



PART E

CONTACT ENERGY LIMITED

Southland Wind Farm

**Approvals relating to the Heritage
New Zealand Pouhere Taonga Act
2014**

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1. INTRODUCTION

Section 43(3)(i) of the Fast-track Approvals Act 2024 (“**FTAA**” or “**the Act**”) sets out that a substantive application must, for an approval for an archaeological authority, include the information required by clause 2 of Schedule 8 of the FTAA. This part of the substantive application provides the information required for the site-wide general Archaeological Authority sought by Contact Energy Limited (“**Contact**”) to authorise activities for the Southland Wind Farm Project (“**the Project**”) that would otherwise be applied for under the Heritage New Zealand Pouhere Taonga Act 2014 (“**HNZPT Act**”). This application is supported by the assessment of the archaeological values of the Project Site completed by Cook (2025), included in **Part H** to these application documents.

A description of the Project, including the Project Site, is provided in full in **Part A** to these application documents, which forms part of this application for approval for an Archaeological Authority. The figures referenced in this application document are included in **Part G** to these application documents.

2. EXISTING ENVIRONMENT

2.1 ARCHAEOLOGICAL VALUES

The Wind Farm Site covers approximately 58km² of privately owned land, including land which forms part of two sheep and beef farms (Jedburgh Station and Glencoe Station), and Venlaw plantation forest owned by Matariki Forests.

The region immediately surrounding the Project Site was an important location of both settlement and travel for mana whenua prior to the arrival of Europeans. A network of several ara tawhito (traditional travel routes) converge to the north and a kāinga (village) known as Tuturaui, is located approximately 12km north-west of the Project Site.

Archaeological sites relating to mana whenua land use have been identified both in the surrounding area and within the Project Site and are indicative of a well-traversed and utilised landscape.

Following the arrival of Europeans, the land cover was transformed for agricultural purposes, becoming Run 251, later named as Venlaw Run, in 1858. The run went through various licence holders throughout the remainder of the 19th Century. It is believed that the original homestead and most associated station buildings would have been located outside of the Project Site. The homestead is reported to have burnt down completely in 1980, with at least one nearby building being saved. However, it is not clear where the homestead was located exactly, as little documentation exists that mentions it or its associated buildings.



Aerial photography taken over time shows that the Matariki forestry blocks have been progressively harvested and are in the process of re-growing. The planting of forest plantations, their growth and harvest are all surface and subsurface disturbing activities. As such, it is likely that any archaeological sites have been at least partially disturbed by this land use, if not outright removed, thereby reducing the archaeological potential of this portion of the Project Site.

Given the above, Cook (2025) considers the most likely archaeological sites within the Project Site will be related to mana whenua land use.

Cook (2025) completed a site survey to identify archaeological sites within the Project Site. This included reviewing the New Zealand Archaeological Association's ("NZAA") site recording database (ArchSite) which indicated that 13 sites have been recorded within, and surrounding, the Project Site (refer to **Figure Archaeology-1 (Part G)**). 12 of these sites are related to mana whenua use, with eight of these being the remains of midden / oven sites, while the remaining four are adze find locations, with one site, F46/10, being the location of six adze finds. These sites demonstrate that the immediate area was likely used for frequent, relatively short-term occupations, likely a result of the location near the crossroads and Tukurau and the possible interactions that resulted from this.

In addition, two archaeological sites have been identified within the Project Site (identified in **Figure Archaeology-1 (Part G)**):

- > G46/17 – This is the location of two musterer's huts that relate to the historic function of the property as part of the Venlaw Run. These huts are located approximately 145m away from the proposed access road, approximately 30m from the proposed transmission line, though 210m from the proposed transmission line Pylon. Therefore, this site will not be affected by any Project related structures or activities.
- > G46/13 – This is recorded on the NZAA site as an artefact (adze) find. The adze was removed from the site in 1987. The site was investigated during the site visit undertaken by Cook and no archaeological material was found, although the ground was highly vegetated. Cook (2025) notes that the location of G46/13 within the NZAA database may be incorrect as the site record form mentions the find being near a crossing, which would most likely place the site south at the Mimihau Stream. For this reason, this site was also examined by Cook, however, no archaeological material was found. The archaeological value of the adze find site is considered to be low, as summarised in **Table 1** below.

Table 1: Assessment of Archaeological Values of G46/13 from Cook (2025).

Value	Assessment
Condition	The adze was removed from site in 1987. If any remaining features or artefacts are present, they are subsurface in nature. Assessment – below surface
Rarity/Uniqueness	Adze find locations are relatively common throughout the South Island, with 102 such finds recorded on the NZAA database for Southland and southern Otago. Assessment – Low
Contextual Value	This specific adze has not been attributed to another site or location, with the closest site being a potential umu located a little over 2km away. This lack of association limits its contextual value. Assessment – Low
Information Potential	Unless additional features are identified, there is no further information potential to be found at this location. Assessment - Low
Amenity Value	Any remains will be below surface and are not visible. Assessment – None
Cultural Associations	Assessment – Māori

Overall, Cook (2025) considers the total archaeological value of the Project Site is low.

2.2 CULTURAL VALUES

Section 6 of **Part A** to these application documents outlines the engagement between Contact and mana whenua in relation to the Project and includes a description of the cultural values associated with the Project Site and surrounding area, summarised below.

Pawakataka is in the Ngāi Tahu takiwā, in a region known as Murihiku that includes Southland (refer to **Figure 1**). Pawakataka is referred to as an Ihu Whenua, a prominent and revered part of the landscape where the interconnections between land, water, flora, fauna, atua and people are accentuated. Pawakataka is a landmark that looks across Te Awa a

Kiwa, Te Rā a Takitimu (Southland Plains) to the inland mountains and headwaters. It is a place where people can physically and spiritually rest, reflect and orientate themselves.

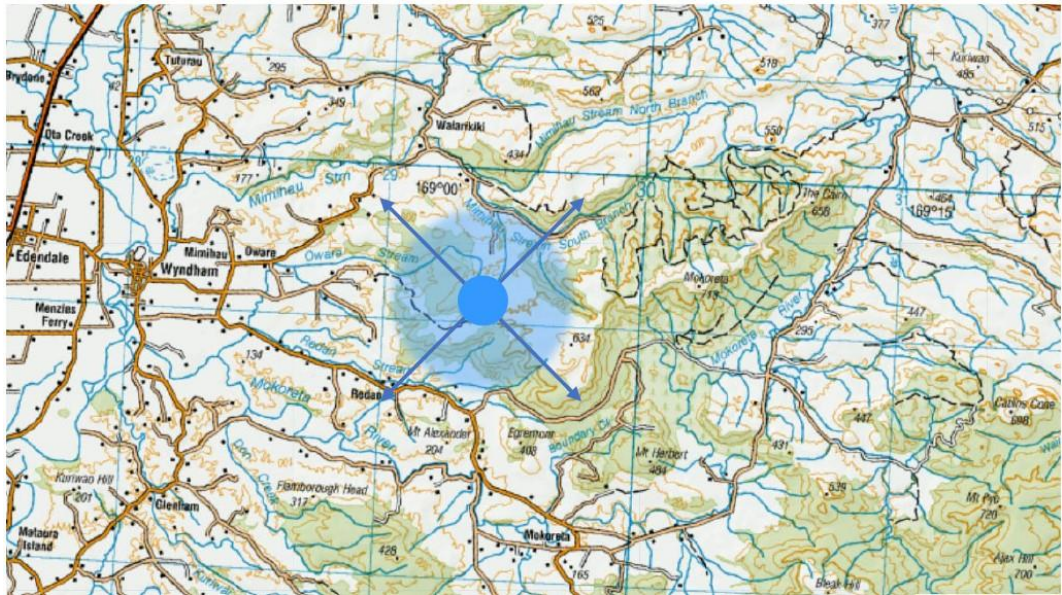


Figure 1: The area identified as Pawakataka.

Ngāi Tahu has a long association with the Murihiku Region, including the Pawakataka / Slopedown Hill, Mataura, Mokoreta and the Mimihaui. Ngāi Tahu led a nomadic lifestyle throughout the region. Generally, the use of the area was extensive rather than intensive, however, the area is thick with iwi stories, traditions and cultural practices. Pawakataka was part of travel routes that crisscrossed between the inland and coastal nohoanga, kaika and mahinga kai.

Pawakataka has an important role in the biodiversity and ecology of the catchment and the connection of Ngāi Tahu ki Murihiku with the coast and inland areas, as well as with Tāwhiri-matea, Papatūānuku and Rangī. However, Te Ao Marama Inc (“**TAMI**”) note since European settlement of the area, access, use and condition of the landscape has declined. In particular, Ngāi Tahu ki Murihiku noted the loss of indigenous flora, fauna and biodiversity and the limited opportunities for Ngāi Tahu to practice mahinga kai or express kaitiakitanga.

The key values, rights and interests Waihōpai Rūnaka associate with the Project Site include:

- > Mauri and the life-supporting capacity and cultural and ecological health of Pawakataka and the surrounding environment;
- > The ability of future generations to engage with Pawakataka and the surrounding environment;

- > Water quality is to be protected to standard that allows for mahinga kai to be diverse, abundant and safe to eat;
- > Mahinga kai species, habitat and access to these for customary use during and after the activity is protected;
- > The protection of wāhi tapu, wāhi ingoa and archaeological sites within, or surrounding, the vicinity of Pawakataka and surrounding environment;
- > The ability of Waihōpai Rūnaka to exercise rangatiratanga over Pawakataka and the surrounding environment; and
- > Exercise of kaitiakitanga within the management and monitoring processes of the Southland Wind Farm Project.

3. APPROVALS SOUGHT THAT WOULD OTHERWISE BE APPLIED FOR UNDER THE HERITAGE NEW ZEALAND POUHERE TAONGA ACT 2014

3.1 ARCHAEOLOGICAL AUTHORITY

Contact is seeking a site-wide general Archaeological Authority for the Project that would otherwise be required under the HNZPT Act. The Archaeological Authority will cover the entire Project Site to ensure that, should any archaeological discoveries be made during earthworks activities required for the construction of the Project, the necessary approvals and protocols are already in place. The proposed earthworks activities for the Project are described in full in the Project Description (included in **Part A** to these application documents) and Riley (2025) (included in **Part H** to these application documents).

There are two known archaeological sites within the Project Site. As noted above, site G46/13 is the only site located within close proximity to any proposed ground disturbance or placement of structures within the Project footprint. However, Cook (2025) considers earthworks elsewhere on the Project Site have the potential to disturb so far undiscovered archaeological material (if present). This is because the expected depths of archaeological material within the Project Site are likely to be relatively shallow, and the Project involves extensive earthworks in some places for the formation and upgrading of roads and/or turbine platforms. The presence of unrecorded archaeological sites within the wider Project Site is considered likely due to the density of archaeological sites within the surrounding landscape and the lack of previous development or research into localised site distribution which would help to locate archaeological sites. Therefore, a general site-wide

Archaeological Authority is sought that would otherwise be applied for under section 44(a) of the HNZPT Act. This reflects that there is a mixture of both:

- > Known and recorded sites that may be modified or destroyed during the proposed works (the identified features being sites G46/13 and G46/17, noting that it is not anticipated the Project will adversely affect these sites, as discussed in Section 4 below); and
- > The potential for unknown or unrecorded sites to be modified or destroyed during the proposed works.

3.2 LOCATION AND LANDOWNER DETAILS

A legal description of the land to which the application relates, and land ownership details is provided in **Table 2** below. The Record of Titles and proof of consent from the landowners for the proposed Archaeological Authority is provided in **Part L** and **Part N** of these application documents respectively.

Table 2: Legal description and landowner details for the properties subject to the Archaeological Authority.

Legal Owner	Legal Description and Title Reference
[REDACTED]	Section 3 Block IX Slopedown Survey District, RT SL9D/824
[REDACTED]	
[REDACTED]	Section 2 Block IX Slopedown Survey District, Section 1 Survey Office Plan 9639 and Section 1 Survey Office Plan 10255, RT SL8D/456
[REDACTED]	
[REDACTED]	Lot 1 DP 3613 and Section 1 Survey Office Plan 9465, RT SL155/79
[REDACTED]	
[REDACTED]	Lot 2 DP 363843 and Lot 1 DP 13176 and Section 1-2 Survey Office Plan 9464 and Section 15 Block X Tuturau Survey District and Part Section 16 Block X Tuturau Survey District, RT 259751
[REDACTED]	
[REDACTED]	Lot 1 DP 363843, RT 259750
[REDACTED]	
[REDACTED]	Lot 1 DP 12509, RT 407674
[REDACTED]	
[REDACTED]	Section 61-62 Block III Wyndham Survey District, RT SL9B/866
[REDACTED]	
[REDACTED]	Lot 2 DP 362693, RT 255758

Legal Owner	Legal Description and Title Reference
	Lot 4-7 DP 15305, Lot 1-4 DP 15076 and Lot 1 DP 15078, SL12B/81
	Section 26 Block II Slopedown Survey District, 265526
	Section 11, Section 16-17 and Part Section 9-10 Block II Slopedown Survey District, RT SLA4/151
	Section 5 and Section 20-22 Block II Slopedown Survey District, RT SL17/134
	Lot 1-3 DP 15305 and Lot 1 DP 15306, SL12B/80

4. ASSESSMENT OF EFFECTS

Cook (2025) assessed the potential effects of the Project on archaeological sites and values within the Project Site. The conclusions of the assessment are summarised below.

The assessment has identified two archaeological sites within the Project Site, both in a similar location. There are two musterer's huts (G46/17) which are approximately 145m from the closest section of the proposed road alignment and approximately 30m from the proposed transmission line route, however, approximately 210m from the nearest proposed pylon. As such, this site will not be modified or destroyed in any way by the Project.

The other archaeological site (G46/13) is located approximately 250m from site G46/17 and is notable as being a site where an adze was found. This site is the only site which is close to the proposed works, being near the proposed road alignment and close to a pylon for the transmission line. The archaeological material at this site was removed in 1987 and no additional above surface material was found during the survey of the site. Therefore, the archaeological value of this site is low and Cook (2025) considers the Project will not modify or destroy this archaeological site. However, it is possible subsurface deposits related to this surface find are present within the vicinity. If deposits such as umu or other artefacts are present within the path of the proposed access road, Cook (2025) considers there is a high potential for them to be disturbed or removed during works. As such, all works within 100m of the site marker will be monitored by a suitably qualified archaeologist and a representative from TAMI. Cook (2025) also notes that the location of the adze may have been incorrectly recorded, and that, based on the description, the correct location may be close to where the existing bridge crosses the Mimihau Stream South Branch. As such, adopting a precautionary approach, all site works that are undertaken within 100m of this stream location will also be treated the same as the site marker location (i.e. that the works

will be monitored by a suitably qualified archaeologist and a representative from TAMI). These locations are identified on **Figure Archaeology-2 (Part G)**.

Despite there being only these two archaeological sites identified on the Project Site, Cook (2025) considers earthworks elsewhere on the Project Site have the potential to modify or destroy unrecorded archaeological sites or material within the Project Site due to the extensive earthworks required. Fill disposal will not disturb any subsurface deposits as it will involve adding material, rather than conducting earthworks.

Given the above, in accordance with the recommendations in Cook (2025), Contact is seeking to obtain approval for a general Archaeological Authority that covers earthworks activities across the entire Project Site (including but not limited to works that would potentially affect G46/13). Conditions are proposed to ensure adherence to appropriate protocols in the event of the accidental discovery of archaeological material, in accordance with best practice. As a first principle, every practical effort will be made to avoid damage to any archaeological site that might be discovered during work on the Project Site (including G46/13). The excavation contractors will be informed of the requirements of the potential to uncover items and sites of archaeological value and the requirements of the Archaeological Authority and briefed by the Project's archaeologist about the site's archaeological values prior to the commencement of works.

An Archaeological Management Plan will be prepared to guide contractors and Contact whilst undertaking site works (refer to **Part J** of these application documents for the draft Archaeological Management Plan). This will include:

- > Protocols relating to the discovery of archaeological sites and features during the construction of the Project, including Contact's responsibilities and procedures for undertaking subsequent archaeological investigations;
- > Monitoring of earthworks within a 100m buffer zone around the site marker and stream crossing location for site G46/13; and
- > Involvement of TAMI in respect of mana whenua sites, such as:
 - The presence of a representative of TAMI during works within the 100m buffer zone for site G46/13; and
 - Notification of TAMI in the first instance if additional archaeological features are found at site G46/13.

The proposed conditions specific to this Archaeological Authority are included in **Part I** of these application documents and provide further certainty the appropriate management measures will be undertaken in the event of the discovery of any archaeological site during



the construction of the Project. TAMI has specifically advised that its preference is for the Archaeological Authority conditions to also be included in the resource consent conditions. Contact is comfortable with this approach, and this is reflected in the proposed conditions for both the resource consent (CM22-CM26) and Archaeological Authority approvals sought in this substantive application.

These measures will ensure suitable protocols are in place to effectively manage archaeological values in the event they are discovered with the Project Site.

5. CONSULTATION

5.1 TANGATA WHENUA

At a substantive level, Contact has a long history of engagement with Te Rūnanga o Ngāi Tahu and Papatipu Rūnaka ki Murihiku on the Southland Wind Farm Project throughout the previously undertaken consenting process under the Covid Fast-track Act. This engagement has informed the Project, including the proposed methods to manage effects and consent conditions.

The engagement between Contact and representatives of Te Rūnanga o Ngāi Tahu and Papatipu Rūnaka ki Murihiku in relation to the Project has resulted in agreement, both in relation to consent conditions for the Project, and (via a confidential agreement) in relation to matters that cannot be mitigated by way of consent conditions.

Furthermore, in relation to this application, a copy of the Scope of Works for the archaeology assessment was provided to TAMI for review and input in early 2023. The reports completed by Cook for the previous Covid Fast-track Act consenting process were circulated to TAMI for review and comment. TAMI provided comments on the Archaeological Assessment. These comments sought to ensure the report included further information regarding the connections of mana whenua to the area and that it is expected a mana whenua representative will be required to be on site at any time an archaeologist is present.

Contact has discussed this application made under the FTAA and associated conditions of consent and of the Archaeological Authority with TAMI. This has included providing TAMI with the draft Archaeological Management Plan. TAMI has confirmed that they are comfortable with Contact seeking an Archaeological Authority for the whole Project Site as part of this application.

In addition, during recent conversations, TAMI requested that the proposed resource consent conditions retain conditions relating to the discovery of archaeology material (as per proposed consent conditions CM22-CM26). Contact and TAMI discussed how an

Archaeological Authority could be implemented alongside these conditions and Contact has recommended that the Archaeological Authority conditions be consistent with the relevant proposed for the resource consent approvals. TAMI confirmed it is comfortable with this approach.

At a recent hui on 9 July 2025, TAMI representatives wished to formally note the special relationship between Contact and rūnanga which they said is appreciated and hoped would transcend any formal requirements under an Archaeological Authority. They note this is tied into the delivery of Tuia Te Mana ō Pawakataka outlined in the mana whenua-specific conditions, and would be part of any discussion in that forum in due course. A placeholder has been included in the draft Archaeological Management Plan to acknowledge that Ka Papatipu Rūnaka will develop a protocol for assisting with archaeological investigations.

5.2 LANDOWNERS

As noted in Section 3.2 above, Contact has consulted with the landowners of the areas that will be subject to this Archaeological Authority. This involved Contact sending a letter to each of the relevant landowners outlining the details of the Archaeological Authority sought. No landowners raised any concerns in response to these letters. Each landowner subsequently provided their consent for this Archaeological Authority application, and this is included in **Part N** of these application documents.

5.3 HERITAGE NEW ZEALAND POUHERE TAONGA

Contact has engaged with HNZPT to provide an overview of the Project and details of the Archaeological Authority sought, which included an online meeting with HNZPT. HNZPT has provided useful feedback on the information that should be addressed in the archaeological assessment that is submitted with this application (this has been addressed in Cook (2025)). HNZPT supported the approach being taken by Contact to obtain a general site-wide Archaeological Authority and did not raise any concerns.

6. STATUTORY ASSESSMENT

6.1 INTRODUCTION

In assessing applications, Panels are to give the greatest weight to the purpose of the FTAA, which is “*to facilitate the delivery of infrastructure and development projects with significant regional and national benefits*”. Section 81(4) of the FTAA states that, when taking into account the purpose of the FTAA, the Panel must consider the extent of the Project’s

regional or national benefits. Where a substantive application is made the approval process set out in the FTAA applies instead of the processes provided for under other legislation.¹

An assessment of the provisions relevant to this application for an Archaeological Authority is provided in the sections below.

6.2 PURPOSE OF THE FTAA

In accordance with clause 4(1)(a) of Schedule 8 of the FTAA, assessment of this application for an Archaeological Authority must take into account, and give the greatest weight to, the purpose of the FTAA. The alignment of the Project with the purpose of the FTAA is discussed in detail in Section 4 of **Part A** of these application documents. However, for completeness, it is noted that the Project is an infrastructure project that will have significant regional and national benefits. The Southland Wind Farm will provide a nationally significant source of renewable electricity and will contribute to achieving New Zealand's decarbonisation goals. The Archaeological Authority sought will ensure the appropriate protocols are in place, including accidental discovery protocols, to ensure the Project can be developed efficiently, whilst appropriately protecting any archaeological sites or material that may be present within the Project Site. The Archaeological Authority will provide an effective means to ensure the correct handling and management of any archaeological sites discovered during the proposed works to ensure the archaeological values of the site are appropriately managed, whilst also facilitating the development of the Project.

6.3 REQUIREMENTS FOR A SUBSTANTIVE APPLICATION FOR AN ARCHAEOLOGICAL AUTHORITY

Clause 2 of Schedule 8 of the FTAA sets out the information requirements for an application for an archaeological authority. Applications must include the following information:

- > A legal description of the land or, if one is not available, a description that is sufficient to identify the land to which the application relates:

This is addressed in Section 3.2 of this application document.

- > The name of the owner of the relevant land, if the applicant is not the owner of the land:

The ownership details are set out in Section 3.2 of this application document.

- > Proof of consent, if the owner has consented to the proposed activity:

¹ Section 40 of the FTAA.



Contact consents to the proposed Archaeological Authority activities on all properties it owns associated with the Southland Wind Farm Project.

Contact has also obtained approval agreements from the owners of the relevant land subject to the proposed Archaeological Authority associated with the Project (as per the approval agreements provided in **Part N** to these application documents).

- > Confirmation that the application complies with section 46(2)(a), (b) and (d)² of the FTAA:

In accordance with section 46 of the FTAA, this substantive application for the Southland Wind Farm:

- Has been developed to adhere to the requirements of section 42 of the FTAA;³
- Includes all of the information listed in section 43 of the FTAA, and is specified in sufficient detail to satisfy the purpose for which it is required in accordance with section 44 of the FTAA;⁴
- Is for a referred project;⁵
- The Project does not involve an ineligible activity;⁶ and
- Contact has paid all fees, charges, or levies for the processing of this substantive application.⁷

- > A description of each archaeological site to which the application relates and the location of each site:

This is addressed in Section 2.1 of this application document, and in Cook (2025).

- > A description of the activity for which the authority is sought:

This is addressed in Section 3 of this application document, in Cook (2025) and the Archaeological Management Plan (contained in **Part J** to these application documents).

Broadly, Contact applies for a general Archaeological Authority for works associated

² Section 46 of the FTAA addresses the EPA deciding whether a substantive application is complete and within scope.

³ Section 46(2)(a)(i) of the FTAA.

⁴ Section 46(2)(a)(ii) of the FTAA.

⁵ Section 46(2)(b) of the FTAA.

⁶ Section 46(2)(c) of the FTAA.

⁷ Section 46(2)(d) of the FTAA.



with the Project, which will include archaeological investigation and recording of any archaeological remains affected or uncovered during earthworks.

- > A description of how the proposed activity will modify or destroy each archaeological site:

These matters are addressed in Section 3 and 4 of this application document, and in Cook (2025). It is noted that the proposed activity is not anticipated to modify or destroy the known archaeological sites G46/13 and G46/17, however, Cook (2025) considers that it is possible the proposed earthworks activities required for the Project will result in the disturbance of archaeological material (if present). This could result in the unintentional modification or destruction of an unknown archaeological site, and therefore, the appropriate protocols will be in place through the implementation of the Archaeological Management Plan to ensure the archaeological values of the site are appropriately managed.

- > Except in the case of an approval described in Section 44(b)⁸ of the HNZPT Act, an assessment of—
 - The archaeological, Māori, and other relevant values of the archaeological site in the detail that is appropriate to the scale and significance of the proposed activity and the proposed modification or destruction of the archaeological site; and
 - The effect of the proposed activity on those values:

This is detailed in Sections 2 and 4 of this application document. In addition, Cook (2025) assesses all archaeological values associated with the area within which the Project is located. An Archaeological Management Plan (provided in **Part J** to these application documents) has also been prepared, which documents the measures to be put in place to address any potential effects on archaeological values and features.

- > A statement as to whether consultation with tangata whenua, the owner of the relevant land (if the applicant is not the owner), or any other person likely to be affected—
 - Has taken place, with details of the consultation, including the names of the parties and the tenor of the views expressed; or

⁸ An application for an authority to undertake an activity that will or may modify or destroy a recorded archaeological site or sites, if the effects of that activity on a site or sites will be no more than minor, as assessed in accordance with section 47(5).

- Has not taken place or been completed, with the reasons why consultation has not occurred or been completed (as applicable):

Section 5 of this application document addresses the consultation and engagement undertaken by Contact in respect of this application for an Archaeological Authority.

6.4 CRITERIA FOR ASSESSMENT OF APPLICATION FOR ARCHAEOLOGY AUTHORITY

For the purposes of section 81 of the FTAA, when considering an application for an archaeology authority, including conditions, the panel must take into account, giving the greatest weight to the purpose of the FTAA:

- > The purpose of the FTAA:

This is addressed in Section 6.2 of this application document.

- > The matters set out in section 59(1)(a) of the HNZPT Act:

- The historical and cultural heritage values of the archaeological site within the Project Site are described in Section 2 of this application document and in Cook (2025).
- The proposed activity is consistent with the purpose of the HNZPT Act as the general Archaeological Authority sought in this application document will provide an effective means to ensure the correct handling and management of any archaeological sites discovered during the proposed works to ensure the archaeological values of the site are appropriately protected.
- The proposed Archaeological Authority will ensure any archaeological sites present within the Project Site are appropriately protected through the implementation of the proposed management measures, while enabling the development of the Southland Wind Farm on the site.
- Contact has consulted with the persons who may be directly affected by the proposed Archaeological Authority, including the landowners, TAMI and HNZPT, as described in Section 5.1 of this application document.
- There is no statutory acknowledgement that relates to any archaeological site within the Project Site.
- The relationship of Māori and their culture and traditions with their ancestral lands, water, sites, wāhi tūpuna, wāhi tapu, and other taonga of relevance to the Project Site is summarised in Section 6 of **Part A** to these application documents and Section 2.2 of this application document.

- > The matters set out in section 47(1)(a)(ii) and (5) of the HNZPT Act:

- The effects of the proposed activity are considered to be no more than minor, as outlined in Section 4 of this application document and in Cook (2025).
 - The significance of the known archaeological sites within the Project Site is described in Section 2.1 of this application document and summarised in Cook (2025).
 - The extent to which the proposed activity will modify or destroy the site or sites is addressed in Section 6.3 above.
- > A relevant statement of general policy confirmed or adopted under the HNZPT Act:

The only HNZPT ‘statement of general policy’ that is potentially relevant to this application is “The Administration of the Archaeological Provisions” (2015). There is nothing in that document that weighs against the granting of this application.

7. CONCLUSION

In summary, Contact is seeking approval for an Archaeological Authority as part of this substantive application for the Southland Wind Farm Project under the FTAA. The archaeological report that has been prepared for the Project has identified two archaeological sites that are located within the Project Site (sites G46/13 and G46/17). Whilst it is not anticipated that the Project will disturb these archaeological sites, due to the nature of the site and the proposed earthworks activities, there is potential for the accidental discovery of archaeological material on other parts of the Project Site during the proposed works. Therefore, Contact is seeking a general Archaeological Authority for the Project. This will be managed in accordance with the Archaeological Management Plan which includes details of the procedures Contact must implement during the construction of the Project in relation to the management of archaeological material discovered within the Project Site.