

Our reference: **APP- 20252544 FTA**
Enquiries to: **Bruce Halligan**
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23 March 2026

The Expert Panel – Contact Energy Southland Wind Farm
Environmental Protection Authority
Private Bag 63002
Wellington 6140

Attention: **Keely Paler**
Email: substantive@fasttrack.govt.nz

Tēnā koe Keely,

FTAA - 2508-1095 – Contact Energy Southland Wind Farm – Comments of Environment Southland on Minute 9- Draft conditions

Thank you very much to the panel for the opportunity to provide comments on the draft conditions, as is provided for under Section 70 of the above fast-track application.

Environment Southland had been involved in considerable dialogue with the applicant during this process in relation to the draft condition suite. The ES in-house project team has reviewed the revised condition suite as provided by the panel. The updated version which illustrates the changes made by the panel was very helpful in that regard, our thanks go to the panel for that.

Overall Environment Southland is generally comfortable with the draft condition suite.

Specifically, Environment Southland **supports** the following changes the panel has proposed:

Condition G6A (Pg 12) – the panel’s proposed additions to this condition are noted and supported. Thorough final design drawings and the associated information required by G6A will be important for ES’s future monitoring, and the pre-commissioning report required by new G6A.5 will be very useful in that regard.

Condition MP1.2 (Pg15) management plan preparation timing – ES supports the minimum 75 working days prior period included in new Condition MP1.2

For **now**
& **our future**

Condition MP.4.2- Advice Note (Pg 15)– ES supports the proposed advice note addition to make it clear that the independent reviewers when agreed are appointed by the councils. This will provide an additional assurance of objectivity to the community/stakeholders. ES also supports the change in MP4.3 to make it clear that all associated costs must be covered by the Consent Holder.

Condition CM7.d (Pg 30) – the addition to this stabilisation condition is noted and supported by ES. The deletion of Conditions 7B and 11B and additions to CM12 are noted.

Conditions CM27 and CM28 (Pg36-37) – Annual Reporting - ES supports the additions and clarifications to the reporting conditions, and the addition of CM28.2 to require provision of engineering survey plans and sections of other site earthworks.

Possible condition changes/ additions for panel consideration:

ES suggests the following condition changes/ clarifications for the panel’s consideration:

Condition CM 13A.2 (Pg 33) ES queries the certainty of the “*must endeavour to*” condition wording – e.g. if such contamination occurs and the “endeavours” of the consent holder are not successful. There may be potential to reword this to provide more certainty for all parties.

Conditions CM 14 and 15 (Pgs 33-34) – it is suggested that these be added to so that culvert design will also, “*minimise potential for trout incursion into non-migratory galaxiid habitat where practicable*”

Condition DT2.3.c (i) (Pg 38) ES would wish to see an addition to this condition to ensure that “*topsoil and revegetation is with locally sourced material to mitigate introduced biosecurity risk*”

Condition EC8 (Pg 45): This table states 2.5 ha of indigenous wetland, the NPS-FM 2020 natural inland wetland definitions do not require that vegetation be indigenous to be natural wetland. Reference to indigenous could be removed and the condition state “wetland”.

Condition EC34 (Pg 52) - dynamic flappers – ES supports this condition for minimising bird collisions and interactions with the transmission line; however it is suggested that the timing of this requirement be clarified in the condition.

Condition SC2.c-(Pg 72-73) Stakeholder Communications - ES appreciates the addition of “Regional Council” to this process in Condition SC1.3 as suggested. It is suggested that this change also flows through to **Condition SC2.c** by adding the “Regional Council”, along with the District Council as proposed.

Decommissioning:

The panel’s position in relation to the decommissioning of the facilities in the decision document is noted. While ES notes its suggestion of a financial/bond type instrument to ensure appropriate decommissioning has not been incorporated into the commission suite, ES notes the panel’s rationale for its position as articulated in the decision document.

Thank you again for the opportunity to provide these comments.

This feedback has been provided under delegated authority from Environment Southland (Southland Regional Council) under the Fast Track Approvals Act 2024.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Bruce Halligan', with a small dot at the end.

Bruce Halligan
Acting General Manager Strategy and Regulation