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Kia ora,

Southland Wind Farm – Contact Energy - FTAA-2508-1095 – Response to Minute 4 - Assessment of 2025 Amendments to National Direction

Southland District Council (SDC) provides this response to the Panel's request that SDC identify and assess amendments to the following national direction instruments in relation to previously provided comments on the proposal:

- a. National Policy Statement for Indigenous Biodiversity Amendment 2025
- b. National Policy Statement for Freshwater Management Amendment 2025
- c. Resource Management (National Environmental Standards for Freshwater) Amendment Regulations 2025
- d. National Policy Statement for Renewable Electricity Generation Amendment 2025
- e. National Policy Statement for Electricity Networks Amendment 2025

SDC has reviewed the amended provisions of the identified national direction instruments to determine whether they give rise to any new or materially different considerations relevant to the matters addressed in its earlier comments. SDC notes that the National Policy Statement for Freshwater Management Amendment 2025 and Resource Management (National Environmental Standards for Freshwater) Amendment Regulations 2025 are primarily directed at regional council functions relating to freshwater management. Given the nature of SDC's statutory responsibilities and the scope of matters addressed in its earlier comments, SDC have not addressed these.

Accordingly, SDC's assessment focuses primarily on the following amended instruments:

- National Policy Statement for Indigenous Biodiversity Amendment 2025
- National Policy Statement for Renewable Electricity Generation Amendment 2025
- National Policy Statement for Electricity Networks Amendment 2025

SDC considers that the 2025 amendments do not materially alter the conclusions reached in its previous comments on the Southland Windfarm Project. SDC's review has focused on whether the amended national direction introduces any new policy considerations that would require revision to its earlier comments. SDC has not identified any such matters.

National Policy Statement for Indigenous Biodiversity Amendment 2025

SDC has reviewed the National Policy Statement for Indigenous Biodiversity Amendment 2025, including the amended Application provisions in clause 1.3. SDC notes that clause 1.3 confirms that the National Policy Statement applies to indigenous biodiversity in the terrestrial environment throughout Aotearoa New Zealand. However, clause 1.3(3) expressly provides that nothing in the National Policy Statement applies to the development, operation, maintenance or upgrade of renewable electricity generation assets and activities and electricity transmission network assets and activities.

SDC notes that the Southland Windfarm Project is a renewable electricity generation activity and therefore falls within the scope of this express exclusion. As a result, the amended National Policy Statement for Indigenous Biodiversity does not introduce new policy requirements that are directly applicable to the Project beyond those previously considered.

Notwithstanding this, SDC reiterates its previous comments regarding the importance of appropriately identifying and managing ecological effects through conditions. SDC considers that the amendments clarify the policy framework rather than altering its earlier assessment.

National Policy Statement for Renewable Electricity Generation Amendment 2025

SDC notes that the National Policy Statement for Renewable Electricity Generation Amendment 2025 continues to recognise the national benefits of renewable electricity generation, including wind energy. SDC considers that the amended provisions reinforce the existing policy context that requires decision-makers to recognise those national benefits while ensuring that adverse effects are appropriately avoided, remedied, or mitigated. SDC does not consider that the amendments alter its earlier, effects-focused assessment of the Project.

National Policy Statement for Electricity Networks Amendment 2025

SDC notes that the National Policy Statement for Electricity Networks Amendment 2025 continues to recognise the importance of electricity network assets and activities. To the extent that the Project relies on electricity network connections and associated infrastructure, SDC considers the amended provisions to be consistent with the policy context previously considered.

Conclusion

SDC's position remains neutral in principle. SDC considers that the 2025 amendments to the relevant national policy statements and regulations do not require any revision to its previous comments on the

Southland Windfarm Project. Any approvals should continue to be subject to appropriate conditions addressing the matters previously identified by SDC.

Should the Panel require any further information or clarification regarding the above, SDC will be pleased to provide such assistance.

Nāku noa, nā



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