

Our Reference: RM25.091

31 October 2025

Email: Ryan Piddington [REDACTED]

Dear Ryan

Mahinerangi Wind Farm Project - Fast Track Application

Section 30(3)(b) Notice under Fast-track Approvals Act 2024

Thank you for your letter dated 10 October 2025 providing notice under section 30(2) of the Fast-track Approvals Act 2024 (FTAA) that Tararua Wind Power Limited will be seeking an approval described in section 42(4)(a) of the FTAA for the Mahinerangi Wind Farm Project.

From your notice we understand that the application will apply to the following areas:

- Section 1-2 Survey Office Plan 21146 and Section 1 Survey Office Plan 21147 and Section 1 Survey Office Plan 21148 and Section 1 Survey Office Plan 21149 and Section 1 Survey Office Plan 21150 and Section 16-18 Survey Office Plan 21165 and Section 19 Survey Office Plan 21164 and Section 1 Survey Office Plan 439629 (667530)
- Section 3 Block X Lee Stream Survey District (OT12C/797)
- Section 1-8 Survey Office Plan 23490 (OT13D/952)
- Section 5 Block X Lee Stream Survey District (OT14C/331)
- Section 1 Block X Lee Stream Survey District and Part Run 186B (OT14C/1133)

In accordance with s30(3)(b) of the FTA we advise that there are no existing resource consents to which section 124C(1)(c) or 165ZI of the Resource Management Act 1991 would apply if the approval were to be applied for as a resource consent under that Act on the area listed above.

In reaching this position, Council has relied on the following information, provided by Tararua Wind Power Limited:

- Civil Engineering Assessment – Puke Kapo Hau Mahinerangi Wind Farm Stage 2, Otago (Report reference 240034-D) prepared by Riley Consultants Ltd dated 15 October 2025; and
- Email from Ryan Piddington, Strategic Consents Manager for Mercury NZ limited dated 30 October 2025 (including attachments).

Council notes that the surface water resource within the Taieri River Catchment, in which the activity is proposed, is fully allocated. Any consent granted to take and use surface water as primary allocation from these catchments could not be fully exercised until the expiry of existing resource consents that utilise the surface water resource.

However, Tararua Wind Power Limited has confirmed that no surface water is proposed to be taken and used, and that any groundwater taken would be taken on a non-consumptive basis. Therefore, any such groundwater would not be allocated as surface water under Policy 6.4.1A of the Regional Plan Water. Consequently, no primary allocation is required. Hence, if the consents sought were to be granted, they could be fully exercised without reliance on the expiration of any existing surface water permit.

If you have any queries or require clarification on the information provided, please contact me on 0800 474 082 or by emailing consent.fasttrack@orc.govt.nz.

Yours sincerely



Mat Bell

Acting Manager Consents

31 October 2025



orc.govt.nz



0800 474 082

Private Bag 1954, Dunedin 9054



CLUTHA DISTRICT COUNCIL

Address all correspondence to:
The Chief Executive

22 October 2025

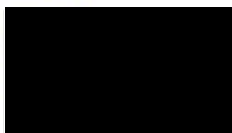
Mercury
C/ - Ryan Piddington
Millenium Centre,
602 Great South Road,
Ellerslie 1051

Dear Ryan

Re: Request to provide confirmation under Section 30(3) of the Fast Track Approval's Act 2024

In accordance with Section 30(3) of the Fast Track Approval's Act 2024, Clutha District Council confirms by written notice to Mercury that there are no existing Resource Consents to which Sections 124C(1)(c) or 165ZI of the Resource Management Act 1991, would apply if approval for the project were to be applied for as a Resource Consent under the RMA.

If you have any further questions, please contact me.



Olivia Restieaux
Acting Regulatory Group Manager
Clutha District Council

From: Fast-Track Info <info@fasttrack.govt.nz>

Sent: Tuesday, 7 October 2025 10:02 am

To: Ryan Piddington <[REDACTED]>

Subject: Fw: Mahinerangi Wind Farm - Stage 2. Mercury Schedule 2 Substantive Application

▪

Kia ora,

Thank you for getting in touch regarding a pre-lodgement discussion.

Before we schedule a meeting, we wanted to share some key information to help you determine whether a discussion would be beneficial at this stage:

1. Purpose of Pre-lodgement Meetings

Please note that we are unable to provide feedback on the content of your application. However, we can offer general guidance on the process and answer questions about next steps.

If, after reviewing the below, you feel a meeting would still be helpful, please let us know your availability and we'll arrange for someone to meet with you to talk through the process.

2. Portal Access

To lodge your application, you'll need access to the Fast-track portal. Please provide a list of names for those who require access.

One person will need to be designated as responsible for lodging the application. Our admin team will send out invites to set up portal access.

3. Cost Recovery

Applications under the Fast-track Approvals process are subject to cost recovery. You'll find full details in our Cost Recovery Policy on the Fast-track website - [Fees, charges and cost recovery](#).

In summary:

- A levy is payable upon lodgement. This is non-refundable.
- An application fee is also required. This is an initial deposit used to cover costs incurred during the application process.
- If the full deposit is utilised, we will request a further deposit to cover additional costs.

4. Indicative Lodgement Date

It's helpful for us to have a rough idea of your intended lodgement timeframe. If you're able to provide indicative dates or dates closer to the time of lodgement if the date you have provided changes, this will assist us with internal resourcing and planning.

5. Application Form and Guidance

The application form is available on our Fast-track website - [Substantive application for resource consents and other approvals](#). We recommend using this form to guide your submission and ensure it meets completeness requirements.

The website also contains a range of resources to help you understand the process and prepare your application - some key links have been included below.

[Process overview](#)

[Substantive application for resource consents and other approvals](#)

[Fees, charges and cost recovery](#)

[Projects](#)

Ngā mihi,

Mehwish Imam

Application Administrator



Fast-track

Fast-track is administered by the Environmental Protection Authority. The EPA's New Zealand Business Number is 9429041901977.

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From: ContactFastTrack <contact@fasttrack.govt.nz>

Sent: 01 October 2025 09:12

To: Fast-Track Info <info@fasttrack.govt.nz>

Subject: Fw: Mahinerangi Wind Farm - Stage 2. Mercury Schedule 2 Substantive Application

Please see request below for a pre-lodgement consultation.

Ngā mihi,

Monika

Customer Insight Advisor

0800 FASTRK (0800 327875)

Fast-track

Fast-track is administered by the Environmental Protection Authority. The EPA's New Zealand Business Number is 9429041901977.

This email message and any attachment(s) are intended for the addressee(s) only. If you receive this message in error, please notify the sender and delete the message and any attachments.

From: Ryan Piddington <[REDACTED]>
Sent: 30 September 2025 5:20 PM
To: ContactFastTrack <contact@fasttrack.govt.nz>
Cc: Sarah Edwards <[REDACTED].nz>
Subject: Mahinerangi Wind Farm - Stage 2. Mercury Schedule 2 Substantive Application

Kia ora,

Mercury has the Mahinerangi Wind Farm Stage 2 project listed within Schedule 2 of the Fast-track Approvals Act 2025.

We are finalising the application and looking to lodge the substantive application mid-October.

We are now seeking a pre lodgement consultation session with the EPA to provide a summary of the project and application, and work through any relevant matters.

I have attached a summary of the project for your information.

I look forward to hearing from you as to whether you can accommodate our pre lodgement consultation request and if so, what information you would like to receive prior to or at that session.

Ngā mihi

Nā Ryan

RYAN PIDDINGTON
STRATEGIC CONSENTS MANAGER

MERCURY.CO.NZ

[REDACTED]

[REDACTED]

108 Durham Street, Tauranga, 3110



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From: [Admin Agency FTAA](#)
To: [Ryan Piddington](#)
Cc: [Sarah Edwards](#)
Subject: RE: Mahinerangi Wind Farm Schedule 2 Substantive Application under Fast Track Approvals Act - Substantive Application Consultation
Date: Friday, 15 August 2025 2:38:31 pm
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.jpg](#)
[image007.png](#)
[image008.png](#)
[image009.jpg](#)
[Section 29 response letter - Mahinerangi Wind Farm.pdf](#)

Kia ora,


Thank you for your email.





Please find attached our response to your request for consultation with the Ministry for the Environment as the administrating agency of the Resource Management Act 1991 in accordance with is required with section 11(1)(e) of the Fast-track Approvals Act 2024.


Ngā mihi,


System Oversight Team



Ministry for the Environment | Manatū Mō Te Taiao
Administering Agency under the Fast Track Approvlas Act 2024
AdminAgencyFTAA@mfe.govt.nz[|environment.govt.nz](http://environment.govt.nz)







A blue background with white text  AI-generated content may be incorrect.

From: Ryan Piddington < >
Sent: Friday, 15 August 2025 2:21 pm
To: Admin Agency FTAA <AdminAgencyFTAA@mfe.govt.nz>
Cc: 
Subject: RE: Mahinerangi Wind Farm Schedule 2 Substantive Application under Fast Track Approvals Act - Substantive Application Consultation



MFE CYBER SECURITY WARNING

This email originated from outside our organisation. Please take extra care when clicking on any links or opening any attachments.

Kia ora,

Following on from the below email please find attached Mercury's pre-lodgement consultation information regarding our Schedule 2 listed project, Mahinerangi Wind Farm Stage 2.

The attached document provides a high-level description of the project, information concerning the positive and other environmental effects, and measures to address these. We have also included some details of project matters as they relate to matters of national importance or matters addressed in national direction under the RMA.

As noted in the attached, we are happy to meet with you to work through the attached and answer any questions you might have.

If you could respond confirming receipt of this information and whether you are able to provide feedback no later than 29 August.

Ngā mihi

Nā Ryan

RYAN PIDDINGTON

STRATEGIC CONSENTS MANAGER

[REDACTED]

Classification: General

From: Admin Agency FTAA <AdminAgencyFTAA@mfe.govt.nz>

Sent: Monday, 9 June 2025 1:21 pm

To: Ryan Piddington [REDACTED]

Cc: [REDACTED]

Subject: RE: Mahinerangi Wind Farm Schedule 2 Substantive Application under Fast Track Approvals Act - Substantive Application Consultation

Kia ora

Thank you for your email. Your request has been passed on to us

When engaging with MfE prior to lodgement

Your request should include:

- a description of the proposal which is sufficient to understand its scale and location and the likely significance of both its positive and adverse effects, particularly as these relate to matters of national importance or matters addressed in national direction under the RMA.

This could include a draft cover document to the application if it is more convenient to provide

this than drafting a new document specifically for this engagement. However, you do not need to include a complete draft application.

- the relevant section of the FTA Act that you are consulting under
- when you need a response by. Please allow at least **5 working days**.

Once provided we can prepare a formal response.

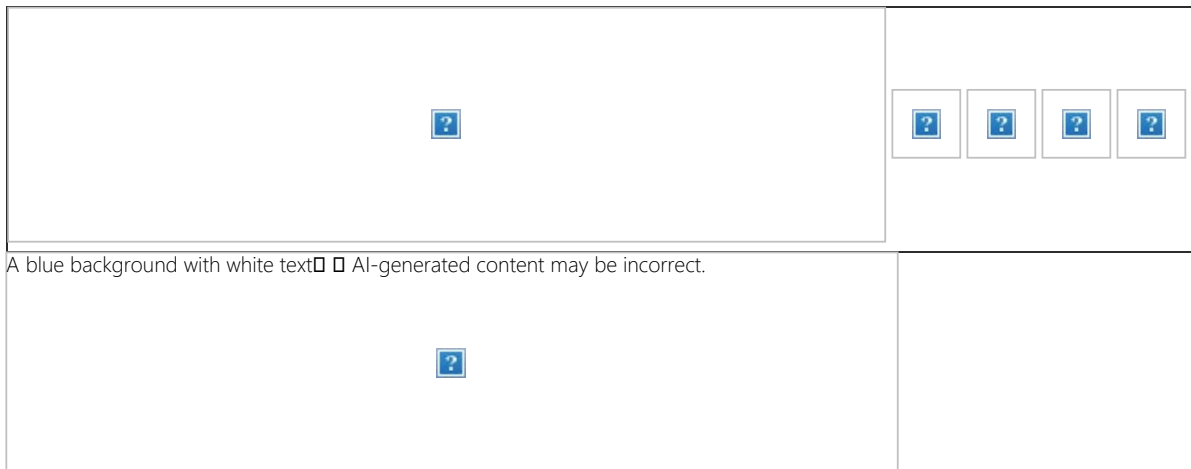
Ngā mihi,

System Oversight Team

Ministry for the Environment | Manatū Mō Te Taiao

Administering Agency under the Fast Track Approvals Act 2024

AdminAgencyFTAA@mfe.govt.nz | environment.govt.nz



Classification: General

From: Ryan Piddington [REDACTED]
Sent: Friday, 6 June 2025 3:30 pm
To: Info at MfE <info@mfe.govt.nz>
Cc: Admin Agency FTAA <AdminAgencyFTAA@mfe.govt.nz>; Sarah Edwards [REDACTED]

Subject: Mahinerangi Wind Farm Schedule 2 Substantive Application under Fast Track Approvals Act - Substantive Application Consultation

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Kia ora,

As you may be aware Mercury (under Tararua Wind Power Limited) has the Mahinerangi Wind Farm listed in Schedule 2 of the FTAA. We are looking to lodge our substantive application with the EPA at the end of July and are reaching out as part of our on our pre-lodgement consultation.

Please confirm what information would like to see pre-lodgement and any specific information you would like to see considered within the substantive application.

Ngā mihi

Nā Ryan

RYAN PIDDINGTON

STRATEGIC CONSENTS MANAGER

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108 Durham Street, Tauranga, 3110



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Classification: General

Tēnā koe Ryan,

Mahinerangi Wind Farm – Pre-lodgement consultation under the Fast-track Approvals Act 2024 (FTAA)

Thank you for your correspondence dated 15 August 2025 in relation to Mercury’s intention to lodge a substantive application for a listed project under the Fast-track Approvals Act 2024 (FTAA) in respect of the Mahinerangi Wind Farm project.

As you are aware, the Ministry for the Environment (the Ministry) is the “relevant administering agency” for approvals relating to the Resource Management Act 1991 (RMA) and Exclusive Economic Zone and Continental Shelf (Environmental Effects) Act 2012 (EEZ Act) under the FTAA.

We have received the information you provided on 15 August 2025. As part of your substantive application, you will need to provide an assessment of the project against any relevant national policy statement, national environmental standards and if relevant the New Zealand Coastal Policy Statement. The Ministry has prepared the following summary on the national direction made under the RMA, for your consideration.

National Direction

Under the RMA, the government can create national direction to support local authorities’ decision making under the RMA and develop a nationally consistent approach to resource management issues. This is typically done where an issue is of national importance, or involves significant national benefits or costs, or where necessary to give effect to other government policy or regulation. There are several types of national direction, including national policy statements and national environmental standards.

National Policy Statements (NPS)

National Policy Statements are instruments issued under section 52(2) of the RMA. An NPS is a vehicle for the government to prescribe objectives and policies for matters which are relevant to sustainable management. All National Policy Statements currently in force are published on the Ministry’s website and links are provided in the table below. It is recommended that you consider the relevance of each NPS to your project. If you are seeking an RMA approval, then under section 13(4)(y)(i) and schedule 5 paragraph 2 of the FTAA your application must include an assessment of your project against any relevant NPSs. Refer to the National Policy Statements linked below.

National Policy Statement	Description
---------------------------	-------------

National Policy Statement for Greenhouse Gas Emissions from Industrial Process Heat 2023	This NPS provides nationally consistent policies and requirements for reducing greenhouse gas emissions from industries using process heat. It works alongside the National Environmental Standards for Greenhouse Gases from Industrial Process.
National Policy Statement for Highly Productive Land 2022	This NPS provides national direction to improve the way highly productive land is managed under the RMA. The objective is to ensure the availability of New Zealand's most favourable soils for food and fibre production.
National Policy Statement for Freshwater Management 2020	This NPS provides local authorities with updated national direction on how they should manage freshwater under the RMA.
National Policy Statement for Indigenous Biodiversity 2023	This NPS provides direction to local authorities to protect, maintain and restore indigenous biodiversity requiring at least no further reduction in indigenous biodiversity nationally.
National Policy Statement for Renewable Electricity Generation 2011	This NPS provides guidance for local authorities on how renewable electricity generation should be dealt with in RMA planning documents.
National Policy Statement on Electricity Transmission	This NPS sets out the objective and policies for managing the electricity transmission network.
National Policy Statement on Urban Development 2020	This NPS recognises the national significance of well-functioning urban environments. It removes barriers to development to allow growth in locations that have good access to existing services, public transport networks and infrastructure.
New Zealand Coastal Policy Statement 2010	The NZCPS provides guidance for local authorities in their day-to-day management of the coastal environment. The NZCPS is the only compulsory NPS under the RMA.

National Environmental Standards (NES)

National Environmental Standards are regulations issued under section 43 of the RMA. They prescribe technical and non-technical standards, methods or other requirements for land use and subdivision, use of the coastal marine area and beds of lakes and rivers, water take and use, discharges and noise. NESs require each local authority to enforce the same standard in respect of these areas unless otherwise specified. All National Policy Statements currently in force are published on the Ministry's website and links are provided in the table below. It is recommended that you consider the relevance of each NES to your project.

If you are seeking an RMA approval under the FTAA, section 13(4)(y)(i) and schedule 5 paragraph 2 require that an assessment of your project against any relevant NES must be included with your application. Refer to the National Environmental Standards linked below.

National Environmental Standard	Description
---------------------------------	-------------

National Environmental Standards for Air Quality	This NES prohibits discharges from certain activities and set a guaranteed minimum standard for air quality for people living in New Zealand.
National Environmental Standards for Commercial Forestry	This NES provides nationally consistent regulations to manage the environmental effects of forestry.
National Environmental Standards for Electricity Transmission Activities	This NES sets out which electricity transmission activities are permitted, subject to conditions to control environmental effects. They apply only to existing high voltage electricity transmission lines.
National Environmental Standards for Freshwater	This NES regulates activities that pose risks to the health of freshwater and freshwater ecosystems.
National Environmental Standards for Greenhouse Gas Emissions from Industrial Process Heat	This NES sets out nationally consistent rules for certain greenhouse gas emitting activities from industrial process heat.
National Environmental Standards for Marine Aquaculture	This NES replaces regional council rules for existing marine farms and provides a more certain and efficient process for replacing consents, realigning farms and changing farmed species. In some instances, they allow regional council rules to remain in force.
National Environmental Standards for Sources of Human Drinking Water	This NES sets requirements to protect sources of human drinking water from becoming contaminated.
National Environmental Standards for Storing Tyres Outdoors	This NES provides nationally consistent rules for the responsible storage of tyres.
National Environmental Standards for Telecommunication Facilities	This NES sets national rules regarding the deployment of telecommunications infrastructure across New Zealand.
National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health	This NES includes requirements for assessing and managing potentially contaminated soil.

Please ensure your application includes a summary of this consultation with the Ministry, and an explanation of how this consultation has informed your project. This information must be included in your application, regardless of whether it is a referral application or a substantive application for a listed project.

Thank you for consulting with the Ministry for the Environment as the relevant administering agency for the RMA and the EEZ Act.

If you have any queries in relation to the FTAA process, please contact info@fasttrack.govt.nz for further assistance.

Ngā mihi,



Acting General Manager, System Enablement and Oversight

From: [Admin Agency FTAA](#)
To: [Ryan Piddington](#)
Cc: [Sarah Edwards](#)
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Nā Ryan

RYAN PIDDINGTON

STRATEGIC CONSENTS MANAGER

[REDACTED]

Classification: General

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Sent: Monday, 9 June 2025 1:21 pm

To: Ryan Piddington [REDACTED]

Cc: [REDACTED]

Subject: RE: Mahinerangi Wind Farm Schedule 2 Substantive Application under Fast Track Approvals Act - Substantive Application Consultation

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- when you need a response by. Please allow at least **5 working days**.

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From: Ryan Piddington 
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Subject: Mahinerangi Wind Farm Schedule 2 Substantive Application under Fast Track Approvals Act - Substantive Application Consultation

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Ngā mihi

Nā Ryan

RYAN PIDDINGTON
STRATEGIC CONSENTS MANAGER

MERCURY.CO.NZ

[REDACTED]
[REDACTED]
108 Durham Street, Tauranga, 3110



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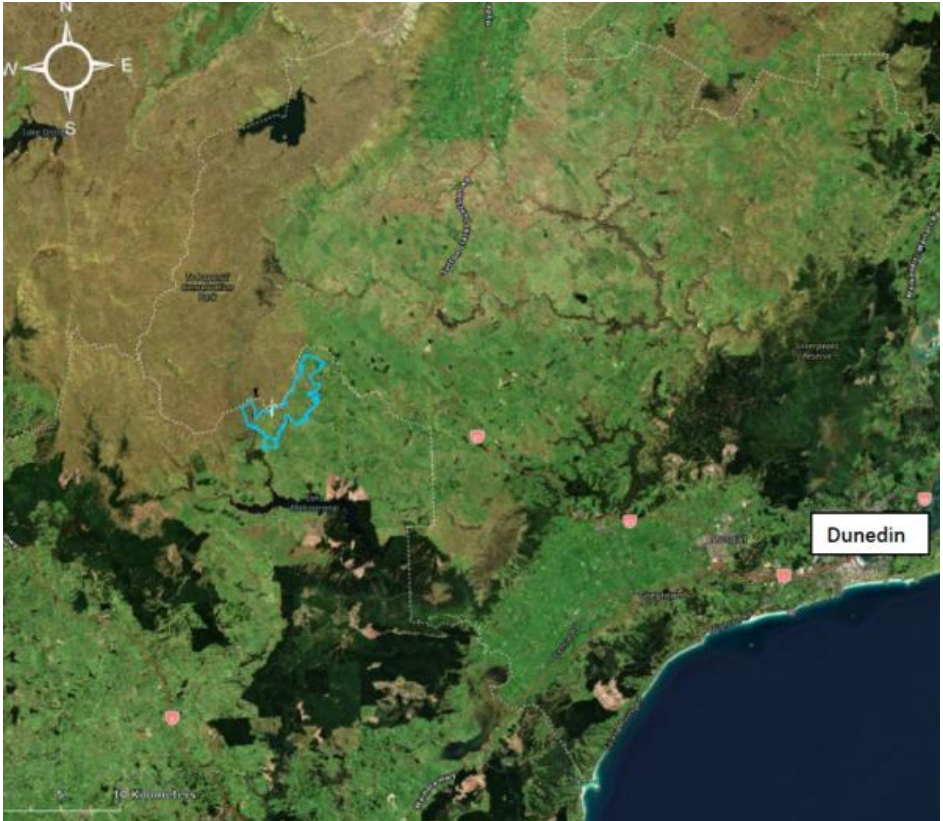
Classification: General

Fast-Track Pre-Lodgement Consultation Summary

Purpose - This document provides a summary of information from DOC following a pre-lodgement consultation request.

Project Details

Project name:	FT-00049 – Mahinerangi Wind Farm
Engagement type:	Substantive application pre-lodgement engagement
Applicant/agent:	Ryan Piddington, Mercury Energy
Proposal overview:	<p>Mercury Energy are progressing Stage 2 of the Mahinerangi Wind Farm (MWF) through a substantive application under the Fast-track Approvals Act 2024.</p> <p>Resource consents for the MWF were granted by the Environment Court in 2009. The MWF currently has 12 Vestas V90-3MW turbines, commissioned in 2011 (Stage 1).</p> <p>Stage 2 is proposed to be the final stage and will consist of 44 turbines. Changes to the number of turbines, and other changes associated with the windfarm layout, will require both variations to existing consent conditions and new resource consents to enable the full development of the wind farm.</p> <p>Stage 2 also includes a new transmission line, substation and a Battery Energy Storage System (BESS), which will require new consents.</p> <p>Also seeking a range of water and discharge permits and regional council land use consents required for the construction of Stage 2, including for installation of a new culvert (to replace an existing culvert) in a headwater tributary of Lee Stream. Assessment against complex freshwater fisheries approval requirements will be undertaken in the second</p> <p>Wildlife Approvals and an Archaeological Authority will also be sought.</p>

	<ol style="list-style-type: none"> 1. The Mahinerangi Wind Farm project proposes to expand its current operation by constructing additional wind turbines, 50 km west of Dunedin, Otago, to connect and supply electricity to the national grid. The Mahinerangi Wind Farm will increase the current approximate peak output by an additional 164 Megawatts. 2. The wind farm will comprise: <ol style="list-style-type: none"> a. the installation of up to 44 turbines b. the construction of an electricity substation/switchyard compound and permanent operations/maintenance facility within the project site c. the installation of new underground 33kV electrical and fiber optic cable network between the turbines d. the establishment of an internal access road network and earthworks, including the widening of existing local roads approaching the site from the State Highway e. the construction of an 8km 110kV transmission line from the wind farm site to Transpower's Halfway Bush-Roxburgh 110kV line, including connection infrastructure. 3. The project will require resource consents under the Resource Management Act 1991 (RMA), permits under the Wildlife Act 1953, and an archaeological authority under the Heritage New Zealand Pouhere Taonga Act 2014.
<p>Location:</p> <p>Located approximately 50km east of Dunedin near Lake Mahinerangi</p>	
<p>Date pre-lodgement request received:</p>	<p>21 February 2025</p>

Summary of pre-lodgement Consultation	
Fast track project lead DOC:	Mary McConnell – Senior Fast-track Advisor (Contractor)
DOC specialist input required:	<p>Fast-track Project Lead – Mary McConnell, Senior Advisor FTA</p> <p>Statutory Manager – Emma Burns</p> <p>Planner – Jane Macleod</p> <p>Legal – Matt Pemberton</p> <p>RMA Planner - Jane Macleod</p> <p>Heritage - Matt Schmidt</p> <p>Statutory Planning Team - Katherine Hughes</p> <p>Treaty Settlement Implications - Grace Masterton, Permissions Advisor</p> <p>Permissions Advisor(s) - Charlotte Grey</p> <p>Terrestrial flora/fauna – Rebecca Teale (E3 Scientific)/Richard Ewans/Daniel Jack</p> <p>Lizards – John Lyall</p>
DOC Permissions/ Approvals Identified by applicant in pre-lodgement request as potentially required:	<p>Authority under Wildlife Act 1953 - Monitoring approvals sought (banding/markings (Wildlife Regs), catch, liberate (Wildlife Act))</p> <p>DOC concessions may be sought (TBC)</p> <p>DOC has received and reviewed the following information relating to the application and the comments below have been based on this information and a site visit undertaken 23 July:</p> <ul style="list-style-type: none"> • Pre-lodgement fast track application consultation form • Draft Wetland Terrestrial Invertebrate Assessment – 27 June 2025 • Transport Effects Assessment – 4 June 2025 • Shadow Flicker and Blade Glint Assessment – 17 June 2025 • Noise Effects Assessment - 6 June 2025 • Landscape + Visual Assessment - 24 June 2025 • Economic Assessment - 16 May 2025 • Civil Engineering Assessment – 27 June 2025 • Assessment of the Effect of Proposed Variations of Consents on Avifauna with a focus on NZ falcon – 2 July 2025 • Archaeological Assessment - May 2025 • Ecological Assessment – Aquatic Ecology – 5 June 2025 • Native Bat Assessment - June 2025 • <i>Carex tenuiculmis</i> and <i>Epilobium chionanthum</i> Management Plan – 18 August 2025 • Rehabilitation Management Plan – 18 August 2025 • Native Fish Recovery Plan – 18 August 2-25 • Water Quality Monitoring Plan – 18 August 2025 • Wetland Monitoring and Management Plan – 18 August 2025

	<ul style="list-style-type: none"> Woody Weed Management Plan – 18 August 2025
<p>DOC Commentary on Fast Track approvals and permissions identified:</p> <p>Note DOC's role in relation to specific activities</p>	<p>See Appendix 1 Freshwater Advisor Memo</p> <p>See Appendix 3 Avifauna and Vegetation Reports</p> <p>Avifauna</p> <ul style="list-style-type: none"> We recommend that approvals sought are broad enough to cover all activities to reduce the risk of a) committing an offence and b) having to pursue additional approvals outside FTAA. We note that it is proposed to seek approvals for banding/marketing, catching and liberating, however, recommend consideration is given to any additional activities that may require approval, such as incidental death/injury to protected wildlife. Surveys completed in January–February 2025 are suitably recent. However, the most recent bird strike monitoring appears to date from 2011–2013. The proposal currently reflects a very light-touch approach to avifauna impacts. Please confirm that your assessment has been reviewed and endorsed by a suitably qualified technical advisor. <p>Invertebrates</p> <ul style="list-style-type: none"> Please be aware that if absolutely protected invertebrate species (Schedule 7 of the Wildlife Act) are likely to be incidentally killed, captured, handled or relocated during works, approval will be required. Your application should clearly outline whether any of the species present fall into this category, as this is not addressed in the current report. Surveys from January 2025 are sufficiently recent. As with avifauna, a technical advisor's agreement with the assessment that effects are minimal is required. <p>Bats</p> <ul style="list-style-type: none"> Surveys completed November 2024 – March 2025 are suitably recent. No bats were recorded, and no wildlife approvals will be sought for bats. No further action is required. <p>Concessions / Other Matters</p> <ul style="list-style-type: none"> Road access to the site is via Blackrock crosses a scientific reserve (tussock). Please confirm whether access will continue under the same arrangements as Stage 1. Please clarify whether the proposed transmission line will traverse Public Conservation Land (PCL). Provide details on the proposed locations of workers' areas and set-down areas.
Treaty partners:	DOC is aware of the following Treaty partners with interests that may be

	<p>relevant to this site:</p> <ul style="list-style-type: none"> • Ngāi Tahu <p>We encourage the applicant to engage directly with relevant Māori groups as required by section 29 of the Act.</p>
Treaty Settlement implications/considerations:	<p>Ngāi Tahu Claims Settlement Act 1998</p> <ul style="list-style-type: none"> • The Department must work together with Te Rūnanga to discuss the approach that will be taken in respect to resource management issues. • Earthworks associated with the Proposal may impact on freshwater fisheries, the Department should have consideration of this. • DOC Protocols for cultural materials and historic resources - wāhi tapu may apply to the project area. • The project may involve the disturbance or removal of some taonga species. DOC will have consideration to these provisions in regard to the management of taonga species. • Works may impact some freshwater fish species (particularly large-scale earthworks), the Department should consult Ngāi Tahu in regard to this potential effect.
Section 4 Conservation Act 1987 implications/considerations	<p>DOC is not aware of section 4 implications/ considerations –</p> <p>Heritage Comments: There are no heritage issues with the application. All heritage sites have been managed as required and an Accidental Discovery Protocol (ADP) will suffice for the project.</p> <p>Anything where DOC land is or maybe involved will need to use the ADP in Appendix 4.</p>
<p>Potential Resource Management Act (RMA) considerations and effects:</p> <p><i>Note: DOC's role in relation to 53(2)(m)(i) FTAA</i></p>	<p>No comments re any further Potential Resource Management Act (RMA) considerations.</p>
DOC Statutory Planning Document considerations in relation to site (e.g. CGP/CMS/CMP):	<p>This report is contained in Appendix 2</p>
Any further information/considerations:	<p>Further advice will be provided following review of material submitted by the Applicant 26/9/25.</p>
Additional Notes:	<p>While DOC will assist applicants as much as we can when they engage in pre-lodgement consultation, it is the applicants' responsibility to comply with the FTAA and to ensure they have applied for all permissions they need.</p>

	It is noted for the record this advice has been provided prior to DOC receiving the draft Lizard Assessment.
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Appendix 1: Freshwater Advisor Memo

From: Daniel Jack, Technical Advisor Freshwater, Dunedin/Ōtepoti Office

Date: July 2025

Subject: Mahinerangi Wind Farm.

Comments of Ecological Assessment – Aquatic Ecology

Key points noted from Bens report (SLR Consulting NZ 2025).

Identifies most the important aspects of land and stream disturbance – primarily sediment discharge via run-off and wind, and culvert installation.

Macroinvertebrates results provide a good baseline for the waterways in the area of activity. Strategic monitoring of these waterways may see improvements to or continuation of community scores after establishment of infrastructure and restoration works have been accomplished.

Agree with the general findings from the survey work: *Given the distribution of galaxiids throughout the upper reaches of the catchments draining the MWF Stage 2, there is suitable, sustained aquatic habitat, likely to contain fish and/or crayfish.*

Providing or enhancing fish passage for non-migratory galaxias is imperative to maintaining natural gene flow within the population fragments. For example, disestablishment of the farm pond and perched culvert (Photo 7, Page 37).

Many of these small first and second order tributary streams appear to be in a poor state due to agriculture – primarily the loss of stream cover. Although galaxias and koura may not be physically present in many reaches, these small catchments do provide hydrological services and buffers to sedimentation downstream where they occur. Restoration of many of these should be considered as part of any remediation and ongoing sediment control.

Imperative for DOC to review these documents - the draft Fish Recovery Plan, and Wetland Rehabilitation Plan.

Avoid at all costs discharge of water taken from below natural waterfalls directly into galaxias and koura waterways.

Recommendation

Culvert installation. Further detail required for the statement: *undertake measures to mitigate effects on fish during construction* (page 46). Suggest developing a fish salvage plan – particularly for Eldon's galaxias.

References

SLR Consulting New Zealand 2025: Ecological Assessment – Aquatic Ecology, Mahinerangi Wind Farm Stage 2. SLR Project No.: 810.031205.00001, Revision V1.0. Client report prepared for Tararua Wind Power Limited, Hamilton.

Appendix 2: Relevant Statutory Planning Provisions

Summary

DOC's view is that the application is not inconsistent with the relevant statutory planning provisions. However, consideration needs to be given to:

- managing any threatened and at-risk species, on the land where the wind farm expansion is proposed, to ensure their persistence and security
- maintaining and restoring wetland ecosystems.

Conservation General Policy 2005

11 Activities requiring specific authorisation (not covered elsewhere)

Policies

- 11.1(a) Any application for a concession or other authorisation will comply with, or be consistent with, the objectives of the relevant Act, the statutory purposes for which the place is held, and any conservation management strategy or plan.
- 11.1(c) The Department and all concession and other authorisation holders should monitor the effects of authorised activities on natural resources, historical and cultural heritage, and the benefit and enjoyment of the public, including public access, to inform future management decisions.
- 11.1(d) Concession and other authorisation holders will be responsible for the safe conduct of their operations, including the safety of staff, clients, contractors, and the public, and compliance with relevant safety standards and legal obligations.

Otago Conservation Management Strategy 2016

1.5.1 Natural heritage

Objectives

- 1.5.1.1 The diversity of New Zealand's natural heritage is maintained and restored, with priority given to:
- a) conserving a full range of New Zealand's ecosystems to a healthy functioning state, with an emphasis on the priority ecosystem units in Appendix 4;
 - b) supporting the work of others to maintain and restore ecosystem types selected from Appendix 2;
 - c) conserving threatened species to ensure persistence, with an emphasis on those species listed in Appendix 5;
 - d) maintaining or restoring populations of nationally iconic species that occur locally, with an emphasis on those species listed in Appendix 7; and
 - e) conserving significant geological features, landforms and landscapes, including those listed in Appendix 9, where they are on public conservation lands waters
- 1.5.1.4 Advocate for the protection of priority heritage, such as: priority ecosystem units and threatened species; and significant geological features, landforms and landscapes at risk of permanent degradation selected from Appendix 9.

- 1.5.1.14 Work with businesses and others to foster greater engagement and support for conservation and the management of natural resources through the application of best conservation and environmental management practices.

1.5.5 Conservation gains from more business partnerships

Objectives

- 1.5.5.3 Seek opportunities to work with businesses that are looking for ways to demonstrate their commitment to and engagement with conservation.

2.2 Te Papanui, Oteake and Hāwea Conservation Parks Place

Outcome

Threatened and at-risk species are secure in their range, especially where intensive management is occurring. Indigenous fish populations retain their migratory waterways, or where possible have natural barriers protecting non-migratory populations from predatory introduced fish.

3 Specific policy requirements for Otago

3.1 General

Policies

- 3.1.11 Should not grant authorisations that are inconsistent with the objectives, outcomes and policies in Part One, the outcomes and policies for Places in Part Two-Places, or the policies in Part Three.

Appendix 2 Ecosystem and habitat types within Otago

Includes wetland ecosystems, such as herbfield/mossfield/sedgeland, herbfield “Ephemeral wetland” habitat types, raupō reedland, and *Carex/Schoenus* sedgeland habitat types

Appendix 5 Threatened and at-risk indigenous flora and fauna present in Otago

Identifies many species, including: various freshwater fish; the nationally critical pekapeka/long-tailed bat (South Island); the nationally vulnerable karearea/southern falcon; the declining *Carex tenuiculmis*; various gecko and skink species; and other species which may be present on the site.

Appendix 3: Avifauna and Vegetation reports

Based on a high-level review and as requested including any initial concerns and potential missing material. Most are relatively minor, however there are certainly a couple that may not be.

Please note and provide to report authors if relevant: once final reports are received and a full in-depth review is completed, some, if not all, concerns may be alleviated.

From what DOC has received to date, DOC does not currently have the following plans (which limits feedback):

- Wetland Compensation Plan
- Ecological Construction Management Plan
- Erosion and Sediment Control Plan
- Ecological Monitoring and Management Plan
- Mammalian Pest Control Plan.

Mahinerangi Wind Farm Stage 2 Draft Avifauna Assessment July 25

- Appear to be missing Appendix 13 (Wildlife Approval Application) and Appendix 14 (updated Ecological Monitoring and Management Plan (EMMP)).
- Given the proposed relative increase in the number of turbines and size of the proposed Stage 2 Wind Farm (compared to Stage 1), to have no bird strike monitoring at all is of some initial concern. Justification for not having this monitoring is provided, however, when weighed against potential data limitations and the size and number of turbines in Stage 2, consideration of bird strike monitoring for a certain time frame post construction may be warranted.

MWF2 Draft Vegetation Wetland Terrestrial Invertebrate Assessment June 25 [excluding terrestrial invertebrates]

- The full potential impact to wetlands is difficult to determine from the EclA, as there are no figures/maps showing flow paths and catchment boundaries etc relevant to the proposed impacts. Such mapping can be used to show that the hydrological function of wetlands would be maintained (or not), where earthworks are proposed within a wetland, within 10 m, and/or within 100m.
 - This information may be within the Riley Consultants reports, if so, some level of this should be incorporated into wetland assessment to provide evidence that wetland hydrological function will be maintained.
- Overall, there is a net loss of wetlands, which is of some concern. However, yet to receive and review the Wetland Compensation Plan, and don't yet know the legal/protective mechanism over the compensation area.
- More detail on the method used for mapping vegetation habitats and plant species present would be expected.
- With regards to the wetland assessment/delineation in Table 6:

- For Sites 2, 68B, and 68C, which have uncertain vegetation, and no hydrological indicators present, why weren't soils looked at?
- Sites B, B2, E2B, 71 failed vegetation tests and deemed to be in pasture. However, hydrological indicators were present, and soils were not assessed. Sites L, 10, and 47 had the same criteria met, with soils also being checked and were assessed to be wetlands. Could these sites not also be wetlands in pasture then?
- There is no obvious impact assessment of the clearance of indigenous vegetation communities. It appears this may be based on one or both of the following arguments: (1) that less is being disturbed than is already consented for, and/or (2), the proposed indigenous vegetation clearance is already consented. Clarification around this would be good, as the inclusion and mapping of indigenous vegetation in the first half of the assessment would indicate that an assessment may be warranted, e.g. at least 11-13 ha of snow tussock grassland is being cleared (Table 2 and 6), and there are five regionally threatened plants within the wind farm site.
- Clarification of whether Table 9 is to assess wetlands and all vegetation communities/ecological values? Depending on the answer, and others above, the overall the impact assessment may need more information. For example, the assessment isn't broken down into community types/ecological values, and there is little detail as to how each criteria is or isn't meet for each community or ecological values present.
- The significance assessment only uses the Otago Regional Policy Statement. There is no reference to or use of CDC, DOC, or NPS-IB significance criteria.

Rehabilitation Management Plan

- Section 4 – was there consideration of use of some native grasses for re-vegetation, if so and it was decided against, what these reasons were would be good to know.
- Ideally identification now of locations for stock piling (to ensure no wetlands, watercourses or native vegetation are impacted).
- Section 5 – what, if any, limits to the volume of nitrogen fertiliser and proximity to wetlands and waterways are there?
- Given 11 – 13 hectares of snow tussock grassland disturbance within CZs, SFDs, and roading (not including the tussocks in the 26.47 ha of rough pasture), clarification if the tussock translocation site is only 1.3 ha, as the rest of the translocated tussocks are going into the 1 m wide rehabilitation strip on both sides of roads and 25% of turbine sites being rehabilitated ?
- Section 5.3.4 – three months is a long time for tussock storage. Ideally this is much shorter, or at worst, if any die during storage, the same number of tussocks are purchased of the same species from native nurseries to replant (which are Eco sourced).
- Section 6 – further information from project Hydrologist ensuring hydrology of streams and wetlands is retained during the removal of tracks and culverts.
- Section 8 – are there survival rates for stream rehabilitation sites?

Wetland Monitoring and Management Plan

- Photo monitoring points are generally one photo over a reasonable large area; for wetlands, additional closer photos may be required to show if impacts are starting to appear in smaller areas.
- Given impacts from hydrological changes can take time to become visible to the human eye, it is expected photos taken post construction to continue for longer than three months.
- Having a smaller selection of photo points at wetlands within 30 to 100 m of activities would be expected to confirm no impact. The selection of these wetlands would ideally be informed in consultation with the project Hydrologist as to any that might be at higher risk of potential disturbance.

***Carex tenuiculmis* and *Epilobium chionanthum* Management Plan**

- Initial concern around potential lack of impact assessment (see 5th bullet point Vegetation Assessment) to understand if the proposed translocation and propagation is sufficient to mitigate impact on threatened plants.
- If needed for Car ten, are double the number lost to be propagated?
- When will the first post-works survey occur to ensure any hydrological impacts on plant species are evident by that time?
- Clarification of if biannually means twice a year or once every two years.
- Would have expected a survey of the ecological values already present in Compensation Area to have been done already, any particular reason this hasn't been (or is this within the Wetland Compensation Plan)?
- It would be expected that regardless of marsh willowherb being present in the Compensation Area or not, double the number plants should be propagated and planted out at suitably protected sites if plants are to be lost elsewhere on site.
- Regarding closure criteria:
 - Two years for monitoring translocated and propagated plants would be a minimum.
 - For At Risk plant species found within 100 m, and Car Ten in the Transmission Line Corridor, how long are the plants monitored for (i.e. what is the timeframe for completion of works at the site)?
 - As the Car ten in the Transmission Corridor aren't being disturbed, why does the Closure Criteria talk about checking propagated plants? Is the Propagated criteria meant to be separate to apply to all propagated plants, not just the Transmission Line Corridor?

Woody Weed Management Plan

- Section 5.2.2 - what is the pre-defined distance from work sites?

- Clarification in Section 5.2.2, is to what the term of consent is (for ongoing weed monitoring and control)?
- Would expect the weed control methods and potentially disposal to be detailed under Sections 5.2.2 and 5.3, to help ensure control is successful, and what herbicides should be used around waterways.
- Clarification on how long the weed control is to occur for in the Compensation Area.
- What were the reasons for the 20 m distance from construction works for weed control?

Kind regards / Ngā mihi,

Rebecca Teele *Technical Director – Terrestrial Ecology*

Appendix 4: Accidental Discovery Protocol

Accidental Discovery Protocol (ADP) for Cultural Heritage on Public Conservation Land & Water

The Department of Conservation is responsible for all cultural heritage discoveries on public conservation land and water. It is also responsible for contacting the appropriate parties for any discovery.

[The CONTRACTOR NAME or “DOC staff”] must take all reasonable care to avoid any cultural heritage values on the Land and/or in the Water which includes (but is not limited to) archaeological sites, historic heritage sites, koiwi/burials, artefacts/taonga and protected New Zealand objects. For Māori cultural heritage values sites, evidence of a site may be in the form of shells, bone, charcoal, hangi stones exposed during earthworks or seen eroding out of a shoreline or riverbank, for example. Other features maybe include pits or low stone formations. Artefacts/taonga maybe in the form of toki/adzes, fishhooks, flake tools, wooden/textile objects. Later sites of Pakeha or Chinese origin may be indicated by the presence of broken glass, crockery, clay pipes, slate, metal, match boxes, cutlery etc. and structural features built of rock, brick, concrete, and metal as well as features such as gold tailings, sluice faces, water races, dams, reservoirs. Burials/koiwi may be found from any period and from any ethnic group.

In the event that a suspected site, place, object or koiwi/burial of cultural origin is found during any work on the Land and/or in the Water, work must cease immediately, and advice must be sought from the [DOC LOCAL OFFICE] Office of the Department of Conservation. The discovery must be GPS'd and photographed in-situ showing close views of the cultural heritage find and showing surrounding views of the area for context. This recording is important to inform on management of the find. [The CONTRACTOR NAME or “DOC staff”] and [OPTIONAL] their contractors must not recommence work until permitted to do so by the Department of Conservation.

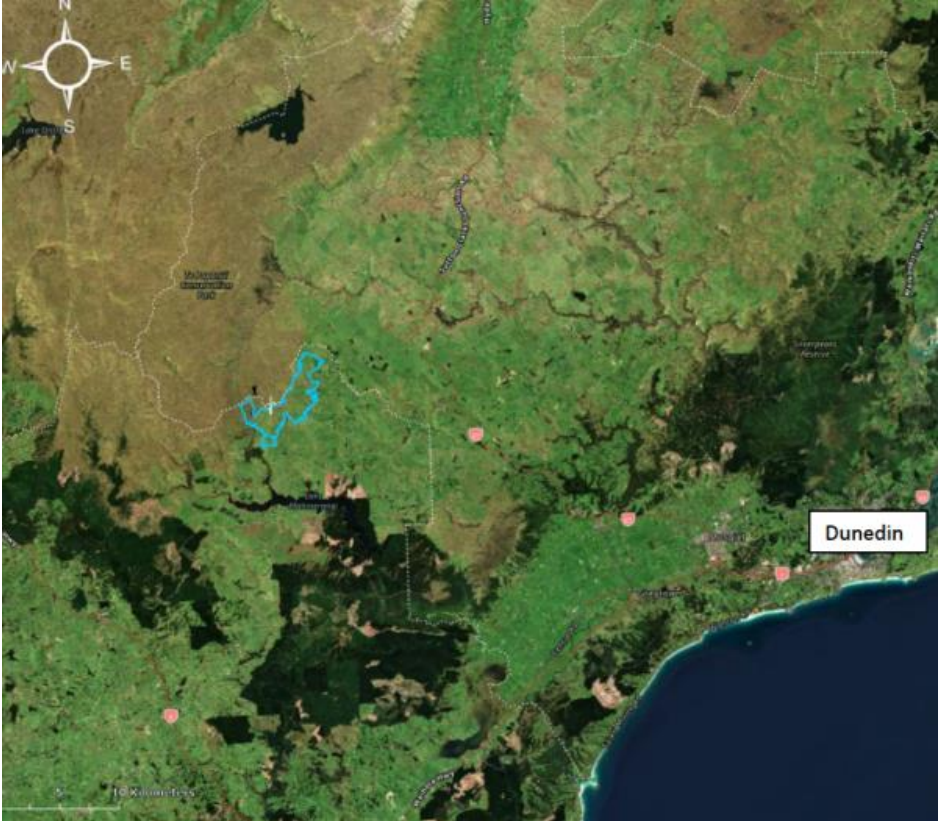
[DOC LOCAL OFFICE] Office of the Department of Conservation contact number [local office number]. Ask for either [try and add two people's names, preferably a person connected to the project e.g. heritage ranger, community ranger, and the Ops Manager].

Fast-Track Pre-Lodgement Consultation Summary

Purpose - This document provides a summary of information from DOC following a pre-lodgement consultation request.

Project Details

Project name:	FT-00049 – Mahinerangi Wind Farm
Engagement type:	Substantive application pre-lodgement engagement
Applicant/agent:	Ryan Piddington, Mercury Energy
Proposal overview:	<p>Mercury Energy are progressing Stage 2 of the Mahinerangi Wind Farm (MWF) through a substantive application under the Fast-track Approvals Act 2024.</p> <p>Resource consents for the MWF were granted by the Environment Court in 2009. The MWF currently has 12 Vestas V90-3MW turbines, commissioned in 2011 (Stage 1).</p> <p>Stage 2 is proposed to be the final stage and will consist of 44 turbines. Changes to the number of turbines, and other changes associated with the windfarm layout, will require both variations to existing consent conditions and new resource consents to enable the full development of the wind farm.</p> <p>Stage 2 also includes a new transmission line, substation and a Battery Energy Storage System (BESS), which will require new consents.</p> <p>Also seeking a range of water and discharge permits and regional council land use consents required for the construction of Stage 2, including for installation of a new culvert (to replace an existing culvert) in a headwater tributary of Lee Stream.</p> <p>Assessment against complex freshwater fisheries approval requirements will be undertaken in the second</p> <p>Wildlife Approvals and an Archaeological Authority will also be sought.</p>

	<ol style="list-style-type: none"> 1. The Mahinerangi Wind Farm project proposes to expand its current operation by constructing additional wind turbines, 50 km west of Dunedin, Otago, to connect and supply electricity to the national grid. The Mahinerangi Wind Farm will increase the current approximate peak output by an additional 164 Megawatts. 2. The wind farm will comprise: <ol style="list-style-type: none"> a. the installation of up to 44 turbines b. the construction of an electricity substation/switchyard compound and permanent operations/maintenance facility within the project site c. the installation of new underground 33kV electrical and fiber optic cable network between the turbines d. the establishment of an internal access road network and earthworks, including the widening of existing local roads approaching the site from the State Highway e. the construction of an 8km 110kV transmission line from the wind farm site to Transpower's Halfway Bush-Roxburgh 110kV line, including connection infrastructure. 3. The project will require resource consents under the Resource Management Act 1991 (RMA), permits under the Wildlife Act 1953, and an archaeological authority under the Heritage New Zealand Pouhere Taonga Act 2014.
<p>Location:</p> <p>Located approximately 50km east of Dunedin near Lake Mahinerangi</p>	
<p>Date pre-lodgement request received:</p>	<p>21 February 2025</p>

Summary of pre-lodgement Consultation	
Fast track project lead DOC:	Mary McConnell – Senior Fast-track Advisor (Contractor)
DOC specialist input required:	<p>Fast-track Project Lead – Mary McConnell, Senior Advisor FTA</p> <p>Statutory Manager – Emma Burns</p> <p>Planner – Jane Macleod</p> <p>Legal – Matt Pemberton</p> <p>RMA Planner - Jane Macleod</p> <p>Heritage - Matt Schmidt</p> <p>Statutory Planning Team - Katherine Hughes</p> <p>Treaty Settlement Implications - Grace Masterton, Permissions Advisor</p> <p>Permissions Advisor(s) - Charlotte Grey</p> <p>Terrestrial flora/fauna – Rebecca Teale (E3 Scientific)/Richard Ewans/Daniel Jack</p> <p>Lizards – John Lyall</p>
DOC Permissions/ Approvals Identified by applicant in pre-lodgement request as potentially required:	<p>Authority under Wildlife Act 1953 - Monitoring approvals sought (banding/markings (Wildlife Regs), catch, liberate (Wildlife Act))</p> <p>No DOC concessions to be sought.</p> <p>DOC has received and reviewed the following information relating to the application and the comments below have been based on information provided 30 September. It is meant to be read alongside pre-lodgement advice provided 27 September.</p> <ul style="list-style-type: none"> • Archaeological Management Plan: Tararua Wind Power Ltd, Mahinerangi Windfarm (Stage 2), July 2025 • Information provided in support of application for approval of person to carry out activity under archaeological authority pursuant to clause 7 to Schedule 8 of the Fast-track Approvals Act 2024, September 2025 • MWF2 Draft Regional Consent Conditions V3, MWF2 Draft RM1409 Land Use Consent Conditions Variation V5, MWF2 New Land Use Consents for TX, Sub, BESS and O&M V3, September 2025 • Mammalian Pest Control Plan, August 2025 • Carex tenuiculmis and Epilobium chionanthum Management Plan, August 2025 • Rehabilitation Management Plan, August 2025 • Native Fish Recovery Plan, August 2025 • Water Quality Monitoring Plan, August 2025 • Wetland Monitoring and Management Plan, August 2025 • Woody Weed Management Plan, August 2025 • DRAFT Environmental Construction Management Plan • DRAFT Lizard Assessment, September 2025

	<ul style="list-style-type: none"> • DRAFT Lizard Management Plan, September 2025 • Construction Travel Management Plan, September 2025 • Avifauna Monitoring and Management Plan, August 2025 • Technical Evaluation for Wildlife Approval, September 2025 • Contaminated Land Assessment, September 2025 • DRAFT Earthworks Management Plan (EMP), September 2025 • Ecological Monitoring and Management Plan, September 2025 • Draft Fire Management Plan, September 2025 • DRAFT Wildlife Approval Assessment: Lizards, September 2025 • Construction Noise Management Plan, July 2025 • Wetland and Aquatic Compensation Plan, September 2025
<p>DOC Commentary on Fast Track approvals and permissions identified:</p> <p>Note DOC's role in relation to specific activities</p>	<p>See Appendix 1 for comments regarding Terrestrial Ecology.</p> <p>See Appendix 2 for a review of lizard management documentation.</p> <p>Advice regarding draft permissions applications is: all information relating to the DRAFT Wildlife Approval Assessment: Lizards has been provided, and for the Applicant to confirm terms of approvals when lodging substantive application.</p>
Treaty partners:	-- Addressed in September 27 Memo
Treaty Settlement implications/considerations:	- Addressed in September 27 Memo
Section 4 Conservation Act 1987 implications/considerations	- Addressed in September 27 Memo
<p>Potential Resource Management Act (RMA) considerations and effects:</p> <p><i>Note: DOC's role in relation to 53(2)(m)(i) FTAA</i></p>	- Addressed in September 27 Memo
DOC Statutory Planning Document considerations in relation to site (e.g. CGP/CMS/CMP):	- Addressed in September 27 Memo
Any further information/considerations:	- Addressed in September 27 Memo
Additional Notes:	<p>While DOC will assist applicants as much as we can when they engage in pre-lodgement consultation, it is the applicants' responsibility to comply with the FTAA and to ensure they have applied for all permissions they need.</p> <p>It is noted this document is supplementary to advice dated 27 September 2025 and addresses material circulated 30 September 2025.</p>

Appendix 1: Terrestrial Ecology Memo

From: Rebecca Teele, Engaged Consultant, Terrestrial Ecology

Date: September 2025

Subject: Mahinerangi Wind Farm.

Wetland and Aquatic Compensation Plan (wetland only (not aquatic)).

- Clarification needed to ensure this is compensation not offsetting. Noting that compensation is employed when no net loss of biodiversity cannot be ensured or other key principles of a biodiversity offset cannot be met, however, the Plan states that it works “*to achieve a net positive gain in wetland and aquatic values within the Wind Farm Site*”.
- What is the appropriate legal protection mechanism that is going to be used? Knowing the mechanism is important to have confidence that protection will persist.
- As there is no wetland creation, there is a net loss of wetland area, therefore unclear as to why the Plan states it works “*to achieve a net positive gain in wetland and aquatic values within the Wind Farm Site*”.
- The current state of the wetland proposed for compensation is not fully described (e.g. plant species present and their cover). Following on, the restoration proposed within the area seems light given the overall net loss of wetlands. Fencing and the tussock planting are good measures, however, depending on the composition of the rest of the wetland more native plantings within the wetland (of native species including Not Threatened, At Risk, and Threatened) could well be warranted given the overall net loss. Following on, has there been quantification of the offsetting/compensation to help ensure the measures proposed are as proportionate as possible (other than the wetland being protected is 29 times more than the area of wetlands lost)?
- Monitoring of the site/plan seems very light in terms of the amount and detail (e.g. spatially and temporally).

Ecological Monitoring and Management Plan (excluding Water Quality Monitoring, Lizard Management Plan, and Native Fish Recovery)

- This EMMP appears to be a summary of the Management Plans, if there is new information in this document (not already in the associated Management Plans) it would be helpful to have this clearly stated, and if relevant, included in the associated Management Plans. Consequently, apart from listing all the Management Plans in one place, seems unusual to have a whole new document if it doesn't also provide something further (e.g. a Gantt chart to provide clarity on timing of all management matters and how they will be achieved to provide further assurance that management measure will be completed).
- A section highlighting the improvements/changes, and greater scope of this EMMP compared to the Stage 1 document would provide further confidence in the current EMMP.

Technical Evaluation for Wildlife Approval - Falcon

- The first sentence of Section 2.0 states bush falcon, I think ‘eastern falcon’ is meant.
- Parts of the following are included, but would good to make clear that all the following apply at all times, to all native species: necropsy to be completed by Massey University or LCR. If dead native birds are found, DOC is to be notified within 24 hours (including species, location, date and time), and all necropsy results to be provided to the DOC within 3 working days of receipt. All necropsy costs including courier, are to be covered by the applicant. The carcasses are to be return to DOC after necropsy.

- Any native bird found within the Wind Farm is to be sent to Massey to have the cause of death determined (cause of death is not to be determined any other way) and all aspects of the above point also applies, for 30 years from commencement of construction.
- All banding data must be entered into the FALCON database within 1 week of collection.
- Unclear why two sections of Table 1 have not been filled out.
- Confirmation that the person who will carry out all work (including but not limited to trapping, banding and transmitter fitting) has certification from the NZ Bird Banding Office at Level 3 Raptors & Owls, with specific experience dealing with eastern falcon and these trapping and transmitter methods (e.g. 25+ individual eastern falcon trapped, banded, and transmitters fitted previously).
- Specific limits on the number of visits to nests needed.
- Greater detail on weather conditions when work will or won't be undertaken, i.e. no work involving nests, trapping etc is to occur during any precipitation, or cold and windy conditions.
- What is the output/purpose from this data collection - may be covered in Avifauna Management Plan, or just require a bit more emphasis in this document.
- The transmitter type, attachment method and age of fledglings is still under review, as soon as outcome reached, we will update the applicant.
- Maps yet to be updated, so review is limited by this.

Avifauna Monitoring and Management Plan

- Regional threat status of species needed.
- Section 3.1.3 – time spent at nest: needs time limit set. And maximum number of checks of the nest status should be set.
- Needs stated in Section 3.1.3 as to the length of time the broadcasting surveys will occur for (as this will disturb breeding birds).
- Is playback/broadcasting proposed as part of the Stationary Observation Surveys? As Plan states at the end of the Stationary Observation Surveys section *"If a falcon responds, the observers will attempt to track the falcon to establish if the falcon is nesting."* If so this needs to be clearly stated and time and frequency limits set.
- Limits on the use of Nest Flashing is needed (to prevent undue disturbance to breeding birds).
- All data provided to DOC in a report.
- Justification/rationale needed for the 20 m used for SIPO.
- Section 3.2.2 – all measures to be completed by a SQEP (ecologist/ornithologist). Requirements needed regarding the training/certification of the dog(s) that will carry out that specific measure. Prioritization of the measures needed and specific timing of when they will start and for how long.
- Clarification in Section 3.2.2 that nest fledged is also when the buffer would be removed in the following sentence - *"As soon as the pied oystercatcher nest has been deserted, or if the nest fails, the specified buffer can be removed, and works can commence within this area."*
- If 20 m is a disturbance distance for *"Nests Within 20 m of the Stage 2 Windfarm Development Area"* (Section 3.2.4), it is expected there would be flags and tape. Further, why are vehicles anticipated within the buffer? Buffer would stay until nest has fledged (same for *"Nests Within the Stage 2 Windfarm Development Area"*).
- Reporting needed of any juvenile SIPO killed on site.

- Monitoring of falcon post construction (i.e. effect from operational wind farm, which is much larger in scale than Stage 1) to occur – might be more relevant comment for the Avifauna assessment document.
- Section 3.3 and 4.1.5 – any known or likely cause of nest mortality should be reported (not just predation).
- Section 3.3 and 4.1.5 – annual reports to be provided to DOC.
- Section 4.1.1 – is the reference to recording any bird strike meant as incidental? As the Avifauna Assessment did not proposed bird strike monitoring in the draft version.
- Confirmation that the person who will carry out all work (including but not limited to trapping, banding and transmitter fitting) has certification from the NZ Bird Banding Office at Level 3 Raptors & Owls, with specific experience dealing with eastern falcon and these trapping and transmitter methods (i.e. 25+ individual eastern falcon trapped, banded, and transmitters fitted previously).
- The transmitter type, attachment method and age of fledglings is still under review, as soon as outcome reached, we will update the applicant.
- All data must be entered into the FALCON database within 1 week of collection.
- What data analysis method is being used, and what output produced, from the data collected from the transmitters? How many location data points per day are collected (only between 7-10am and 3-6pm)?
- Clarification/emphasis that all reasonable efforts will be made to locate carcasses that switch to mortality signal.
- Two years of monitoring is not likely to be long enough to confirm the benefit of pest control.
- Section 6.1. - more detail/parameters/expectations are needed within the Management Plan regarding the potential mitigation program required in the event that monitoring of falcon identifies breeding failure as a result of the wind farm operation.

CONDITIONS:

NB: The Conditions are dependent on the final content of reports, which are yet to be viewed/assessed. For example, bird strike monitoring has been deleted from **MWF2 Draft RM1409 Land Use Conditions Variation V5**, which while this fits with the current drafts, bird strike monitoring may still be required.

MWF2 Draft RM1409 Land Use Conditions Variation V5 (only section “Ecological Monitoring and Management” excluding Lizards)

- The conditions all largely refer to adherence to the Management Plans, so again until the final reports are ready, the conditions are subject to change. The wording of all relevant Conditions could be stronger in regard to the adherence to the Management Plans, and some of the targets specifically included in the conditions.
- 27 ii (g) - three days is stated but avifauna management plan has 5/7/10 days.
- 29B – “in excess of the status quo” is limiting for weed control, as if any weeds are left it perpetuates more weed control (effectively in perpetuity).
- 30A – Reports submitted to DOC as well as CDC.

MWF2 Draft Regional Consent Conditions V3 (only relevant sections)

- G23 – potentially missing Car ten and Epi Chi Management Plan, Woody Weed Management Plan, Avifauna Monitoring and Management, Mammalian Pest Control, Lizard Management Plan.
- Would expect that G24 to G29 condition that all requirements within each Management Plan are completed.

MWF2 New Land Use Consents for TX, Sub, BESS and O&M V3 (only relevant sections)

- 28 – The Management Plans listed are exactly those listed as missing in the first bullet point above under “**MWF2 Draft Regional Consent Conditions V3**”. Clarification on why there is a separation and variation of Management Plans listed between Condition documents (NB: this is potentially a query for Planners not Ecologists).
- The wording of all relevant Conditions could be stronger in regard to the adherence to the Management Plans, and some of the targets specifically included in the conditions.

Appendix 2: Review of lizard management documentation for a Fast-Track Application for the Mahinerangi Wind Farm project in Otago

General comment

The three reports submitted to inform lizard management planning that have been prepared by Blueprint Ecology are highly detailed, thorough and address all of the relevant considerations that should be taken into account in accordance with best practice lizard management methodologies. In general, I agree that this lizard management approach is sufficiently robust to achieve the stated objectives.

Two points of clarification would be useful. Section 8.3 of the LMP (Salvage methods) states that ACOs shall be checked at least five times, or until two unsuccessful salvage attempts occur within a cluster of 20 ACOs. A bit more detail around what triggers would determine continued trapping within any given ACO cluster would be useful. For example, would trapping in some clusters finish after five days where capture numbers decline, but still allow for continued trapping in other clusters beyond the five days where lizard hotspots result in on-going captures.

Section 9 of the LMP describes the proposed lizard release site at the 59.2ha Scrappy Pines Block. Rodent level predator control is to be undertaken within a 2ha area at the northern end of the block, where all lizards are to be released. Given the potentially very high number of lizards to be released within the block, a bit more description around how the 2ha area will be prepared to ensure sufficient refuges shall be available for up to 4000 lizards within the discrete sub-section of the overall release site. Consideration to alternatives to account for capture thresholds would be good. For example, for every 1000 lizards salvaged, a 1-2ha release site shall be prepared with rodent-level predator control and any appropriate refuge enhancements made.

The predator control planning section does not address the well-established impact of mice to lizards and given the high number of lizards to be impacted by the salvage, measures to address mouse-predation should be included. This may take the form of an intensified rodent control framework or provision of refugia (e.g. rock stacks) within the discrete release areas to exclude mice.

It is anticipated that once the above considerations have been addressed that this LMP will provide enough detail to complete the assessment in accordance with fast-track legislation requirements. Thereafter, it is considered that this LMP will appropriately mitigate impacts to lizards in accordance with best practice objectives and guidelines.

For any further questions regarding this review, please do not hesitate to contact me.

Kind regards,



Jacqui Wairepo

Director | Herpetologist

Kūkūwai Consulting Limited

From: [Phillis Chen](#)
To: [Ryan Piddington](#)
Cc: [Helen Green](#); [Sarah Edwards](#); [REDACTED]
Subject: FW: Mahinerangi Wind Farm Stage 2 - Fast-track Approvals Act 2024. Pre Lodgment Meeting Enquiry
Date: Wednesday, 1 October 2025 10:13:49 am
Attachments: [image001.png](#)

Kia ora Ryan,

Thanks for getting in touch and bringing this project to our attention.

Your email has just been forwarded to our team for a response. I noticed your email was dated in September. Sorry for keeping you waiting.

We can confirm that a pre-lodgement engagement with the Ministry for Culture and Heritage (under section 29 of the Fast-track Approvals Act) for your Mahinerangi Wind Farm Stage 2 Project **is not required**.

Heritage New Zealand Pouhere Taonga is the agency responsible for administering the archaeological authority under the Heritage New Zealand Pouhere Taonga Act 2014. We defer to Heritage New Zealand Pouhere Taonga's statutory role and its expertise, and do not expect to be consulted separately on the matter of archaeological authority.

We understand that you have also reached out to Heritage New Zealand Pouhere Taonga to discuss your projects. We encourage you to continue to work closely with them.

Any questions, please let us know.

Ngā mihi,

Phillis Chen

Pou Tohu Matua o Te Pae Kaupapa | Senior Adviser, Operational Policy
Manatū Taonga Ministry for Culture & Heritage

Email [REDACTED]

Ki te puāwai te ahurea, Ka ora te iwi
Culture is thriving, The people are well

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From: Ryan Piddington [REDACTED]
Sent: Wednesday, 10 September 2025 8:48 am
To: Info Mailbox <info@mch.govt.nz>
Cc: Sarah Edwards [REDACTED]; kimtatton2 [REDACTED]
Subject: Mahinerangi Wind Farm Stage 2 - Fast-track Approvals Act 2024. Pre Lodgment Meeting Enquiry

Kia or, my name is Ryan Piddington, and I am Mercury's Strategic Consent Manager coordinating the preparation of our substantive application for the Mahinerangi Wind Farm Stage 2 project.

The application is being applied for under Tararua Wind Power (TWP) a wholly owned subsidiary of Mercury NZ Limited. TWP currently holds an existing resource consent (LUC RM 1409) for the Mahinerangi Wind Farm (MWF) that was confirmed by the Environment Court in 2009. Amongst other things, the existing conditions provide for up to 100 wind turbines with a maximum tip height of 145 m. The consent was given effect to by the construction of Stage 1 that comprised twelve 3 MW wind turbines that became operational in 2011.

TWP now seeks to vary the conditions of LUC RM 1409 to enable Stage 2 of the wind farm (MWF Stage 2) to be completed with an additional 44 wind turbines (within 54 locations) of up to 165 m height (an increase in the blade tip height of 20 m). The primary purpose of changing the conditions of the land use consent is to enable for the use of larger and more efficient wind turbines that have become available since the original consent was granted.

In addition to the variation to the existing district land use consent conditions, TWP also requires a new suite of regional consents for the construction, operation and maintenance of the wind farm (given the expiry of the previously held consents) and a new district land use consent for the construction and use of a new Battery Energy Storage System (BESS), and a 110 kV transmission line (and associated infrastructure) to connect to Transpower's National Grid.

An application for an archaeological authority under the Heritage New Zealand Pouhere Taonga Act 2014 (HNZPTA) under section 42(4)(i) of the FTAA is being sought. An Archaeological Assessment has been undertaken by Clough & Associates Ltd. (Kim Tatton) that involved a review of the 2006 archaeological assessment and the consented layout plan of the proposed Stage 2 of the project, with some additional field survey undertaken.

The assessment concluded that:

“...the effects of Stage 2 of the Mahinerangi Wind Farm on archaeological values have not changed from the 2006 assessment. The conclusions of the 2006 assessment remain valid if any of the 54 consented turbine locations and contingency zones are utilised, amended, or repositioned (including hardstand and laydown areas) and with respect to the proposed changes to the spoil locations, roading layout (including track widths and cut and fill batters).

It is recommended that a general archaeological Authority to modify site H44/1200 and to cover all earthworks for the project would be required under the HNZPTA and is therefore included in the FTAA approval application so that potential delays can be avoided should sites be exposed. This should include appropriate discovery protocols, including the training of all staff who work on the project during the earth moving phase(s) in the recognition of archaeological sites.

In addition, the existing conditions 69-71 relating to accidental discovery protocols remain valid and appropriate in managing the discovery of unknown archaeological sites and/or artefacts.”

We have consulted with Heritage New Zealand and prepared an Archaeological Management

Plan (attached) that includes protocols relating to Taonga (as defined by the Protected Objects Act 1975). We are aware of our obligations under this act in the case of an accidental discovery. The Project Archaeologist is a registered archaeologist.

Mercury has and continues to engage with Tangata Whenua in relation to the project for the last 10 months and has an existing Memorandum of Understanding with Te Rūnanga ō Ōtākou that will be reviewed as part of this process.

A substantive application is being completed and will be submitted to the EPA soon. The EPA has advised that engagement with the Ministry for Culture and Heritage is required as part of the pre-lodgement process. Could you please confirm whether you would like to arrange a pre-lodgement meeting, or if you're comfortable with the application proceeding without pre-lodgement discussions.

Ngā mihi
Nā Ryan

RYAN PIDDINGTON
STRATEGIC CONSENTS MANAGER

MERCURY.CO.NZ



108 Durham Street, Tauranga, 3110



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From: [James Sutherland](#)
To: [Ryan Piddington](#)
Cc: [InfoDeepSouth](#); [Jasmine Weston](#); [Eva Forster-Garbutt](#); [Huia Pacey](#)
Subject: Heritage New Zealand Pouhere Taonga - Fast Track
Date: Wednesday, 23 July 2025 11:39:10 am



Kia ora Ryan,

Thanks for popping in this morning.

As discussed, Heritage New Zealand Pouhere Taonga (HNZPT) undertook a pre-application meeting at the HNZPT Dunedin Regional Office on 23 July 2025.

Feel free to use this email as evidence of undertaking pre-application consultation with HNZPT.

If you have any further questions or queries, please get in touch.

Kā mihi nui,

James Sutherland | Planner, Kaiwakamāhere, Otago/Southland | Heritage New Zealand Pouhere Taonga |
PO Box 5467, Dunedin 9054, New Zealand | Ph: [REDACTED] | Mobile: [REDACTED]
[REDACTED] | Visit [\[www.heritage.org.nz\]](http://www.heritage.org.nz) www.heritage.org.nz and learn more about New Zealand's heritage places

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