

RURAL CITY LIVING



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Dear Ian

The following letter relates to Minute 4 of the Expert Panel, received by the Gore District Council in relation to the substantive application for the Southland Wind Farm under the Fast-track Approvals Act 2024.

The Government introduced three new national direction instruments and several amendments to existing ones on 18 December 2025, all of which took effect from 15 January 2026. Five of these instruments are directly relevant to the Panel's assessment of the Southland Windfarm Project Application:

- 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

The Panel requested that the Applicant and the relevant councils review these amended instruments, identify changes affecting their earlier assessments under Schedule 5, clause 5(1)(h) and clause 5(2), and reassess the Project accordingly. The reassessment focusing on new or amended provisions influencing the case for or against granting approvals, with reference to section 85 FTAA.

The following constitutes Gore District Council's assessment of the above amended national direction instruments and the effect on Gore District Council's assessment of the substantive Southland Wind Farm application.

National Policy Statement for Indigenous Biodiversity Amendment 2025 (NPS-IB)

The revised version of the NPS IB still includes clause 1.3(3) which states:

"Nothing in this 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."

Based on this no change to the assessment related to the NPS-IB is considered necessary.

National Policy Statement for Freshwater Management Amendment 2025 (NPS-FM)

The amendments to the NPS-FM relate to the addition of the term '*operational need*' in relation to natural inland wetlands, specifically in relation to quarrying and the extraction of minerals which are not relevant to this project.

Based on this no change to the assessment related to the NPS-FM is considered necessary.

Resource Management (National Environmental Standards for Freshwater) Amendment Regulations 2025 (NES-FW)

The amendments to the NES-FW relate to the addition of the term '*operational need*' in relation to natural inland wetlands, specifically in relation to quarrying and the extraction of minerals which are not relevant to this project. Note that the NES-FW has yet to be formally updated with this change despite the changes taking effect from the 15 January 2026.

National Policy Statement for Renewable Electricity Generation Amendment 2025 (NPS-REG)

The recent changes to the NPS-REG have been developed to strengthen direction for decision-makers to support increases in renewable generation capacity, security of supply, and emissions reductions. The proposed amendments give greater national direction in support of the proposed Southland Wind Farm.

Objective 1 - The proposal provides for national regional and local benefits, an increase to REG capacity and output, will support the social, economic, cultural wellbeing and health and safety of people and communities. The proposal will provide greater security and resilience of energy supply, and will support the emissions reduction target, whilst managing adverse effects from and on the REG activity.

Policy A - The Southland Wind Farm will deliver nationally significant renewable electricity, contributing to reduced greenhouse gas emissions, improved security and resilience of electricity supply, and reduced reliance on finite fossil fuel resources. The proposal supports national and regional decarbonisation objectives and provides social and economic benefits at the local and regional scale.

The use of wind energy represents an efficient and renewable use of natural resources, with effects that are largely reversible at the end of the project life. The site's proximity to existing electricity infrastructure enables efficient transmission and minimises electricity losses. The location and design of the wind farm allows for continued rural land use and seeks to minimise adverse effects on surrounding activities.

Overall, the proposal is strongly consistent with Policy A, and the significant benefits of renewable electricity generation weigh in favour of enabling the activity, subject to appropriate management of site-specific effects.

Policy B - Policy B requires decision-makers to enable cumulative increases in renewable electricity generation and avoid, where practicable, cumulative losses of generation capacity.

The Southland Wind Farm would result in a significant increase in renewable electricity generation capacity and supports cumulative gains in regional and national renewable supply. The proposal does not result in the loss of any existing renewable generation capacity, and unnecessary restrictions on the development could reduce effective use of the wind resource.

Overall, the proposal is consistent with Policy B, subject to appropriate management of site-specific effects.

Policy C requires decision-makers to recognise and provide for renewable electricity generation activities that have an operational or functional need to be located in particular locations and environments.

The Southland Wind Farm has a functional need to be located where a viable wind resource is present at sufficient scale and quality to sustain electricity generation. An additional operational need is demonstrated by the sites access to existing electricity transmission infrastructure, enabling efficient network connection, and contains sufficient land area to accommodate the wind farm and associated infrastructure.

In accordance with Policy C, an assessment of alternative sites is not required to demonstrate this operational and functional need. Overall, the proposal is consistent with Policy C, subject to appropriate management of site-specific effects.

Policy D requires decision-makers to protect existing renewable electricity generation activities from adverse effects, including reverse sensitivity.

The Southland Wind Farm would not create reverse sensitivity effects on existing renewable electricity generation assets. Instead, it would establish a long-term REG activity that should be protected from incompatible future subdivision, use or development, with any future developments that have the potential to create reverse sensitivity effects, will need to be assessed on their merits and assessed against the NPS-REG. Having regard to the existing rural environment, the site is not considered to be particularly vulnerable to reverse sensitivity effects.

Overall, the proposal is consistent with Policy D and reinforces the need to manage future land-use activities to protect the ongoing operation of the wind farm.

Policy E requires decision-makers to recognise and provide for Māori interests in relation to renewable electricity generation activities, including by taking into account the outcomes of engagement with tangata whenua.

The applicant has undertaken early and ongoing engagement with Kā Papatipu Rūnaka ki Murihiku and Te Ao Marama Inc. The outcomes of this engagement have informed project design and resulted in agreed mana whenua-specific consent conditions and associated measures to address cultural effects.

Council considers that the engagement undertaken, and the incorporation of its outcomes into the proposal and conditions, demonstrates alignment with Policy E of the NPS-REG.

Overall, the amended NPS-REG gives decision makers greater support for the granting of the Southland Wind Farm, subject to the proposed conditions of consent.

National Policy Statement for Electricity Networks Amendment 2025 (NPS-EN)

The NPS-EN replaces the National Policy Statement for Electricity Transmission 2008. The NPS-EN applies to electricity network activities. As the Southland Wind Farm does not meet the definition of an electricity network activity the NPS-EN is not relevant to the proposal.

Overall, the new and amended national direction does not alter Gore District Council's position of support for the proposed Southland Wind Farm. The updated national direction provides stronger and clearer support for renewable electricity generation activities, reinforcing the Council's position. The Council's original comments and recommended amendments to consent conditions therefore remain relevant and unchanged in light of the updated national direction.

Yours sincerely

A handwritten signature in black ink, appearing to be 'Mishka Banhidi', written in a cursive style.

Mishka Banhidi
Consultant Planner