

⁵⁷ Policy 2, NPS-FM.

⁵⁸ Policy 3, NPS-FM.

⁵⁹ Policy 4, NPS-FM.

⁶⁰ Policy 5, NPS-FM.

⁶¹ Policy 6, NPS-FM.

⁶² Policy 9, NPS-FM.

⁶³ Policy 10, NPS-FM.

at certain identified proposed culvert stream crossings to protect the upstream indigenous fish populations. This is also consistent with the policy direction of clause 3.26 of the NPS-FM;

- > Ensure freshwater is used efficiently during construction and the proposed water take is not located in a catchment that has been identified as over-allocated;⁶⁴
- > Implement water quality monitoring during construction to ensure there is no degradation to the freshwater bodies within the Project site;⁶⁵ and
- > Provide for the social, economic and cultural wellbeing of both the Southland region and New Zealand through the generation of a significant new source of renewable electricity and the associated economic benefits that will be derived from this Project.⁶⁶

Given the above, the Project will be consistent with the policy direction of the NPS-FM.

3.9.1.4 National Policy Statement for Highly Productive Land (“NPS-HPL”)

The NPS-HPL provides protection of highly productive land from inappropriate subdivision, use and development and to ensure its availability for food and fibre production. The NPS-HPL came into force in 2022 and was most recently amended in December 2025.

Part of the Project footprint may encroach on land identified as Class 3 soil; therefore, the provisions of the NPS-HPL are applicable to the Project.

The objective of the NPS-HPL is as follows:

‘Highly productive land is protected for use in land-based primary production, both now and for future generations.’

The policies relevant to the Project seek to:

- > Recognise highly productive land as a resource with finite characteristics and long-term values for land-based primary production;⁶⁷
- > Prioritise and support the use of highly productive land for land-based production;⁶⁸
- > Protect highly productive land from inappropriate use and development;⁶⁹ and

⁶⁴ Policy 11, NPS-FM.

⁶⁵ Policy 13, NPS-FM.

⁶⁶ Policy 15, NPS-FM.

⁶⁷ Policy 1, NPS-HPL.

⁶⁸ Policy 4, NPS-HPL.

⁶⁹ Policy 8, NPS-HPL.



- > Manage reverse sensitivity effects so as not to constrain land-based primary production activities on highly productive land.⁷⁰

HHWFLP will seek to avoid the impact of the Project footprint on highly productive land to the greatest extent possible. However, it may not be possible to completely avoid Class 3 land within the Project site. Clause 3.9(2)(j)(i) of the NPS-HPL provides an exception for the use or development of highly productive land for the development, operation or decommissioning of specified infrastructure (of which the Project meets the definition of, as discussed above) where there is a functional or operational need to be in that location. Therefore, in accordance with this policy direction, in the event the Project encroaches onto highly productive land, HHWFLP will ensure there is a functional and operational need for the infrastructure to be sited in this particular location. The Project will therefore be designed to be consistent with the NPS-HPL.

3.9.1.5 National Policy Statement for Indigenous Biodiversity (“NPS-IB”)

The proposed Hokonui Wind Farm is a renewable electricity generation asset and activity, and as such, the NPS-IB does not apply to any parts of this activity, including construction. Therefore, the objectives and policies of the NPS-IB do not apply to the Hokonui Wind Farm Project and the proposed activity does not need to be assessed against the provisions of the NPS-IB.⁷¹

3.9.1.6 National Policy Statement for Natural Hazards 2025 (“NPS-NH”)

Clause 1.3(2) of the NPS-NH states that the NPS-NH applies to all activities managed under the RMA, except for infrastructure as defined in the RMA, of which the Project meets the definition of, being a facility for the generation of electricity.⁷² Therefore, the NPS-NH does not apply to the Project and the Project does not need to be assessed against the provisions of the NPS-NH.

3.9.1.7 Resource Management (National Environmental Standards for Freshwater) Regulations 2020 (“NES-FW”)

The NES-FW regulates activities that pose risks to the health of freshwater and freshwater ecosystems. As noted above, the Project will be seeking approvals under the NES-FW for

⁷⁰ Policy 9, NPS-HPL.

⁷¹ Clause 1.3, NPS-IB.

⁷² Section 2, RMA.

activities relating to earthworks activities that may affect natural wetlands and the construction of culverts.

The NES-FW specifies rules relating to the construction of specified infrastructure (of which the Project meets the definition of) where they may impact wetlands. These state that a resource consent must not be granted under these relevant regulations of the NES-FW unless the consent authority has first:⁷³

- > Satisfied itself that the specified infrastructure will provide significant national or regional benefits; and
- > Satisfied itself that there is a functional need for the specified infrastructure in that location; and
- > Applied the effects management hierarchy.

As discussed in relation to the NPS-FM and NPS-REG above, the Project meets the above criteria and is therefore consistent with the requirements of the NES-FW.

3.9.1.8 Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2009 (“NES-ETA”)

As noted previously, it is anticipated the NES-ETA will be applicable to the proposed activities relating to the upgrade of the existing National Grid transmission line. These activities will be designed in consultation with Transpower and the effects associated with the proposed activities will be appropriately managed.

3.9.1.9 Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (“NES-CS”)

The NES-CS outlines the standards relating to the disturbance of soil at sites that are potentially contaminated. The site is not located on land that is identified as contaminated on Environment Southland’s contaminated register. HHWFLP has commissioned a report for the substantive application for the Project to confirm that no activities listed on the Hazardous Activities and Industries List (“**HAIL**”) have occurred on the Project site and that the NES-CS does not apply to the Project.

⁷³ Regulation 45(6) of the National Environmental Standards for Freshwater.



3.9.1.10 Resource Management (National Environmental Standards for Air Quality) Regulations 2004 (“NES-AQ”)

The NES-AQ came into effect on 1 June 2011 and contains standards which set a guaranteed minimum level of health protection for people living in New Zealand, particularly in relation to discharges within urban airsheds. No resource consent for the Project is required under these regulations, however, HHWFLP will ensure that the management of dust and other discharges of airborne particulates associated with the construction of the Hokonui Wind Farm are appropriately managed.

3.9.2 Approvals relating to Conservation Act 1987, Reserves Act 1977, Wildlife Act 1953 and National Parks Act 1980

3.9.2.1 Concessions

The application involves approvals for concessions under the Conservation Act 1987; however, these do not include a lease.

3.9.2.2 Land Exchanges

Does the application include a land exchange?

As outlined in Section 3.2.2 of this report, HHWFLP is considering seeking approval for a land exchange as part of the Project. This will involve the exchange of approximately 11.67ha of privately owned land with 22.02ha of land identified as public conservation land, administered by DoC, located at the southern border of the Project area.

An initial request for the proposed land exchange was made by the landowner, Fairfield Trustees Limited, approximately 20 years ago and was verbally agreed with DoC at the time, however, was never formally recognised. A request was subsequently made by the landowner in 2023; however, this process was not completed due to competing priorities at DoC at the time. Therefore, HHWFLP is seeking to include this land exchange as part of this application to formalise this agreement and to enable the development part of the Project within this area.

The land exchange is primarily administrative and is sought to align the boundaries of the land parcels with the historic and existing activities that occur on the land, including the fenceline that currently separates the privately owned farmland from the adjacent conservation land. The land-use of the land that is proposed to be acquired by DoC is mānuka and gorse regenerating indigenous scrub and reflects the ecological values of the adjacent Hokonui Forest Conservation Area, while the land that is currently DoC land which



is proposed to be exchanged is currently extensive-grazing pastoral farmland. The land exchange will therefore result in improved conservation outcomes.

A description of both land areas proposed for exchange (for example, maps showing areas and location, addresses and legal descriptions where possible):

The areas of land that are proposed to be exchanged are identified in **Figure 10** above and can be viewed in **Figure 11** below. The land parcel that is outlined in **Figure 11** is currently privately owned. The boundary of the area that is located within the fenceline of the Hokonui Forest Conservation Area can visibly be seen on the aerial imagery, and further in **Figure 12** below, being the densely vegetated area that currently encroaches within the boundary of the privately owned land. The area that is within the boundary of the conservation area can also be seen where the pastoral farmland extends beyond the southern boundary of the highlighted land parcel.



Figure 11: Aerial view of the proposed land exchange areas, with the boundary of the privately owned land outlined.



Figure 12: Looking in a south-west direction across the fenced off land owned by Fairfield Trustees Limited (source: e3scientific).

The area currently identified as public conservation land (the purple area in **Figure 9**) is located within the land parcel legally described as Sec 422 Forest Hill Hd, Pt Sec 625 Forest Hill Hd, Pt Sec 625 Forest Hill Hd. The address for this area is 1200 Bushy Park Road, Waimumu.

The area that is owned by Fairfield Trustees Limited (the green area in **Figure 9**) is located within the land parcel legally described as Lot 1 Deposited Plan 2523. The address for this area is 300 Retreat Road, Hokonui Hills.

The financial value of the land proposed to be acquired by the Crown:

The financial value of the land proposed to be acquired by the Crown is estimated to be approximately \$61,787.⁷⁴

⁷⁴ Note that this is an estimate based on the current value of the land and HHWFLP will engage a property valuer to confirm the financial value of the land that is proposed to be exchanged to support the land exchange application.

A brief description of the conservation values of both pieces of land, including an explanation of why the exchange would benefit the conservation estate and details of anything registered or noted for conservation purposes on the record of title for the land to be acquired by the Crown:

The conservation values of both pieces of land that will be the subject of the land exchange are described below, and the ecological values are discussed further in the report prepared by e3scientific, included as **Appendix L** to this application. More fulsome technical assessments will be completed to assess the conservation values (including biodiversity, freshwater, recreational, cultural and heritage values) of the land subject to the land exchange for the land exchange application that will be made.

Public conservation land proposed to be acquired by Fairfield Trustees Limited

The land that is currently identified as public conservation land has limited conservation values. This is because there is an existing fenceline which separates this land from the adjoining public conservation land and this area is therefore currently managed by the neighbouring landholder and is grazed pastoral farmland. As such, there are no existing recreational values associated with this land as there is no public access to this area. Furthermore, no cultural or historical features have been identified in this area.

The e3Scientific report notes that the majority of this land is exotic pastoral grassland, however, copper tussock grassland, shrubland and wetlands are also present.

There is no Record of Title for this land parcel, however, Part sec 625 has Gazette Notices 1982 pg 3013 and 1984 pg 14 Dunsdale Ecological Area against it and Part sec 422 has Gazette Notice 1984 pg 14 and 1972 pg 124 Dunsdale Ecological Area against it. It is noted that the Dunsdale Ecological Area is not located within the areas that are the subject of the land exchange application.

Private land proposed to be acquired by DoC

This privately owned land that is proposed to be acquired by DoC has higher conservation values. This is because the land is currently contiguous with the Hokonui Forest Conservation Area, located on the side of the fence within it. Therefore, this area is not currently farmed and has been left to naturally regenerate. As such, it is essentially already part of the Hokonui Forest Conservation Area. The area has higher ecological values, being covered in a closed canopy shrubland dominated by dense gorse with emergent shrubs, indigenous shrubland and a wetland. The area also has higher recreational values as it can be accessed by the public and is not currently fenced off. There are no known cultural or historic features within this area.



The land proposed to be acquired by DoC is also consistent with the wider Hokonui Forest Conservation Area which consists of rolling to steep terrain. Vegetation cover is primarily podocarp forest and tussock land. The area is used recreationally by hunters, with the animals that are present including red deer, fallow deer and pigs. The hunting area is covered by an open area permit.

The Record of Title is included as **Appendix A** and does not contain anything for conservation purposes.

In light of the above, the proposed land exchange will benefit the conservation estate because it will ensure the land parcel boundaries align with the boundary of the fenceline and historical and existing uses of the land, in particular noting that the land that is proposed to be acquired by DoC has higher conservation values and the current land use of this area is consistent with the land use of the adjacent Hokonui Forest Conservation Area. The public conservation land has comparatively limited conservation values and is currently utilised for pastoral farming activities. e3scientific considers the ecological trajectory of the land proposed to be acquired by DoC will result in a positive ecological outcome that will support a successional process leading to significant biodiversity gains that cannot be achieved on the land parcel within the public conservation land.

Given the context outlined above, the proposed land exchange is appropriate and will result in positive conversation outcomes.

If the land exchange would trigger a right of first refusal or a right of offer or return, provide evidence that the applicant has written agreement from the holder of the right of first refusal or right of offer or return to waive that right for the purpose of the land exchange.

HHWFLP has confirmed with DoC that the land exchange will not trigger a right of first refusal, noting that, the relevant Treaty Settlement Act, being the Ngāi Tahu Claims Settlement Act 1998, sets out exemptions from the rights of first refusal in Section 50 of the Act. A fast-track exchange of the subject land is therefore considered exempt from any rights of first refusal in accordance with Section 50(g).

Provide sufficient detail in respect of both land areas to confirm that no part of any land to be exchanged by the Crown is land listed in Schedule 4 or a reserve declared to be a national reserve under section 13 of the Reserves Act 1977.

As noted above, the conservation land subject to the land exchange application is located with the Hokonui Forest Conservation Area. The land owned that is proposed to be acquired by DoC is privately owned land that is not conservation land.



An assessment of the conservation land against the land listed in Schedule 4 of the FTAA on which non-mining activities are ineligible is provided below:

- > Hokonui Forest Conservation Area is not located within any national park (within the meaning of section 2 of the National Parks Act 1980);
- > Hokonui Forest Conservation Area is not located within any reserve classified as a nature reserve under section 20 of the Reserves Act 1977;
- > Hokonui Forest Conservation Area is not located within any reserve classified as a scientific reserve under section 21 of the Reserves Act 1977;
- > Hokonui Forest Conservation Area is not located in any part of a reserve set apart as a wilderness area under section 47(1) of the Reserves Act 1977;
- > Hokonui Forest Conservation Area is not located in any conservation area declared under section 18AA or 18(1) of the Conservation Act 1987 as:
 - A wilderness area; or
 - A sanctuary area.
- > Hokonui Forest Conservation Area is not located in any area declared a wildlife sanctuary under section 9(1) of the Wildlife Act 1953;
- > Hokonui Forest Conservation Area is not located in any area declared a marine reserve under section 4(1) of the Marine Reserves Act 1971;
- > Hokonui Forest Conservation Area is not located in any land within a wetland and notified to the Ramsar Secretariat by the Minister for the time being responsible for the Ramsar Administrative Authority (as the terms Ramsar Secretariat and Ramsar Administrative Authority are defined in section 2(1) of the Conservation Act 1987);
- > Hokonui Forest Conservation Area is not located within the area described in the Otahu Dedicated Area Notice 1976 (*Gazette* 1976, p 654);
- > Hokonui Forest Conservation Area is not located in within the area described in the Parakawai Geological Area Notice 1980 (*Gazette* 1980, p 2408);
- > Hokonui Forest Conservation Area is not located within any land:
 - Held, managed, or administered under the Conservation Act 1987, or under any enactment set out in Schedule 1 of that Act, as at 1 October 1991; and
 - Situated on any island in the area bounded by latitude 35°50'S and latitude 37°10'S, and longitude 177°E and longitude 174°35'E, other than the following islands in the Mercury Islands group:



- Red Mercury Island (Whakau);
- Ātiu or Middle Island;
- Green Island;
- Korapuki Island.

- > Hokonui Forest Conservation Area is not located within the following scenic reserves:
 - Kaikoura Island Scenic Reserve in Auckland City (*Gazette* 2004, p 3688);
 - Rakitu Island Scenic Reserve (*Gazette* 1995, p 4265).

Further, the Hokonui Forest Conservation Area has not been declared a reserve under section 13 of the Reserves Act.

Given the above, both of the proposed areas are eligible for a land exchange under the FTAA.

3.9.3 Approvals relating to Complex Freshwater Fisheries activities

3.9.3.1 Whether an in-stream structure is proposed (including formal notification of any dam or diversion structure), and a description of the extent to which this may impede fish passage

The Project will involve constructing new culverts and upgrading existing ones to enable the transport of wind turbine components within the Project site. Some of these existing culverts have been identified as impeding the passage of exotic fish, thereby protecting upstream indigenous fish populations. It is therefore considered that it may be beneficial to maintain this restricted passage for exotic fish, while these proposed crossings are upgraded. As such, approval will be sought for a complex freshwater fisheries activity as part of the application.

3.9.3.2 Whether any fish salvage activities or other complex freshwater fisheries activities are proposed

No other fish salvage activities or complex freshwater fisheries activities are proposed.