

6 July 2023

Meridian Energy Ltd
C/- Incite (Wellington) Limited
PO Box 2058
Wellington 6140
By email only: Tom@incite.co.nz
Cc: Lynley.Fletcher@MeridianEnergy.co.nz
Cc: Nick.Bowman@MeridianEnergy.co.nz

Kia ora Tom

Additional Information Request for Application APP-2022203902.00

Horizons Regional Council – APP-2022203902.00
Greater Wellington Regional Council – WAR230312 [39005, 39006, 39007, 39008, 39009]
Tararua District Council – 202.2023.53.1
Masterton District Council – RM 230068

Thank you for your resource consent application in regard to the proposed Mount Munro windfarm lodged on 26 May 2023 and 9 June 2023 with the above Councils. The application has been reviewed, and it has been determined that in order to fully assess the effects of the project, additional information is required.

The additional information is listed below and is requested under Section 92(1) of the Resource Management Act (the Act):

District Council Consents

Landscape / Visual

1. The roading alignment included in the Tonkin + Taylor Indicative Roding Section Plan essentially adopts an alignment that is positioned central to the Turbine Consent Envelope and Turbine Exclusion Zone corridors. It is considered that the effects conclusions made within the Landscape Effects Assessment, in relation to the earthworks associated with the construction of the internal road network, are credible based on the demonstrated alignment and prepared visual simulations. However, there is the potential for a considerably larger scale earthworks within these proposed consent corridors, particularly when it is noted that the specified road width *“don’t include feathered edges, drains, or removal of banks on the road shoulders to enable the transport of turbine blades”*¹. Please confirm that the scale of

¹ Appendix K - Landscape Effects Assessment (Boffa Miskell 2023); Section 4.2.5

earthworks (cut/fill), associated with the final alignment of the internal road layout, is consistent with the level of effect assessed in the Landscape Effects Assessment.

- Additional information on the boundary treatment (for mitigation purposes) with the immediately adjacent properties along Old Coach Road (Figures 1 & 2) is requested. These two properties are in close proximity to the proposed site access, which is the beginning of the new internal access road and the location of the laydown area (including temporary site offices, amenities, security, parking, and potentially a permanent Services/O&M building).



Figure 1 – View near the site entrance to the West (across the corner of Dwelling ID35 - Coppieters)



Figure 2 – View near the site entrance to the East (across the K Farms Ltd boundary)

- The proposed on-site concrete batching plant(s) has not been definitively identified and is an activity that warrants its own effects considerations. It is difficult to understand the potential level of landscape and visual effect associated with this activity in the absence of a defined location(s). Please provide further detail on the proposed location(s) of the on-site concrete batching plant(s) and an associated landscape and visual assessment and any associated mitigation measures required to accommodate this facility.
- Please provide comment on the potential visual effect of the Terminal Substation adjacent to State Highway 6, noting that this location may also house the Services/O&M Building. While this area is well

screened by the existing roadside shelterbelt when travelling south, when travelling north (Figure 2) there will be a reasonably open view toward the proposed substation footprint. This aspect of the proposal provides for a main envelope up to 7m in height and poles/gantries up to 18m in height), and likely security style fencing. Have you considered any potential mitigation (such as a planted buffer area)?



Figure 3 – View from SH6 toward the Terminal Substation

Traffic

5. What are the intended days and hours for construction traffic activity? Many if not all of the local intersections, including the SH2 intersections, do not appear to have lighting. Will construction vehicle activity be limited to daylight hours or is there an intention to add lighting at the intersections?
6. There are a number of SH2 intersections and accesses that will be affected by the construction activities. Has there been any consultation with Waka Kotahi with regard to ensuring the ongoing safety of SH2 during construction?
7. Table 2.2 of the Traffic and Transportation Effects Assessment, includes 3,500vpd on SH2 at Mt Bruce with 13.8% heavy vehicles. The proportion of heavy vehicles is significant and interactions between turning and through heavy vehicles at the SH2 intersections will need to occur safely. With a 10-year lapse period requested what traffic growth is forecast for SH2 over the next ten years?
8. Did any of the crashes referred to in Section 2.3 of the Traffic and Transportation Effects Assessment involve heavy vehicles? Please provide an update of the crash reporting to include crashes reported to date in 2023.
9. Has any consultation been undertaken with New Zealand Cycle Trails regarding the effects on the Heartland Rides which are the Tararua Traverse and Route 52 cycle rides mentioned in Section 2.4 of the Traffic and Transportation Effects Assessment, and also the Connector Ride along Pa Valley?

10. At Section 2.4.1 'no school buses operating along any of the roads identified in Section 2.1.1.'. Please confirm whether all school drop-offs and pick-ups are done by private vehicle, especially for residents along Old Coach Road.
11. At Section 2.1 of the Traffic and Transportation Effects Assessment, an assumption is included that the internal roads will be provided and maintained to an appropriate standard. What is the appropriate standard?
12. Section 3.1.2 of the Traffic and Transportation Effects Assessment describes 6km of ridge road with 8m to 11m width, 5.5km of access road with 6m to 8m width. Road grades of up to 16% 'requiring suitable surfacing to enable heavy components to be safely transported'. Please confirm what constitutes suitable surfacing. In addition, are there drainage and stormwater effects that vary depending on the surface treatment of the internal roads?
13. The Traffic and Transportation Effects Assessment identifies seven properties along Old Coach Road, of which four have permanent dwellings. Please confirm whether this has changed.
14. At Section 2.1.3 of the Traffic and Transportation Effects Assessment, reference is made to the existing quarry on Falkner Road. Please confirm the likelihood of material being sourced from this quarry. If so, how much material and associated truck movements are expected?
15. At Section 2.1.4 of the Traffic and Transportation Effects Assessment reference is made to the existing quarry on Opaki-Kaiparoro Road. Please confirm the likelihood of material being sourced from this quarry. If so, how much material and associated truck movements are expected?
16. Please confirm that emergency only access is intended via Coach Road South only.
17. At Section 3.1.8 of the Traffic and Transportation Effects Assessment, two options are included for the permanent operations and maintenance building. Please confirm whether you are seeking consent for both options and/or intend to construct both options as part of the development.
18. Section 3.1.10 of the Traffic and Transportation Effects Assessment refers to a diesel tank being located on-site. Have truck movements been included in Table 3.4 for diesel delivery to the site?
19. Section 3.5.5 refers to the possibility of up to 60 truckloads of water being delivered to the site per day. Can you please confirm that this is the case?
20. Section 3.1.12 of the Traffic and Transportation Effects Assessment refers to the Mount Munro Aggregate Supply Assessment Memo Report May 2023 - has this document been provided? Table 3.1 includes 135,000m³ of aggregate being imported to the site with a Masterton quarry identified to the south and Hi-Rock quarries to the north. Please confirm the location of the three Hi-Rock quarries to the north and how this has been included within the assessment.

21. Section 3.3 of the Traffic and Transportation Effects Assessment describes the proposed site accesses and the alignment with the Tararua District Plan. Please provide concept designs for each of the three site accesses showing how they will accommodate both legal and oversize vehicles and show available sight lines.
22. The trip generation forecasts for staff assume that two or three people will travel per vehicle with one arrival at and one departure from the site per day. Given the proximity to Eketahuna, is there the potential that staff might leave site for instance to purchase lunch? If not, how would this be controlled?
23. Section 3.7 of the Traffic and Transportation Effects Assessment refers to the Mount Munro Windfarm Port to Site Routes Assessment July 2021v2, has this document been provided?
24. Section 3.8 of the Traffic and Transportation Effects Assessment describes possible upgrades to Old Coach Road but no designs are included and there is no certainty regarding the nature of the upgrades. In order to assess effects of any upgrades, please provide:
 - a. The design of any works at the SH2/Old Coach Road intersection including swept paths for maximum legal-size vehicles and also whether oversize vehicles and loads can be accommodated within the road reserve at the intersection.
 - b. The design of upgrades along Old Coach Road including the horizontal and vertical alignment, forward sight distances, road pavement and surface, and cross-section including any changes to drainage and culverts. Powerpoles that will need relocating need to be identified on a plan. Passing for two maximum legal-size vehicles needs to be demonstrated along the length of Old Coach Road and that the swept paths of the oversize vehicles and loads can be accommodated within the road reserve width. Locations where changes are needed to activities that are currently within the road reserve, such as stockyards, gardens and grazing need to be clearly identified.
25. Section 4.2 of the Traffic and Transportation Effects Assessment describes the capacity assessment. No intersection modelling has been undertaken and the section concludes that the capacity of the intersections is not likely to be an issue. Given that the largest trucks can take 10 to 15 seconds to clear an intersection when turning from a stop, please provide modelling which includes allowance for the gaps needed by larger trucks and also allows for traffic growth on SH2 over the next ten years.
26. Section 4.4 of the Traffic and Transportation Effects Assessment sets out the assessment of intersection safety. No upgrades are planned for any of the SH2 intersections. Please advise whether a following vehicle on SH2 can safely move around a truck waiting to turn right into any of the side roads accessing parts of the site. Is there a need for any localised seal widening and if so, can this be accommodated within the existing road reserve?
27. Regarding the Civil Engineering Report, do the concrete trucks remain on the site for the duration of construction? Similarly, do the haulage (aggregate etc.) trucks remain on site over night?

28. Figure 9.1 of the Civil Engineering Report shows the location of the Terminal Substation. Please provide the location and design of the vehicle access to the site, along with turning paths for legal and oversize vehicles. The vehicle paths should be demonstrated from SH2 into Kaiparoro Road and then into the site in order to understand whether any upgrades are needed to the road and any works can be accommodated within the road reserve.
29. Figure 9.2 of the Civil Engineering Report shows the location of the access to the Internal Terminal Line. Please advise whether any upgrades are needed to the existing access onto the road and the initial section of the access into the site. Please demonstrate the vehicle paths from across the existing bridge and then into the site in order for us to understand whether any upgrades are needed to the road and whether any works can be accommodated within the road reserve.
30. Table 10.1 of the Civil Engineering Report sets out the earthworks volumes. Does the forecast truck activity provide for all the 539,700m³ of fill to be imported, or is some of the cut expected to be of sufficient quality?
31. If sections of the internal roads were to be formed with a permanent surface, asphalt or concrete, what would be the effects on the number of truck movements to and from the site? Are you able to provide examples of where internal roads with grades of up to 16% have operated satisfactorily with an unsealed surface?
32. Do the material and associated forecast truck movements allow for the possibility of Gravity Pad Foundations described in Section 2.4.2 of the Assessment of Effects on the Environment (AEE)?
33. Section 2.4.6 of the AEE describes the main laydown and site administration area and includes that wastewater will be trucked off the site and that portaloos will be serviced on an as required basis. What number of truck movements are likely to be associated with these activities and have these movements been included in the traffic activity forecasts?
34. In respect to Masterton District Council (MDC) roading network, Section 5.5 of the AEE indicates that MDC roads may be required for people and material transportation with no additional detail given. Please provide an assessment of the effects on the roading hierarchy. Please include details on aggregate source and therefore transportation route(s) in order for us to assess the impact on the MDC roading networks and therefore upgrade requirements/cost recovery. For completeness, please also cover roads in the Tararua District Council jurisdiction.

Lighting

35. Please quantify the anticipated actual and potential lighting effects that may be visible from beyond the site in terms of likely receivers, potential frequency, duration and nature (e.g., light spill, glare, intermittent switching and light sweep [headlights, mobile plant lights]). Matters to address include:
 - a. Construction Phase

- i. Temporary buildings
- ii. Access roads
- iii. Carparks
- iv. Security
- v. Concrete Batching Plant
- vi. Vehicles on access roads (headlight sweep)
- vii. Mobile machinery (headlights, working lights & hazard lights)
- viii. Any other light sources

b. Operational Phase

- i. Permanent buildings
- ii. Access roads
- iii. Carparks
- iv. Security
- v. Vehicles on access roads (headlight sweep)
- vi. Functional lighting (if any) and aircraft warning lights on the wind turbine structures
- vii. Any other light sources

36. Please also quantify the anticipated sky glow effects.

37. Please provide any proposed mitigation associated with actual and potential lighting effects.

Noise

38. Construction traffic on Old Coach Road is discussed in 4.4 of the Noise Effects Assessment. The Noise Effects Assessment identifies that additional construction traffic will be “*very significant*”. However, there is no assessment made of the resultant noise or of any mitigation measures other than managing noise through the CEMP or similar “*such as controlling the hours*” of construction traffic movement. The Noise Effects Assessment considers that the 8 months of construction traffic represents a temporary effect which is more readily tolerated. It is also anticipated that Old Coach Road will require a significant upgrade to be suitable for wind farm deliveries and construction traffic and the noise of this should also be factored in.

- a. What are the construction noise impacts relating to the upgrades to Old Coach Road that are necessary to accommodate wind farm construction and delivery traffic?
- b. What is the noise impact of the windfarm construction and delivery traffic on residents of Old Coach Road?
- c. What noise mitigation measures are available?

39. Wind farm sound monitoring is shown in Figures 8 to 13 inclusive of the Noise Effects Assessment. The (purple) *line of best fit* in the night-time results is the most critical. There are often times when the background sound levels are significantly below the *line of best fit* showing that the areas are regularly

quieter when the wind farm hub height wind speed are less than 10m/s. Because of the spread of background sound levels, the *line of best fit* is not representative of these quieter times and the assessment of wind turbine noise effects in 6.2 of the Noise Effects Assessment does not reflect the true picture. To clarify the situation:

- a. Please justify where higher than normal background sound levels were measured at night-time or remove them from Figures 9, 11, and 13 (and subsequent charts).
 - b. Please advise whether the monitoring equipment used can measure sound levels below 20dBA and, if not, whether this influences the charts in 6.1 of Appendix H and/or truly describes how quiet the area is.
40. The predictions are that the night-time background sound levels are often low at wind farm wind speeds of 10m/s and less. The Noise Effects Assessment relies on compliance with NZS 6808:2010 without assessing the actual impacts of wind farm noise on the residents.

Please undertake a FIDOL (frequency, intensity, duration, offensiveness and location) analysis of wind farm noise predicted in 6.2 of the Noise Effects Assessment against the (commonly quieter) background sound levels in Figures 9, 11 and 13, including an assessment of how often the different conditions would apply and the possible noise impact on residents.

41. The Noise Effects Assessment (section 4.1.3) envisages locating the concrete batching plant at a distance of 35 metres from a dwelling when there is opportunity to maximize this separation distance. Concrete batching is a manufacturing activity with characteristics that are different to construction works e.g., it does not change its location or noise generating characteristics during the construction period.

Is the proposed concrete batching plant noise more appropriately controlled using the relevant district plan (NZS 6802) noise limits in favour of the Construction Noise (NZS 6803) Standard given concrete batching is a manufacturing process and generates noise that is different to construction activities? If not, then what would the noise impact be on a dwelling located 35 metres from a concrete batching plant as identified in 4.1.3 of the Noise Effects Assessment?

Shadow Flicker

42. The proposed shadow flicker condition has limits calculated in accordance with the EPHC “National Wind Farm Development Guidelines – Draft” July 2010 (draft Guidelines). However, the assessment/proposed conditions do not provide sufficient clarity on how existing barriers such as trees and shelterbelts are taken into account in assessing compliance with the limit. Please provide further clarification.

Aggregate Crushing

43. Mobile aggregate crushing has been identified throughout the AEE as an activity that may take place, but other than potential dust/air discharges, has not been further assessed. Please clarify the likely location(s) of this proposed activity and assess the actual and potential noise and traffic related effects of this activity.

Planning

44. The AEE document submitted with the application makes reference to the temporary effects of the activity arising during construction attributed to noise, traffic movements etc. (covered also in some of the questions above). To assist in defining the duration of any works as 'temporary', please provide a breakdown of key construction activities, the anticipated duration of each activity and definition as to whether or not those activities may occur simultaneously or be staged.
45. Please confirm that those aspects of the proposal considered temporary (e.g., construction compound at Old Coach Road, Concrete Batching Plant, Portacom Buildings, fuel storage, general construction activity and associated traffic movements) meet the relevant definition/standard of 'temporary activity' under Part 6.1 of the Tararua District Plan and Rule 21.1.16(a) of the Wairarapa Combined District Plan. Where any activity falls outside these definitions, please provide confirmation that the appropriate resource consent(s) have been applied for.

Civil Aviation Requirements

46. The proposed wind turbines are considered to constitute a potential navigation hazard within navigable airspace. From observation, the site and surrounding sites have the potential to be utilised for various aircraft operations which may conflict with the intended future use of the site. Please undertake and provide details of consultation with the Civil Aviation Authority.

Record of Consultation

47. Section 7.4 of the AEE outlines specific stakeholder engagement undertaken prior to lodgement, that includes neighbouring landowners/residents, iwi and the Department of Conservation. Section 7.4.1 expands on communication with neighbouring landowners outlining that the communication begun in July 2011 and again during the current process in mid-August 2022. In reference to these meetings, can information please be provided in respect to:
- When these meetings occurred in reference to the current application being lodged;
 - The level of detail shared on the project i.e., was the project in the conceptual stages only?
 - A list of landowners who were engaged in the process and how/why these landowners were engaged i.e., proximity of proposed windfarm, visibility to proposed windfarm?
 - Meridians engagement plan with key stakeholders and landowners moving forward (that may provide for some of the above detail).

Regional Council Consents

Erosion and Sediment Control

48. Consent conditions offered specify provision of Construction Environmental Management Plans (CEMPs) and Specific Environmental Management Plans (SEMPs), however there appears to be no ability to audit and certify or otherwise the CEMP by the Regional Council. There appears to be the ability to certify the SEMPs, however there does not appear to be an allowance for certification of amendments. The ESCP Report is silent on the use of a CEMP, however discusses SEMPs. The AEE only contains mention of CEMP in the offered conditions. Please provide further information on the intent and interaction of the CEMPs and SEMPs, including proposed certification processes and their implementation on site.
49. In Table 1 of the Erosion Sediment Control Plan Report (ESCP), the road corridor for earthworks is listed as approximately 2ha, yet there is a proposed (excluding topsoil) cut volume of 935,100 cubic metres for the road corridor. Are those values correct, and what are the maximum cut and fill depths? We note a slightly larger volume (1,090,000 cubic metres) is to be placed in fill sites over 25ha. How does the 2ha of roading correlate to 11km roading and access track?
50. Section 4.2 of the ESCP Report indicates an open earthworks period of 14 days, however, it also indicates in Section 7.1 "...a 14-day maximum period of leaving exposed areas with no works occurring." Does this mean an area will be exposed for a maximum of 14 days, or only stabilised after 14 days of no earthworks? On a project of this size, and with the cut and fill depths alluded to in the query above, how are the 14 day open earthworks areas going to be managed? Please provide further information around how the 14 day open earthworks period is going to be managed for both general earthworks and fill sites.
51. Section 5.1.5 of the ESCP Report states that hydroseeding may be applied as an alternative to mulch, and other alternatives such as polymer/soil binder products may be used to aid in stabilisation if trialled on site. While hydroseeding and polymer/soil binder products are a useful tool to aid in stabilisation, these products are generally not considered to be a form of stabilisation on their own. Please provide further information on how these methodologies will be used to achieve stabilisation and how sediment controls will be maintained until stabilisation is achieved.
52. The ESCP Report details Sediment Retention Ponds (SRPs), Hybrid Decanting Earth Bunds (HDEBs), and Decanting Earth Bunds (DEBs) as the primary methods of sediment control. Section 5.2.1 of the ESCP Report states that "SRPs provide the most robust and effective measure in achieving sediment removal from construction runoff however are only appropriate for larger areas of earthworks." It is therefore assumed that HDEBs and DEBs provide a lesser robust and effective measure. Please provide further information around the hierarchy of sediment control and criteria that will be used to determine the use of the 'lesser' controls. Is a tool such as USLE or similar proposed in this assessment?

53. Section 5.2.2 of the ESCP Report states that DEBs will typically not be subject to chemical treatment unless the SEMP confirms this requirement for higher risk locations. Section F1.2.1 of the GWRC Guidelines (which is considered best practice and proposed as the ESC standard for the proposed works) states “Flocculation treatment should be used for all DEBs to increase their efficiency, unless other justification is provided.” This is also consistent with current best practice and should be the minimum standard. If chemical treatment is not the proposed standard for DEBs, further justification is required to explain why it is not required in this case. This may include further information on how higher risk locations are to be determined and when flocculation will be utilised or not.
54. Section 5.2.1 of the ESCP Report states that geotechnical assessment may be required in the construction of SRPs, however there is no ‘trigger’ for when this might be required. There is also no mention of whether this is required for the HDEBs and DEBs. Please provide further information on how a geotechnical assessment will be used in the design and construction of all sediment retention devices, including any geotechnical sign off required.
55. Section 6.2 of the ESCP Report states “...earthworks themselves will progress no more than 24 hours in advance of the stabilised surface.” This cut and cover approach is sensible in that it reduces the time of exposure, however given the size of some of the cut and fills on site, how is this proposed to work in a practical sense?
56. The level of sediment control for topsoil stockpiles is lower than that proposed for the main earthworks (silt fence or filter sock) given the temporary nature and lower risk. These are less effective than the SRP/HDEB/DEB controls proposed for the balance of the works. Please provide further information on the temporary nature of topsoil stockpiles, stabilisation proposed, and further justification for the controls proposed.
57. It is assumed that subsoil drainage will be required for turbine excavations, effectively providing drainage for the turbine excavation and completed foundations. If this assumption is correct, how is subsoil drainage from turbine excavations going to be managed from an ESC perspective?
58. Section 6.4 of the ESCP Report states “ESC measures for this site compound will include a super silt fence and as soon as possible stabilising the area with aggregate as part of the site compound formation.” As discussed at the site visit, the site compound remains for the duration of the proposed works and can be at risk of generating sediment runoff through the breakdown of stabilised surfaces. Has an SRP been considered for this area as a more robust and longer-term ESC measure?
59. Section 6.4 of the ESCP Report states that “...one concrete batching plant to be located within the Turbine Envelope Zone or the Turbine Exclusion Zone.” Section 2.12 of the Ecological Assessment states “The site will include two concrete batching plants to be located within the Turbine Envelope or Turbine Exclusion Zone.” Please provide further information around the number and location of batching plants and proposed erosion controls.

60. Section 6.5 of the ESCP Report details a cut and cover methodology for cable installation, however provides no details on the timing of this other than if a forecast rain event occurs. Please provide further details around the timing of the stabilisation for the cabling methodology.
61. Section 6.7 of the ESCP Report states “...it is assessed that the key methodology to be employed will be based on a dam and pump process.” Two of the proposed culverts are of significant length and require significant works to construct. The methodology that proposes pumping upstream flows around the works area can create an element of risk over longer construction periods as the pump is unlikely to cater for anything above minimum flows. How is this risk going to be mitigated?
- A specific ESC methodology for two of the longer culverts along with associated bulk earthworks may assist in understanding the proposed construction methodology and thereby addressing this query.
62. The ESCP Report details “Proactive water quality monitoring, both qualitative and quantitative, will occur as part of the Project implementation as a way of assessing the effectiveness of the treatment and allowing for improvements/modifications as the Project works continue.” What are the water quality monitoring processes, standards, and triggers used for this project? There is discussion around the use of turbidity, however no discussion on levels.
63. Consent conditions offered contain no discharge monitoring requirements or standards. These should be considered in relation to the sensitivity of receiving catchments. Are you proposing a discharge standard to protect the values of the receiving environments?
64. The AEE and ESCP Report are light on detail of the earthworks required for the construction of the transmission line and associated infrastructure. It is noted that the proposal is to utilise existing farm access tracks, however experience on previous sites has shown that this is not always practical and upgrades and new access tracks are generally required. While onsite it was mentioned that the construction can be undertaken as a permitted activity, in order to be considered as part of this assessment, please provide further information on the construction of the transmission line and associated infrastructure.
65. Table 31 of the Ecological Assessment provides a summary of the overall level of adverse effects from a substantive sediment discharge event. This table indicates a low magnitude of effects and a low to very low level of effect from a substantive sediment discharge event. Please clarify how this is measured (both the substantive sediment discharge event and level of effect). It is unclear how the potential sediment discharge has been estimated and how this then impacts on the freshwater environment. Further understanding of this may assist in determining discharge monitoring standards and requirements.

Aquatic Ecology

66. In relation to the stream classification method, the hydroclasses of waterways have been classed as either permanent, intermittent, or ephemeral, however the method undertaken to define these hydroclasses is not stated and is unclear. For instance, page 41 of the Ecology Assessment states that perennial and intermittent reaches were determined based on having a defined channel and flowing water, however we note that by definition intermittent reaches might not always contain flowing water. Additionally, Map 14 appears not to display intermittent reaches. The boundary between intermittent and ephemeral is particularly important as this determines whether the waterbody is a 'river' in terms of the RMA. Existing methods are available, such as the Auckland Unitary Plan (AUP) Practice and Guidance Note River/Stream Classification. Please provide information to demonstrate the stream classifications in accordance with the Guidance Note River/Stream Classification method.

67. In relation to ecological values, the assessment of rarity contained in Appendix 6 incorrectly labels the status of longfin eel to be not threatened, when it does in fact have a threatened status. There is no science basis for this, and the position taken has been used to justify a low rarity value for all waterways assessed. A more appropriate valuation would be moderate rarity for all waterways where longfin eel occurs due to its threatened classification. Please provide justification on why this classification has been used.

Diversity for all streams has been rated as low. However, in contrast the macroinvertebrate results (Figure 6) show good water quality being indicated at most sites monitored at least once, and four sites have returned >50% %EPT taxa richness. This data provides evidence that diversity is greater than low in a number of instances, and this is not reflected in the ecological valuation. Please provide justification as to why this classification has been used.

Table 6 of EIANZ (2018) states that an area has Moderate value if it rates Moderate for two or more assessment matters and Low or Very Low for the remainder. A review consistent with the above would likely result in changes from low to moderate value, which has implications for the overall level of effect. Please review the ecological valuation considering these points or justify why the ecological valuation shows the area as having a low value.

68. In relation to your proposal to culvert 210m of the Mangaroa tributary, we note that your evaluation of the magnitude of effect has not considered the duration of effect. The culvert installation would be permanent (i.e., c. 25 yrs + as per EIANZ 2018 Table 9). The character of the zone of influence would be partially changed, which is in line with a moderate magnitude of effect. Please review the proposed magnitude of effect in line with best practice guidance for ecological impact assessment as outlined here and detailed in EIANZ (2018), and also the corresponding overall level of effect for these proposed culverting works (following review of value and magnitude as above). As a result of the review, please provide any amendments or provide justification as to why the provided magnitude of effect and corresponding overall level of effect for the culverting works are appropriate.

69. In line with requirements of the National Policy Statement for Freshwater Management 2020 (NPS-FM), please provide an assessment of alternatives to avoid the proposed 210m of culverting of the Mangaroa

tributary. Please also describe how the mitigation hierarchy has been applied in the decision making to culvert the Mangaroa tributary. These assessments should consider both alternative alignments and alternative methods of stream crossings (e.g., stream simulation culverts) as means of reducing freshwater habitat loss and loss of freshwater values.

70. Please describe specific treatments to ensure fish passage would be achievable through the 210m of culverting in the Mangaroa tributary.
71. Please provide a full set of Stream Ecological Valuation data and offset calculations to demonstrate a no-net loss position for the affected waterways for each of the main activities/effects. The formula and steps to be followed can be found on page 56 of the document below:

<https://knowledgeauckland.org.nz/media/1397/tr2011-009-streamecological-valuation.pdf>

The offset calculation must include the standard multiplier for risk and time lag as the positive effects from the restoration treatment (riparian restoration) will lag behind the time of culverting by about 5-10 years (+) and planting native trees is uncertain regarding weather, pests and other factors beyond your control.

72. In tandem with the above point, please clarify what corresponding structures are required (such as concrete aprons, bed armouring, etc) in addition to the culverts. Please describe and quantify the effects if there are any additional structures and determine the quantity of restoration required to address these effects.
73. Please provide a protocol in accordance with best practice for managing effects to instream values during instream works (e.g. culvert installation), including temporary diversions, so that works can be undertaken in the dry and provide for fish salvage. This may be included within the site specific erosion sediment control plan for the culverts.
74. Please provide a method for monitoring the effects of sediment released from the site. During the site visit, the ecologists discussed using existing instream survey sites as baseline sites that erosion and sediment events could be monitored at when triggered at the earthworks site. Please provide details of this monitoring including confirming sites, methods, duration, frequency, and any discharge standards.
75. In tandem with the above point, please describe possible remediation measures that can be adopted in the event of a sediment release to freshwater.
76. Regarding the proposed freshwater offsetting, please provide the following information:
 - b. The location, area (ha) and timing of the freshwater offset.
 - c. The proposed planted species composition and spacing.

- d. A description and quantification of what is meant in the ecological assessment as “improvements to substrate and flow heterogeneity” at the offset site. What would these restoration treatments constitute?
- e. The proposed mechanism of legal protection (conservation covenant) of the freshwater offset site to ensure the positive effects are protected in perpetuity.
- f. The width of riparian planting. On site your ecologist stated that riparian planting would be 20m either side of the stream. Please confirm.
- g. Please describe and detail the proposed methodology of determining the proposed offset and if it’s successful (such as using SEV monitoring).

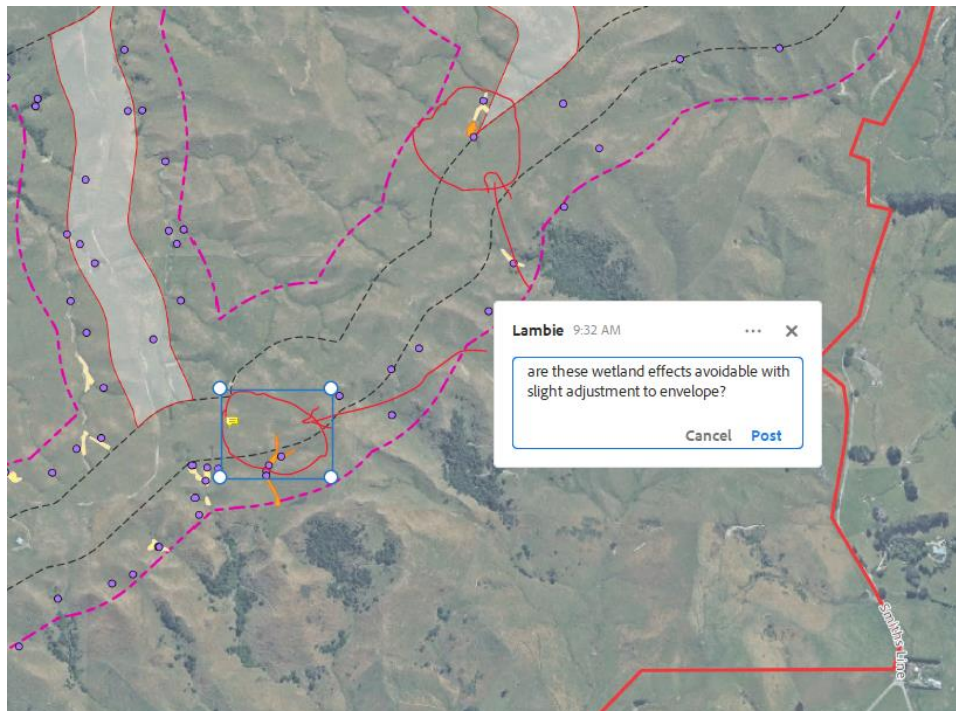
Terrestrial Ecology

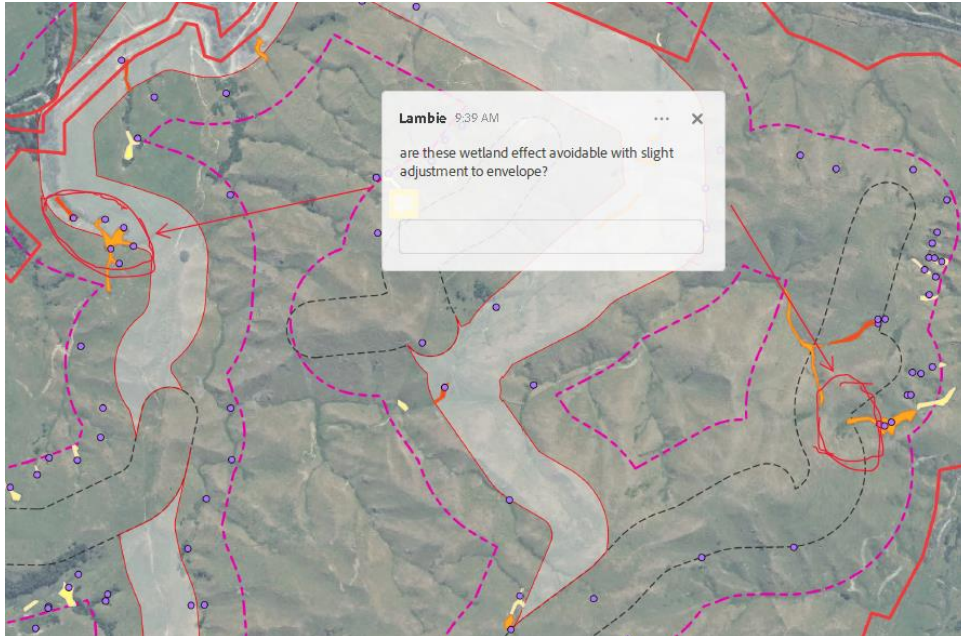
77. There is no general section or comment on terrestrial invertebrates. We note that indigenous vegetation that is likely to be habitat for threatened or at-risk invertebrate species is avoided. Therefore, there are unlikely to be any impacts. We also note the extensive survey undertaken for lizards and birds which could also have resulted in the discovery of invertebrates should they have been present and so we are comfortable that the risks to threatened or at-risk invertebrates is low. However, it would be useful if you could please confirm that the assumption of low risk is valid and provide an explanation as to why.
78. We note and agree that the wetlands within Horizons’ region that are likely to be lost are not those that the One Plan 2022 seeks to protect. We also note and agree that the NPS-FM identifies these sites as “wetlands” and therefore the effects management hierarchy is to be followed and, if these wetlands are lost, then some kind of offset or compensatory response is warranted. There is one of these such (non-indigenous dominated boggy ground) “wetlands” that is earmarked as “partially within” the effects envelope in the Greater Wellington Region. We note that the intent is to avoid the “partially within” wetlands. However, the application in general has taken an effects envelope approach to provide flexibility in design and that these approaches usually assume total loss of the values within. There is a condition for 1:1 wetland loss offset/compensation with no upper limit/maximum area for the loss, and no condition specifically specifying avoidance of wetlands in the first instance. Therefore, the loss of the partial extent of “partially within” wetlands remains in scope and avoidance is not the inherent strategy. In this way, the application does not clearly show an intent to follow the effects hierarchy with regard to potential wetland loss. Please provide further details on how the hierarchy is followed.

The proposal is to compensate for the loss of wetland extent by replacing the wetlands with 1:1 ratio of vastly improved wetland habitat value. This does not seek to limit the total loss of wetland extent, but does seek to adequately compensate for loss of ecological value. This is consistent with the pathway available for specified infrastructure, although this could put the proposal at odds with the Greater Wellington Regional Plan (GWRP) with respect to avoiding loss of extent. We note that the one wetland in the Greater Wellington Region is in the Pahiatua Ecological District, but the proposed wetland

restoration sites are on the boundary of the Pahiatua/Woodville ecological District or just inside the Woodville Ecological District. This would also put the proposal at odds with the wetlands effects hierarchy within the GWRP. Please provide justification as to why this has been selected and detail as to why it's included.

Please confirm whether it is possible to specifically identify and exclude the “partially within” (and possibly one of the “within”) wetlands with a slight adjustment to the effects envelopes (see figures below). If it is possible, the issue with adhering to the GRWP goes away as there would be no potential loss of wetland extent in the Greater Wellington Region, and there would also be a more obvious intent to follow the effects hierarchy to avoid wetlands in the first instance. Has this been considered?





79. With regard to the 1:1 wetland loss compensation approach and reference to previous examples (cited in Appendix C of the Consent Application, Section 9.2, paragraph 4), have the previous examples been backed by a model or other objective approach to establish that this is a fair ratio? If so, please provide that evidence which may include details of the models.
80. Please confirm whether the wetland offsets/compensation sites involve any other third party other than the landowner/occupier of the land that the windfarm is on (i.e., does it require the permission of the neighbouring properties?).
81. The effect on pipits is identified as “low” (Appendix C of the Consent Application, end of par 4, Section 8.5.2, pg. 83), whereas Table 36 identifies the effects as “very low”. Mr James Lambie is of the view that “very low” is the correct assessment using the EIANZ framework and therefore it is understandable that you have not suggested a condition requiring pre-clearance surveys even though farmland tracks are prime real estate for this high value species. However, disturbance of nesting pipit may be avoidable in the first instance through a condition that requires the grass to be maintained (through grazing or mowing) at a low height and for pre-clearance checks if the grass is suitably tall. Have you considered this as a possible methodology?
82. The application states that the effect on lizards is likely to be very low (Appendix C of the Consent Application, Section 8.4.1) and that mitigation is not warranted (Section 9.4). Nevertheless, a permit under the Wildlife Act is likely to be required, and that permit may have conditions (Section 9.4). Have you considered whether it may be appropriate for the Regional Councils to view this permit prior to commencing construction activity? Please also advise if you have considered whether an accidental discovery protocol should be included in order to reduce effects on lizards even further.
83. With regard to the proposed Regional Council Ecological Condition 16 – it would be in keeping with the effects hierarchy that the total anticipated unavoidable effect of 0.32 hectares of wetland loss be

specified here as the upper limit. The condition could also specify that a lesser amount of replacement is anticipated if there is a lesser loss of extent. Have you considered setting limits to manage the potential effects based on the envelope approach?

84. Please clarify what is meant by “...for 5 years...” in proposed Condition 19 in terms of the frequency of inspection and maintenance in any given year. We note that the site is likely going to require at least a spring and autumn inspection for weed clearance. It also would aid certainty if the wetland vegetation restoration condition specified a target (such as 80% indigenous canopy cover) as a logical, reasonable, and measurable extension of the “net gain” principle of offsetting to demonstrate fulfilment of a compensation outcome.
85. In terms of proposed Condition 21, have you considered the inclusion of a mechanism that would show that the plantings are not being counted twice given that the wetland planting is to be conjunction with stream planting (perhaps through reporting on areal extent of wetland loss and wetland planted)?
86. Please provide clarification on the conclusion presented in Appendix C, Consent Application, Section 9.1. It appears that the assertion that there is “...unlikely to be any adverse effects...” only refers to the loss of indigenous terrestrial vegetation and not fauna or wetlands (which are listed later). Is this the correct interpretation?

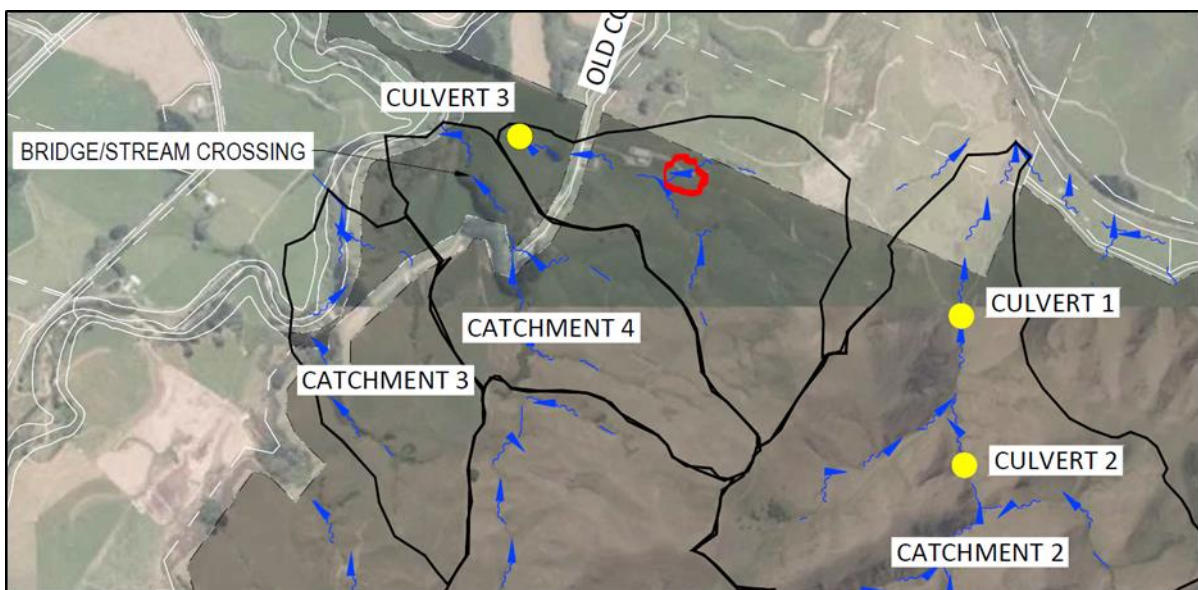
Stormwater Quality

87. We note that no technical or planning assessment has been undertaken regarding the long term effects of the discharge of contaminants. Much of the infrastructure (i.e. the roads, substation and some of the laydown areas) will remain on site after the construction phase has been completed, yet an assessment of the water quality effects of this infrastructure on the receiving environment has not been undertaken. Ongoing maintenance activities, vehicles on the roads, and the roads and associated hardstand areas all have the ability to negatively affect the quality of stormwater discharges in the long term. Additionally, since the road pavement will be an unsealed granular pavement, ongoing discharge of sediments could occur. Furthermore, the creation of table drains in cut areas could concentrate flows and it is unclear if any of these table drains would discharge directly to streams within the site.
 - a. Please provide an assessment of the effect on water quality from impervious surfaces which will be created by the project, along with a description of and design information for the necessary mitigation measures (e.g. stormwater treatment devices) to manage these effects.
 - b. Please also demonstrate how the proposal meets the Regional Council rules as a Permitted Activity, or alternatively apply for a resource consent and assess against the relevant planning documents (including the potential for the proposal to support Te Mana o te Wai in the long term, as required in the NPS-FM).
88. Please provide an assessment of the efficacy of the proposed mitigation measures to reduce increased pH levels which could result from discharges from the concrete batching plant. We note that sediment

retention ponds are generally not effective at mitigating the effects of pH on downstream freshwater receiving environments.

Hydrology

89. No technical or planning assessment has been undertaken regarding effects related to stormwater quantity, including flooding, overland flow paths and erosion (both erosion arising from concentrated discharges as well as channelized stream erosion). Please provide an assessment of effects in relation to the risks indicated below, and associated stormwater quantity mitigation systems proposed to manage these risks:
- Increased peak flows;
 - Increased runoff volumes;
 - Punctual / concentrated discharges;
 - Channelized stream erosion risks;
 - Modifications to natural flow patterns and overland flow paths, including flow diversions resulting from the construction of road corridors and other works; and
 - Impact of the proposed works on downstream floodplains including the Makākahi River and Bruce Stream.
90. Based on observation on site and a desktop review of the available LiDAR information, there is likely to be a number of additional culvert crossings which are not indicated in the application. For example, east of Culvert 3, there appears to be an additional stream crossing that hasn't been mentioned in the application (as indicated with the red circle in the screenshot below). More detailed maps should be provided showing the topography with contours and identifying any other culvert crossings that may be required for the project, within the road alignments or other areas where land modification is proposed.



91. Please provide hydrological and hydraulic calculations to understand the flows generated within the various sub catchments that will be affected by the works, both for a pre and post development

condition, and design calculations to support the sizing of the proposed culverts, bridge and other stormwater infrastructure to service the road and other project areas.

92. Similarly, please provide information (calculations and details) on proposed scour and erosion protection measures where concentrated discharges will be generated (e.g. culvert outlets or other piped or channelled outlets or runoff diversion drains).
93. We note that no information has been provided on proposed operation and maintenance or other plans during the operational phase of the project to ensure that the proposed primary and secondary drainage systems and any associated mitigation systems are regularly inspected, monitored and maintained to ensure they remain effective for the life of the project. Please provide this.
94. Section 11 of the Tonkin & Taylor engineering report indicates that there will be surplus fill arising from the works, which will be disposed within the Turbine Envelope, and Turbine Exclusion Zones. It mentions that fill sites will be identified where catchment areas above them are minimised, however there is no information provided in the application on where these sites will be located. Please provide information to show how any potential impact of the fill sites on local catchments will be managed to ensure that natural drainage patterns are unchanged wherever possible and overland flow paths and natural floodplains are protected.
95. Please also demonstrate how the proposal meets the Regional Council rules as a Permitted Activity, or alternatively apply for a resource consent and assess against the relevant planning documents.

Combined

Geotechnical/Land Stability

Basis for Main Corridor Widths

96. The following requests relate to more specific information on related geotechnical influences on the corridor widths (including cut slopes, roading/culvert fill area and fill disposal areas):
 - a. Have fill disposal areas (footprints) been used to inform the proposed corridor widths?
 - b. What assumed cut slope angle, roading/culvert fill batter and excess fill batter angles have been used to inform the proposed corridor widths i.e., the maximum cut and fill slope angles, or has lower slope angle contingency been added? Noting that the Civil Engineering Report states maximum cut slope and fill batter angles have been used as a basis for preliminary civil design to assess environmental effects and to provide an indicative earthworks volume.
 - c. What geotechnical aspects have influenced the wider corridor width in roading zone section R01?
 - d. Can all batter cuts and fill embankments/disposal areas be contained within the turbine exclusion and turbine envelope zone corridors either with or without mitigation works to ensure long term stability?

- e. Please provide a plan showing the indicative road alignment and cut slope footprint with respect to the corridor boundaries.
- f. Please provide the range of mitigation measures that can be adopted to maintain a stable cut slope within the project corridors should poor ground/adverse groundwater conditions be encountered including at any fault zones.

Total Earthworks Volumes

97. There are inconsistencies in the total earthworks volumes in the various references. For example, the summary in the AEE states 1,672,100m³ of cut volume and 477,000m³ of fill volume (which infers 1,195,100m³ of excess fill volume requiring disposal). The Civil Engineering Report Table 10.1 states 1,756,900m³ of cut volume and 539,700m³ of fill volume (which infers 1,217,200m³ of excess fill volume requiring disposal). The Construction Water Management Plan and Effects Assessment Report Table 1 has a total volume of fill for disposal of 1,166,300m³. In relation to the earthworks volumes:

Volume Figures

- a. Which table/set of earthworks volume figures is correct and a breakdown of the figures is requested?
- b. What bulking factor has been used for the fill volumes provided?
- c. The Construction Water Management Plan and Effects Assessment Report Table 1 mentions earthworks volumes include a 10% contingency whereas there is no mention of a contingency in the Civil Engineering Report – what factors have been used to inform the contingency?

Cut Volume

- d. The Civil Engineering Report states maximum cut slope angles have been used as a basis for preliminary civil design to assess environmental effects and to provide an indicative earthworks volume. Is it correct to assume that these cut slope angles have been used to estimate total cut volume available for road embankment filling as well as the volume of excess fill requiring disposal i.e. there is no allowance for shallower cut slope angles where actual ground conditions require this for stability reasons? Note: The potential for shallower cut slope angles being required is stated in the Civil Engineering Report as being due to rock/soil conditions encountered and whether any stabilisation measures are to be constructed.
- e. What excavation configuration is assumed for the turbine foundations for the cut volume calculation? The largest foundation type noted in the AEE is an octagonal gravity pad with a width of approximately 23 m and a depth of approximately 3.5 m.
- f. Please provide an indicative range of earthworks cut volumes (minimum and maximum) based on the above possible scenarios in order for us to better understand the range of fill volumes that will be generated.

Fill Embankment Volume

- g. Similar to point d. above, in the Civil Engineering Report the maximum roading/culvert embankment fill batter angle (26 degrees) has been used to provide an indicative earthworks volume (for embankment use vs fill disposal) but it is also stated that optimisation of fill slopes to 18.5 degrees or flatter could be considered and adopted. However, it is noted that the Construction Water Management Plan and Effects Assessment Report states that all batter slopes will be kept to less than 20 degrees to maintain a lower erosion risk. Which of these batter slope angles is envisaged for fill embankment slopes?
- h. Please provide an indicative range of fill (minimum and maximum) that will be used in fill embankments based on the above possible information/scenarios in order for us to better understand the fill volumes that will require disposal.

Fill Volume for Disposal

- i. Leading on from Point h. above, please provide an indicative range of fill volume requiring disposal in order for us to better understand the requirements for onsite fill disposal sites.

Fill Disposal Sites

98. There is a paucity of information on the indicative locations of roading/culvert related embankment fills and separately excess fill disposal areas. This information is required to check the feasibility of disposing of the indicated fill volume range within the corridors (and would also better inform potential effects associated with the sites). Current information appears to be limited to a plan (including a table) in the Construction Water Management Plan and Effects Assessment Report showing an aerial image with the general roading network plus blue areas assumed to be a combination of roading/culvert fill areas and excess fill disposal areas and red areas assumed to be cuts slopes. The plan does not show the project corridor boundaries. The accompanying table sets out topsoil stripping, cut volumes and fill volumes per roading section. The only other plans with mention of soil disposal areas appears to be the Site Investigation Location Site Plans in the Geotechnical Factual Report. These plans have a limited number of soil disposal areas marked with some extending outside the corridor boundaries. In relation to the above:
 - a. Are the soil disposal areas on the Site Investigation Location Site Plans in the Geotechnical Factual Report valid?
 - b. Please provide plans showing indicative footprint areas of roading/culvert related embankment fills and excess fill disposal areas with respect to the roads and the corridor boundaries. This should include indicative fill volumes by roading sector and colour coded on the plan accompanied by a table outlining the location, footprint and volume for each fill site. The plans should differentiate the fill areas required to accommodate the minimum fill volume range and the maximum fill volume range (refer above for request for a range) at the assumed minimum fill batter angle. The indicative fill disposal sites should be based on the range of fill location criteria provided in Section 11 of the Civil Engineering Report.

Transmission Corridor

99. Will any excess fill requiring disposal be generated from the terminal substation, internal transmission line access tracks, the transmission line route (access and pole installation)? If yes, where will the fill be disposed of?

It is noted that a cut/fill balance is proposed for the site substation earthworks in Table 10.1 of the Civil Engineering Report.

Turbine Foundations

100. What range of rock improvement/mitigation/drainage methods would be used to ensure suitable foundations are achieved for the turbines if unsuitable ground/ground water conditions are encountered?

Public Roads

101. Section 2.4.5 of the AEE notes various earthworks will be carried out to upgrade Old Coach Road to facilitate construction traffic. Will there be excess fill from these works requiring disposal and if so, where will it be disposed?

Temporary Concrete Batching Plants(s)

102. Is there to be 1 or 2 batching plants? This is not clear in the Civil Engineering Report, Section 8.
103. The location of the concrete batching plant(s) has not been finalised but it is noted it/they could be located in the Main Storage Laydown Area, Turbine Envelope or the Turbine Exclusion Zones. Given the required area (100m x 60 m), is there a suitable location in either of the latter two options for the plant(s) and if so, has this been considered when setting the corridor widths at these locations?
104. What is the conceptual design (e.g., lined/unlined/embedded/elevated), footprint and volume of the decanting pond and settlement pond for the concrete batching plant(s)?

It is noted a cut/fill balance is proposed for the overall batching plant(s) earthworks in Table 10.1 of the Civil Engineering Report.

Main Storage Laydown Area

105. How many ponds will be constructed for in the laydown area? Note: The Civil Engineering Report does not mention ponds, but a pond is mentioned in the AEE Section 2.4.6 and two pond locations are shown on various site plans.
106. What is the conceptual design (e.g., lined/unlined/embedded/elevated), footprint and volume of any such pond?
107. Will the pond(s) be classifiable in terms of the Dam Safety regulations?

It is noted that a cut/fill balance is proposed for the main storage laydown area earthworks in Table 10.1 of the Civil Engineering Report.

Seismic Considerations

108. It is noted in Section 6.2 of the Geological and Geotechnical Information to Support Civil Engineering Report, founding conditions for the turbines, main storage laydown area and earthworks and infrastructure areas across the site are to be determined prior to construction to confirm assumed sub soil classes. Will further investigations be carried out as part of windfarm design to determine liquefaction potential at the main storage laydown area and terminal substation?

Indicative further Geotechnical Investigations for detailed Windfarm design

109. Please provide a list of infrastructure (e.g., turbines, substations, culverts, ponds etc.) and earthworks (e.g., roads, cut slopes, fill areas etc) sites where further geotechnical investigations are anticipated. This includes the proposed scope and type of investigation.

Contaminated Land

110. We note that you have used council records as the sole source of information regarding HAIL land uses/contaminated land matters. We note that these records are rarely complete or exhaustive and should not be relied upon as the sole source of evidence when undertaking site contamination assessments. We note that during the site visit, the following potential HAIL activities or land uses were identified (there may have been more in areas of the site that were not visited):

- a. A 'super bin' on the main ridge: potential HAIL category A6 'fertiliser manufacture and bulk storage';
- b. A sheep dip/spray unit adjacent to the proposed access road off Old Coach Road: potential HAIL category A8 'livestock dip or spray race operations';
- c. Cropping land at the proposed laydown area off Old Coach Road: potential HAIL category A10 'persistent pesticide bulk storage or use including sport turfs, market gardens, orchards, glass houses or spray sheds'; and
- d. What appeared to be disused underground fuel storage tanks (UST), one which had been converted to a water tank at the super bin site, another sitting on a grassed area near the sheep dip/spray unit, its current use, if any, unknown.

Given the above, please have a PSI, and any subsequent assessment recommended by the PSI, undertaken by a suitably qualified and experienced practitioner (SQEP) in accordance with Ministry for the Environment (MfE) Contaminated Land Management Guideline (CLMG) Nos 5 'Site investigation and analysis of soils' and 1 'Reporting on contaminated sites in New Zealand', both revised 2021. As well as the site area, the PSI should also consider adjacent activities or land uses that may have had or be having

an effect on the site. The findings of the PSI, and any subsequent assessment recommended by the PSI, will allow you to determine additional consenting requirements under the National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health 2011 and/or the regional plans.

Air Quality

111. It is noted that there is not a single comprehensive document that deals with air quality effects that has been provided as part of the application. These effects are exclusively associated with construction and primarily associated with the earthworks, which are potentially substantial. While the majority of the activities will occur well away from sensitive receptors, it is considered that applicant still needs to demonstrate that the potential effects have been considered and that appropriate mitigation measures will be put in place to ensure that off-site effects are at an acceptable level. Therefore, please provide an air quality assessment which focuses on construction phase of the project. This assessment should be consistent with good practice and with respect to dust management be consistent with the Ministry for the Environments' Good practice guide for Assessing and Managing Dust (2016). In particular, the document should assess the following:

- a. How will you be carrying out the operation of concrete batching plant and the handling of the aggregates? Please demonstrate that these will meet the relevant standards associated with the Horizons One Plan Rule 15-14.

It is noted that this rule only covers aggregate handling and not the operation of the batching plant, which therefore appears to be a discretionary activity under Rule 15-17. This activity is also covered by the Combined Plan 4.5.6 as a discretionary activity. See also Wellington Natural Resources Regional Plan Rule 27 and 28.

- b. Will you be using a generator in associated with the operation of the concrete batching plant, or used elsewhere as part of the project? If so, please demonstrate that these will meet the Permitted Activity rules, or prepare an appropriate assessment under One Plan Rule 15-6 or 15-10 if the generators are not able to meet these rules. This assessment needs to demonstrate that emissions associated with any generator will not cause an exceedance of any of the National Environmental Standards for Air Quality. See also Rule 8 in the Greater Wellington Plan.
- c. Please demonstrate that the placement of excess fill material will not result in effects that are covered by Policy 15-2, standards (a) to (d) or Rule 15-14.
- d. Please demonstrate that the aggregate processing meets the requirements of One Plan Rule 15-14 for aggregate handling or 15-16, or Wellington Natural Resources Regional Plan Rule 27.

- e. For activities that occur within the Masterton district, please demonstrate that they can be carried out in a way that meets Rule 21.1.12.
- f. Please demonstrate that the earthworks, and the traffic movements along the gravel roads, can generally can be carried out in a way that does not give rise to offensive or objectionable dust nuisance effects. This assessment should follow MfE guidance and include a FIDOL assessment. Please provide a draft Construction Air Quality Management Plan, which is consistent with the requirements of the Ministry for the Environment's Good practice guide for Assessing and Managing Dust (2016).

Greenhouse Gases/Carbon Life Cycle

112. Please provide a preliminary/high level assessment, which may be qualitative and/or quantitative as appropriate, to address the materiality of the possible carbon emissions associated with various activities during construction, operation and at the end of life of the Project, including those associated with materials used in the construction and operating phases. We suggest you consider the assessment being in accordance with the following frameworks:
 - a. ISO 14067 Greenhouse gases — Carbon footprint of products — Requirements and guidelines for quantification;
 - b. ISO 14040 Environmental management — Life cycle assessment — Principles and framework; and
 - c. ISO 14044 Environmental management — Life cycle assessment — Requirements and guidelines.
113. Please provide an emissions reduction strategy that identifies the methods or approaches and procedures that will be used to manage the material emissions, including identifying opportunities to reduce emissions, throughout the Project lifecycle.
114. Please explain your organisational policies and commitments relating to emissions reduction and managing carbon on new infrastructure developments, including operational emissions.

Planning – Resource Consent Requirements

115. In responding to the matters raised within other topic headings in this further information request, please confirm whether any new or additional resource consents under the applicable Regional Plan(s), District Plan(s) or any National Environmental Standard are required.

Planning - Statutory Planning Assessment

116. The application at Section 3 and Appendix G of the AEE has provided an overview of the applicable planning framework and the associated objectives and policies that are relevant in the consideration of

the application. Section 9 of the AEE includes a high-level analysis of consistency with the identified planning framework and relevant objectives and policies.

In light of the further information requested above, please provide a comprehensive updated planning assessment of the proposal against all relevant national, regional and district planning instruments in order to provide confidence that the proposal is consistent with the relevant statutory planning framework.

Under the Resource Management Act, you must, within 15 working days of the date of this letter, take one of the following options:

- a. provide the information; -OR-
- b. advise in writing that you agree to provide the information (at which point we would negotiate a reasonable time within which the information will be provided); -OR-
- c. advise in writing that you refuse to provide the information.

The time taken to respond to this request and provide the information will be excluded from the processing of your application as per section 88C of the Act.

General Comment - Proffered Conditions

The application sets out proffered conditions at 8 of the AEE. The Councils have extensive comments on the condition set as lodged which flow from their preliminary review and which will be further informed by the information requested in this letter. It is anticipated that further engagement and clarification on the proposed condition set will be sought following receipt of the further information. In the interim however, any new or additional proposed conditions may be provided in response to the matters raised in this further information request.

If you have any questions in relation to the determination or wish to discuss any aspects of this letter, please feel free to contact the relevant person(s) listed below.

Kind regards



Lauren Edwards
SENIOR CONSENTS PLANNER
Horizons Regional Council



Josh Pepperell
RESOURCE ADVISOR
Greater Wellington Regional Council



Aimee Charmley
TEAM LEADER PLANNING SERVICES
Taranua District Council



Rosanne Heyes
RESOURCE PLANNER
Masterton District Council