

Your Reference :

Our Reference : 191149

24th August 2021

Environmental Protection Authority  
c/o [June.Cahill@epa.govt.nz](mailto:June.Cahill@epa.govt.nz)

Dear June,

## **Kapuni Green Hydrogen Project - Consent Application**

In response to your email of 23 August 2021 requesting clarification / further information on the Kapuni Green Hydrogen consent application I provide the following responses (in italics).

The occupiers of the sites are not explicitly identified in the AEE, although the landowners are. While it is assumed they are one and the same, this is not explicitly stated. Please confirm.

*The occupiers of the sites are all identified on the plan in Appendix P.3. Where the property is owner occupied this is identified in the Note column. The occupiers of the Wind Turbine site are identified under ID 1. 1. To clarify, the Wind Turbine Site identified in blue is part of property ID 1 owned by PKW and forms part of the overall PKW farm which spans both sides of Kokiri Road.*

Section 11(e) requires any discharge of contaminants into the environment and options for the treatment and disposal of contaminants to be covered. The options for treatment and disposal of potentially contaminated soil have not been addressed.

*As discussed in the Contaminated Soil Management Plan (CSMP), excess excavated soil at the Ballance Plant is conservatively being treated as contaminated and will all be removed from site and disposed of at an authorised facility. No other option for disposal exists. If contamination is discovered a potential alternative would be to manage the contaminated material on site either mixing with clean soil or capping under hardstanding areas, however this is not the chosen option given the estimated small volume of excess material. In terms of options for managing discharge of contaminants associated with potential contaminated soil the management measures proposed are outlined in Section 5 of the CSMP (Appendix E.3).*

The referral order requires an assessment of the effects on sightlines of Mount Taranaki when viewed from sites of importance to Māori (as determined in consultation with Te Korowai o Ngāruahine Trust and Ngāruahine hapū. While the AEE outlines the consultation that was taken with Maori, it does not document the consultation undertaken with o Ngāruahine Trust and Ngāruahine hapū to identify which sites are important to Maori, which then formed the basis of the landscape assessment.

*Section 7.8.3 of the application outlines that the above matter was discussed with Te Korowai and hapū and the advice provided was to focus on sightlines from all marae of Ngāruahine which has been followed through the landscape/visual assessment work that supports the application.*

Of more significance is the traffic assessment as specified in the referral order: 6(e) a traffic impact assessment, which **must** include an assessment of the effects of large vehicles transporting turbine sections to the project site;

I believe this was discussed when we spoke after the assessment of the draft application. While you have mentioned that a contractor has not been selected we would have expected some preliminary assumptions to have been made about likely load lengths, type of transport equipment and potential transport routes so that possible effects could be identified and or mitigated.

*Preliminary assumptions have been made regarding the above matters within the TIA. In Appendix A of the TIA, a swept path analysis has been undertaken at a key pinch point on the proposed transport route based on a nominal transporter configuration that would cater for the wind turbine blades. The roading network for the potential transport routes is described in section 3 of the TIA with a preliminary assessment of routes for the overmass / over dimension loads addressed in section 4.5.*

*Consultation outcomes with Waka Kotahi / NZTA and STDC are detailed in section 4.1 of the TIA. In summary both authorities are comfortable with the approach proposed i.e. the preliminary assessment work undertaken and the commitment that the finer detail will be confirmed once the contractor is appointed and through the required Construction Traffic Management Plan and Transport Plan, both of which are proposed conditions of consent.*

*Both Plans require further engagement with the Road Controlling Authorities. It is also noted that transport of overmass / over dimension wind turbine loads from Port Taranaki southwards is not a new activity and both roading authorities have used the same approach successfully in managing the effects of other similar projects moving large loads through the region.*

If you require any further clarification on any of the above points please let me know.

Yours sincerely,



Cam Twigley  
Director, Planning and Environment