PO Box 489, Dunedin 9054

Reference: Southland Wind Farm / MDL002079

25 November 2025

Environmental Protection Authority
Private Bag 63002
Wellington 6140

Attention: Keely Paler – Application Lead

Dear Ms Paler

RE: Request for Information from Contact Energy in relation to the Southland Wind Farm under the Fast-track Approvals Act 2024

Thank you for your letter dated 19 November 2025 regarding a request for further information in relation to the Southland Wind Farm ("**SWF**") Project. Please find a response to the questions included in Appendix 1 of your letter below.

1) *Please confirm whether all of the consented turbines in the Kaiwera Wind Farm have been modelled in the relevant visual simulations or whether the 20 turbines that Mercury have said they no longer wish to develop have been excluded? (H03, paragraphs 167 to 169, including footnote 30, and paragraphs 267, 269).*

   Mr Coombs confirms that all of the Stage 1 (10 x 145m tall turbines) and all of the consented Stage 2 (56 x 165m tall turbines) for the Kaiwera Downs Wind Farm are simulated in the combined visual simulations in the Graphic Attachments (H03a) to the Landscape Assessment Report. The reference in H03 paragraph 167 should read:

   "*Stage 1 of the Kaiwera Downs Wind Farm was completed in November 2023 and consists of ten wind turbines 145m in height. Construction of Stage 2 commenced in June 2024 and is consented to comprise up to an additional **56** wind turbines, 165m in height*."

The reference should therefore not be to 36 additional turbines. While it is understood that the current development plan is to only construct 36 turbines in Stage 2 (noting that Gore District Council may have additional information that could be provided to the Panel on this point), Contact Energy ("**Contact**") is unaware of any reason why Mercury could not construct the final 20 turbines under its Stage 2 consent at a later date. Therefore, the total consented number of turbines is the basis of the simulations and therefore the most conservative approach.

2) *Mr Coombs acknowledges the associative values of the site as an "identifying backdrop and local landmark to the Mokoreta farming community" at H03 paragraph 95(g). There does not appear to be a discussion of effects in relation to this associative value (although reference to the landmark qualities of the area are acknowledged in the discussion of cultural landscape effects). Please provide an evaluation in this regard from both Mr Coombs and Mr Bray (given that Mr Bray's evaluation is a stand-alone assessment that adopts Mr Coombs' work where he is in agreement or does not consider that it needs expansion, and he has not specifically commented on this specific matter).*

H03 paragraph 95(g) is a description of the landscape values of **the scarp**, "*as different and separate to the SWF Site*" (Para 95). See Figure 3 – the landform diagram on Page 42 of H03 for the location of the mapped scarp.

Mr Coombs' assessment of landscape and visual effects of the SWF on the scarp as a landscape feature, potential Outstanding Natural Feature ("**ONF**") candidate and as a backdrop and local landmark to the Mokoreta farming community, including the associative values, is contained in paragraphs 248-255, 32-339, 352-378 (by reference to viewpoints 3 to 10), 392-394 (by reference to viewpoint 15), 480-499, 504, and 509 of H03.

Mr Bray's assessment of the associative values is consistent with the analysis within the "Broad Landscape Context" section of H04 (paragraphs 91-100), the "Effects on Rural Character" section (paragraphs 113-116) and the "Effects on the Scarp" section (paragraphs 151-154). In these, Mr Bray discusses the connection people have with the rural, productive landscape (where food and energy come from, H04 paragraph 49), and the level of organisation within the landscape that provides different types of associational values (such as the farming activity on flatter sites and the natural values of steeper, vegetated slopes, H04 paragraphs 91-92). Mr Bray goes on to identify that these landscape patterns will be retained, and that the proposal is consistent with the broader productive land use values experienced across this landscape. He concludes that "*the turbines do not alter the fundamental values of the landscape*" (paragraph 153), and that the valued features, if they were to qualify as an ONF, would still do so with the proposal in place. Based on this assessment, Mr Bray confirms that, in his opinion, the effect of the proposal on the associative landscape values will be ***low***.

3) *At H03 paragraph 215, Mr Coombs advises that "the natural character values of parts of the SWF site are **high**. Some specific areas of the site have very high natural character values, as mapped in Figure 6, above. These areas include wetlands and streams". At H03 paragraph 409, Mr Coombs says "the natural character values are assessed at **high** across the entire Project site and **very high** in some areas". (Emphasis added.) Please clarify Mr Coombs' advice in this regard.*

   Mr Coombs advises that the description of the natural character values of the site at paragraph 215 is correct. The description at paragraph 409 is not correct. Paragraph 409 should read:

   *"the natural character values are assessed at **high** across parts of the Project site and **very high** in some areas".*

   That corrected description of the natural character values of the site was confirmed at the site visits undertaken to the site by Mr Coombs in April 2022, September 2022 and November 2025 and in reading the Ecological Assessment Reports. There is a broad range of natural character values across the site, linked with the landscape character varying from modified working pastoral areas and plantation forestry to specific areas dominated by indigenous vegetation and wetland values, as identified in the Ecological Assessment Reports.

4) *Please advise which viewpoints Mr Coombs considers there is a lack of intervening lighting from other sources which means that it will result in higher levels of nighttime adverse visual effects due to increased sensitivity to the flashing function of the obstacle lighting. (Refer H03 paragraph 284 (b).)*

   The description of the effect of the lighting on viewpoints at paragraph 284 of H03 is in support of the Leading Design Professionals conclusion[1] (summarised at section 5.4.8 of Part B of the application) recorded at paragraph 283:

   *"The lighting effects of the aviation warning lights are concluded to be **low to moderate** and **no more than minor**".*

   The viewpoints selected and assessed in H03 and H03a represent areas where public and private views of the SWF will be available. Generally, there are settlements, houses, road intersections or other sources of lighting at or close to the selected viewpoints. There are some viewpoints, for example viewpoints 1 and 2, where lighting from the settlements at Edendale and Wyndham will have a higher level of effect on the dark skies through light spill. Generally speaking, there are settlements and disbursed rural settlement patterns in proximity to all of the viewpoints assessed, and therefore, some degree of light spill is anticipated at most viewpoints.

[1] Southland Wind Farm Aviation Warning System, Assessment of Environmental Effects of Proposed Lighting.

Viewpoints with the lowest levels of intervening or backdrop lighting, due to the lower density of settlement patterns, are the viewpoints to the south and the east of the Wind Farm Site. Viewpoint 10 is the only viewpoint photograph that does not appear to contain any other potential sources of lighting within the field of view of the photograph. However, there could be other sources of lighting in the surrounding context, including passing traffic (see the peripheral context of the photograph from viewpoint 10 at the bottom of page 54 in H03a).

5) *Please advise how Messrs Coombs and Bray have evaluated visual amenity effects in relation to dwellings in the local area (and in particular, for dwellings where adverse visual amenity effects are rated as **moderate-high** and **moderate** by Mr Coombs).*

The method for the assessment of visual amenity effects on local dwellings is contained in the Methodology section of Mr Coombs' evidence at paragraphs 4-54 of H03. Further context for the assessment and calibration of effects is provided at paragraphs 40-407. The narrative and description of the visual effects assessment is contained in paragraphs 345-399 for the selected viewpoints and more specifically for all 165 residences identified within 10km of the closest turbine in the Dwelling Inventory and Effects Assessment in Appendix D of H03 (pages 129-152). The maps, photographs and visual simulations in H03a were used as a tool to assess visual amenity effects.

Each of the viewpoint locations has been revisited by Mr Coombs with the H03a (Visual Simulation) document to confirm the visual effects ratings 'in the field'.

The Dwelling Inventory table is a detailed record of all residences identified within 10km. While undertaken as a desktop exercise, where possible observations have been made from roadside locations and in some cases from the residences themselves.

The identification of **moderate-high** and **moderate** levels of visual effects did not require any different type or level of assessment than the rest of the residences assessed, however, the identification of the higher levels of visual effects as an outcome led to a recommendation to make an offer of off-site mitigation planting to the owners of those residences, reflecting the higher levels of effects identified.

In Mr Coombs' view, the factors he used to assess and calibrate the levels of visual effects for the SWF, and the application of those factors, have led to a conservative effects assessment in comparison with other visual effects assessments for wind farms in New Zealand. For example:

i. The identification of all residences within 10km of a wind turbine is conservative. Ordinarily a Dwelling Inventory and assessment of visual effects on residences would be undertaken to a distance of 5km because the most affected residences are likely to be the closest and those

with the most direct views of turbines. Beyond 5km effects are generally of a much lower order.

ii. The closest residence to a turbine is 2.3km away for the SWF proposal. There are also only eight residences that are recorded at 3km or less from the closest turbine (see Appendix D to H03). Turbines in other wind farms in New Zealand are consented as close as 800m to 1km to the closest residence, where higher levels of visual effects were generally assessed (discussed further below in the response to question 7). This is not to say that this latter level of proximity between wind turbines and residences would be appropriate in all circumstances, however, in relation to the distance between proposed turbines and residences the SWF is of a different order to others that have been consented in New Zealand.

iii. The closest settlement to the SWF is Wyndham at 12km away. Other wind farms with large turbines in similar elevated pastoral and forested hillcountry in New Zealand are consented and constructed as close as 5km to settlement areas, for example, turbines in the Turitea wind farm are approximately 5km from the residential settlement of Aokautere and 7.5km from the closest residential areas of Palmerston North. Turbines within the Te Apiti Wind Farm are as close as 2km to the edge of Ashhurst (pop. 3400).

Mr Coombs considers that a generous level of conservatism has been built into the assessment of visual effects of the SWF on the viewpoints and residences assessed. Despite this, the visual effects identified for the viewpoints and residences around the SWF are assessed at generally lower levels than for other wind farms (such as Mt Munro); for the SWF, **15 residences** are assessed as experiencing a **moderate high** or **moderate** level of visual effect (whereas at Mt Munro a number of properties were assessed as experiencing a high or very high level of effect). As noted above, Contact has proffered consent conditions requiring off-site planting / landscaping to be offered to the owners of those residences (WF26).

Mr Coombs advises that this method, or a similar method of visual assessment has been used on several wind farms throughout New Zealand that have been consented and, in many cases, constructed.

Mr Bray agrees that Mr Coombs has allowed a “generous level of conservatism” in the assessment of visual effects. In reviewing the ratings Mr Coombs had developed, Mr Bray has advised that he considered the following considerations in assessing effects of the proposal:

> For **Moderate**: The landscape context is not particularly unique and not outstanding, but may have some particularly attractive features that draw the attention of the viewer and potentially may have an outstanding landscape as a background. The view of the landscape is either broad and the Project occupies a moderate but noticeable part of it, likely to be just removed from the main focal point, or the view is restricted in places by dense vegetation, landforms or

buildings which from the viewpoint provide partial screening of the Project. It is likely a few turbines will be visible, potentially in the middle-ground, although it may be that there are 1-2 turbines that are more prominently located which can catch the eye. If the whole Project (or a large majority of it) is visible, then it is likely to be somewhat distant (between 3-5km away). The Project is more likely to be experienced in the periphery of the main outlook.

- For **Moderate-High**: The landscape context is recognised as somewhat significant and is likely to have some particularly attractive features that draw the attention of the viewer, and potentially may have an outstanding landscape as a distant background. The view of the landscape is either broad and takes in a pleasing composition of the various features in the primary outlook from the viewpoint. The wind farm will become a visually prominent part of the view, but the majority of key landscape features will remain as the key focal points. The views towards the Project are likely to be relatively clear and unobstructed, and the Project will present as relatively prominent and somewhat cluttered. It is more likely to be relatively close (within 3km).
- For **High**: The landscape is highly significant and there is a clear and well composed view of it from the specific viewpoint (if the viewpoint is from a building, then it is probable that the orientation of the building is towards the Project). The Project will become a visually dominant part of the view, not necessarily the key focal point, but a distraction from it and occupying a large portion of the view. The views towards the Project are clear and generally unobstructed, and the Project presents as tall, dominating and potentially cluttered. It is likely to be relatively close (within 2-3km).

Mr Bray confirms that he also considered the landscape context in which each residence is located and benchmarked the rating against other wind farms, including Puketoi Wind Farm (a consented proposal in the Tararua District, located on a cuesta landform with a strongly defined ridgeline and scarp), Mt Munro Wind Farm (a consented proposal in the Wairarapa District where turbines are located in an elevated position in the northern aspect, approximately 2km from properties identified as having a high rating), and Waiuku Wind Farm (a proposal in the Franklin District declined consent partially for landscape reasons) - noting that Mr Bray had historical involvement in all three of those proposals.

In his independent assessment of residences, Mr Bray reached very similar ratings to Mr Coombs and determined it appropriate to adopt the findings in Mr Coombs' Appendix D (Dwelling Inventory Table) in its entirety (with the exception of the adverse, neutral or positive qualifier, discussed further below).

6) *At H04 paragraph 132, Mr Bray explains "I deviate somewhat from Mr Coombs' evidence where he identifies whether potential visual effects will be adverse, neutral or positive. In my opinion, adversity can ultimately only be determined by the person affected. In my opinion, the role of the*

landscape architect is only to determine the nature and severity of the potential change, so that people can make their own judgement". Mr Bray advises that that he does not endorse the use of the descriptor 'adverse' in relation to Mr Coombs' evaluation of adverse visual effects for a number of public viewpoints (see H04, paragraph 135).

a. *It is noted that Mr Bray appears to concur with Mr Coombs' rating of adverse visual amenity effects in relation to residential properties at H04 paragraphs 142, 147 and 148. Please clarify the meaning of Mr Bray's evidence in this regard, as his paragraph 132 would suggest that Mr Bray may provide an update to his visual effects assessment once he has reviewed any landscape related comments received from other parties on the application.*

   Mr Bray's agreement with Mr Coombs' assessment of individual properties extends only to the significance rating (the 7-point scale), not to the use of the additional qualifier of adverse, neutral or positive.

   In Mr Bray's opinion, existing landscape values are identified using relatively broad considerations. A component of assessing associational landscape values, for example, is understanding how widely shared or recognised such values are across a community, often determined through understanding whether (or how) a landscape forms part of the identity of a place. Equally, perceptual values are understood as how humans in a more general sense respond to the physical attributes of landscape – for example, indigenous vegetation, natural landforms and legible landscape patterns are generally considered to result in high perceptual value. Mr Bray's paragraphs 91 to 100 draw out these more widely shared values of the landscape.

   In the assessment of effects, it is Mr Bray's opinion that the role of the landscape architect is to determine the nature and severity of change only (paragraph 132). He confirms he uses this approach because, in his opinion, individuals react very differently to change, and (in particular) introducing wind turbines to a landscape can be very polarising. There are many people who find that turbines add interest and sculptural form to a landscape (i.e. positive), and there are others that see it as industrialisation (i.e. adverse). The nature of wind farm applications is that commonly only those opposed to the proposal are heard. Yet there are examples where communities have embraced turbines as part of their identity, even when the presence of turbines has dramatically changed the landscape.[2]

   Mr Bray is of the opinion that all people interpret landscape values differently, so while there are degrees of commonality, there will always be different opinions on whether change and development within a landscape is positive or adverse. Mr Bray's focus is on considering the nature of the proposal (including the factors affecting perception of turbines outlined in his

[2] https://teara.govt.nz/en/photograph/24220/windfarm-capital-of-new-zealand

Appendix 2) to determine to what extent the proposal will change the landscape, and to what extent existing landscape values are retained.

Therefore, rather than assume all change is adverse, Mr Bray confirms that he prefers to describe the change anticipated by a proposal, and then use the rating scale to identify to what extent this change will impact the existing landscape values – that is, will the proposal result in the full erosion of all existing values (a high or very-high effect), or will such values be retained even if the proposal is introduced (lower rating scores)? Whether such effects are considered to be positive, neutral or adverse will be determined by individuals experiencing the change.

b. *In terms of perceptual effects for public audiences, please advise how the Panel should interpret Mr Bray's conclusion that effects on perceptual landscape values are 'somewhat limited' (H04, paragraph 146), noting that this is not an effects rating recommended in Te Tangi a te Manu, Aotearoa New Zealand Land Assessment Guidelines which Mr Bray repeatedly references in his statement.*

Mr Bray confirms that in the context of this paragraph, "somewhat limited" can be interpreted as ***low-moderate***. The reasons for reaching this rating level are outlined in paragraphs 145-150 of H04.

7) *Page 15 of the A02 Part A report explains that further analysis has been carried out since the Covid Fast-track decision, which is additional to the various modifications that Contact made to the Project and effects management measures through the last process to address concerns raised. The report goes on to list the refinements made during the Covid Fast-track but does not include reference to the deletion of GLE-01, GLE-02 and GLE-03. Please clarify whether this is an oversight, and if not, why Mr Coombs' evidence has changed in this regard as it is understood that he supported the removal of these turbines in response to concerns raised by landowners.*

The lack of reference in the refinements made during, and since, the Covid Fast-track process to the deletion/removal of GLE-01, GLE-02 and GLE-03 is not an oversight; those three turbines remain part of the Project as proposed.

Moreover, it is not the case that Contact agreed to their deletion during the Covid Fast-track process or that Mr Coombs' assessment of those turbines has changed; he has consistently expressed the view that the landscape/visual effects of those turbines, and of the Project as a whole, are acceptable in their context.

However, Contact understands how confusion may have arisen in this respect, so a detailed explanation is set out below which addresses:

- Contact's desire to develop the Project in an environmentally responsible way, which includes making efficient use of the available wind resource to generate renewable electricity;
- Specific details regarding turbines GLE-01, GLE-02 and GLE-03, including their benefits;
- How the issue of potential deletion of GLE-01, GLE-02 and GLE-03 arose during the Covid Fast-track process; and
- The response provided by Contact and Mr Coombs to that issue.

Making efficient use of the wind resource

When designing the Project, the fundamental consideration for Contact has been to devise a proposal that respects the environmental values and constraints present at the site and can comfortably be accommodated within the receiving environment.

Subject to that consideration, Contact obviously intends to develop a wind farm that is economically efficient and therefore feasible to deliver; the Project will not proceed unless its economic benefits outweigh its costs (which include a number of significant sunk costs, such as in respect of roading and transmission infrastructure).

Because the clear advice received by Contact was (and remains) that this site is suitable to accommodate a large-scale wind farm, a key question therefore became how to configure the Project in order to make the most efficient use of the available wind resource to generate renewable electricity.

The proposal before the Panel reflects the output of the process broadly summarised above. All 55 proposed turbine locations are considered appropriate by all experts advising Contact (as well as a number of other key participants in this process) and the Project is designed to make efficient use of the excellent wind resource at the site.

Against that background, Contact is seeking all necessary approvals for the 55-turbine layout. If the Panel were to grant approval for a lesser number of turbines, that would reduce the benefits of the Project (which are a matter central to the purpose of the Fast-track Approvals Act 2024 (“**FTAA**”)), as well as be an inefficient use of the wind resource (contrary to section 7(b) of the Resource Management Act 1991 (“**RMA**”)).[3]

Turbines GLE-01, GLE-02 and GLE-03

Turbines GLE-01, GLE-02, and GLE-03 are the only three turbines proposed on Glencoe Station, owned by Geoff and Kathryn Dodds.

[3] See also Objective ENG.1 of the Southland Regional Policy Statement.

The relevant locations are very well sited to host wind turbines; the current land use is pastoral farming, the ecological values on the site are low, and the turbines are approximately 2.3-3km from residences around the Redan intersection on the Wyndham-Mokoreta Road (a significantly greater separation distance than exists for many consented or operational wind farm sites in New Zealand, as discussed above).[4]

The three turbines make up approximately 5% of the proposed installed capacity of the Project. That is, they:

> Will provide up to approximately 20 MW of installed capacity; and

> Are likely to generate approximately 60GWh/annum, which is sufficient to provide electricity to up to 7,500 households. For context, that is more households than exist in either the Gore District or Southland District (i.e. in the entirety of each district).[5]

As such, GLE-01, GLE-02 and GLE-03 alone:

> In terms of installed capacity, represent approximately:

  - The same capacity as the Waitaha Hydro project (23MW), which is a project of regional / national significance listed in Schedule 2 of the FTAA;[6]
  - 55% of the Mahinerangi Wind Farm (36MW);[7]
  - 47% of the Kaiwera Downs Wind Farm Stage 1 (43MW);[8]
  - 40% of the Te Rere Hau Wind Farm prior to its repowering (46MW);[9]
  - 33% of the White Hill Wind Farm (58MW)[10] and Mill Creek Wind Farm (60MW);[11] and
  - 30% of Stages 1 and 2 of the Tararua Wind Farm (68MW);[12] and

> Are likely to generate more renewable electricity, in GWh, than Mount Stuart Wind Farm (21GWh)[13] and Flat Hill Wind Farm (25GWh)[14] combined.

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4 To give one recent example, at the Mount Munro Wind Farm 16 dwellings are within 2km of the nearest turbine: Meridian Energy Ltd v Tararua District Council [2025] NZEnvC 44 at [2] and [232]–[233].

5 Stats NZ, Census 2023 data.

6 Waitaha Hydro Scheme | Westpower

7 Mahinerangi Wind Farm - Wind Energy NZ | Mercury

8 Kaiwera Wind Farm | Wind Generation NZ | Renewable

9 Te Rere Hau Wind Farm | Meridian Energy

10 White Hill Wind Farm | Meridian Energy

11 Mill Creek Wind Farm | Meridian Energy

12 Tararua Wind Farm - Wind Generation NZ | Renewable

13 Mount Stuart Wind Farm — Pioneer Energy Renewables

14 Flat Hill Wind Farm — Pioneer Energy Renewables

How the potential deletion/removal of GLE-01, GLE-02 and GLE-03 arose

The potential deletion/removal of turbines, including GLE-01, GL-02 and GL-03, was raised late in the Covid Fast-track process by several commenters, the expert panel, and the panel's landscape peer reviewer, Ms Steven. By way of summary, the relevant steps in the process were as follows:

- The deletion/removal of GLE-01, GLE-02 and GLE-03 was not raised in the July 2024 responses from those invited to comment.
- The panel's landscape peer reviewer, Ms Steven, did not refer to the deletion/removal of any turbines in her August[15] and September[16] 2024 peer review reports or in the joint witness statement she prepared at expert conferencing.[17]
- In response to the draft conditions circulated by the panel in November 2024, a number of commenters (including the West Catlins Preservation Society) specifically sought the removal of GLE-01, GLE-02 and GLE-03 for the first time.
- On 4 December 2024, Ms Steven provided a further peer review and recommended the removal of a number of turbines (including GLE-01, GLE-02 and GLE-03) for the first time.[18]
- On 5 December 2024, the Panel:[19]
    - Asked Contact whether its proposal was an 'all or nothing' approach;
    - Observed that that certain submitters most affected by the Project had queried why Contact could not remove GLE-01, GLE-02 and GLE-03; and
    - Provided Ms Steven's further peer review, noting her suggestion to remove a number of turbines to reduce landscape and amenity effects.
- On 9 December 2024, Ms Steven provided a table listing the turbines she had recommended removing and the reasons for that recommendation (noting the specific requests for removal of GLE-01, GLE-02 and GLE-03).[20]

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15 Microsoft Word - ASLA Peer Review Report August 2024.docx Microsoft Word - APPENDIX TO ASLA REPORT Southland Wind Farm August 2024.docx Microsoft Word - ATTACHMENTS FINAL.docx

16 Microsoft Word - Response to RFI.docx Anne-Steven-response-to-comments-on-Southland-Wind-Farm.pdf rep viewpoints

17 Landscape-Expert-Conferencing-JWS.pdf

18 Microsoft Word - Review of Responses to New Information from Invitees.docx

19 Southland-Wind-Farm-Minute-11.pdf at [5].

20 Microsoft Word - TURBINE REMOVAL SCHEDULE.docx

- On 11 December 2024, Contact[21] and Mr Coombs[22] provided a response to Ms Steven's update of 4 December. Contact explained that its position, relying on Mr Coombs' evaluation, remained that:
  - The Project in its entirety was acceptable from an effects perspective, and Contact's preference was to retain all 55 turbines; but
  - If the panel chose to remove any turbines, GLE-01, GLE-02 and GLE-03 were a logical choice because they were the closest turbines in the Project to any dwelling.
- A series of further materials were then exchanged, in which Contact reiterated that position. Those materials included the panel's Minute 12, noting Ms Steven's further update of 9 December and inviting Contact to respond by 13 December,[23] Contact's response dated 13 December 2024,[24] Ms Steven's further response dated 18 December 2024,[25] and Contact's final response dated 30 January 2025.[26]

Contact's response to the requests to delete turbines

The Covid Fast-track panel stated in its decision that Contact had "offered" to reduce the number of wind turbines to 52 by removing GLE-01, GLE-02 and GLE-03.[27] The phrasing used by the panel miscategorises Contact's response; at no point in the process did Contact offer or propose the deletion of turbines GLE-01, GLE-02 and GLE-03.

Rather, as noted above, Contact's position remained that the Project was well-designed, robust, and defensible in its proposed shape and rationale. While the Project was not 'all or nothing':

- It had not been advanced on the basis that there were 'sacrificial' turbine sites';
- Any amendment or deletion should be based on a sound evidence-based rationale;
- Any reduction in turbine generation output would reduce not only the benefits and the efficient use of the wind resource, but the viability of the Project (which is a matter of degree); and
- Agreements with Te Rūnanga o Ngāi Tahu, Ngāi Tahu ki Murihiku (including Te Ao Marama) and the Department of Conservation were based on all 55 proposed turbines being

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21 Contact-Energy-Limited-response-to-minute-11-11-December-2024.pdf

22 Attachment-3-Southland-Wind-Farm-Peer-Review-Response.pdf

23 Minute-12.pdf at [2] and [4].

24 Memorandum-of-counsel-for-Contact-Energy-Limited-13.12.2024.pdf

25 ADDITIONAL RESPONSE 18 December 2024 (2).pdf

26 Memorandum-of-counsel-for-Contact-responding-to-minutes-14-and-16-and-seeking-resumption-of-processing70419493.1.pdf

27 Southland-Wind-Farm-Decision_FINAL-1.pdf at [13(a)], [584] and [652].

consented and built – those measures would be disproportionate if any turbines were removed.

Mr Coombs also provided a response that supported this position, while accepting the obvious logical proposition that deleting turbines from the wind farm would reduce the Project's potential visual effects on the nearest properties to those turbines.

Contact's position in this FTAA process remains that all 55 proposed turbines are appropriate, including in respect of landscape and visual effects, relying on the assessment of Mr Coombs, as well as the further primary assessment prepared more recently by Mr Bray.

I trust that this information addresses the Panel's request for information. Contact is happy to assist with any further requests related to this or other matters.

Yours sincerely,

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