

SOUTHLAND CONSERVATION BOARD

TE ROOPU ATAWHAI O MURIHIKU

19 March 2026

Fast-track Submission to the Southland Wind Farm Approval Panel

Re: Southland Wind Farm – Draft Decision (9 March 2026)

Submitter: Southland Conservation Board

Introduction

The Southland Conservation Board (SCB) acknowledges the Expert Panel’s Draft Decision dated 9 March 2026 regarding the Southland Wind Farm proposal. While the Board recognises the national interest in renewable energy development, it remains deeply concerned that the proposal, even as conditioned, presents significant and potentially irreversible risks to freshwater systems, wetlands, migratory and threatened avifauna, and indigenous terrestrial fauna and flora.

The Board considers that the Draft Decision confirms many of the uncertainties and risks previously raised by the SCB and others. In particular, the decision continues to rely heavily on future management plans, adaptive mitigation, and post-construction monitoring to address adverse effects, rather than ensuring their avoidance. In the Board’s view, this approach does not provide sufficient certainty that serious and permanent ecological harm will be prevented.

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Wetlands, Headwaters, and Freshwater Effects

The Board is of the view that the adverse effects associated with the clearing and disruption of wetlands within the project area are significant and have not been adequately addressed. The ecological consultants’ mapping does not, in the Board’s opinion, adequately capture the true extent and connectivity of wetlands across the site. Much of the development footprint is located within an ecologically distinct **upland wetland mosaic**, where wetland systems are interspersed across the landscape and function collectively. This entire area should be treated as a wetland complex rather than isolated wetland fragments.

Upland wetlands are naturally fragile systems that rely on intact hydrology and undisturbed soils. The construction of turbines, service roads, hard-stand areas, and associated earthworks through this mosaic is highly likely to result in disruption to groundwater flows, surface connectivity, and sediment regimes. These effects would extend beyond the immediate footprint of infrastructure and are likely to undermine the functioning of the wider wetland system and its downstream environments.

Wetlands in Aotearoa New Zealand are among the most depleted ecosystems nationally, with approximately **90% having already been lost or significantly modified**. Against this context, the Board considers that clearing or degrading upland wetlands on the basis of an asserted “on-balance” benefit is not an appropriate outcome. These environments cannot be meaningfully replaced or offset elsewhere, and their loss would further erode an already critically depleted ecosystem type.

The Board also emphasises the importance of protecting the **headwaters** of catchments within the project area. These headwater wetlands and streams play a crucial role in maintaining downstream water quality, ecological resilience, and hydrological stability. Disturbance at the top of these systems risks cumulative and cascading effects that cannot be adequately remedied once they occur.

Increased Alkalinity and Water Quality Risks

The Board remains particularly concerned about the risk of increased alkalinity and contamination of surface waters arising from extensive earthworks, concrete turbine foundations, culvert installations, and stormwater discharges. The Draft Decision acknowledges that construction activities have the potential to alter water chemistry and aquatic habitat, with these effects proposed to be managed primarily through conditions and management plans

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Wetland and headwater stream systems in Southland are highly sensitive to changes in water chemistry and sediment inputs. Even short-term spikes in alkalinity or sediment-laden runoff can have long-lasting impacts on aquatic invertebrates, fish habitat, and downstream wetlands. Once hydrological integrity and water quality are compromised in these environments, remediation is often extremely difficult or impossible.

Migratory Birds and Other Avifauna

The Board remains concerned about interference with migratory bird activity and other avifauna, particularly wetland-associated and nationally threatened species that rely on connected wetland complexes and low-altitude flight paths. The Draft Decision accepts that bird strike risk, habitat displacement, and barrier effects are likely adverse effects of the development and proposes to manage these risks through monitoring, operational responses, and adaptive mitigation.

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The Board reiterates that reliance on post-construction monitoring is inherently risky. If unacceptable levels of avian mortality or displacement are detected after turbines become operational, it is largely too late to undo the damage. Turbine relocation, re-establishment of disrupted flight paths, or restoration of degraded wetland habitats is not realistically achievable once permanent infrastructure is in place.

Indigenous Flora, Fauna, and Ecosystem Integrity

Southland's indigenous flora and fauna are closely tied to intact wetland and headwater systems. The Board remains concerned that the proposal poses ongoing risks to wetland vegetation communities and to dependent fauna, including cryptic and poorly understood species. Incomplete baseline data and the reliance on future management plans create further uncertainty.

The Board maintains that offsetting and adaptive management are not appropriate substitutes where effects are likely to be irreversible or where they affect threatened species and fragile ecosystems, particularly upland wetland mosaics that have limited capacity to recover from disturbance.

Conclusion

In summary, the Southland Conservation Board remains of the view that the Southland Wind Farm proposal carries major unresolved ecological risks, particularly in relation to:

- Loss and degradation of upland wetland mosaics and associated hydrological processes.
- Insufficient recognition and protection of headwater wetlands and streams.
- Increased alkalinity and degradation of freshwater systems.
- Interference with migratory bird movements and other avifauna; and
- Adverse effects on indigenous plant and animal communities.

While the proposed mitigation and adaptive management measures may appear robust on paper, their effectiveness cannot be assured in practice. Failure would only become evident after irreversible ecological harm has already occurred. For these reasons, the Board maintains its opposition to the proposal proceeding in its current form.



Chairperson

Southland Conservation Board