

Under the **FAST-TRACK APPROVALS ACT 2024**

In the matter of an application for resource consents, concessions, wildlife approvals, an archaeological authority, and approvals relating to complex freshwater fisheries activities in relation to the Southland Wind Farm project

By **CONTACT ENERGY LIMITED**

Applicant

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**STATEMENT OF EVIDENCE OF CLAIRE HUNTER AND MEGAN HANKEY  
(PLANNING) ON BEHALF OF CONTACT ENERGY LIMITED**

14 January 2026

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**BUDDLE FINDLAY**

Barristers and Solicitors  
Wellington

Solicitor Acting: **Dave Randal / Thad Ryan**

Email: [REDACTED] / [REDACTED]

Tel 64 4 462 0450 Fax 64 4 499 4141 PO Box 2694 DX SP20201 Wellington 6011

## **INTRODUCTION**

1. Our full names are **Claire Elizabeth Hunter** and **Megan Kate Hankey**.
2. Our evidence is given on behalf of Contact Energy Limited (**Contact**) in respect of Contact's proposed Southland Wind Farm project (**Project**), specifically in response to comments made under section 53 of the Fast-track Approvals Act 2024 (**FTAA** or **Act**) by:
  - (a) Southland District Council (**SDC**);
  - (b) West Catlins Preservation Society (**WCPS**); and
  - (c) Environment Southland (**ES**).
3. We also briefly respond to section 53 comments on consent conditions made by SDC, ES, the Department of Conservation (**DoC**) and Environmental Defence Society and section 51 comments on conditions relating to the other approvals sought from DoC (concessions, wildlife approvals, complex freshwater fisheries activities) and Heritage New Zealand Pouhere Taonga (archaeological authority).
4. We have been involved in the Project since 2022 and prepared the primary substantive application documents for the Project (Part A-F) and the proposed approval conditions submitted with the application.

### **Qualifications and experience**

5. Our respective qualifications and experience are set out in Appendix A to this evidence.

### **Code of conduct**

6. We confirm that we have read the Code of Conduct for expert witnesses contained in the Environment Court Practice Note 2023 and have complied with it in preparing this evidence. We each confirm that the issues addressed in our evidence are within our area of expertise and we have not omitted to consider material facts known to us that might alter or detract from this evidence.

## **SOUTHLAND DISTRICT COUNCIL**

7. Mr Henderson, on behalf of SDC, has prepared a number of comments on the Project that are specific to planning-related matters.

8. It is evident that Mr Henderson is largely in agreement with our assessment presented in the application regarding the relevant rules applicable to this Project, as well as the degree of compliance with those rules. Furthermore, he agrees with our identification of the relevant objectives and policies that will inform the consideration of this Project. Additionally, Mr Henderson acknowledges that the site is situated within the General Rural Zone, without any spatial overlays or site-specific controls specified in the Southland District Plan (**District Plan**).
9. From paragraphs 90 – 94, Mr Henderson notes that the application has addressed the relevant planning instruments relevant to the SDC jurisdiction, and that the application is "*generally thorough in terms of the assessments provided.*" He goes on to say in paragraph 94, however, that there remain "*areas Council considers merit clarification to ensure complete consistency with these provisions.*"
10. Before discussing the specifics of the provisions noted by Mr Henderson as requiring greater clarity or assessment, it is important to clarify that neither the Resource Management Act 1991 (**RMA**) nor the framework established by the FTAA requires proposals to achieve "complete consistency" with all objectives and policies found in various statutory documents. It is not unusual, therefore, for significant projects to have some inconsistencies with the objectives and policies outlined in District or Regional Plans, especially where competing priorities can lead to policy directions that often "pull in different directions." Accordingly, these provisions should be considered collectively and in context.
11. Mr Henderson acknowledges that the noise produced by the wind turbines is anticipated to comply with the District Plan permitted activity rule NOISE-R8; however, he notes that any modifications to the turbine design may necessitate a reassessment.
12. Rule NOISE-R8 stipulates that wind farm noise must conform to NZS 6808:2010 Acoustics – Wind Farm Noise. Proposed consent condition NO5 imposes an obligation that all wind turbines be designed, constructed, operated, and maintained in accordance with the requirements of this standard. Furthermore, condition WF4 delineates restrictions on the extent to which the wind farm may be "redesigned," confining such changes to the Turbine Envelope Zone as specified in the application documentation.

13. We therefore do not anticipate any issues with continuing to achieve compliance with NOISE-R8 once the wind farm is operational.
14. Mr Henderson agrees that there are no scheduled Outstanding Natural Features or Landscapes (**ONF/ONL**) within the Project Site. However, he references the findings of the Southland/Murihiku Regional Landscape Assessment (**SMRLA**) (Boffa Miskell, 2019) and the comments made by Mr Girvan. He states that the provisions of the District Plan regarding ONFs and ONLs are therefore relevant to understanding how the District Plan anticipates managing these features or landscapes, should they be present.
15. We are of the view that it is necessary to approach this section of the District Plan holistically, considering the introduction and explanatory text, to understand how the objectives and policies are intended to operate in practice.
16. The introductory text of the Natural Features and Landscapes (**NFL**) chapter sets out that there are two tiers of landscapes identified in the District Plan. This process has identified the District's coastal environment and the landscapes within the Fiordland / Rakiura Zone as ONF/ONL and has further identified Visual Amenity Landscapes in the coastal environment and in the Te Anau Basin. It further notes that these landscapes have been identified in various studies, but does not include a reference to the SMRLA.
17. The SMRLA report referenced by Mr Henderson has not been through any formal Schedule 1 RMA process, and we also note that there is a clear disclaimer on the 2019 landscape report stating that these studies do not include cultural advice on values or matters of importance to Ngāi Tahu ki Murihiku: *'Any use of these studies to inform policy creation or resource consent applications must be accompanied by cultural assessments and advice'*<sup>1</sup>.
18. For these reasons, it is our view that the proposal does not directly engage with the two objectives (NFL-O1 and NFL-O2) nor the two policies (NFL-P1 and NFL-P2) as these are specific to the scheduled ONL/ONF and Visual Amenity Landscapes in the District.
19. Policy NFL-P3 is, however, relevant. The explanatory text for this provision states that Policies NFL-P1 and NFL-P2:

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<sup>1</sup> Disclaimer, Boffa Miskell (April 2019) Southland / Murihiku Regional Landscape Study.

*"provide specific direction for Outstanding Natural Features and Landscapes and Visual Amenity Landscapes. However, there is a range of natural features and landscapes within the District that have not been assessed to determine their landscape values. These landscapes are the Inland Mountains (Tākitimu, Livingstone, Eyre, Garvie and Umbrella Ranges), the Southland Hills (Longwoods, Taringaturas, Hokonuis and Inland Catlins), the Southland Valleys and Plains (Lower Waiau Valley, Waimea Plains, Southland Plains). As landscape assessments of these areas are undertaken Council, through the plan change process, may identify and protect additional Outstanding Natural Features and Landscapes and Visual Amenity Landscapes."*

20. Policy NFL-P3 seeks to 'avoid, remedy or mitigate effects of subdivision, land use and development on the District's natural features and landscapes that have not been assessed by Council for landscape values.'
21. Upon a comprehensive review of the NFL chapter, we consider that (notwithstanding the absence of a formal ONF/ONL status within the District Plan) the chapter as a whole requires decision makers to assess the "appropriateness" of an activity in the context of the existing landscape values and the extent and degree of effects that would affect those values. Specifically, with respect to this Project, it is necessary to determine whether the adverse effects on those features or values can be adequately avoided, remedied or mitigated in accordance with Policy NFL-P3.
22. We acknowledge that there will be some effects on visual amenity from wind turbines located on this site, and that, in turn, this will have an impact on landscape values. However, in our view, the site selection process and the deliberate approach to the layout of turbines and ancillary activities (e.g the siting of roading, transmission connection and fill disposal sites) avoid significant adverse effects on natural landscape values or features, noting in particular the significant setbacks from the visually prominent high points of Mokoreta, Puke Mimiha and The Cairn, and also from the 45 degree 'Slopedown' feature at the southern end of the wind farm site, near to the Redan/Mokoreta area. This feature is the most prominent to those dwellings to the west and northwest of the site (i.e. from the more densely populated areas of Wyndham and Edendale and surrounds). There is an approximate 1.5km setback from the 'Slopedown' feature, to the nearest turbine (JED-17) and this separation is apparent when viewing the site from these more populated areas to the west and northwest of the site. Furthermore, Contact

has sought to avoid (to the extent practicable) siting infrastructure and roading in wetlands and in high (or very high) value vegetation.

23. Visual effects are also avoided, remedied, or mitigated through various measures, including the colour of the wind turbines, reduced night-time lighting requirements, the extensive use of existing disturbance footprints, and site remediation.
24. Effects on natural features and landscape values are also broader than visual effects and include consideration of natural science factors, such as geological form, expressiveness, ecological value, value to tangata whenua, historical heritage association, the presence of waterbodies, vegetation (particularly indigenous vegetation) and wild or scenic values.<sup>2</sup> Factors such as natural vegetation, waterbodies and the presence of indigenous species also contribute to the site's natural character.
25. Although the installation of turbines will lead to a visible change in the landscape as noted above, the fundamental physical structure and scale of the land (e.g. geological form and expressiveness) itself will remain unchanged.
26. The technical assessments prepared by Mr Coombs and Mr Bray conclude that the proposal is appropriate in this landscape, and also note that any loss of natural habitat which contributes to natural character (e.g the wetlands, streams, indigenous species and vegetation) has been appropriately mitigated through the fencing, restoration, replanting and pest control measures that will enable natural processes to recover, allowing natural character to increase over time. We discuss natural character in further detail below.
27. In reference to the broader context of assessment of natural features and landscape values, the Project has also been developed to foster a lasting connection with mana whenua and other stakeholders (e.g. DoC regarding ecological values) regarding the site, while also considering the ongoing rural use of the area. Mana whenua have concluded that the cultural and te taiao effects arising from the Project have been appropriately avoided, remedied, mitigated, offset and compensated. This includes the Tuia Te Mana ō Pawakataka programme of work outlined in conditions TW5-7, intended to manage potential impacts on mana whenua values through the

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<sup>2</sup> As set out in Policy LNF.1 of the Southland Regional Policy Statement which sets out the features / values to be used to identify and assess Southland's outstanding natural features and landscapes.

implementation of additional monitoring, mitigation, restoration and enhancement measures.

28. The provisions of the NFL chapter also need to be read alongside those set out in other national, regional or district planning provisions, including provisions which are specific to the development of renewable electricity generation and infrastructure. Notably, the broader framework of provisions in play for this Project in this location and context is not focused on avoiding adverse effects as the primary or exclusive objective.
29. Policy INF.2 of the Southland Regional Policy Statement requires that, where practicable, adverse effects of infrastructure are avoided, remedied or mitigated (which is generally consistent with the framing of the relevant SDC landscape policy outlined above), and in determining the practicability of avoiding, remedying or mitigating adverse effects on the environment, the following matters should be taken into account:
  - (a) Any functional, operational or technical constraints that require the physical infrastructure of regional or national significance to be located or designed in the manner proposed;
  - (b) Whether there are any reasonably practical alternative designs or locations;
  - (c) Whether good practice approaches in design and construction are being adopted; and
  - (d) Where appropriate, and such measures are volunteered by a resource user, whether any significant residual adverse effects can be offset or compensated for.
30. Policy EM-P8 of the Southland District Plan then specifically provides for offsetting and compensation where any residual environmental effects of renewable electricity generation activities cannot be avoided, remedied or mitigated.
31. Mr Girvan asserts that the natural character of the Jedburgh Plateau currently exhibits wetland characteristics, with minimal observable modifications to the landforms and an ecosystem that supports areas of regenerating native and exotic vegetation. Findings from the application and expert ecological assessments confirm that certain species and habitats,

particularly within the Plateau area of the site, meet the criteria for significance as outlined in the Southland Regional Policy Statement.

32. However, Mr Goldwater, in his expert ecological assessment and further evidence in response to comments, provides critical insights into the challenges faced in this area. He emphasises the significant impact of invasive species, specifically deer and feral pigs, as well as other pests that have already affected and continue to threaten the site's ecological integrity.
33. Mr MacGibbon, in his expert ecological assessment and further evidence in response to comments, considers that the extent of this ecological degradation by feral animals has been substantially underestimated. He further posits that the anticipated recovery of vegetation and habitats, which is expected to follow the implementation of Contact's proposed pest control measures, will likely be more profound than currently acknowledged. This recovery is expected to positively influence all vegetation types affected on the Plateau, highlighting the potential to restore the ecological balance of this area. Such restoration is unlikely to be achieved if the Project does not proceed.
34. In relation to any potential loss or impact on stream habitat and quality within the broader Project area, and its contributing impact on the natural character values of the site, Contact is proposing to implement a Riparian Offsetting Management Plan. This plan aims to enhance at least 1 to 2km of stream length (primarily through riparian planting), well in excess of the approximately 769m of stream length affected by stream crossings.<sup>3</sup> Additionally, based on eDNA and other tests undertaken at multiple proposed stream crossings, Contact proposes that two culverts should be designed and constructed to prevent the entry of exotic fish species, thereby addressing potential predation issues of the indigenous galaxias populations identified as living in catchments upstream of these locations.
35. Mr Davis, on behalf of the Southland District Council, in his ecological review, also agrees that significant ecological benefits to the vegetation and habitats of the site can be achieved through the successful implementation of the proposed offsetting and compensation measures.
36. In this regard, the National Policy Statement for Freshwater Management (Amended 2025) (**NPSFM**) and Proposed Southland Water and Land Plan

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<sup>3</sup> Noting that a portion of this estimate is already culverted, and as such, the actual stream length affected by the Project will be lower (potentially 200m less).

(**SWLP**) include provisions which are directly relevant to the management of wetlands, streams, significant indigenous vegetation and habitats of indigenous fauna and flora.

37. Policy 32 of the SWLP seeks to protect significant indigenous vegetation and significant habitats of indigenous fauna and maintain indigenous biodiversity associated with natural wetlands, lakes and rivers and their margins, and Policy 33 seeks to prevent the reduction in area, function and quality of natural wetlands, including through drainage, discharges and vegetation removal. These policies need to be read together with Policy 33A, which was inserted directly into the SWLP as directed by clause 3.22 of the NPSFM. That is to say, the policies drive the protection of natural inland wetlands – including their values and functions and the avoidance of loss of area/extent – subject to the exceptions specified in detail in Policy 33A. These exceptions provide for specified infrastructure<sup>4</sup> where there is a functional need<sup>5</sup> to locate in such environments.
38. The Project is for the construction and operation of specified infrastructure<sup>6</sup>, and therefore, the ‘exception’ pathway is in play. Policy 33A, which is consistent with the NPSFM, requires that the effects of this activity be managed by ensuring access to and application of the effects management hierarchy.
39. The technical assessment prepared by Mr Goldwater and Dr Lloyd states that the anticipated loss of wetlands within the Project footprint is approximately 2 hectares, and limited by conditions to be no more than 2.5 hectares. The reduction in wetland area is necessitated by the establishment of the internal access road network and wind turbine generator platforms, where there is a functional need and no practicable alternative location to

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<sup>4</sup> As defined in clause 3.21 of the NPSFM, **specified infrastructure** means any of the following:

- (a) infrastructure that delivers a service operated by a lifeline utility (as defined in the Civil Defence Emergency Management Act 2002)
- (b) regionally significant infrastructure identified as such in a regional policy statement or regional plan
- (c) any water storage infrastructure
- (d) any public flood control, flood protection, or drainage works carried out:
  - (i) by or on behalf of a local authority, including works carried out for the purposes set out in section 133 of the Soil Conservation and Rivers Control Act 1941;
  - (ii) or for the purpose of drainage by drainage districts under the Land Drainage Act 1908 defence facilities operated by the New Zealand Defence Force to meet its obligations under the Defence Act 1990
- (e) defence facilities operated by the New Zealand Defence Force to meet its obligations under the Defence Act 1990
- (f) ski area infrastructure

<sup>5</sup> As defined in clause 3.21 of the NPSFM, **functional need** means the need for a proposal or activity to traverse, locate or operate in a particular environment because the activity can only occur in that environment

<sup>6</sup> Being infrastructure that delivers a service operated by a lifeline utility and regionally significant infrastructure, which as defined in the Southland RPS means infrastructure in the region which contributes to the wellbeing and health and safety of the people and communities of the region, and includes all critical infrastructure.

position these. This is currently the minimum area of impact the design team could achieve through multiple iterations of civil design.

40. Upon approvals being obtained, Contact will proceed with the detailed design of the Southland Wind Farm. In conjunction with the detailed design, further vegetation mapping will be conducted to confirm the areas of vegetation that will be impacted by the 'final' Project footprint and from this, the identification of the specific management measures that Contact must implement to manage potential effects on high-value (or very high value) vegetation (which will be outlined in the Vegetation Management Plan). These activities are stipulated as part of the proposed conditions (EC4A and EC4B). Further consideration will also be made as to whether any further changes can be made to the Project footprint to avoid or minimise effects on high or very high value vegetation. EC7 further mandates Contact to comprehensively analyse how the impact on key vegetation and habitat types, including wetland habitat, will be addressed.
41. Moreover, as set out above, Condition EC8 establishes a maximum disturbance threshold for wetland and other habitat types noted as being of significance. This includes the requirements that there shall be no loss of wetlands greater than 2.5ha across the Project site. The exercise described above will confirm compliance with this limit. Monitoring of wetlands is also proposed and, in response to comments, has been extended to at least 13 years, as discussed in the evidence of Mr Goldwater and Mr MacGibbon (refer to EC11B).
42. The proposed condition set is therefore comprehensive and provides certainty in terms of total impact and also requires Contact to continuously apply the effects management hierarchy in its approach to designing and constructing the wind farm. In our view, this is entirely consistent with the policy requirements that relate to the management of the natural features and landscape, and as part of that 'natural character', as it should be considered in this location and context.

#### **WEST CATLINS PRESERVATION SOCIETY**

43. The West Catlins Preservation Society (**WCPS**) commented that the proposed wind farm does not meet the test of a functional need to locate on this site, on the basis that *several sites have less ecological impact* and that

the Regional Energy Strategy for Southland (**Regional Energy Strategy**) notes over 100 potential wind farm locations.<sup>7</sup>

44. We note that WCPS provides no evidence of there being several sites with less ecological impact than the Southland Wind Farm Site, and the majority of the sites identified in the Regional Energy Strategy have not been fully investigated to confirm the suitability of the development of a wind farm. Nor does this appear to be the intent of the Regional Energy Strategy, as discussed further below.
45. As discussed above, the policy provisions relevant to managing impacts on wetland and stream values within the site require that the activity demonstrate a “functional need” to be located in such areas. This is also the policy requirement regarding the management of highly productive land (where that exists within the Project Site).<sup>8</sup>
46. The substantive application deals with functional need by assessing a range of relevant factors to show why the proposal meets this requirement. These include:
  - (a) The wind resource at the Wind Farm Site is good quality for the development of a wind farm, with low turbulence intensity, low wind shear and low occurrence of extreme wind speeds;
  - (b) The Wind Farm Site is located relatively close to the existing Transpower 220kV circuit between Invercargill and Dunedin (the North Makarewa to Three Mile Hill A Circuit). Transpower has confirmed that this circuit has the capacity to accommodate the electricity that will be generated from the Southland Wind Farm;
  - (c) The proposed transportation route from South Port to the Wind Farm Site has been confirmed as being suitable for the transportation of oversized and overweight wind turbine components;
  - (d) The landowners within the Project Site are willing to make the land available to Contact – the landowner has also commented that his land has been investigated as a potential wind farm site for around 20 years by various entities (indicating its value as a viable wind farm);

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<sup>7</sup> Paragraph 270 of the West Catlins Protection Society, Comments on the Southland Wind Farm Application

<sup>8</sup> Clause 3.9(2)(j)(i) of the National Policy Statement for Highly Productive Land.

- (e) The nearest dwelling is located 2.3km from the nearest proposed wind turbine. This is a significant distance for wind farms in New Zealand – the greatest of all of the wind farms listed in the table of New Zealand wind farms submitted with Contact’s response to Minute 3, which represents approximately 90% of the total operational wind farm capacity in New Zealand.<sup>9</sup> This will minimise certain effects on nearby dwellings, in particular, noise and shadow flicker effects (which is avoided entirely);
- (f) The wind farm layout is restricted to the technical feasibility of the design, including the modelled wind resource across the site, wind turbine spacing requirements, setbacks from external property boundaries and compliance with the wind turbine noise standard;
- (g) Other matters that also need to be taken into account include physical access, construction efficiency and scale; and
- (h) Taking into account the operational requirements as noted in (f), the wind farm layout has been redesigned a number of times following updates to the vegetation mapping prepared by Wildlands, as well as the other ecological surveys completed by Wildlands, to avoid the impact of the Project on high value ecological features to the greatest extent practicable. Alternatives to the proposed wind farm layout have been considered, and it has been determined to be the best practicable option from both technical and environmental effects perspectives.

47. 'Functional need' was a highly relevant matter in the Mt Messenger Bypass case. There, the Court held:

- (a) The presence of alternative routes for a proposal is not in itself a sufficient argument to indicate a lack of "functional need" because with linear infrastructure, alternatives will always exist, and their existence could not have been intended to make the specified infrastructure exception serve no practical purpose.
- (b) The "location" in which the activity occurs does not mean the specific wetland in question, but the broader environment (as defined in section 2 of the RMA) that is subject to the activity.

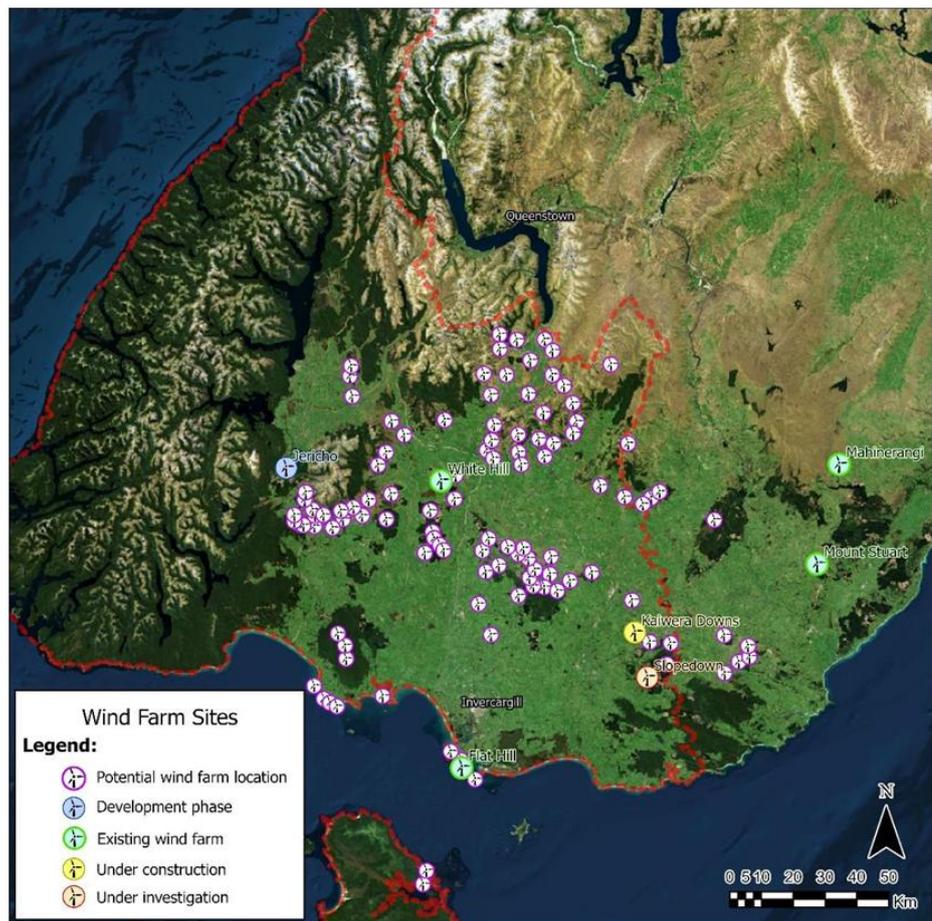
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<sup>9</sup> SWF- New Zealand Wind Farm Database, prepared by Paul Botha, Roaring40s Wind Power.

48. We also note that Policy C of the National Policy Statement for Renewable Electricity Generation (**NPSREG Amended 2025**) has been amended to provide direction on the operational need or functional need for renewable electricity generation activities to be in particular locations and environments as follows:
- (1) *Decision-makers must recognise and provide for REG assets and activities that have an operational need or functional need to be in particular locations and environments.*
  - (2) *Decision-makers must recognise that the operational need or functional need of REG assets and activities includes, but is not limited to, the need to:*
    - (a) *be located where a renewable electricity resource is located and available at a viable scale and quality to sustain the REG activity;*
    - (b) *be accessible to connect to electricity networks and be nearby to electricity demand; and*
    - (c) *have sufficient and accessible land available to support all associated current and reasonably foreseeable future REG activities at that particular location.*
  - (3) *An assessment of alternative sites is not required to demonstrate that an operational or functional need exists*
49. In accordance with Policy C(3), an assessment of alternative sites is therefore not required to demonstrate an operational or functional need for the Southland Wind Farm. We therefore disagree with the comments that, because there may be alternative sites that may also be suitable for wind farm developments, this Project does not meet the functional need test.
50. For greater clarity, the sites identified in the Regional Energy Strategy are shown in the image in the figure<sup>10</sup> below:

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<sup>10</sup> Figure 5-3, extracted from Page 37 of the Southland Murihiku Regional Energy Strategy Report 2022 - 20250



51. Following our review of this report, we understand that the Regional Energy Strategy is presented at a high level, and it is not intended to include a detailed assessment of each site identified in the figure. It certainly does not reflect the level of evaluation conducted by Contact as part of its substantive application, though the Regional Energy Strategy does note that the "Slopedown" site is "under investigation".
52. The Regional Energy Strategy highlights that finding a suitable site for a wind farm is an iterative process that requires progressively detailed consideration of three key factors: technical requirements, environmental considerations, and financial viability. It briefly discusses these factors in the context of onshore and offshore wind generation in Southland Murihiku.
53. The document identifies four essential technical requirements for evaluation: wind resource, availability of suitable land, site accessibility, and grid infrastructure. In our opinion, these aspects are directly related to assessing the functional need for wind farm development. They also notably align with the NPSREG Amended 2025 Policy C(2), outlined above, which provides clear guidance on the matters that decision-makers must recognise in this regard.

54. As set out above, we view these matters as having been comprehensively assessed and satisfied for this proposal.

55. The Regional Energy Strategy then goes on to say that developers of onshore wind farms must assess their environmental impacts, noting that:

*Proximity to sites of environmental or cultural significance will be an important consideration and will need to include an assessment of environmental impacts and mitigation. 58% of Southland's total land area is managed as part of the New Zealand conservation estate, therefore consideration should be given to early engagement with iwi, councils, community and stakeholder entities such as the Department of Conservation to facilitate a smooth planning process.<sup>11</sup>*

56. Contact has conducted a thorough assessment and has developed a comprehensive understanding of the cultural, environmental, and heritage values associated with the site. Notably, key stakeholders, including the Department of Conservation and Kā Papatipu Rūnaka ki Murihiku, have expressed their overall comfort with the substantive application and the proposed conditions at this site.

57. The Regional Energy Strategy then concludes with a set of opportunities identified for wind farm development within Southland Murihiku – these are understandably high-level and recommend:

- (a) Southland Murihiku actively explore both onshore and offshore options.
- (b) Wind could be seen as a dominant source of energy to meet the energy gap presented by the energy balance. Begin by optimising the available onshore resource, as this will provide lower cost energy and come online sooner.
- (c) Undertake detailed feasibility studies for lowland wind sites between Invercargill and Endale.
- (d) Potential offshore sites assessments undertaken whilst technology is still developing so that future generation can be forecast and developed in time to meet demand.

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<sup>11</sup> Page 38 of the Southland Murihiku Regional Energy Strategy Report 2022 - 20250

- (e) If New Zealand Aluminium Smelter (NZAS) and Southern Green Hydrogen (SGH) are both online, then the need to develop offshore wind may become critical for Southland Murihiku.
  - (f) New generation should be located close to new load and transmission infrastructure where possible.
58. We therefore disagree with the assertions made by WCPS regarding the Regional Energy Strategy, which imply that there are more suitable locations for this proposal. In fact, the Strategy identifies a range of wind farm development opportunities in Southland, of which the “Slopedown” site is one. In our evaluation, the proposal and the process by which Contact has developed it closely align with the findings and recommendations outlined in the Regional Energy Strategy. This alignment and the resulting assessment clearly demonstrate a functional and operational need for situating the wind farm and its associated infrastructure at this specific location.

## **ENVIRONMENT SOUTHLAND**

59. Environment Southland commented that any benefits from removing livestock from wetlands must be evaluated in the context of the SWLP. SDC has also sought clarification as to whether Contact has any intention to enable grazing within the Jedburgh Plateau.
60. We acknowledge that there is already a Regional Plan framework in place in relation to stock exclusion from wetlands, which we summarise below.
61. According to Rule 70(ca1) of the SWLP, the disturbance of the bed of a waterbody within a natural wetland for sheep grazing is classified as a discretionary activity. Rule 70(cb) states that, aside from what is outlined in Rule 70(ca1), any use of land within a natural wetland or the disturbance of the bed of a waterbody for access or livestock grazing is considered a non-complying activity.
62. We understand this rule to mean that sheep are allowed access to or through wetland areas but cannot graze there without prior resource consent. In contrast, cattle need consent for both access and grazing in these areas.
63. As the Panel is aware, Contact has proposed a comprehensive on-site and off-site offsetting and compensation package. This proposal includes establishing a 245-hectare Ecological Enhancement Area at Jedburgh Station, to be fenced to exclude deer, pigs, and farm livestock. This area

encompasses a total of 18 hectares of fen wetlands and 1.5 hectares of bog wetlands.

64. The ecological evidence indicates that feral animals, particularly pigs and deer, are currently significantly impacting the Jedburgh Plateau, and the proposed broad-spectrum and integrated pest control measures (which extend beyond the Jedburgh Plateau to the 1400 hectare Jedburgh Station Pest Control Area) will greatly reduce the populations of these species accessing the entirety of the Plateau.
65. We are of the view that these measures go well beyond any statutory obligations and the current management of that environment. There is no legal requirement to entirely enclose or protect wetlands (or areas of significant biodiversity value) within a property through fencing or other mechanisms. The only stipulation under the SWLP pertains to the prevention of livestock grazing in wetlands unless consent is obtained.
66. Additionally, there is no binding requirement for landowners to manage or exclude feral ungulates in the area, and there is no requirement to control feral deer and pigs on the Southland mainland under the Southland Regional Pest Management Plan. Consequently, ecologists have determined that the conditioned, fully resourced and closely monitored control of feral ungulates (and other pest animals and plants) and the proposed planting efforts surpass existing statutory requirements. In essence, there is no statutory obligation compelling landowners to remove all livestock from all areas of the Plateau or directly protect all wetland areas through fencing, for example, under a business-as-usual scenario.

## **CONDITIONS**

67. The comments received in the section 51 reports prepared by the Department of Conservation (**DoC**) in respect of the approvals sought for the wildlife approvals, concessions and complex freshwater fisheries activities, and by Heritage New Zealand Pouhere Taonga (**HNZPT**) regarding the archaeological authority sought, included comments on the proposed conditions for each of these approvals.
68. In addition, the section 53 comments received from Southland District Council, Environment Southland, Gore District Council, Department of Conservation and the Environmental Defence Society included comments on the resource consent conditions.

69. We have considered the comments and suggested amendments made by the various commenters and prepared an updated set of proposed conditions for each of the approvals sought, included as Appendices 8-12 of Contact's response. Where we agree with the suggested amendments, we have included these as tracked changes. Where we disagree with the suggested amendments we have stated why.
70. Where the comments relate to technical matters, our responses are informed closely by advice received from Contact's technical experts. We note in particular that the evidence of Mr Goldwater and Mr MacGibbon (re ecology), Mr Coombs and Mr Bray (re landscape and natural character) and Mr Halstead (re noise) specifically respond to comments made on conditions. Our updated conditions reflect that evidence.
71. SDC provided detailed comments and suggested changes on the proposed resource consent conditions, and these have largely been accepted in the updated condition set. These primarily related to timeframes, clarification on the management plan certification process and advice received from its expert peer reviewers.
72. Environment Southland's comments confirmed it is generally comfortable with the proposed consent conditions and provided minor suggested amendments to the conditions, which have largely been accepted in the updated conditions.
73. Mr Harding, the ecologist engaged by the Environmental Defence Society, also provided comments on the proposed consent conditions, and these are addressed in the evidence prepared by Mr Goldwater.<sup>12</sup>
74. DoC provided comments on the conditions for the DoC related approvals and the consent conditions. Contact's primary response provides a detailed response to DoC's comments in the s51 reports, including where suggested amendments to conditions have or have not been accepted and therefore is not repeated here. We have largely accepted DoC's comments on the DoC related approval conditions, however, where we consider the conditions are already appropriately addressed in the consent conditions, we have avoided unnecessary duplication. We consider this is consistent with the purpose of the FTAA. DoC also provided minor comments on the consent conditions, and these have been accepted, with minor refinements in accordance with

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<sup>12</sup> Contact's main response to comments document addresses the additional condition comments made in EDS's legal submissions.

the advice received from Contact's expert ecologists and discussed in detail in the evidence prepared by Mr Goldwater.

75. HNZPT provided detailed comments on the Archaeological Authority conditions in its section 51 report, and these were updated in its section 53 comments following further consultation between HNZPT and Contact. As outlined in Contact's primary response document, Contact's updated proposed Archaeological Authority conditions submitted with this response have been prepared in consultation with Te Ao Marama Inc. (**TAMI**). The conditions largely reflect HNZPT's suggested standard conditions, however, have been refined to ensure TAMI is comfortable with the conditions to ensure cultural values are appropriately provided for.

### **NATIONAL DIRECTION INSTRUMENT AMENDMENTS**

76. On 18 December 2025 the government announced ten new or amended national direction instruments under the Resource Management Act 1991 that will come into effect on 15 January 2026. In its Minute 4 dated 19 December 2025, the Panel identified that at least the following five instruments appear directly relevant to the application:
- (a) National Policy Statement for Indigenous Biodiversity Amendment 2025 (NPS-IB);
  - (b) National Policy Statement for Freshwater Management Amendment 2025 (NPS-FM);
  - (c) Resource Management (National Environmental Standards for Freshwater) Amendment Regulations 2025 (NES-FW);
  - (d) National Policy Statement for Renewable Electricity Generation Amendment 2025 (NPS-REG); and
  - (e) National Policy Statement for Electricity Networks Amendment 2025 (NPS-EN).
77. In Minute 4, the Panel requested Contact (as well as the Councils) to identify the amendments to the above instruments that are now relevant to the previous statutory planning assessment included in Part B of the substantive application and undertake an assessment of the Project against those amended provisions. An assessment of the relevant amendments is provided below.

78. For completeness, we have also considered the other five instruments released on 18 December 2025. None are directly relevant to the Project, as noted below:
- (a) Resource Management (National Environmental Standards for Detached Minor Residential Units) Regulations 2025 (NES-DRMU) [not relevant because the Project does not involve the construction of Detached Minor Residential Units];
  - (b) National Policy Statement for Natural Hazards 2025 [not relevant because it does not apply to infrastructure per clause 1.3];
  - (c) National Policy Statement for Infrastructure 2025 [not relevant because it does not apply to REG / transmission per clause 1.3];
  - (d) National Policy Statement for Highly Productive Land Amendment 2025 (NPS-HPL) [not relevant because the changes do not amend the policies relevant to the Project as addressed in Section 8.9 of Part B of the substantive application]; and
  - (e) New Zealand Coastal Policy Statement Amendment 2025 (NZCPS) [not relevant because the Project is not located in the coastal environment].

*National Policy Statement for Indigenous Biodiversity Amendment 2025*

79. The amendments to the NPS-IB are not relevant to the Project as clause 1.3(3) of the NPS-IB still states the NPS-IB does not apply to renewable electricity generation activities. Therefore, an assessment of the Project against the changes to the NPS-IB (or the NPS-IB overall) is not required and the assessment set out in Section 8.10 of Part B of the substantive application is still applicable.

*National Policy Statement for Freshwater Management Amendment 2025 and Resource Management (National Environmental Standards for Freshwater) Amendment Regulations 2025*

80. The amendments to the NPS-FM and NES-FW apply to provisions relevant to quarrying and mineral extraction activities in natural inland wetlands and are therefore not relevant to the Project. Therefore, an assessment of the amendments to the NPS-FM or the NES-FW is not required and the

assessment set out in Section 8.8 and 8.12 of Part B of the substantive application is still applicable.

81. However, the amendments to the NPS-REG must guide the Panel's analysis of the Project against the provisions of the NPS-FM. In particular, the new NPS-REG Policy C in respect of functional and operational need must be applied by the Panel when considering the "functional need" element of clauses 3.22 (wetlands) and 3.24 (rivers) of the NPS-FM. As discussed below, Policy C of the NPS-REG reinforces our conclusion that there is a functional need for the Project in its proposed location.

*National Policy Statement for Electricity Networks Amendment 2025*

82. The NPS-EN replaces the National Policy Statement on Electricity Transmission 2008. The NPS-EN applies to electricity network activities, including all electricity transmission and distribution networks and ancillary network activities across New Zealand.<sup>13</sup> The Project does not meet the definition of an electricity network activity, and therefore, the NPS-EN does not apply to the Project.<sup>14</sup>

*National Policy Statement for Renewable Electricity Generation Amendment 2025*

83. The amendments to the NPS-REG are relevant to the Project. The relevant provisions of the NPS-REG have been strengthened to ensure greater clarity and clearer direction for decision-makers regarding the importance of enabling renewable electricity generation activities and the national significance of these activities. A number of amendments have been made to the NPS-REG, and therefore, a complete assessment of the amended NPS-REG is provided below, and this supersedes the assessment provided in Section 8.7 of Part B to the substantive application.
84. The definition of renewable electricity generation activities in the amended NPS-REG is as follows:

*"Renewable electricity generation (REG) activities include the full range of activities required for REG, including small-scale and community-scale REG, including:*

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<sup>13</sup> Clause 1.3 of the NPS-EN.

<sup>14</sup> Electricity network activity means the construction, operation, maintenance, development, upgrading, replacement, decommissioning or removal of electricity network assets, and includes ancillary electricity network activities. Electricity network means the electricity transmission network (ETN) (being the National Grid operated by Transpower) and the electricity distribution network (EDN). The Project does not involve the distribution of electricity or activities associated with the ETN. Refer to the definitions included in clause 1.4 of the NPS-EN.

- (a) *the investigation, construction, operation, monitoring, maintenance, upgrade, repowering, decommissioning and removal of REG assets;*
- (b) *the storage of generated electricity, whether connected to REG, the electricity network or directly to a site or community;*
- (c) *the conveyance of generated electricity to electricity networks or directly to end users;*
- (d) *all ancillary REG activities; but*
- (e) *does not include electricity network assets as defined by the National Policy Statement for Electricity Transmission 2008 and its amendments."*

85. In addition, ancillary renewable electricity generation activities mean:

*"an activity that supports and is subsidiary to a REG activity, including but not limited to:*

- (a) *vegetation clearance and tree trimming;*
- (b) *earthworks and land disturbance;*
- (c) *construction, maintenance, repair and upgrading of access tracks, bridges and culverts; and*
- (d) *construction, maintenance, repair and upgrading of power supply and telecommunication cables and devices."*

86. Therefore, the NPS-REG applies to all activities associated with the Southland Wind Farm Project, including the construction, operation and maintenance of the Project and associated activities such as vegetation clearance, earthworks and roading upgrades, including stream crossings. As such, the NPS-REG provides the most relevant national policy direction for the Project, including the management of effects.

87. The objective of the NPS-REG is to:

- (a) *ensure the national, regional and local benefits of REG are provided for;*
- (b) *enable REG capacity and output to significantly increase;*

- (c) *enable REG to support the social, economic and cultural well-being of people and communities, and for their health and safety;*
- (d) *enable REG to provide greater security of electricity supply and resilience to supply disruptions to all people and communities;*
- (e) *enable REG to support achieving New Zealand's emission reduction target and implementation of the emissions reduction plan under the Climate Change Response Act 2002; and*
- (f) *ensure REG is developed and operated in a safe, efficient and effective manner while managing the adverse effects from or on REG activities.*

88. The objective of the NPS-REG recognises the regional and national significance of renewable electricity generation activities and seeks for the associated benefits of these activities to be enabled and provided for. As set out in detail in the substantive application, the Southland Wind Farm Project is therefore supported by and strongly aligned with this policy direction.

89. Policy A of the NPS-REG requires the Panel to recognise the national significance and benefits of renewable electricity generation and notes the benefits of these activities which decision makers must recognise and provide for as follows:

- (1) *Decision-makers on REG activities must recognise and provide for the national significance and the national, regional and local benefits of REG activities.*
- (2) *Decision-makers must recognise that the benefits of REG activities include:*
  - (a) *avoiding, reducing and displacing greenhouse gas emissions;*
  - (b) *contributing to the security, resilience and independence of electricity supply at local, regional and national scales through diverse REG sources and electricity storage in diverse locations;*
  - (c) *providing for the social, economic and cultural wellbeing of people and communities and for their health and safety;*
  - (d) *using renewable rather than finite sources of energy;*

- (e) *avoiding reliance on imported and domestic fossil fuels for the purposes of generating electricity;*
- (f) *the temporary and reversible nature of adverse effects on the environment of some REG technologies;*
- (g) *reducing electricity losses by locating REG activities close to electricity demand and existing electricity networks; and*
- (h) *reducing adverse effects by:*
  - (i) *co-locating REG with other appropriate REG assets and activities and other appropriate infrastructure and activities; and*
  - (ii) *locating REG activities to minimise adverse effects on other activities.*

90. The matters set out in Policy A(2) are highly relevant to the Project, as outlined in Part A of the substantive application document, as well as Section 5.2 of Part B. By way of summary, the Southland Wind Farm will generate a nationally significant source of renewable electricity, that will increase the security and resilience of New Zealand's electricity supply. The Southland Wind Farm will result in significant economic benefits to the Southland Region, in particular during the construction of the Project, which is expected to contribute between \$260 million and \$430 million of capital investment into the New Zealand economy and will generate 180-300 direct jobs. The electricity generated at the Southland Wind Farm will contribute to New Zealand's decarbonisation goals and reduce reliance on non-renewable energy sources. Further, the Southland Wind Farm is located in a suitable location for a wind farm, noting its proximity to the national grid and the need for increased generation in Southland, which is currently a net importer of electricity. This policy therefore supports the Southland Wind Farm Project.

91. Under the amendment, Policy B has been replaced with the following to ensure decision-makers consider cumulative gains and losses of renewable electricity generation capacity:

- (1) *Decision-makers on REG assets and activities must recognise and provide for the importance of:*

- (a) *enabling cumulative increases of REG capacity and output at any scale and any location, including small-scale and community-scale REG assets and activities; and*
- (b) *avoiding, where practicable, any overall or cumulative losses of REG capacity and output from a region or district or existing REG assets and activities.*

- (2) *Decision-makers must have regard to any potential and reasonably foreseeable reduction in the utilisation of renewable electricity resources from inappropriate subdivision, use and development.*

92. The policy direction in Policy B requires the Panel to recognise and provide for the importance of the Southland Wind Farm in contributing to the cumulative increase of New Zealand's renewable electricity generation. The New Zealand government has set a target of doubling renewable electricity by 2050, and significant investment in renewable electricity generation activities is required to achieve this goal. The Southland Wind Farm will make a significant contribution to achieving this, as it is expected to generate enough electricity to power up to 150,000 households per year. Reductions in the ability of the applicant to use the renewable energy resource at the Project Site as efficiently as possible, such as through the deletion of turbine locations or exclusions in certain areas, such as the Jedburgh Plateau, would be contrary to the direction of Policy B.

93. Policy C of the NPS-REG has been amended to provide clearer direction on the operational or functional need of renewable electricity generation activities to be located in particular locations and environments:

- (1) *Decision-makers must recognise and provide for REG assets and activities that have an operational need or functional need to be in particular locations and environments.*

- (2) *Decision-makers must recognise that the operational need or functional need of REG assets and activities includes, but is not limited to, the need to:*

- (a) *be located where a renewable electricity resource is located and available at a viable scale and quality to sustain the REG activity;*

*(b) be accessible and to connect to electricity networks and be nearby to electricity demand; and*

*(c) have sufficient and accessible land available to support all associated current and reasonably foreseeable future REG activities at that particular location.*

*(3) An assessment of alternative sites is not required to demonstrate that an operational or functional need exists.*

94. This policy requires the Panel to consider the operational and functional need of the Southland Wind Farm to be located in this particular location. The functional need of the Project is described in detail in Section 8.8.6 of Part B to the substantive application document (in relation to the functional need test under the NPS-FM) and this assessment is also relevant to this NPS-REG policy. In addition, of particular relevance to the direction in Policy C:

*(a) The quality of the wind resource at the Wind Farm Site is highly suitable for the development of a wind farm, with low turbulence intensity, low wind shear and low occurrence of extreme wind speeds;*

*(b) The Project Site is located in close proximity to the National Grid, and the circuit has the capacity to accommodate the electricity that will be generated from the Southland Wind Farm; and*

*(c) Contact has agreements in place with the relevant landowners that will enable the development of the Southland Wind Farm in this location.*

95. Further, and as discussed earlier in this evidence, Policy C notes that an assessment of alternatives is not required to demonstrate that an operational or functional need exists. As such, the Panel cannot have regard to any other potential sites that may also be suitable for the development of a wind farm in forming its decision on the suitability of the Project Site.

96. The previous policies E1-E4, F and G have been revoked and are therefore no longer relevant to the Project. New policies E-H have been inserted. Policy E seeks to recognise and provide for Māori interests:

*(1) Decision-makers must recognise and provide for Māori interests in relation to REG assets and activities, including by:*

- (a) *Taking into account the outcome of any engagement with tangata whenua on a relevant resource consent, notice of requirement or private plan change;*
- (b) *Recognising the opportunities tangata whenua may have in developing and operating their own REG activities at any scale or in partnership; and*
- (c) *Local authorities:*
  - (i) *providing opportunities for tangata whenua involvement where REG assets and activities may affect a site of significance or issue of cultural significance to Māori; and*
  - (ii) *operating in a way that is consistent with any relevant iwi participation legislation or Mana Whakahono ā Rohe.*

97. Policy E(1)(a) is of particular relevance to the Project, noting that Contact has been engaging with Kā Papatipu Rūnaka ki Murihiku and their designated resource management authority, Te Ao Marama Inc (TAMI) in relation to the Project since 2023. This engagement is described in full in Section 6 of Part A to the substantive application documents. This consultation informed Contact's response in terms of avoiding, remedying and mitigating cultural effects of the Project.

98. This resulted in the development of the proposed consent conditions to address effects, in particular the mana whenua-specific conditions, which have been agreed between Contact and Ngāi Tahu ki Murihiku (and the other tangata whenua entities), as well as a separate confidential agreement which has been reached to address matters that cannot be mitigated by way of conditions. The Panel must therefore take into account the outcome of this engagement to recognise and provide for Māori interests in relation to the Southland Wind Farm Project.

99. In addition, Policy F provides direction on enabling and managing the effects of renewable electricity generation activities on the environment:

- (1) *Decision-makers must enable REG assets and activities in all locations and environments.*
- (2) *Where REG assets and activities are proposed to locate in or are likely to have adverse effects on environments and values provided*

*for in section 6 of the Act, the provisions of this policy must be read alongside other relevant national direction, regional policy statements and regional and district plans.*

- (3) Where (2) does not apply, the adverse effects of REG assets and activities must be, where practicable, avoided, remedied or mitigated.*
- (4) Decision-makers must have particular regard to the use of adaptive management measures.*
- (5) When considering any residual adverse effects of REG assets and activities that cannot be avoided, remedied or mitigated, decision-makers shall have regard to offsetting measures or environmental compensation, including measures or compensation that benefit the local environment and community affected.*

100. Policy F seeks to enable renewable electricity generation activities in all locations and environments. Policy F(2) recognises that renewable electricity generation activities may be located in areas that result in adverse effects on the environments and values provided for in section 6 of the RMA, such as the natural character of wetlands and their margins and areas of significant indigenous vegetation and significant habitats of indigenous fauna. Where this is the case, the policy direction provided in the NPS-REG must be read alongside the policy direction provided in the other relevant planning instruments.
101. Of particular relevance to this Project is the national policy direction provided in the NPS-FM, as well as the Southland Regional Policy Statement, Proposed Southland Water and Land Plan, the Southland District Plan and the Gore District Plan (operative and proposed). The relevant provisions are assessed in full in Section 8 of Part B to the substantive application which confirms the Project is consistent with the policy direction outlined in these documents.
102. In addition, Policy F(4) and (5) requires decision makers to also have regard to adaptive management measures and, where there are adverse effects that cannot be avoided, remedied or mitigated, regard must be given to offsetting and compensation measures, including those that benefit both the environment and community affected.
103. It is noted that Contact is proposing an extensive ecological offsetting and compensation programme to address residual adverse effects which is

expected to result in a net ecological gain. In addition, Contact will also establish a Community Benefit Fund that will include an initial fund of \$200,000 and regular annual contributions into the fund of \$70,000, plus \$250 per MW above 200 MW of installed capacity. This will be highly beneficial to the community and can be accessed to support community-based services or projects over the lifetime of the Project. The Panel must therefore also have regard to these measures in accordance with this policy direction.

## **CONCLUSION**

104. In conclusion, the recent amendments to most of the national direction instruments are not relevant to the Project and do not have an effect on the statutory planning assessment that was included in Part B of the substantive application.
105. However, the amendments to the NPS-REG are highly relevant to the Project, and we consider these amendments weigh further in favour of the granting of the approvals sought for the Project in accordance with section 85 of the FTAA, particularly noting the recognition of the national benefits of renewable electricity generation activities and the need for increased renewable electricity generation in New Zealand.
106. Moreover, it remains our view that the proposal aligns with the policy direction set out in all relevant regional and district planning documents, including those that address the management of landscape values, natural features, natural character, and functional need.

**Claire Elizabeth Hunter and Megan Kate Hankey**

**14 January 2026**

## **APPENDIX 1**

### **QUALIFICATIONS AND EXPERIENCE OF CLAIRE HUNTER**

1. My full name is Claire Elizabeth Hunter.
2. I hold a Bachelor of Applied Science (First Class Hons) majoring in Environmental Management from the University of Otago, obtained in 2004, and hold membership with the Resource Management Law Association.
3. I am a Director at Mitchell Daysh Limited and have 21 years of experience in resource management. I have worked on numerous renewable energy projects across the South Island, including wind farms and hydroelectric schemes, as well as various large-scale infrastructure and primary resource-related projects. Below is a selection of key clients and projects I have been involved with:
  - (a) Contact Energy Limited – Southland Wind Farm; Otago Proposed Regional Policy Statement; Clutha Hydro Scheme – ancillary activities.
  - (b) Meridan Energy Limited – Project Hayes Wind Farm, Central Otago; Mokihinui Hydro Scheme, West Coast.
  - (c) Fortescue Future Industries – Advice on a proposal relating to the development of a hydrogen production plant in Southland.
  - (d) Willowridge Developments Limited – prepared and presented evidence in the Environment Court for an earthworks plan change being proposed by the Otago Regional Council.
  - (e) Bathurst Resources Limited – West Coast and Canterbury mining proposals.
  - (f) OceanaGold New Zealand Limited – Macraes Mine (Deepdell North Stage 3 development); Otago Proposed Regional Policy Statement.
  - (g) Aurora Energy Limited – Successfully obtained a resource consent and subdivision for a new large-scale substation in Camp Hill, Hawea.
  - (h) Liquigas Limited – Reconsenting of its significant South Island LPG Terminal located at Port Otago, Dunedin.
  - (i) Wellington International Airport Limited – Management of technical inputs and reports for its previously proposed runway extension,

preparation of regional and district council resource consent applications.

### **QUALIFICATIONS AND EXPERIENCE OF MEGAN HANKEY**

1. My full name is Megan Kate Hankey.
2. I hold a Master of Science degree in Geography from the University of Otago, obtained in 2021, and hold membership with the Resource Management Law Association.
3. I am a senior consultant at Mitchell Daysh Limited, which practices as a resource management planning and environmental consultancy firm throughout New Zealand. I have approximately 4 years' experience in this field. In this capacity, I was the primary author of the substantive application (Parts A-F of the substantive application) for the Southland Wind Farm Project.
4. I have been involved in the preparation of resource consent applications, including statutory planning assessments, and providing resource management advice to a wide range of clients in relation to regional and district plans, resource consents and environmental effects assessments. My experience includes renewable electricity generation projects, meat processing activities and substantial mining activities. Below is a selection of key clients and projects I have been involved with:
  - (a) Contact Energy Limited – Southland Wind Farm; Clutha Hydro Scheme – ancillary activities.
  - (b) Silver Fern Farms Limited – various consenting activities relating to its meat processing activities.
  - (c) Waitaki District Council – Notices of Requirement to designate Waitaki District Council's three waters infrastructure in the Proposed Waitaki District Plan.
  - (d) OceanaGold (NZ) Limited – Macraes Mine MP4 Project.