

3 July 2023

Digitally Delivered

Taumatotara Wind Farm Limited
Attn: Glenn Starr
157 Woodlands Park Road
Titirangi
Auckland 0604

By email to: glenn@ventusenergy.co.nz

Dear Glenn,

RM200019:- TAUMATOTARA WIND FARM – APPLICATION TO INCREASE TURBINE HEIGHT

Thank you for facilitating the recent wind farm site visit with our s42A reporting team for Waitomo District Council on 22 June 2023. We also acknowledge the receipt of the Kina Consultants report on the transportation route bridge review dated 14 April 2022 and received on 1 June 2023.

The site visit and the Kina report have raised a number of questions for our team. Pursuant to s92 of the RMA, we need clarification on these matters to enable us to adequately prepare the section 42A report for the application.

Kina bridge review report:

The Kina report provided additional information that was not previously available to Council. We note that the final paragraph of the Conclusions and Recommendations section states the following:

It appears that significant work is required to strengthen bridge 7 to accommodate the loads. We recommend that a bypass and temporary bridge be established around bridge 7. This will prevent the need for significant extra investigation, and issues regarding the potential need to extend the effective life of this bridge.

However, Appendix 1 of the Kina Report contains a marked up plan for Bridge 7 showing some structural strengthening options. We also note that condition 20 from the existing 2011 consent requires that *“at all times, all Waitomo District Council administered roads shall be kept open.”*

20. The Traffic Management Plan shall be designed to ensure that at all times during construction, all Waitomo District Council administered roads shall be kept open. In exceptional circumstances a request may be sought for short term road closures. Any road closures shall be approved by the Manager, Policy and Planning, Waitomo District Council.

1. Please confirm whether you wish to strengthen Bridge 7 in accordance with the plans in Appendix 1 of the Kina Report or seek a bypass and temporary bridge around Bridge 7 as the current version of the Kina report provides conflicting information on the preferred option.
2. Please confirm that whichever option is chosen, you will still be able to comply with existing condition 20 from the 2011 consent.

Construction and Operational Noise:

Siiri Wilkening is generally comfortable that the operational noise arising from the windfarm will be able to comply with the relevant limits and considers that the conditions (as amended between Council and the applicant) will adequately address this issue. However, the site visit has highlighted the importance of addressing construction noise, in particular noise arising from any public road or bridge upgrading works.

3. Please provide confirmation of whether there will be any nighttime works on the site or the public roading network and if so, whether those activities will be able to meet the requirements of table 2 in NZS6803 in condition 12:

Time	Weekdays		Saturdays		Sundays	
	L _{eq}	L _{max}	L _{eq}	L _{max}	L _{eq}	L _{max}
0630-0730	55dBA	75dBA	45dBA	75dBA	45dBA	75dBA
0730-1800	70dBA	85dBA	70dBA	85dBA	55dBA	85dBA
1800-2000	65dBA	80dBA	45dBA	75dBA	45dBA	75dBA
2000-0630	45dBA	75dBA	45dBA	75dBA	45dBA	75dBA

Ecology:

The site visit was particularly useful for our consultant Ecologist to understand the context of the entire site. The site visit in conjunction with another review of the application reports on ecology has resulted in the following questions:

4. If the public roads on the transportation route need to be widened to accommodate the longer turbine blades, please confirm whether any additional native vegetation along the roadside will need to be removed.

As noted in Council's further information letter dated 7 September 2020: "as a general comment, for Council to be satisfied with respect to each of the key effects associated with the increase in height, it needs to be satisfied with respect to both the effect of the change and the factual basis for the original effect." The site visit has reiterated the importance of understanding the level of effect on bats of the consented layout versus the level of effect on bats of the proposed change in the windfarm size and layout.

5. Please confirm the level of effects on bats for the consented versus the proposed changes in the windfarm size and layout. This is particularly important given that it is not clear how the proposal has adhered to the effects management hierarchy required by the RMA of "avoid, remedy, mitigate, offset". The 10 August 2021 report outlined the applicant's approach to mitigation and remedy as comprising survey and pest control. It is unclear how these proposed actions can be considered as "remedies" under the RMA.

6. Please confirm exactly what is proposed in terms of remedying effects on bats. The December 2020 report by Ecology NZ states at page 3 that: "I recommend a consent condition that requires that the applicant establish a pest control programme over a minimum area commensurate with the scale of the project (eg 200 hectares of native forest habitat)." However, the August 2021 report by Ecology NZ states at the end of section 7 that "the operator offers to undertake intensive pest control over a minimum of 20 hectares of the two larger forest areas in the surrounding landscape...".

Given the significant difference between 20 hectares and 200 hectares, please clarify exactly what is proposed for remedying adverse effects on bats.

Important Notes

Within 15 working days from the date of this request you must either:

- a) Provide the information requested, or
- b) Advise Council in writing that you agree to provide the information requested, or
- c) Advise Council in writing that you refuse to provide the information requested.

A response is due from you no later than **2 August 2023**.

Please note that the statutory timeframes for processing your application have been put on hold until the further information requested has been provided. Once it is received, it will be assessed for completeness.

Please do not hesitate to contact Chris Dawson, Principal Planner at BBO, if you have any questions in relation to this letter.

Yours faithfully



ALEX BELL

GENERAL MANAGER – STRATEGY & ENVIRONMENT