

Comments on project under the Fast Track Approvals Act 2024

Southland Wind Farm [FTAA-2504-1041]

Contact Details	
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Introduction

1. Contact Energy Limited (Applicant) has lodged an application for the Southland Wind Farm (project) under the Fast-track Approvals Act 2024 (the FTA Act).
2. HNZPT was consulted prior to the Applicant lodging its substantive application.
3. There are no listed heritage places located within the project area.
4. The Applicant has applied for an archaeological authority as part of the substantive application.
5. In accordance with section 53(2)(k) of the FTA Act, Heritage New Zealand Pouhere Taonga (HNZPT) has been invited to comment on the substantive application as the administering agency for the Heritage New Zealand Pouhere Taonga Act 2014.

Comments on Application

Archaeological Authority

6. HNZPT has provided comment in relation to the archaeological authority in its s51 Report dated 3 December 2025.
7. In summary, HNZPT has recommended that the archaeological authority be granted subject to recommended conditions; and that the authority be issued for site G46/13 and potential sites, as yet unrecorded.
8. The s.51 report drew on the draft conditions submitted as part of the substantive application.
9. Since completion of the s.51 report, the applicant has circulated a further set of draft archaeological conditions, *Southland Wind Farm- Proposed Archaeological Authority Approval Conditions (Updated December 2025)*, that draw on HNZPT's recommendations as set out in Appendix B and C of the s51 Report date 3 December 2025.

Draft Conditions

10. HNZPT has reviewed the December 2025 draft conditions proposed by the Applicant

11. HNZPT notes that the applicant has proposed Russel Cook as section 45 approved person, replacing Dr Chris Jennings as assessed in the s51 Report. HNZPT considers that Russel Cook has the appropriate qualifications and sufficient skill and competency to undertake the work required if the authority is granted and has access to appropriate institutional and professional support, has the requisite competencies for recognising and respecting Māori values, and has access to appropriate cultural support.
12. HNZPT continues to advise that G46/17 be excluded from the authority; site G46/17 will not be impacted by the proposed works so it is inappropriate to include it within the authority.
13. HNPZT continues to recommend the Expiry Date for the authority to be 5 years after the date of grant, consistent with s54(4)(b) of the HNPZT Act.
14. In respect of the December 2025 draft conditions a track change version of the draft conditions, including reasoning for amendments, has been set out in **Appendix One** of these comments. This **replaces Appendix B of the s51 Report**. A recommended archaeological authority with HNZPT recommended conditions set and including Russel Cook has been appended as **Appendix Two** of these comments and **replaces Appendix C of the s51 Report**.

Conclusion

15. HNZPT considers that the Application is able to be approved subject to amendments to the conditions as set out above.

Appendix One: HNZPT Track changes and comments on December 2025 Draft Conditions

No.	Condition
1	The Authority shall must be exercised in accordance with the Archaeological Management Plan for the Southland Wind Farm Project, to be approved by Heritage New Zealand Pouhere Taonga prior to works commencing. The plan which shall include an accidental discovery/on-call protocol in accordance with Condition 2. Any changes to the plan require the prior written agreement of Heritage New Zealand Pouhere Taonga, and Te Ao Marama Inc. (on behalf of Ngā Rūnaka ki Murihiku).
New	At least five working days prior to the commencement of earthworks activities required for the construction of the Southland Wind Farm Project, the Authority Holder shall ensure that Heritage New Zealand Pouhere Taonga and Te Ao Marama Inc. (on behalf of Ngā Rūnaka ki Murihiku) are advised of the date when earthworks will commence.
New	The Authority Holder shall ensure that all contractors working on the construction of the Project are briefed on site by the section 45 approved person, who may appoint a person to carry out the briefing on their behalf, prior to any works commencing. The briefing must include the possibility of encountering archaeological evidence, how to identify possible archaeological sites, the archaeological work required by the conditions of this authority, and contractors' responsibilities with regard to discovering archaeological evidence (including stopping works and parties to notify).
2	If kōiwi tangata (human skeletal remains); or taonga or archaeological artefacts are discovered during all phases of the Project construction and operation, the Authority Holder shall, without delay: <ol style="list-style-type: none"> Cease all work within a 50m radius of the discovery and secure the area; Notify their nominated archaeologist the s45 approved person; the relevant District Council, Te Ao Marama Inc. (on behalf of Ngā Rūnaka ki Murihiku), Heritage New Zealand Pouhere Taonga, and in the case of kōiwi tangata (skeletal remains) the New Zealand Police in accordance with Heritage New Zealand Pouhere Taonga's Guidelines for Kōiwi Tangata/ Human Remains (AGS8 2010); Enable a site inspection by the section 45 approved person Heritage New Zealand Pouhere Taonga and Te Ao Marama Inc. with the appropriate Rūnanga, and their advisors, who shall determine the nature of the discovery and the further action required; Any kōiwi tangata or taonga shall only be handled and removed by hapū/rūnaka representatives responsible for the tikanga (custom) appropriate to its removal and preservation; Ensure that the further action identified in accordance with part (c) of this condition, and determined in consultation with Heritage New Zealand Pouhere Taonga to ensure all statutory requirements under the Heritage New Zealand Pouhere Taonga Act 2014 and the Protected Objects Act 1975 are met, is undertaken; and Upon completion of tasks (a) to (e) above, and provided all statutory permissions have been obtained, the Authority Holder may recommence site construction following consultation and agreement with the relevant District Council, Te Ao Marama Inc. (on behalf of Ngā Rūnaka ki Murihiku), Heritage New Zealand Pouhere Taonga, and in the case of kōiwi tangata, the New Zealand Police.
New	The authority may not be exercised until landowner consent is received by Heritage New Zealand Pouhere Taonga for all land affected by this authority.

Commented [HNZPT1]: HNZPT must approve the finalised Archaeological Management Plan prepared for the project. The AMP that has been provided is in draft condition, and is likely to be modified in response to the s51 report and this s53 comment. It is necessary to review and approve the AMP to ensure archaeological material is treated in a way compliant with the authority and the HNZPT Act and to ensure consistency with the HNZPT standards and guidelines which are prepared solely to achieve best practice for archaeological site management prepared by HNZPT to achieve consistency with all archaeological works around New Zealand.

Commented [HNZPT2]: An Accidental Discovery Protocol is inappropriate as an authority is in place - the authority sets in place the procedures for if archaeological material is encountered and an on-call protocol (outlining where areas of stand-over archaeological monitoring is not required, and procedures to undertake if a discovery is made) is what is appropriate to manage archaeological finds outside of the areas of proposed monitoring.

Commented [HNZPT3]: HNZPT is unable to require third party approval within authority conditions. We suggest that review of the Archaeological Management Plan by Te Ao Marama Inc. be conditioned for within the resource consent for this project, or go within the tikanga condition.

Commented [HNZPT4]: A stop-works to enable tikanga, consultation, and decision-making between the Authority Holder, iwi/hapū, and HNZPT does not make sense if archaeological material that relates to European occupation is encountered. Archaeological material of non-Māori origin will be appropriately managed under the condition requiring any archaeological evidence to be investigated, recorded, and analysed in accordance with accepted archaeological practice.

Commented [VT5]: Doesn't make sense if not kōiwi or taonga tūturu

Commented [HNZPT6]: There is no role for the District Council to play if taonga or kōiwi are encountered.

Commented [HNZPT7]: It is more appropriate and expedient to have the s45 approved person assess the nature of the discovery and advise HNZPT so that we can advise on further action in accordance with condition 2e.

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Commented [HNZPT8]: Land owner consent is incomplete as the applicant has not sought consent of Southland District Council for works taking place within road reserves. The HNZPTA requires the consent of all landowners prior to works commencing thus this condition has been included.

5 Any earthworks that may affect any archaeological sites must be monitored by the section 45 approved person (or a person appointed on their behalf) in accordance with the Archaeological Management Plan, and a representative from Te Ao Marama Inc. (on behalf of Ngā Rūnaka ki Murihiku) shall be invited to be present during any earthwork activities that are undertaken within 100m of the archaeological site identified as G46/13 as shown on Figure Archaeology-2 (Part G) included in Part G to the substantive application, and any earthworks that may affect any other archaeological site that is discovered within the Project Site.

Commented [HNZPT9]: It is not sufficient to invite the s45 approved person to be present - they must be on site for works that may affect an archaeological site (i.e. High-risk areas as identified in the Archaeological Management Plan and wherever archaeological material is encountered outside of those areas).

New Any archaeological evidence encountered during the exercise of this authority shall be investigated, recorded and analysed in accordance with accepted archaeological practice, as outlined in the Archaeological Management Plan for the Southland Wind Farm Project.

Commented [HNZPT10]: This is an important condition that ensures archaeological work takes place as set out in the management plan and in accordance with current archaeological practice.

New Archaeological work must be undertaken in conformity with any tikanga Māori protocols agreed between the Authority Holder and Te Ao Marama Inc. (on behalf of Ngā Rūnaka ki Murihiku)

Commented [HNZPT11]: Access should be enabled for Murihiku Rūnaka across the project to undertake tikanga, not just within the high risk archaeological areas. This can be actioned through the Archaeological Management Plan and the Tikanga agreed with the applicant.

New The Authority Holder shall ensure that Heritage New Zealand Pouhere Taonga and Te Ao Marama Inc. (on behalf of Ngā Rūnaka ki Murihiku) are advised of the completion of the construction of the Southland Wind Farm Project within two working days of completion.

New Within 20 working days of the completion of the on-site archaeological work associated with this authority, NZAA Site Records shall be updated or created in ArchSite based on accepted archaeological practice in the event any new archaeological sites are discovered, and in accordance with tikanga as advised by local rūnaka representatives for archaeological finds relating to Māori.

Commented [HNZPT12]: Condition wording has been updated to account for updating site records and creating new records in the event that new sites are encountered. The original wording didn't allow for the possibility of updating existing archaeological site records.

New Within 20 working days of the completion of the on-site archaeological work associated with this authority, the Authority Holder shall ensure that an interim report completed to the satisfaction of Heritage New Zealand Pouhere Taonga and following the Archaeological Report Guideline (AGS12 2023) is submitted for inclusion in the Heritage New Zealand Pouhere Taonga Archaeological Reports Digital Library. The report shall also be provided to Te Ao Marama Inc. (on behalf of Ngā Rūnaka ki Murihiku).

New Within 12 months of the completion of the on-site archaeological work the Authority Holder shall ensure that a final report, completed to the satisfaction of Heritage New Zealand Pouhere Taonga and following the Archaeological Report Guideline (AGS12 2023), is submitted for inclusion in the Heritage New Zealand Pouhere Taonga Archaeological Reports Digital Library. Digital copies of the final report must also be sent to the NZAA Central Filekeeper, Te Ao Marama Inc. (on behalf of Ngā Rūnaka ki Murihiku) and the relevant landowner/s.

	accordance with Condition 2. Any changes to the plan require the prior written agreement of Heritage New Zealand Pouhere Taonga.
3	<p>Site Briefing</p> <p>The Authority Holder shall ensure that all contractors working on the construction of the Project are briefed on site by the section 45 approved person, who may appoint a person to carry out the briefing on their behalf, prior to any works commencing. The briefing must include the possibility of encountering archaeological evidence, how to identify possible archaeological sites, the archaeological work required by the conditions of this authority, and contractors' responsibilities with regard to discovering archaeological evidence (including stopping works and parties to notify).</p>
4	<p>Landowner Consent</p> <p>The authority may not be exercised until landowner consent is received by Heritage New Zealand Pouhere Taonga for all land affected by this authority.</p>
During Works	
5	<p>Monitoring</p> <p>Any earthworks that may affect any archaeological sites must be monitored by the section 45 approved person (or a person appointed on their behalf) in accordance with the Archaeological Management Plan. A representative from Te Ao Marama Inc. (on behalf of Ngā Rūnaka ki Murihiku) shall be invited to be present during any earthwork activities that are undertaken within 100m of the archaeological site identified as G46/13 as shown on Figure Archaeology-2 (Part G) included in Part G to the substantive application, and any earthworks that may affect any other archaeological site that is discovered within the Project Site.</p>
6	<p>Archaeological Finds</p> <p>Any archaeological evidence encountered during the exercise of this authority shall be investigated, recorded and analysed in accordance with current archaeological practice, as outlined in the Archaeological Management Plan for the Southland Wind Farm Project.</p>
7	<p>Kōiwi and Taonga Tūturu</p> <p>If kōiwi tangata (human skeletal remains) or taonga are discovered during all phases of the Project construction and operation, the Authority Holder shall, without delay:</p> <ol style="list-style-type: none"> a) Cease all work within a 50m radius of the discovery and secure the area; b) Notify the s45 approved person, Te Ao Marama Inc. (on behalf of Ngā Rūnaka ki Murihiku), Heritage New Zealand Pouhere Taonga, and in the case of kōiwi tangata (skeletal remains) the New Zealand Police in accordance with Heritage New

	<p>Zealand Pouhere Taonga’s Guidelines for Kōiwi Tangata/ Human Remains (AGS8 2010);</p> <p>c) Enable a site inspection by the section 45 approved person and Te Ao Marama Inc. with the appropriate Rūnanga, and their advisors, who shall determine the nature of the discovery and the further action required;</p> <p>d) Any kōiwi tangata or taonga shall only be handled and removed by hapū/rūnaka representatives responsible for the tikanga (custom) appropriate to its removal and preservation;</p> <p>e) Ensure that the further action identified in accordance with part (c) of this condition, and determined in consultation with Heritage New Zealand Pouhere Taonga to ensure all statutory requirements under the Heritage New Zealand Pouhere Taonga Act 2014 and the Protected Objects Act 1975 are met, is undertaken; and</p> <p>f) Upon completion of tasks (a) to (e) above, and provided all statutory permissions have been obtained, the Authority Holder may recommence site construction following consultation and agreement with Te Ao Marama Inc. (on behalf of Ngā Rūnaka ki Murihiku), Heritage New Zealand Pouhere Taonga, and in the case of kōiwi tangata, the New Zealand Police.</p>
8	<p>Tikanga</p> <p>Archaeological work must be undertaken in conformity with any tikanga Māori protocols agreed between the Authority Holder and Te Ao Marama Inc. (on behalf of Ngā Rūnaka ki Murihiku).</p>
After works	
9	<p>Work Completion Notification</p> <p>The Authority Holder shall ensure that Heritage New Zealand Pouhere Taonga and Te Ao Marama Inc. (on behalf of Ngā Rūnaka ki Murihiku) are advised of the completion of the construction of the Southland Wind Farm Project within two working days of completion.</p>
10	<p>Site Record Forms</p> <p>Within 20 working days of the completion of the on-site archaeological work associated with this authority, NZAA Site Records shall be updated or created in ArchSite based on accepted archaeological practice, and in accordance with tikanga as advised by local rūnaka representatives for archaeological finds relating to Māori.</p>
11	<p>Interim Report</p> <p>Within 20 working days of the completion of the on-site archaeological work associated with this authority, the Authority Holder shall ensure that an interim report completed to the satisfaction of Heritage New Zealand Pouhere Taonga and following the Archaeological Report Guideline (AGS12 2023) is submitted for inclusion in the Heritage New Zealand</p>

Pouhere Taonga Archaeological Reports Digital Library. The report shall also be provided to Te Ao Marama Inc. (on behalf of Ngā Rūnaka ki Murihiku).

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Final Report

Within 12 months of the completion of the on-site archaeological work the Authority Holder shall ensure that a final report, completed to the satisfaction of Heritage New Zealand Pouhere Taonga and following the Archaeological Report Guideline (AGS12 2023), is submitted for inclusion in the Heritage New Zealand Pouhere Taonga Archaeological Reports Digital Library. Digital copies of the final report must also be sent to the NZAA Central Filekeeper, Te Ao Marama Inc. (on behalf of Ngā Rūnaka ki Murihiku) and the relevant landowner/s.

SCHEDULE OF LEGAL DESCRIPTIONS

Legal description	
	<p>Section 3 Block IX Slopedown Survey District, RT SL9D/824;</p> <p>Section 2 Block IX Slopedown Survey District,</p> <p>Section 1 Survey Office Plan 9639</p> <p>Section 1 Survey Office Plan 10255, RT SL8D/456;</p> <p>Lot 1 DP 3613</p> <p>Section 1 Survey Office Plan 9465, RT SL155/79;</p> <p>Lot 2 DP 363843</p> <p>Lot 1 DP 13176</p> <p>Section 1 Survey Office Plan 9464</p> <p>Section 2 Survey Office Plan 9464</p> <p>Section 15 Block X Tuturau Survey District</p> <p>Part Section 16 Block X Tuturau Survey District, RT 259751;</p> <p>Lot 1 DP 363843, RT 259750;</p> <p>Lot 1 DP 12509, RT 407674;</p> <p>Section 61 Block III Wyndham Survey District, RT SL9B/866;</p> <p>Section 62 Block III Wyndham Survey District, RT SL9B/866;</p> <p>Lot 2 DP 362693, RT 255758;</p> <p>Lot 4 DP 15305,</p> <p>Lot 5 DP 15305,</p> <p>Lot 6 DP 15305,</p> <p>Lot 7 DP 15305,</p> <p>Lot 1 DP 15076</p>

	<p>Lot 2 DP 15076</p> <p>Lot 3 DP 15076</p> <p>Lot 4 DP 15076</p> <p>Lot 1 DP 15078, SL12B/81;</p> <p>Section 26 Block II Slopedown Survey District, 265526;</p> <p>Section 11 Block II Slopedown Survey District, RT SLA4/151;</p> <p>Section 16 Block II Slopedown Survey District, RT SLA4/151;</p> <p>Section 17 Block II Slopedown Survey District, RT SLA4/151;</p> <p>Part Section 9 Block II Slopedown Survey District, RT SLA4/151;</p> <p>Part Section 10 Block II Slopedown Survey District, RT SLA4/151</p> <p>Section 5 Block II Slopedown Survey District, RT SL17/134;</p> <p>Section 20 Block II Slopedown Survey District, RT SL17/134;</p> <p>Section 21 Block II Slopedown Survey District, RT SL17/134;</p> <p>Section 22 Block II Slopedown Survey District, RT SL17/134;</p> <p>Lot 1 DP 15305</p> <p>Lot 2 DP 15305</p> <p>Lot 3 DP 15305</p> <p>Lot 1 DP 15306, SL12B/80;</p> <p>Road reserve and unformed legal road (paper roads).</p>
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