

Your Comment on the Mahinerangi draft conditions and decision (if applicable)

Please include all the contact details listed below with your comments and indicate whether you can receive further communications from us by email to substantive@fasttrack.govt.nz.

1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
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Please provide your comments below, include additional pages as needed.

Condition:	Comment:	Suggested Amendment:
Clutha District Council consent conditions		
56	The condition is not framed consistently with the other conditions, such that the phrases 'are' and 'should meet' ought to be replaced with phrasing that provides a greater level of certainty. The following amendments are suggested.	Transmission lines are <u>shall be</u> specifically designed to prevent the electrocution of Karearea (New Zealand Falcons). The design should <u>shall</u> meet the following requirements: a) All distribution transformer bushings connections be taped or covered; b) Taller bushings and insulators be considered installed <u>installed</u> on transformers and overhead structures, <u>unless it is not reasonably practicable to do so, with reasons provided why it is not reasonably practicable to do;</u> c) All HV droppers <u>shall</u> use black PVC covered conductor with split-tubing used to supplement it where possible. Split tubing or an alternative should always be used at voltages above 11kV; and d) That network drawings and designs incorporate wildlife symbology and graphic representations.
72	Consistency with operational noise limits in this consent and the variation to RM1409.	Update condition 34 of RM1409 to refer to L_{eq} in favour of L_{10} if it is appropriate to do so.

Condition 72 applies the L₁₀ descriptor for day time and night hours for operational noise.

Condition 34 of RM1409 applies to operational noise (other than wind turbine generation and construction), it is proposed by the Applicant that this condition be modified so that the noise L₁₀ descriptor is replaced with L_{eq}.

For both conditions being, 72 of this consent, and 34 of RM1409, the nature of noise generating activities appear to be the same. Therefore, it is questioned why the sound measurement parameters/descriptors differ.

72.	Operational noise from activities authorised by this consent must not exceed the following limits within the notional boundary of any dwelling: a. 7:00 am to 10:00 am 55dBA L10 b. 10:00 pm to 7:00am 45dBA L10 c. 10:00 pm to 7:00am 75dBA Lmax	
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OPERATIONAL NOISE (NON-TURBINE)

34. Noise from all other activities on the site (other than wind turbine generator operation and construction activities) shall not exceed the following limits within the notional boundary of any dwelling (excluding any dwelling on the wind farm site):

7:00 am to 10:00 am	55dBA L_{10} L_{eq}
10:00 pm to	45dBA L_{10} L_{eq}
7:00 am to 10:00 pm to 7:00 am	75dBA L_{max}

The noise shall be measured in accordance with ~~NZS6801:1991-~~
~~Measurement of Sound~~ NZS6801:2008: ~~Acoustics - Measurement of~~
~~Environmental Sound~~ and assessed in accordance with ~~NZS6802:1991-~~
~~Assessment of Environmental Sound~~ NZS6802:2008: ~~Acoustics -~~
~~Environmental Noise.~~

It is understood that L_{eq} is an expression of the average noise over time, and L_{10} is the noise level exceeded for 10% of the time.

The Marshall Day noise assessment¹ explains that the L_{10} descriptor is not used anymore and the L_{10} descriptor has been replaced in practice with the L_{eq} descriptor.

The Council consider that the noise limits, and associated measurement descriptors should be consistent across both consents, where applicable.

Consistent with the advice in the Marshall Day Report, it is suggested that confirmation is sought whether condition 34 of the land use consent ought to also refer to the L_{eq} descriptor, in

¹ [B.04-Marshall-Day-2025-Noise-Effects-Assessment.pdf](#) page 7.

	favour of L ₁₀ , and whether there is a material difference in the authorised sound levels emitted.	
Variation to RM1409		
Condition:	Comment:	Suggested Amendment:
25(i) Advice Note	Potential placeholder reference to land use consent 'RMXXXX'. If the reference is intended to be populated by a Clutha District Council consent reference, the CDC do not (yet) have a reference for this application in their consent database, because the Council are not the consenting authority for this application. It is suggested the EPA's reference be applied.	Advice note: The substation, BESS, operations and maintenance facility are subject to a separate land use consent RMXXXX <u>FTAA-2510-1125</u> and are shown on the Map 1 – Puke Kapo Hau Stage 2 Layout Plan for locational purposes only.
34	Refer to above comment in relation to Condition 72 of the land use consent for transmission facilities.	