

Under the **FAST-TRACK APPROVALS ACT 2024**

In the matter of an application for resource consents, concessions, wildlife approvals, an archaeological authority, and approvals relating to complex freshwater fisheries activities in relation to the Southland Wind Farm project

By **CONTACT ENERGY LIMITED**

Applicant

**STATEMENT OF EVIDENCE OF BRADDYN THOMAS COOMBS (LANDSCAPE,
VISUAL, AND NATURAL CHARACTER EFFECTS) ON BEHALF OF CONTACT
ENERGY LIMITED**

14 January 2026

BUDDLE FINDLAY

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INTRODUCTION

1. My full name is Braddyn Thomas Coombs.
2. My evidence is given on behalf of Contact Energy Limited (**Contact**) in respect of Contact's proposed Southland Wind Farm project (**Project**) in response to comments made under section 53 of the Fast-track Approvals Act 2024 (**FTAA**) by:
 - (a) Rhys Girvan – Landscape Peer Review for and on behalf of the Southland District Council (**SDC**);
 - (b) West Catlins Preservation Society (**WCPS**); and
 - (c) Environment Southland (**ES**).
3. I prepared Technical Assessment #3: Landscape, Visual and Natural Character Effects, dated 18 August 2025, in Part H of the application for the Project. My qualifications and experience are set out in paragraphs 26 – 28 of my technical assessment.

Code of conduct

4. I confirm that I have read the Code of Conduct for expert witnesses contained in the Environment Court Practice Note 2023 and have complied with it in preparing this evidence. In particular, unless I state otherwise, the issues addressed in my evidence are within my area of expertise and I have not omitted to consider material facts known to me that might alter or detract from the opinions I express.

RHYS GIRVAN PEER REVIEW (SDC)

Overall conclusions and comments

5. Mr Girvan has undertaken a fairly detailed review of my Technical Assessment (H03), the Visual Simulations and Mapping document (H03a) and Mr Bray's Technical Assessment (H04) that form part of Contact's substantive application.
6. Mr Girvan concludes that the Technical Assessments that he has reviewed "adopt an appropriate methodology, draw on adequate site and desk-based analysis, and generally provide a credible baseline for understanding the

landscape, natural character and visual effects of the Southland Wind Farm".¹ He also concludes that:

- (a) because the turbines avoid the scarp face and are an appropriate separation distance from it, the relocation of turbines off the plateau is not required to achieve an acceptable landscape outcome;²
- (b) the Project "*will introduce a large-scale wind farm which is largely seen from within a modified working rural landscape where large infrastructure is not inherently out of place*";³ and
- (c) the landscape and natural character effects of the Project can be reconciled with the intent of the FTAA to facilitate regionally and nationally significant renewable energy infrastructure while protecting high-value landscapes and natural character as far as practicable.⁴

7. These concluding statements as to the appropriateness of the Project in this location are qualified by some other views expressed by Mr Girvan. Mr Girvan is of the opinion that the Isthmus and Wayfinder Technical Assessments' treatment of the ONF and natural character values of the Slopedown / Mokoreta – Pukemimihau candidate ONF understate the sensitivity and importance of the landscape values of the site and its context.⁵ He also expresses the view that, for the Project to be appropriate in landscape terms, stricter controls over land management, access formation and restoration are required.⁶ I explain below why I disagree with Mr Girvan on those points of detail.
8. Nonetheless, the overall conclusions of Mr Girvan's review are important because they confirm that the materials and methodology of the Technical Assessments are appropriate for the landscape assessment of the Project, and that the wind farm and associated infrastructure comprise an appropriate proposal on the site, subject to appropriate conditions. These conclusions frame my response to any specific points from Mr Girvan's review below and to comments from the WCPS. My responses to Mr Girvan's review below are only made where a response or clarification is required – or where I disagree with his assessment; I broadly concur with other sections of his review.

¹ Rhys Girvan Peer Review – Landscape Comments. Para 53.

² Rhys Girvan Peer Review – Landscape Comments. Para 56.

³ Rhys Girvan Peer Review – Landscape Comments. Para 53.

⁴ Rhys Girvan Peer Review – Landscape Comments. Para 58.

⁵ Rhys Girvan Peer Review – Landscape Comments. Para 54.

⁶ Rhys Girvan Peer Review – Landscape Comments. Para 56.

SPECIFIC RESPONSES

Methodology

9. Mr Girvan considers that the Isthmus Technical Assessment follows best practice and the Wayfinder Assessment provides further comparative analysis based on professional experience. Mr Girvan also considers that the visual simulations have been prepared following best practice.⁷ These comments from Mr Girvan are important as they confirm broad agreement between the three qualified landscape assessors on these matters; below I address WCPS' criticisms of broad aspects of the landscape and natural character assessment and the visual simulations.

Existing landscape

10. Mr Girvan is generally complimentary of the description of the existing landscape within and surrounding the site,⁸ however he identifies what he considers to be a 'discrepancy' in the identification and subsequent delineation of what qualifies as 'outstanding' in the context of Southland's natural features and landscapes.⁹ By this I understand Mr Girvan to suggest that while all three landscape architects have concluded that there are areas within or close to the site that may have outstanding landscape values that warrant recognition as an ONF, the likely location of the boundary of such an ONF is not agreed.
11. Mr Bray and I consider that the outstanding landscape values are limited to the scarp, and Mr Girvan considers that they are broader, including the Jedburgh Plateau and other surrounding areas. Mr Bray and I have acknowledged the highly natural areas within the Project site, for example the southern rātā-kāmahi gully to the north of the Jedburgh Plateau, but irrespective of whether those areas have values that are outstanding in landscape terms (the gully area, for example, is avoided by the Project in any event), my view is that those areas are not adversely affected by the proposal in an inappropriate way and some parts will be improved.¹⁰
12. Mr Girvan suggests that natural features may encompass a combination of attributes which come together and form a coherent whole.¹¹ Neither Mr Bray nor I have suggested that a combination of valued landscape attributes

⁷ Rhys Girvan Peer Review – Landscape Comments. Paras 6 & 7.

⁸ Rhys Girvan Peer Review – Landscape Comments. Paras 8 & 9.

⁹ Rhys Girvan Peer Review – Landscape Comments. Para 10.

¹⁰ Technical Assessment H03. Paras 510-511.

¹¹ Rhys Girvan Peer Review – Landscape Comments. Para 10.

is not present within and surrounding the wind farm site. Rather, our view is that there is a difference between the landscape values of the scarp (in particular) and other parts of the potential ONF candidate that is mapped in the Southland Murihiku Regional Landscape Assessment (**SMRLA**), and that the highest landscape values are on the scarp, making the scarp most likely to be a defensible ONF candidate.

13. The Slopedown / Mokoreta – Pukemimihau ONF candidate assessment sheet and maps from the SMRLA study were attached as Appendix E to the Isthmus Technical Assessment accompanying the substantive application, and were also appended to WCPS' comments. I have reproduced the assessment sheet and map for ease of reference below (**Figure 1**).
14. As the Panel will be aware from its site visit and the various other maps it has before it (including the site visit maps provided by Contact in response to the Panel's Minute 3), the SMRLA map in **Figure 1** illustrates that the candidate ONF in the SMRLA report includes the scarp face, some of the foot slopes below the scarp, the crest of the ridgeline, parts of the upper dip slope, the southern rātā-kāmahi gully, the Jedburgh Plateau, parts of the pastoral slopes below the plateau and the physically separate landform of Mount Herbert. The mapped area contains varying types and stature of vegetation, including native forest, a mosaic of wetland vegetation and pasture, scrub and grazed pastoral areas. Plantation forests are noted as being excluded from the mapped area. Some areas are within the Catlins Conservation Park and others are part of a working pastoral station. There is, self-evidently, a wide range of landscape attributes across the ONF candidate area as identified in the SMRLA report.
15. **Figure 2** below is the Slopedown / Mokoreta – Pukemimihau ONF candidate map from the SMRLA report, with the landforms annotated to illustrate the variability of the landform topography of the ONF candidate.
16. The assessment sheet below in **Figure 1** states that under Sensory Attributes there is a 'Highly coherent sequence of native vegetation and sub-alpine tussock which expresses a notable altitude sequence in harmony with the landform'. The Biophysical Attributes on the sheet also refer to "the tops [having] a significant amount of intact red tussock and peatlands".
17. In my opinion the values identified on the ONF candidate sheet are primarily located on the scarp and on other parts of the Conservation Park, and so are outside of the wind farm Project site. In respect of the Jedburgh Plateau in

particular, which appears to be the main location where myself, Mr Bray, and Mr Girvan have different views as to ONF status, there are no areas of "*intact red tussock*"; I have spoken with Mr Goldwater who confirms there is no tussock along the crest or on the Jedburgh Plateau. Nor, I understand from Mr Goldwater and Mr MacGibbon, are there extensive peatlands on the Jedburgh Plateau. While there are a number of bog and fen wetlands, as their assessments describe, I am advised that the bogs at Jedburgh are shallow, rain-fed wetlands with low nutrients and generally high acidity but they are not or have not, to date, been peat-forming other than in a minor way. I also understand that the majority of bog wetlands have been induced through the clearance of vegetation by fire and farming activity over the past century.

18. The largely desktop nature of a regional scale landscape assessment like the SMRLA risks mapping and attribute discrepancies, which are less of an issue at a regional scale. However, when it comes to a property and project site scale, such discrepancies can capture areas or attributes unintentionally. It is my opinion that the area mapped as the Slopedown / Mokoreta – Pukemimihau candidate ONF cannot be described as a 'coherent whole' given the highly variable topography and biophysical and vegetation habitat differences across the mapped area. The shape of the candidate ONF itself, along with the variability of the attributes described above illustrate the lack of coherence across the mapped candidate ONF area in the SMRLA.

Above: View overlooking Mt Herbert and the Slopdown escarpment on the right. Boffs Miskell, 2018.

SLOPEDOWN / MOKORETA – PUKEMIMIHOU ONF

Slopdown forms a striking part of the Southland Syncline and contains an impressive altitudinal sequence of indigenous vegetation providing recreation opportunities.

SLOPEDOWN / MOKORETA – PUKEMIMIHOU ONF

LANDSCAPE ATTRIBUTES	EVALUATION	RATING
BIOPHYSICAL	<ul style="list-style-type: none"> Part of the geologically significant Southland Syncline which incorporates a series of striking ridges and valleys from western Southland through to the Catlins/Te Ākau Tai Toka. This unit is divided into two sub-units. Although the whole unit is part of the wider area known as the Catlins and is part of the Southland Syncline, the physical characteristics of the two sub-units are quite distinct. The Catlins area is characterised by the parallel low hills, escarpments and valleys of the Southland Syncline (Department of Conservation, 2000). One of the last largely undisturbed examples of the transitional vegetation between the region's predominant rimu-kamahi forest and the former mixed podocarp forest of the Southland/Murihiku plains and peripheral hill country (Sandercock, 1987). Slopdown Hill has some mountain cedar (<i>Libocedrus bidwillii</i>) on the southern slopes, while the tops have a significant amount of intact reed tussock and peatlands (Department of Conservation, 2000). The Slopdown Ecological Area contains altitudinal sequences of regenerating kamahi, podocarp and mixed broadleaved forest on relatively flat to steep hill sides (Department of Conservation, 2016). 	 HIGH
SENSORY	<ul style="list-style-type: none"> Distinctive plateau and sloping strike ridge remains highly legible and expressive of the Southland Syncline through this area. The dominant cover and sequence of indigenous forest which culminates along grassland and scrub upon the plateau establishes an overt sense of naturalness. Combination of flattened ridgetop and distinctive sloping forested scarp forms a memorable feature and skyline observed from the Southland Plains. Highly coherent sequence of native vegetation and sub-alpine tussock which expresses a notable altitude sequence in harmony with the landform. 	 VERY HIGH
ASSOCIATIVE	<ul style="list-style-type: none"> The Mimiha Stream is important to Ngāi Tahu and the wider area includes a number of archaeological sites of Māori origin highlighting traditional use and occupation. Slopdown Forest has been used as an outdoor education area (Department of Conservation, 2000). Recognised important backcountry hunting and tramping opportunities. 	 MODERATE-HIGH

OVERALL LANDSCAPE VALUE

OUTSTANDING

Mapped Extent

Refer to Figure 36. The Slopdown/Mokoreta - Pukemimihau ONF has primarily been mapped according to the extent of native vegetation. This encompasses the full extent of the vegetated scarp slope and extends onto the plateau top where existing vegetation predominantly remains intact. It also includes the adjacent vegetated form of Mount Herbert. Exotic plantation forestry has been excluded from the ONF and typically forms the boundary along which the extent of the ONF has been defined.

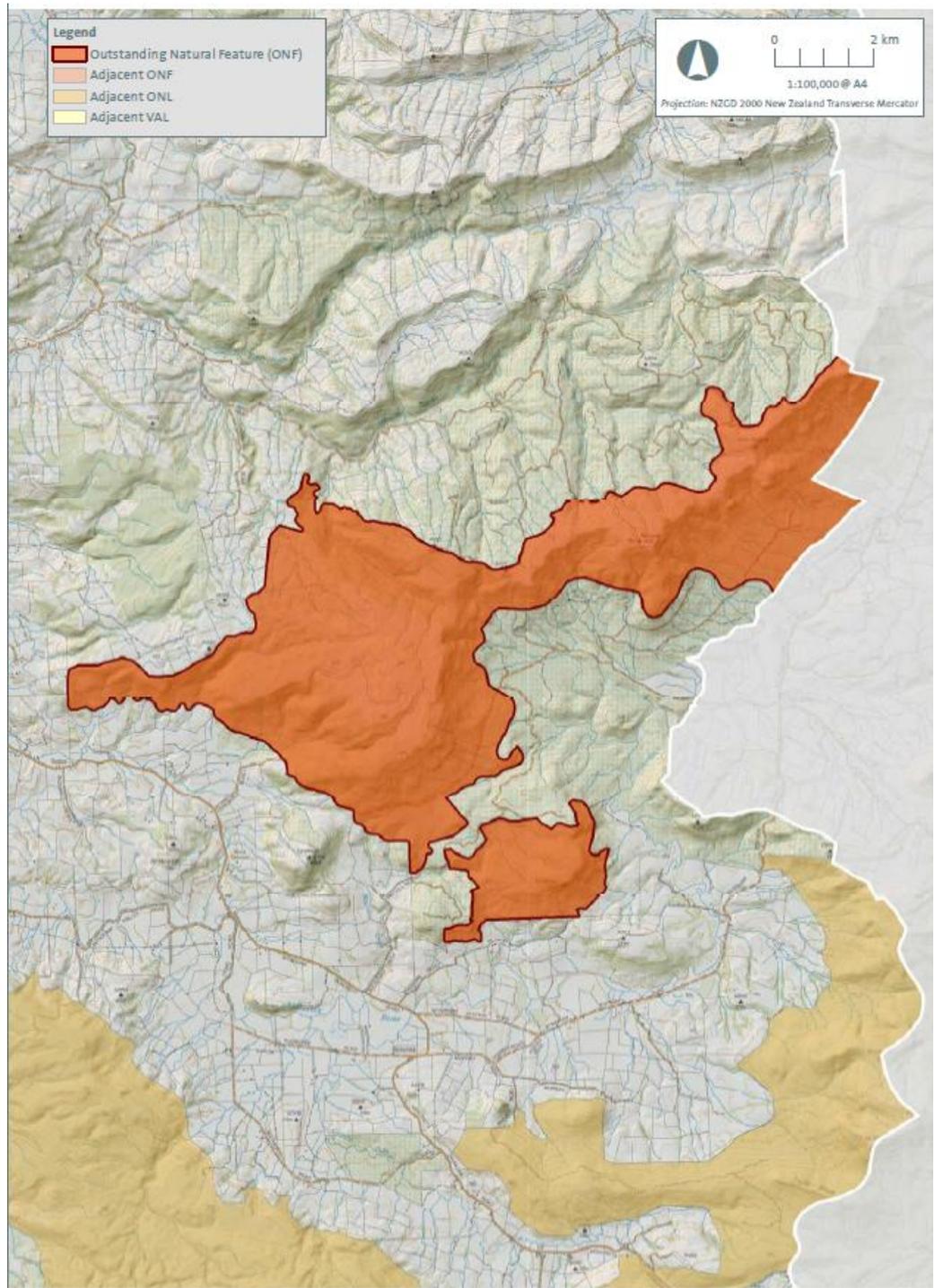


Figure 36: Slopedown ONF. Boffa Miskell, 2018.

Figure 1: Slopedown / Mokoreta – Pukemimihau ONF candidate assessment sheet and map from the SMRLA study

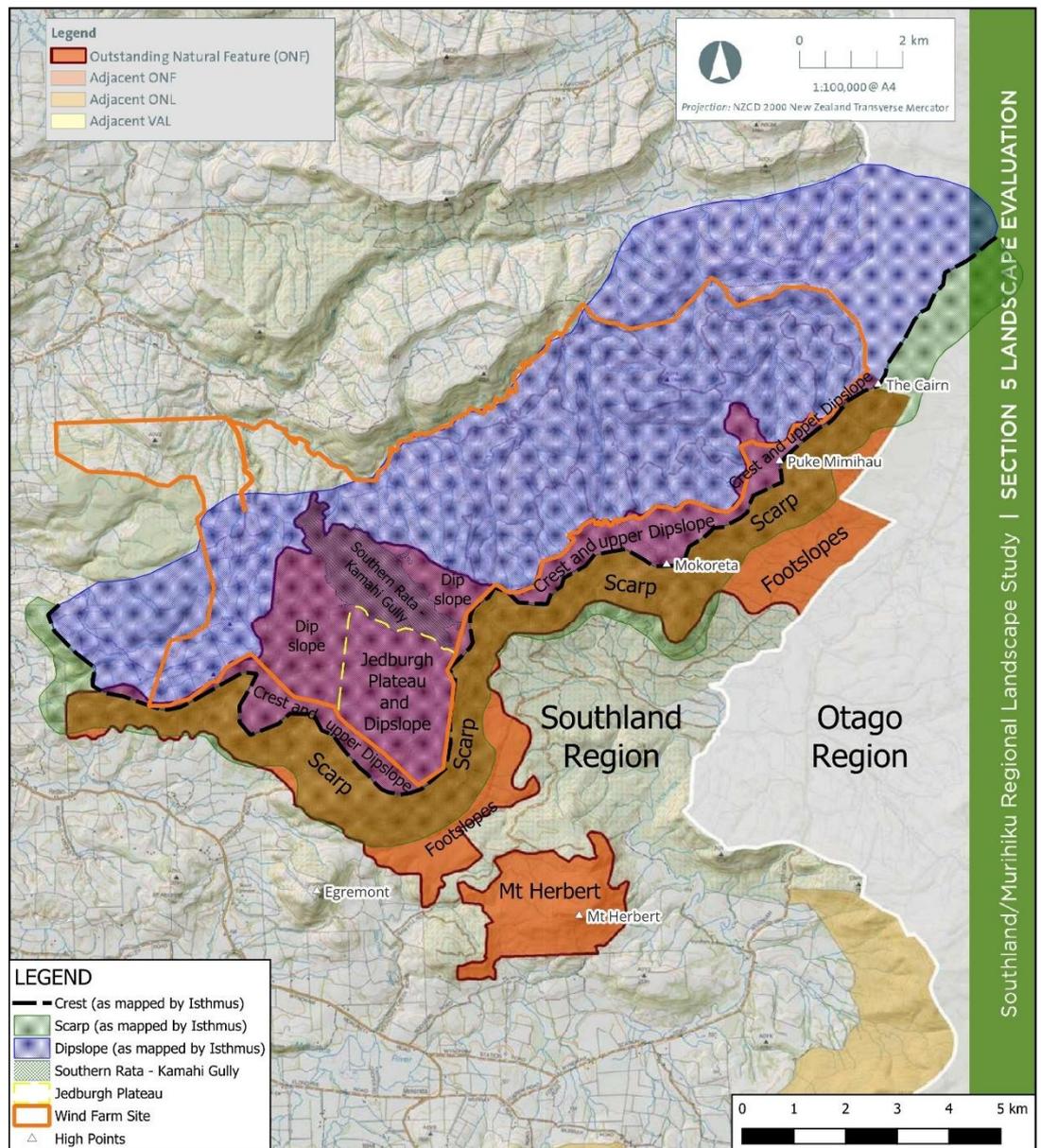


Figure 2: Slopdown / Mokoreta – Pukemimihau ONF candidate map from the SMRLA study with landform areas annotated.

19. As Mr Girvan points out, the boundary of the ONF candidate has not yet been confirmed through a statutory planning process¹² (and nor has its ONF status). The aspects which might influence the location of the ONF boundary are discussed further below.

Landscape effects

20. In reviewing the effects of the Project on the Slopdown / Mokoreta – Pukemimihau candidate ONF, Mr Girvan again confirms that the boundary has not been adopted.¹³ Mr Girvan points out that the proposed access

¹² Rhys Girvan Peer Review – Landscape Comments. Para 11.
¹³ Rhys Girvan Peer Review – Landscape Comments. Para 22.

roads and turbine foundations generally avoid the more visible bush clad scarp.¹⁴ I would add that the access roads and turbine foundations **completely** physically avoid the bush clad scarp; the scarp, as it is mapped on **Figure 3** on page 42 of my Technical Assessment and in **Figure 2** above, is outside of the Project site. This is also evident on the Project video that was created to illustrate the context of the wind farm layout in the wider landscape.

21. Mr Girvan is of the opinion that the level of landscape effects of the Project relate to the consequence of impacts on the specific landscape values to be protected.¹⁵ An assessment of the effects of the Project on the specific biophysical, sensory and associative landscape values that are identified in the SMRLA report¹⁶ for the ONF candidate is recorded at paragraphs 321-339 of my Technical Assessment, including the reasons why I consider the Project appropriate within this landscape context, including if it were to be confirmed as an ONF in the District Plan.
22. Mr Girvan has not specifically challenged that assessment of effects on the ONF candidate in my Technical Assessment. I have reviewed that section of my Technical Assessment and I stand by it, along with the reasons why the Project is appropriate in this landscape setting. Mr Girvan has not undertaken such a detailed assessment against the specific landscape attributes, however has concluded that the effects on the Jedburgh plateau section of ONF candidate would be more than **moderate-low (minor)**¹⁷.
23. Mr Girvan concludes that the turbines are a sufficient distance from the distinctive angled slope of the ridgeline to ensure that the 'Slopedown' remains legible, and I agree.¹⁸ Mr Girvan infers that my Technical Assessment considers that the natural values of the ONF candidate are limited to the scarp and culminate at the scarp crest.¹⁹ That is not the case as the Technical Assessment has acknowledged the elevated natural values on the scarp, in the southern rāta-kāmahi gully and on specific wetland areas on the Jedburgh Plateau and within stream and riparian environments.²⁰ Again, however, in my view that does not warrant any part of the Jedburgh Plateau having ONF status, as I have explained.

¹⁴ Rhys Girvan Peer Review – Landscape Comments. Para 23.

¹⁵ Rhys Girvan Peer Review – Landscape Comments. Para 26.

¹⁶ Assessment sheets with attributes recorded in Figure 1 above.

¹⁷ Rhys Girvan Peer Review – Landscape Comments. Para 26.

¹⁸ Rhys Girvan Peer Review – Landscape Comments. Para 27.

¹⁹ Rhys Girvan Peer Review – Landscape Comments. Para 28.

²⁰ Technical Assessment H03. Paras 174-197 and 203-217.

24. Again, regardless of any apparent 'discrepancy' between the views of Mr Bray, myself and Mr Girvan on the possible location of the boundary of a candidate ONF and the potential effects of the Project on the landscape values within the site and the surrounding area, all of the landscape assessors have concluded that the Project is appropriate to the location and the effects can be managed through conditions of consent. The material points in contention relate to what conditions of consent are necessary and appropriate for managing landscape and natural character effects. I discuss this further below.

Visual effects

25. Mr Girvan largely agrees with my assessment of the visual effects of the Project, the levels of effects assessed and the areas that are likely to experience the highest levels of visual effects.²¹ Mr Girvan questions the discrepancy between the categorisation of potential visual effects as being 'adverse' or not between the Isthmus Technical Assessment and the Wayfinder Technical Assessment; as the Panel will recall, my assessment concludes that effects are 'adverse' by making an assumption regarding landowners' subjective perspectives regarding wind farms in general and the Project in particular (because it is not feasible to discern those perspectives, including for possible future landowners), whereas Mr Bray takes a different approach.
26. The reason for identifying the category of effect in my Technical Assessment is simply to ensure a conservative approach towards the assessment of effects. As Mr Bray points out, someone experiencing views of a wind farm may well be positively disposed towards views of turbines. I have assumed that all viewers would be negatively disposed towards the introduction of turbines to such views and therefore the conclusions in relation to the 165 residences assessed within 10km of the closest turbine are that 117 dwellings are adversely affected and 48 dwellings are affected in a neutral way,²² but no dwellings are assessed as experiencing positive effects. These effects conclusions reflect the conservative nature of my visual assessment. Mr Girvan has agreed with those conclusions.

²¹ Rhys Girvan Peer Review – Landscape Comments. Para 28.

²² Where distance, orientation, foreground topography and/or vegetation and other factors affecting visibility of the turbines have reduced the level of effects to a point where it is neutral.

Natural character effects

27. Mr Girvan has largely agreed with the method of assessing natural character in the Isthmus Technical Assessment, including the consideration of biotic, abiotic and experiential aspects of natural character.²³ Mr Girvan points out that areas of very high natural character on the Jedburgh Plateau have been identified, which is at odds with his inference at paragraph 28 of his Peer Review that the Isthmus Assessment concludes that higher natural values are limited to the scarp, that is, they stop at the scarp crest.
28. Mr Girvan also implies that the Project will lead to increasing grazing of "*domestic animals*" (by which I understand he means stock).²⁴ I do not understand there to be any intention to increase the grazing regime on the Jedburgh Plateau or other parts of the wind farm site as a result of the Project. In fact, the combination of Landscape and Ecological Mitigation and Offset Measures, as recorded at paragraphs 500-501 of the Isthmus Technical Assessment, will lead to an overall reduction in the land area where stock grazing can occur and will increase the natural values on the Project site and the surrounding area.

Cumulative effects

29. Mr Girvan reviews the cumulative effects sections of the Isthmus Technical Assessment, including the visual simulations that illustrate potential future views of both the Project and the Kaiwera Downs Wind Farm together and concludes that the Project will not give rise to significant adverse cumulative effects.²⁵ I agree.

Night-time effects

30. Mr Girvan has concluded that the night-time lighting of the Project will lead to additional potential effects and that light shields will effectively manage the effects from night lighting.²⁶ Again, this accords with my assessment.

Design response

31. Mr Girvan has suggested that the identification of the Slopedown / Mokoreta – Pukemimihau ONF candidate has not materially affected the wind farm's layout or design.²⁷ That is not correct. The site selection and wind farm

²³ Rhys Girvan Peer Review – Landscape Comments. Para 39.

²⁴ Rhys Girvan Peer Review – Landscape Comments. Para 41.

²⁵ Rhys Girvan Peer Review – Landscape Comments. Para 44.

²⁶ Rhys Girvan Peer Review – Landscape Comments. Paras 45-46.

²⁷ Rhys Girvan Peer Review – Landscape Comments. Para 48.

sizing, placement and design has considered the existing natural and landscape constraints of the site and its surrounding areas – starting from an early stage of the wind farm investigations.

32. I personally was involved in the initial assessment of several potential wind farm sites for Contact from April 2022. That process included considering similar landscape constraints, proximity to the electricity market and transmission line connections, proximity to urban areas or areas of higher population density, existing landform and topography, existing land uses and natural vegetation cover, locations of high(er) ecological values, locations of rivers, streams, wetlands and other main water bodies, proximity to the coastal environment, access roads and the port to site route. Once all of the wind farm site constraints were assessed by a range of project team specialists, the (Southland Wind Farm) Project site emerged as the preferred site for a wind farm – including from a landscape perspective.²⁸
33. Once the Project site was selected as an appropriate location for a wind farm, the same constraints filter was applied to the sizing, location and design of the wind farm. As described in detail and assessed throughout the Isthmus Technical Assessment (and as referred to above), all known constraints were avoided as far as practicable, a process that has been continuously reviewed and iterated throughout the life of the Project as studies have progressed and provided an increasingly detailed body of information.
34. Where some constraints were not able to be avoided, for example, the need to cross certain areas of wetland on the Jedburgh Plateau (in order to provide access to turbine locations and the substation), a comprehensive package of Landscape and Ecological Mitigation and Offset Measures²⁹ was developed to manage those unavoidable effects.
35. While the site was not initially considered to be part of an ONF candidate, once it was identified in the SMRLA and that assessment work was made available to the Project team, a full and comprehensive assessment of the effects of the Project against the landscape attributes was incorporated into the Technical Assessment. In response to that assessment some additional landscape and ecological mitigation and offset measures were developed and incorporated into the Project, with a continuing focus on reducing

²⁸ Other sites had more constraints to the location and development of a wind farm or were ultimately constrained by landowner agreements with other electricity generation developers.

²⁹ Isthmus Technical Assessment. H03. Paras 500-501.

adverse effects on wetlands and otherwise supporting enhanced natural values on the Jedburgh Plateau (and elsewhere), as well as provision of a community benefit fund to support recreation opportunities and other positive community outcomes.

36. From the initial site selection, location and design of the Project, the inherent ecological and landscape constraints of the site have always shaped the Project, including the location of the access roads, the turbines, the substation, the alignment of the transmission line and any other main components.

Recommended conditions – landscape and natural character

37. As described above, Mr Girvan has concluded that the site can accommodate the Project, with some strengthened conditions in relation to landscape and natural character outcomes. Mr Girvan recommends additional conditions relating to:
- (a) the preparation of a Landscape and Natural Character Management Plan (**LNCMP**);
 - (b) landform and earthworks integration, with a view to minimising adverse natural character effects;
 - (c) stock exclusion and grazing controls; and
 - (d) monitoring, review and adaptive management.
38. The preparation of the LNCMP and the requirement for monitoring, review and adaptive management are understandable responses to ensuring that the detailed site works are planned and implemented to ensure that they are integrated into the natural topography of the site as far as is practicable.
39. However, the request for an additional management plan will replicate existing construction management, earthworks and habitat restoration and enhancement plans that are already provided for in the application documents and through conditions. It is not clear if Mr Girvan has had the opportunity to consider the suite of detailed management plans that have been drafted to control such effects. Overall there are 15 management plans that have been drafted to manage the effects of the Project on vegetation, lizards, terrestrial invertebrates, avifauna, biosecurity, bats, habitat restoration and enhancement, construction, earthworks, flocculation,

construction noise, construction traffic, archaeology, riparian off-setting and stakeholder communication and engagement³⁰.

40. I have read the relevant sections of the suite of management plans. Particularly relevant to Mr Girvan's recommended conditions are sections of the vegetation, habitat restoration and enhancement, and earthworks and construction management plans. The draft management plans are very detailed, largely objective and measurable, and they cover many of the areas of concern to Mr Girvan. For example, the earthworks management plan includes the same objective which is suggested by Mr Girvan in his review: *"Minimise to the extent practicable the area and volume of earthworks required for construction of the Southland Wind Farm"*.³¹
41. The draft earthworks plan stipulates the three types of Surplus Fill Disposal (**SFD**) types: blanket SFD, shoulder SFD and gully SFD, along with maximum fill depths, maximum falls, topsoiling and finishing requirements, exclusion zones, etc.³² Other details in the earthworks plan include road and track length, maximum cut and fill volumes, erosion and sediment control, establishment and construction phases, etc. Similarly, the vegetation management plan specifies the areas and types of vegetation that are to be avoided, and so on.
42. Some areas of detail could be added to the existing management plans, for example, the draft earthworks management plan could add reference to the rounding of SFD surfaces to mimic and integrate into existing natural topography on site. Such edits to the draft earthworks management plan would be relatively minor and would not require the inclusion of new conditions of consent as suggested by Mr Girvan. These are matters that could be discussed between Contact and Environment Southland during the finalisation of these plans, as required by the conditions of consent.
43. The suggested condition relating to stock exclusion on the Jedburgh Plateau appears to relate more to the ecological effects of historic and ongoing grazing on the Plateau and not an effect associated with the Project, so I defer to the advice of expert ecologists on that matter. I understand that stock is essentially excluded from the southern rātā-kamahi gully by virtue of the topography of the gully – it is too steep for stock to access. Feral deer

³⁰ [Substantive application](#) Attachment J: Management Reports.

³¹ J09 Part J. DRAFT - Southland Wind Farm Earthworks Management Plan. Objective a). Page 5. The wording suggested by Mr Girvan is more specific to limiting earthworks within the ONF candidate area.

³² J09 Part J. DRAFT - Southland Wind Farm Earthworks Management Plan.

and pigs are present in the gully. The proposed offset and compensation measures include control of the number of feral browsing animals in the gully (and across 1,400ha of the site), so an overall improvement to the vegetation condition in the gully can be anticipated.

44. Ultimately, I consider that the ongoing effects of browsing animals (stock and feral) on the Jedburgh Plateau and the adjacent natural areas (with or without the Project) are better covered by ecologists with detailed knowledge and experience of those effects.
45. Overall, while I understand the concern raised by Mr Girvan in relation to the preparation of a LNCMP and the monitoring and reporting of the outcome of that plan, I consider that the draft management plans already prepared, which are very detailed, cover the appropriate management and reporting on effects that Mr Girvan is concerned with. The management of earthworks effects on the Jedburgh Plateau is similarly adequately covered in the relevant draft management plan. I consider that the duplication of such management plans in additional conditions of consent would not serve any practical purpose.

West Catlins Preservation Society (WCPS) comments

Response to comments

46. The WCPS has provided comments in relation to the landscape effects of the Project at pages 13-27 of their detailed comments document. Again, I will provide responses where I consider that they are helpful for the Panel to understand the nature or context of WCPS' comments.
47. WCPS considers that the Isthmus and Wayfinder Technical Assessments do not cover the effects of the Project on landscape, natural features and natural character.³³ I respectfully disagree; my report is a detailed assessment of the landscape, natural character and visual effects of the Project. Mr Girvan has reviewed my Technical Assessment and concluded that it follows best practice assessment and that the Project is an appropriate development in this location, even if he has some residual concerns in relation to the conditions of consent.
48. WCPS considers that the SMRLA report "*could form the broader basis of a regional identity and value for the Southland District*".³⁴ The SMRLA

³³ WCPS Comments. Para 60.

³⁴ WCPS Comments. Para 67.

assessment report has been acknowledged, reviewed and responded to in my Technical Assessment, and I accept that at least part of the ONF candidate is likely to satisfy the relevant criteria to be considered outstanding.

49. WCPS calls into question the accuracy of the visual simulations in portraying the location and scale of the wind turbines.³⁵ While I acknowledge – as all landscape assessors should acknowledge – the limitations of using visual simulations as an assessment tool on their own, the visual simulations in Technical Assessment H03a have been prepared to be as accurate as possible. The photo simulation methodology statement is contained on Page 83 of H03a and the visual assessment methodology is further described at paragraphs 41-54 of my Technical Assessment. Mr Bray and Mr Girvan have both reviewed the Isthmus visual simulations and concluded that they meet best practice standards.
50. WCPS considers that it is inappropriate to categorise the site as a 'working landscape with no ecological values'.³⁶ I am unclear of the basis for WCPS' reference to my evidence stating there being no ecological values present at the site; as my assessment makes clear, the site has been subject to detailed ecological assessment, with many areas of high ecological values identified.
51. WCPS has suggested that I have 'resubmitted' my landscape assessment report from the previous COVID-19 Recovery (Fast-track Consenting) Act 2020 application.³⁷ That is not the case; my Technical Assessment is a considerably different and more detailed assessment of the revised Project, including the consideration of a detailed landscape and ecological mitigation and offsetting package that is integral to the Project.
52. WCPS has sought comment from Ms Lucas and Ms Stevens (both qualified and experienced landscape architects) in relation to the revised Project, but in the absence of any written assessment or evidence from those experts it is impossible to respond in a way that may assist the Panel.
53. WCPS comments on the effects of the aviation safety lighting on the night sky environment.³⁸ The Isthmus Technical Assessment considers and assesses the effects of night-time lighting at paragraphs 278-284 and concludes that the night lighting has been minimised from the original CAA recommendations through specific design to 16 lights. I am also familiar (and

³⁵ WCPS Comments paras 79, 84.

³⁶ WCPS Comments. Para 86.

³⁷ WCPS Comments. Para 89.

³⁸ WCPS Comments. Para 118-119.

concur) with the 2024 work on this issue by Leading Design Professionals, that I understand will be included with Contact's response.

54. WCPS comments that there is additional recreational potential on the scarp below the Project site.³⁹ The Project does not prevent or limit recreational access to the scarp or to other areas of the Catlins Conservation Park; rather, the Project will provide access to a Community Benefit Fund which could be used, if considered a priority to the local community (and approved by relevant landowners such as DOC), for the development and maintenance of access tracks to and through the scarp and the wider area.

ENVIRONMENT SOUTHLAND (ES)

Response to comments

55. ES has provided a letter including comments on the landscape effects of the Project.⁴⁰ ES considers that landscape should be an important focus for the Panel in making its decision. The Isthmus and Wayfinder Technical Assessments accompanying the application and the review by Mr Girvan constitute a detailed, thorough and balanced assessment of the landscape effects of the Project and confirmation of those assessments. It is my opinion that the Panel has detailed assessments and materials available to it and sufficient technical expertise and experience itself to have confidence in the high level of agreement and conclusions between the landscape assessors and the peer reviewer.

Braddyn Thomas Coombs

14 January 2026

³⁹ WCPS Comments. Para 123-125.

⁴⁰ ES Comments. Page 7.