

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 SHANNON BRAY (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 **Shannon Bray**.
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 (**Act**) by:
 - (a) Rhys Girvan, Boffa Miskell Ltd, on behalf of Southland District Council (**SDC**); and
 - (b) West Catlins Preservation Society.
3. I prepared Technical Assessment #4: 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 paragraph 2 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.

RESPONSE TO COMMENTS BY RHYS GIRVAN FOR SDC

Overall comment

5. Although there are some specific differences in opinion on some matters, which I will address below, in my opinion it is apparent that there is broad agreement between Mr Girvan, Mr Coombs and myself that the Project can be considered appropriate in this landscape. I note the comments made by Mr Girvan in relation to the following matters and have nothing further to add to my primary assessment in regard to them:
 - (a) Methodology and Method; Mr Girvan notes that the detailed landscape assessments follow best-practice guidance and that visual simulations are prepared to accepted standards¹. He recognises that our

¹ Note that I provide further comment on visualisations in paragraphs 25-28

comparative approach draws on professional experience. From our evidence it is clear that Mr Girvan, Mr Coombs and I all have confidence in the representations of the proposal provided in the visualisations.

- (b) Existing landscape; Mr Girvan highlights the difference between Mr Coombs' and my focus on the scarp, in terms of a potential candidate Outstanding Natural Feature (**ONF**) and the approach taken by Mr Girvan / Boffa Miskell in the Southland/Murihiku Regional Landscape Assessment (**SMRLA**). The SMRLA indicates a broader mapped area as an ONF candidate, with that area comprising scarp, dip slope and plateau – considered by Boffa Miskell to be a 'coherent whole'. Mr Girvan accepts that the ONF extent is yet to be confirmed.
- (c) Statutory planning provisions; Mr Girvan has identified no issues with my assessment in this regard.
- (d) Cumulative effects; Mr Girvan considers the Project's cumulative effects with Kaiwera Downs will not be significant based on simulations.
- (e) Night-time effects; Mr Girvan notes the Civil Aviation Authority recommendations and the design for aviation lighting (16 lights), concluding that potential effects are higher in dark-sky areas but can be managed by directional control (shielding below the horizontal).
- (f) Effects from transmission infrastructure; Mr Girvan briefly covers the transmission line and GIP, agreeing that the Project's adverse effects in this regard are low to very low.

Specific responses

The Project

- 6. Mr Girvan summarises the proposed turbines, access tracks, and the suite of embedded mitigation and offset measures, including pest control, fencing, and wetland restoration. This accurately captures the mitigation and offset measures that are the primary mechanism for reducing effects and improving ecological and natural character outcomes.

Landscape effects

- 7. Mr Girvan notes that Mr Coombs' landscape effects assessment is comprehensive. He references Mr Coomb's assessment that the turbines

and ancillary works are generally located in more modified parts of the site and that the Project avoids the most visually prominent scarp. While concluding the wind farm can be appropriate, he cautions that earthworks and access could undermine natural patterns and recommends strengthened conditions to manage these risks. However, my assessment finds the embedded mitigation measures already achieve this outcome.

8. Mr Girvan places significant weight on the Jedburgh Plateau as part of a coherent natural feature and asserts that the ONF should extend beyond the scarp, whereas I consider the plateau does not meet the criteria for a singular, distinctive feature.
9. In any case, the assessment of landscape effects must be related to values, including the significance of such values (not whether it is or is not included in a policy overlay²). I conclude that the design response, combined with mitigation, ensures landscape and visual effects remain within an acceptable range and will improve natural character over time.

Visual effects

10. Mr Girvan agrees with Mr Coombs' approach to characterising visual effects as adverse, neutral, or positive, and accepts that the most affected area is Redan. He supports the suggestion of off-site planting for properties in the moderate to moderate-high range as an appropriate mitigation measure.
11. In my assessment, I adopt the approach to visual effects by focussing on the magnitude of effect and not presupposing the opinion of people viewing the proposal. I agree that views from Redan experience the greatest change, with effects diminishing with distance and screening. I also accept that some viewers will find such change to be adverse, but additionally there will be others that have a neutral opinion on the visual presence of the wind farm in such views, and those who will consider it favourably.

Natural character

12. Mr Girvan identifies very high natural character in wetlands on the Jedburgh Plateau and in the southern rātā–kāmahi forest gully, describing these areas as exhibiting evident naturalness through wetland systems, regenerating vegetation, and landform patterns that contrast with the surrounding modified rural landscape. He raises concern that improved access tracks and

² I note that there are numerous wind farms across New Zealand that are located in ONLs and ONFs – please refer to the table of NZ wind farms provided by Contact in response to the Panel's request.

earthworks could enable increased grazing, leading to degradation of wetland margins and regenerating shrubland and forest.

13. Neither Mr Coombs' or I have been provided any evidence that increased grazing is proposed, beyond what is currently permitted by the District Plan, and the design is not intended to enable this. Overall, the Project is not intended to intensify pastoral use.
14. Under *Te Tangi a te Manu*³, natural character is understood as dynamic, shaped by natural processes rather than constrained by human intervention. In my primary assessment I considered the natural character as it exists today, consistent with *Te Tangi a te Manu*, acknowledging that long-term burning, grazing, pugging, and feral browsing have suppressed naturalness. However, I also discussed how natural character might change over time, noting advice from Mr Goldwater that such change would take a very long time and that currently the naturalness of the plateau is suppressed by existing activities (including both managed and feral grazing).
15. I note that the Project is for the construction and operation of a wind farm, that involves habitat loss of less than 2% of the total site area.⁴ In my opinion, this loss has been appropriately mitigated through the fencing, restoration, and pest control measures that are intended to reduce grazing pressure across areas of the Project site and enable natural processes, allowing natural character to increase over time. Whether the plateau, or other areas of the site that are not proposed to be protected, continue to be grazed (in accordance with policy related to that activity) is not related to the establishment and operation of the wind farm.
16. In my opinion the effects of the wind farm on natural character are not substantive enough to warrant widespread land-use change across the site, and I am not aware of any other wind farm that has required such a change.

Outstanding Natural Feature

17. Mr Girvan observes that identification of the ONF candidate has not materially influenced the wind farm layout since the first application. He argues that managing residual effects depends less on relocating turbines and more on enforceable land management controls across the dip slope and plateau. He contends that the effects assessments supporting Contact's

³ Te Tangi a te Manu, Section 09

⁴ Paragraph 129 of my Primary Assessment

application place considerable weight on existing ecological modification such as grazing and pest browsing to discount natural values on the Jedburgh Plateau, and suggests this underplays its role as an open, functioning natural system and the risk of incremental degradation.

18. Mr Girvan does not provide much detail on how he defines natural values in his report (he touches briefly on landcover, but does not appear to consider other matters such as geology, legibility, habitat, etc), making his critique somewhat difficult to evaluate. In *Te Tangi a te Manu*, values must be explicitly identified and described, not asserted in the abstract. In contrast, both Mr Coombs' and my assessments draw directly from the terrestrial, wetland, and freshwater ecological reports by Wildlands and Ryder, which document both the high ecological values present and the extensive degradation caused by grazing and pests. These findings form the basis for our natural character assessments.
19. Both Mr Coombs and I acknowledge the high natural values present on the plateau while in my opinion correctly recognising the substantial, longterm ecological modification caused by burning, grazing, pugging, and the presence of feral ungulates and other pest plants and animals. Rather than discounting natural values, our assessments follow *Te Tangi a te Manu* by evaluating naturalness as it exists today. The evidence shows the plateau does not function as a cohesive natural system nor does it meet the criteria for a singular, distinctive feature required for ONF status. In my opinion, Mr Girvan's concern about incremental degradation overlooks the proposal's measures to reverse ecological decline, including large scale pest control and wetland restoration required by conditions. These interventions will enhance natural character rather than undermine it.

Recommended conditions

20. Mr Girvan recommends preparing a Landscape and Natural Character Management Plan (**LNCMP**), integrating earthworks design principles, implementing permanent stock exclusion, and establishing monitoring with adaptive triggers. He also proposes retaining or enhancing the apparent naturalness of landform, vegetation patterns, and hydrological features on the dip slope through the LNCMP.
21. In my opinion, Mr Girvan's recommendation for stock exclusion from wetlands and indigenous vegetation areas is providing mitigation to grazing effects that are not generated by the Project. Rather, various other measures

(extensive pest control, wetland restoration areas and the protection of some areas of natural habitat) have been considered directly against, and are commensurate to, the effects of establishing and operating the Project.

Conclusions

22. Mr Girvan reiterates his view that the ONF should extend beyond the scarp to include the dip slope and plateau. However, I consider that the ONF is better defined as the singular, distinctive scarp feature, not a mosaic of scarp and dip slope (including the Jedburgh Plateau).
23. Mr Girvan also states that without additional controls, adverse effects would be more than minor due to enabling earthworks, access formation, and potential for intensified grazing and associated degradation of natural patterns on the Jedburgh Plateau. This does not reflect the Project, which integrates controls to address these effects and does not propose grazing intensification. In my opinion, the embedded mitigation measures including stock exclusion, pest control, and wetland restoration will enhance natural character rather than undermine it.

RESPONSE TO COMMENTS BY WEST CATLINS PRESERVATION SOCIETY

Overall comment

24. My primary assessment addresses the following matters raised by West Catlins Preservation Society (**WCPS**) and I have no further comment to make. I stand by my original conclusions in the primary assessment for these matters:
 - (a) The area covered by the candidate ONF and consideration of its values in relation to the Project;
 - (b) The categorisation of the site and locality as a working rural landscape;
 - (c) The Project site's proximity to conservation areas and its location in the transition from the Southland Plains to the Catlins;
 - (d) Effects on natural character and natural features will be overwhelmingly positive;
 - (e) Skyline integrity is retained and legibility remains intact in relation to the turbines;

- (f) Visual catchment and prominence of the Project, including that views from the south to the Project are limited;
- (g) Effects on amenity values including aesthetic coherence, sense of place, and experiential qualities are acceptable;
- (h) Cultural associations including tāngata whenua values were considered and are managed through engagement and mitigation;
- (i) Cumulative effects are acceptable; and
- (j) Overall conclusions that effects of the proposal on landscape character and values are acceptable.

Specific responses

Comments on visualisations

- 25. WCPS is somewhat critical of the visualisations that have been prepared by Isthmus and which are used in both my and Mr Coombs' assessments.
- 26. When preparing my original assessment, I asked my team to critically review the Isthmus visualisations. This included interrogating the photographs (and photograph locations), the methodology, and the final outputs. My team regularly prepares visualisations similar to this, and we found that the Isthmus visualisations have been prepared in accordance with published Best Practice Guidelines.⁵
- 27. By contrast, the visual material provided by WCPS falls well short of best practice. Alongside not being correctly mounted and described, the representation of the turbines does not appear to be in scale or correctly located, and there is no methodology provided indicating how the visualisations were prepared. My own observations of hundreds of turbines across numerous landscapes confirms that these visualisations heavily overemphasise the scale, particularly the width, of the turbine masts.
- 28. However, I noted in footnote 16 of my primary assessment that all visual material has limitations and needs to be used in conjunction with the landscape assessment and site and locality visit/s. Also note the Graphic Attachments document includes guidance on the use and limitations of photosimulations.

⁵ New Zealand Institute of Landscape Architects, Best Practice Guidance for Visualisations BPG10.2, 2011.

Comment on the benefits of wind generation

29. WCPS asserts that I have gone beyond the scope of my expertise by discussing the benefits of wind generation. My evidence addresses these benefits only in the context of the need for wind generation to be located somewhere in New Zealand to help meet predicted energy demands. In support of this point, I refer to the economic evidence of Mr Clough rather than relying solely on my own analysis.
30. National policy, including the National Policy Statement for Renewable Electricity Generation (**NPS-REG**), directs decision makers to provide for renewable energy generation. By default, this sets expectations that effects on landscape must be accepted to some degree – and the considerations in my primary assessment are an attempt to quantify and understand the extent of such effects nationally. I consider it materially relevant to this Project because landscape is often a key limitation to where wind farms can be located, and as such it is necessary under national policy to look favourably on locations where landscape effects can be appropriately managed (even if not fully mitigated).

Associative values

31. WCPS describes how in their view Pawakataka/Slopedown is a deeply significant landmark comparable to other iconic peaks recognised in other parts of the country. They stress strong multi-generational ties to the area and view preserving its character as essential to maintaining their cultural identity and community heritage.
32. In preparing my report, I considered how associative values are affected, and describe how the turbine layout was specifically designed to remain subservient to the scarp and avoid ridge-top dominance, ensuring the landform remains visually legible. I acknowledge that not all generational narratives have been described in my assessment (some are unknown or privately held), but nonetheless I consider that the Project has appropriately responded to the effects on associative values and preserves the identity of the landform as a key feature.

Recreation and tourism values

33. WCPS comments that the wind farm will compromise recreational values by preventing the reinstatement of historic walking tracks and community events on Pawakataka/Slopedown and Mt Mokoreta, and by reducing opportunities

for activities such as running, biking, and adventure training that currently occur in the area. WCPS also argues that the development will limit future recreational potential and detract from the natural experience people seek in this landscape.

34. In my opinion, the Project does not prevent recreation opportunities beyond the immediate turbine locations (which are on private property) and does not compromise the potential for people to enjoy the broader landscape. The turbines are set back from the western scarp and designed to remain subservient to the landform, preserving the legibility of natural features as a key feature of recreation and tourism in the area. While the Project introduces a change, in my opinion it does not fundamentally alter the qualities of the surrounding conservation areas or the broader landscape that supports tourism values.⁶

Shannon Bray

14 January 2026

⁶ I note that the Tararua Wind Farm is located directly adjacent to the Manawatū Gorge Track, managed by DOC, and includes along it several locations where the wind farm is not only visible, but where specific viewing areas have been established to see it and the adjacent Te Āpiti wind farm.