

SOUTHLAND CONSERVATION BOARD

TE ROOPU ATAWHAI O MURIHIKU

FAST-TRACK SUBMISSION TO THE SOUTHLAND WINDFARM APPROVAL PANEL

Re: Southland Wind Farm – Fast Track Proposal

Submitter: Southland Conservation Board

Date: 12 December 2025

1. Introduction

Thank you for the opportunity to comment on the Southland Wind Farm Fast-Track proposal and its associated ecological assessments, including *Technical Assessment #7: Review of Terrestrial and Wetland Ecology and Ecology Offsetting and Compensation* (MacGibbon, 18 August 2025).

The Southland Conservation Board (the Board) recognises that renewable energy development is essential for Aotearoa New Zealand's low-carbon transition. Climate change is the greatest long-term threat to biodiversity, and well-designed renewable energy projects can make an important contribution to national emissions-reduction goals.

However, renewable energy development must be balanced against the protection of irreplaceable ecosystems and nationally threatened species. In this case, the proposal raises significant concerns regarding:

- Major risks to wetlands, hydrological systems, and soil integrity.
- Impacts on the critically endangered long-tailed bat (pekapeka-tou-roa)
- Risks to migratory and threatened birds.
- Potential harm to threatened reptiles, freshwater species (including Clutha flathead), endemic invertebrates, and threatened flora.
- Insufficient survey effort and high residual uncertainty.
- Reliance on offsetting where effects are not offsettable.

Given the magnitude of these issues, the Board cannot support the proposal in its current form. Substantial redesign, strengthened ecological safeguards, and significantly improved ecological datasets are required before the project can be considered further.

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2. Impacts on Wetlands and Watercourses

2.1 National and regional context

New Zealand has lost approximately **90% of its wetlands** since 1850, with Southland suffering the highest loss nationally. As of 2014/15, only **3.6%** of Southland's original wetlands remained, and these continue to decline at approximately **0.5% per year**. The region's remaining wetlands therefore represent an exceptionally vulnerable and irreplaceable ecological resource.

2.2 Wetlands and ecological significance on the project site

Information provided in the application identifies extensive wetland values, including:

- 132 ha of bog, fen, and copper-tussock wetlands—classified as ecologically significant under the Southland Regional Policy Statement.
- Upland wetland complexes on the Jedburgh Plateau forming a mosaic of interconnected bogs, pools, and seepages.
- Land within the **acutely threatened LENZ** classification.

Field observations and vegetation mapping for the Jedburgh Plateau likely underestimate wetland extent. The upland mosaic functions as a single integrated hydrological system; fragmenting it with roads, platforms, and buried services risks widespread degradation rather than isolated, localised impacts.

2.3 Hydrological alteration

Wetlands depend on stable surface- and groundwater regimes. The proposal introduces substantial hydrological risks, including:

- Sediment runoff into wetland catchments during earthworks.
- Drainage modification from elevated roading, side-cast material, cut-to-fill earthworks, and culverts.
- Groundwater disruption from excavation and soil compaction.
- Potential full extraction of stream flow under proposed water-take conditions, with minimum flow requirements insufficiently described or absent.

Such changes may trigger irreversible ecosystem collapse, including vegetation die-off, reductions in wetland invertebrate communities, and loss of habitat for wetland birds, threatened reptiles, and invertebrates.

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2.4 Earthworks and fill disposal

Management of **1.1 million m³** of surplus earth presents risks despite proposed buffers. These include:

- Informal wetland infilling.
- Slope instability and erosion.
- Redirection of overland flows.
- Soil profile mixing and soil-structure degradation.

The Board is not confident that these effects can be avoided or mitigated at this scale, particularly within sensitive wetland mosaics and steep gullies.

2.5 On-site concrete batching and cement washwater risks

On-site batching introduces significant contamination risk because concrete washwater is **highly alkaline**, toxic to freshwater species, and harmful even in very small volumes. Risks are amplified by fine sediments, chemical additives, and the steep terrain and gullies that could rapidly convey contaminants into the Mimihau, Kaiwera, or Mokoreta catchments. Proposed sediment controls cannot neutralise alkalinity. The application does not provide adequate assurance that cement washwater can be fully contained or prevented from entering wetlands or waterways.

3. Risks to Critically Endangered Long-Tailed Bats (Pekapeka-tou-roa)

3.1 Known presence and habitat values

Long-tailed bats have been recorded 10–20 km from the site, and eight turbines are proposed in areas assessed as high bat habitat value. Nationally critical species cannot sustain even minimal increases in mortality.

3.2 Collision and barotrauma risk

International evidence (North America and Europe) shows that:

- Barotrauma from sudden pressure changes near turbine blades is a major cause of mortality and may occur without blade strike.
- High-altitude foraging species—behaviourally similar to Pekapeka—are highly vulnerable.
- Mortality spikes during low-wind-speed conditions when turbines operate below cut-in speeds.

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- For a nationally critical species, even 1–2 deaths per decade could have population-level consequences.

3.3 Inadequate survey effort

Survey effort does not meet DOC’s best-practice requirements for wind energy developments affecting nationally threatened species, which require multi-year, multi-season, and spatially extensive monitoring. Given the scale of uncertainty, application of the precautionary principle is essential.

4. Impacts on Birds and Other Native Fauna

4.1 Birds

The turbine array lies within movement corridors for migratory and wetland bird species, including:

- New Zealand falcon.
- Fernbird.
- Long-tailed cuckoo.

Collision-risk modelling lacks radar data, seasonal flight-path monitoring, and modelling of low-visibility flight behaviour, and therefore may underestimate effects.

4.2 Threatened reptiles, invertebrates, and plants

The site supports:

- **Tussock skink** (At Risk – Declining).
- **Tautuku gecko** (At Risk – Declining).
- **Desert broom** (At Risk – Declining; a threatened native plant) present at a proposed water crossing.
- **10 notable invertebrate species**, including two populations of protected Helm’s stag beetle.

The Wildlife Act Authority allows incidental harm if “unavoidable and foreseeable”, raising concerns regarding oversight and enforceability.

4.3 Freshwater species

Proposed transmission and access routes occur near habitat for **Clutha flathead (Threatened – Nationally Critical)**. Risks include:

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- Sedimentation.
- Hydrological disruption.
- Changes to water temperature and channel form.

Any habitat loss for a nationally critical freshwater fish is unacceptable.

5. Problems With Offsetting and Compensation

Although the proposal includes a community fund and pest-control programme (10,000 ha in Beresford), and DOC technical advisors consider effects “addressed through conditions”, the Board remains concerned that:

- Wetland hydrology cannot be recreated or offset.
- Bat mortality cannot be offset
- Ecological “gains” from pest control occur off-site and are not ecologically equivalent to on-site losses.
- Success and durability of proposed offsets remain uncertain.
- The proposal conflicts with regional plan rules (e.g., non-compliance with pLWP civil works in natural wetlands).

Offsets are not appropriate where effects are irreversible or fall on species with high extinction risk.

6. Site Footprint and Landscape Considerations

The wind farm spans **58 km²** of forestry and farmland and proposes up to 55 turbines, with:

- 64 ha of indigenous vegetation clearance.
- 16 km of new transmission line.
- 39 unlit and 16 lit turbines.
- significant upgrades to roading (6.5–8 m width).

Although parts of the site are degraded, the Jedburgh Plateau upland wetland complex holds high ecological value that cannot withstand impacts of this scale. The Board strongly prefers a design that avoids this area entirely.

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7. Relief Sought

The Southland Conservation Board requests that the Panel:

1. **Decline the application in its current form**, or at minimum:
2. Require **multi-year, multi-season bat and bird surveys** aligned with DOC and international best practice.
3. Require a **full hydrological assessment** addressing earthworks, road alignments, groundwater, surface-water connectivity, and cumulative effects on wetland systems.
4. Require redesign to **avoid all wetlands and wetland catchments**, including the Jedburgh Plateau wetland mosaic.
5. Require evidence that **no feasible lower-impact alternative layout** exists.
6. Apply the **precautionary principle** wherever wetlands or nationally threatened species may be affected.
7. Strengthen Wildlife Act conditions, including mandatory pre-construction surveys with GPS-verified search evidence for sensitive species.
8. Ensure freshwater culvert designs **protect native fish movement** while **blocking invasive species**.
9. Require a **concrete washwater management plan** demonstrating zero discharge, full containment, and safe off-site disposal.

8. Conclusion

The Southland Wind Farm proposal presents unacceptable ecological risks to wetlands, hydrological regimes, nationally threatened species, and high-value upland ecosystems. While renewable energy development is vital to Aotearoa's climate response, this project—in its current form—does not achieve an appropriate balance between emissions reduction and biodiversity protection.

Until critical knowledge gaps are addressed, and the layout is fundamentally redesigned to avoid sensitive ecological areas—particularly the Jedburgh Plateau upland wetland complex—the proposal should not proceed.

Signed:



Keith McRobie - Chairperson
Southland Conservation Board