BEFORE AN EXPERT PANEL
SOUTHLAND WIND FARM

FTAA-2508-1095

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

MEMORANDUM OF COUNSEL FOR CONTACT ENERGY LIMITED IN ADVANCE OF PANEL BRIEFING

24 November 2025

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MAY IT PLEASE THE PANEL:

1. This memorandum of counsel is filed on behalf of Contact Energy Limited (**Contact**) in advance of the Panel briefing on the Southland Wind Farm project (**Project / Application**), scheduled for 2pm on 26 November 2025.

2. At the conference, Contact intends to provide a high-level overview of the Application, as signalled in Minute 2 of the Expert Panel dated 19 November 2025 (**Minute 2**). In particular, Contact intends to:

   (a) Speak to a PowerPoint presentation that gives an overview of:

      (i) the need for the Project, by reference to the New Zealand electricity market and supply / demand situation and forecast; and

      (ii) the Project itself, including its history, the existing environment, and Contact's approach to effects management.

   (b) Provide an outline of the approvals sought for the Project under the Fast-track Approvals Act 2024 (**FTAA**), and the proposed conditions.

   (c) Update the Panel on discussions with the other participants at the Panel Convener's conference.

   (d) Give an overview of what Contact considers will likely be the key substantive issues for the Panel to assess.

   (e) Address arrangements for the Panel's site visit, as necessary.

3. Contact has, with the assistance of Wayfinder Landscape Planning & Strategy Ltd (led by Mr Bray), prepared a 16-minute video providing an overview of the Project. It would be helpful for the Panel to view that video in advance of the conference. The video is available online at https://www.youtube.com/watch?v=JhhSUffZmAw. Contact and/or Mr Bray would be happy to address any questions arising from the video at the conference.

4. The Panel will be aware that Part A of the Application is an overarching substantive application document, and that the appendix to Part A is a legal analysis of the FTAA and the Project. Together those documents address the key matters relevant to the briefing. We do not repeat the detailed content of those documents in this memorandum, but refer to those and other Application documents as appropriate.

Attendance at the conference

5. Noting the Expert Panel's request to make various experts available (either in person or online), the attendees at the Panel briefing on behalf of Contact will be:

   In person:

   (a) Dave Randal and Thad Ryan (legal counsel);

   (b) Chris Abbott, Chris Drayton, and Steve Harding (Contact);

   (c) John Kyle and Megan Hankey (consultant planners, Mitchell Daysh);

   (d) Nick Goldwater (terrestrial and wetland ecology, Wildlands);

   (e) Brad Coombs (landscape, visual effects and natural character, Isthmus);

   (f) Shannon Bray (landscape, visual effects and natural character, Wayfinder);

   Online:

   (g) Miklin Halstead (noise, Marshall Day Acoustics);

   (h) Luke Gordon (engineering design and construction, Riley);

   (i) Paul Botha (Contact, focussing on technical wind farm matters); and

   (j) Roger MacGibbon (terrestrial and wetland ecology reviewer, Tonkin & Taylor).

The benefits of and need for the Project

6. As noted above the PowerPoint presentation highlights the need for, and benefits of, the Project.

7. In summary, the Project will deliver a nationally significant amount of renewable electricity, helping to decarbonise the economy by lowering wholesale power prices and enabling the displacement of fossil fuel-derived energy uses, which cause negative environmental effects. The Project will also have significant employment and other economic benefits for local communities and businesses and New Zealand more broadly.

8. Consenting and delivering new renewable electricity generation is a pressing need and high priority for New Zealand. That is reflected in:

   (a) The Minister for Infrastructure's decision referring the Project into the FTAA process.[1]

   (b) The comments made under section 17 of the FTAA by the relevant Ministers, as well as by Environment Southland and Southland District Council.[2]

9. The benefits of and need for the Project are set out in detail in the Application documents, including in particular:

   (a) Part A of the Application[3] and the attached legal analysis document;[4]

   (b) Part B of the Application (approvals relating to the RMA, which is broadly equivalent to an AEE prepared for an RMA application);[5] and

   (c) Two technical assessments, prepared by consultant experts and included in Part H to the Application:

      (i) Technical Assessment 1 – Electricity System Benefits (prepared by Simon Coates and Rachel Holden of Concept Consulting);[6] and

      (ii) Technical Assessment 2 – Economic Framing and Impacts (prepared by Peter Clough of the New Zealand Institute of Economic Research).[7]

10. As discussed in the legal analysis document, the Project Site is an excellent location for the delivery of the Southland Wind Farm and the renewable electricity generation and other related benefits it will bring. In particular, the Project Site is:

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[1] 13.-FTAA-2504-1041-Southland-Wind-Farm-Stage-2-Notice-of-Decisions_Redacted.pdf The decision confirmed that the Minister was satisfied that the Project is "an infrastructure or development project that would have significant regional or national benefits".
[2] Refer to the comments provided by Environment Southland and Southland District Council on Contact's referral application, provided pursuant to section 17 of the FTAA, as well as in the comments in that process by the Minister for Economic Growth, Minister for Regional Development, Minister of Climate Change and Energy: https://www.fasttrack.govt.nz/__data/assets/pdf_file/0017/10574/09.-Combined-Comments_Redacted.pdf.
[3] A02. Part A - Overarching Substatnive Application Document Refer to sections 3 and 4 of that document.
[4] 6e8dd4fd5564b02a510780fc3cb31035a44afff1.pdf
[5] B01.-Part-B-Resource-Consent-Approvals-Application_Redacted.pdf Refer to section 5.2.
[6] https://www.fasttrack.govt.nz/__data/assets/pdf_file/0017/11672/H01.-Part-H-Technical-assessment-1-Electricity-System-Benefits.pdf
[7] H02.-Part-H-Technical-assessment-2-Economic-Framing-and-Impacts.pdf

(a) elevated and exposed to an excellent wind resource, in reasonable proximity to the National Grid;

(b) not a pristine environment that is subject to specific protections in the planning documents; the Project Site is (and is within) a 'working' rural environment, largely comprised of pastoral farmland and commercial plantation forest; and

(c) relatively sparsely populated, with a low density of dwellings in the surrounding area and no houses within 2.3km of any proposed wind turbine.

11. Contact acknowledges the cultural, ecological and landscape values associated with the Project Site, but is firmly of the view (aligned with that of its expert advisors and of Kā Papatipu Rūnaka ki Murihiku) that effects on those values can and will be appropriately managed.

Overview of the Project

12. Contact's PowerPoint presentation also provides an overview of the Project itself, including those aspects described in Part A of the Application,[8] in particular:

(a) The Wind Farm Site and wider Project Site.[9]

(b) The Project's key components, which include:

(i) up to 55 turbines, each up to approximately 7MW in capacity and with a maximum blade 'tip height' of up to 220m;

(ii) electrical reticulation within the wind farm, a substation and switching station (Grid Injection Point) and an overhead transmission line between the substation and Grid Injection Point to connect to the National Grid; and

(iii) an operations and maintenance facility, and the construction of wind farm roading, turbine foundations and 'hard stands'.

[8] At section 7.
[9] The 'Wind Farm Site' is the land upon which the wind turbines, wind farm substation and wind farm roads are located. The 'Project Site' is the Wind Farm Site plus also required for the grid connection works (i.e. the transmission line and the GIP) and the main construction access route to the Wind Farm Site, through the Port Blakely Forest.

(c) The construction process and key elements (such as stream crossings, earthworks and fill disposal, and water takes and use) for the Project.

13. The legal analysis document appended to Part A adds a summary of the Project's other elements that, while not directly needed to generate renewable electricity, will provide significant benefits for local communities and the environment more generally and are properly considered as integral aspects of this proposal.[10] In summary those elements include:

(a) Cultural initiatives that will acknowledge the mana and support the exercise of kaitiakitanga by Kā Papatipu Rūnaka ki Murihiku;

(b) A proposed Community Benefit Fund to support local social or environmental initiatives, which could amass as much as $4,225,000 over the first 35 years of the Project; and

(c) A comprehensive suite of measures to offset and compensate for the Project's adverse ecological effects, at a range of ecological enhancement and restoration areas, which will lead to a material overall enhancement in biodiversity values.

14. The Project Figures included as Part G of the Application provide a useful visual overview of the Project. Refer in particular to the seven Project Description figures,[11] and to Figure Terrestrial Ecology 3a, b, c and d which show the proposed ecological enhancement and restoration areas.[12] The Civil Design Drawings included as Part K of the Application provide more detail.

Approvals sought and proposed conditions / terms

15. The FTAA Application is for the necessary approvals to construct, operate and maintain the Southland Wind Farm. Parts B to F of the overall Application include the specific application document for each category of approval sought.

16. The approvals sought include:

[10] At 1.20 - 1.23.
[11] https://www.fasttrack.govt.nz/__data/assets/pdf_file/0016/11662/G01.-Part-G-Technical-Report-Maps-Pages-01-to-15.pdf
[12] The 10,000ha treatment enhancement area in the Beresford Range, Catlins, which will be the focus of funding by Contact payable to the Department of Conservation ($300,000 upfront then $150,000 per year inflation adjusted for the life of the wind farm) for habitat enhancement measures for long-tailed bats, is shown on Figure Long-Tailed Bats-14: G04.-Part-G-Technical-Report-Maps-Pages-43-to-52.pdf

(a) Resource consents that would otherwise be applied for under the RMA.[13] They include regional consents that would otherwise be the sought from Environment Southland, and land-use and earthworks consents that would otherwise be sought from Southland District Council and Gore District Council. Part B of the Application is the overall application document for the RMA approvals.

(b) Concessions that would otherwise be applied for under the Conservation Act 1987 (**Conservation Act**). The concessions are to provide for:

(i) the construction of a culvert within the Mimihau Stream North Branch (and Marginal Strip) to enable vehicles to cross this stream without having to use the existing ford crossing;

(ii) an airspace easement associated with the transmission line to pass over that same stream (and Marginal Strip); and

(iii) an airspace easement for the transmission line to cross over the edge of the nearby Waiarikiki Stream, Mimihau Conservation Area.

Part C of the Application is the overall application document for the Conservation Act approvals;[14] the location of the concessions / easements sought are shown on Figure Part C-5.[15]

(c) Wildlife approvals that would otherwise be applied for under the Wildlife Act 1953 (**Wildlife Act**). The approvals are for the intentional disturbance of wildlife (lizards and Helms' stag beetles), including for the purposes of catching, holding and releasing. Part D of the Application is the overall application document for the Wildlife approvals.[16]

(d) An archaeological authority that would otherwise be applied for under the Heritage New Zealand Pouhere Taonga Act 2014 (**HNZPT Act**). Contact is seeking a 'site-wide' authority, on a precautionary basis.

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[13] Refer to Part B of the substantive application and to the index of resource consents included at the start of the draft resource consent conditions (Part I of the substantive application).
[14] https://www.fasttrack.govt.nz/__data/assets/pdf_file/0019/11656/C01.-Part-C-Conservation-Act-Approvals-Application.pdf
[15] G02.-Part-G-Technical-Report-Maps-Pages-16-to-29.pdf.
[16] https://www.fasttrack.govt.nz/__data/assets/pdf_file/0020/11657/D01.-Part-D-Wildlife-Act-Approvals-Application.pdf

Part E of the Application is the overall application document for the archaeological authority.[17]

(e) Approvals that would otherwise be applied for under the Freshwater Fisheries Regulations 1983 (**Fisheries Regulations**). The approvals are to allow three culverts to be designed to prevent the passage of exotic fish (for the protection of native fish species upstream). That is technically a 'complex freshwater fisheries activity' under the FTAA. Part F of the Application is the overall application document for these approvals.[18]

17. Conditions are proposed to apply to each category of approval sought. The conditions are provided as Part I of the Application document, with a specific condition document addressing each category of approval sought.

18. As is standard practice for infrastructure projects of this scale, a suite of management plans is proposed to implement the requirements of various conditions. A number of those relate to managing ecological effects (those addressing terrestrial and wetland ecology comprise the overall Terrestrial Ecology Management Plan), with the remainder addressing earthworks and other construction management matters. All of the management plans have been provided in draft form (in Part J of the Application), with most of them being fulsome and well-advanced drafts.[19]

19. At the briefing, Mr Kyle and Ms Hankey intend to take the Panel through the proposed conditions, at a high-level and focussing on key issues and the overall approach taken. They will be well placed to answer any initial questions from the Panel. They have prepared an overview PowerPoint pack on the proposed conditions, which is **attached** to this memorandum.

20. The proposed conditions and management plans have been subject to detailed discussions between Contact, the relevant administering agencies, and others (including in particular Ka Papatipu Rūnaka and Te Ao Mārama). The proposed resource consent conditions have, to a large extent, been carried through from the previous COVID-19 Recovery (Fast-track Consenting) Act 2020 (**Covid Fast-track Act**) consenting process for the Project, and so are well known to the key participants.

[17] https://www.fasttrack.govt.nz/__data/assets/pdf_file/0021/11658/E01.-Part-E-Archaeological-Authority-Approvals-Application_Redacted.pdf
[18] https://www.fasttrack.govt.nz/__data/assets/pdf_file/0022/11659/F01.-Part-F-Freshwater-Fisheries-Regulations-Application.pdf
[19] Clearly signalled placeholders are included where additional detail is to be added after the consenting process.

Update on discussions

21. The memorandum of counsel filed on behalf of Contact ahead of the Panel Convener's Conference set out Contact's understanding in terms of the position of and remaining issues for all participants in that conference. Following discussion at that conference, the Panel Convener issued a Minute providing an updated summary.[20]

22. Contact has continued engaging with those parties since the Panel Convener's Conference. To assist the Panel, counsel provide the following update.

Ngāi Tahu / Kā Papatipu Rūnaka

23. The position remains as recorded at the Panel Convener's Conference: following a sustained period of constructive engagement between Contact and Ka Papatipu Rūnaka and Te Ao Mārama, agreement on the appropriate management of cultural and other effects of the Project has been reached, including in terms of the conditions. There are no issues to be resolved.[21]

The Councils: Gore District Council (GDC), Southland District Council (SDC) and Environment Southland (ES)

24. Contact has been engaging closely with the three councils for a number of years, including throughout the previous Covid Fast-track consenting process. Through that engagement, Contact has been able to address issues raised and to refine its approach to just a small number of matters. All three councils have expressed broad support for the Project, including during this FTAA process.

25. At the Panel Convener's Conference, GDC confirmed that it supports the Project and approvals sought and has no outstanding issues to raise.

26. SDC recorded at the Panel Convener's Conference that it considers the key issues of interest to be noise, landscape and ecology. SDC provided expert-led comments on those matters during the during the previous Covid Fast-track process, to which Contact and its consultant experts responded in a way that led to updated proposed effects management measures and

[20] https://www.fasttrack.govt.nz/__data/assets/pdf_file/0013/14161/Minute-of-the-Panel-Convener-Advising-of-the-Expert-Panel-Appointment-Southland-Wind-Farm.pdf

[21] Subject to confirmation by Te Ao Marama re the minor updates to the proposed conditions to the archaeological authority as discussed with HNZPT (see below).

consent conditions. Those updated effects management measures and conditions have been carried through to this process.

27. Since the Panel Convener's Conference, Contact has been in direct discussion with the consultants from Boffa Miskell who are assisting SDC in reviewing the Application. In particular, a site visit took place on 13 November 2025 for Rhys Girvan, the Boffa Miskell landscape architect advising SDC, to visit the Project Site and wider area with the two landscape architects who have provided the primary landscape and visual assessments that form part of the Application, Mr Coombs and Mr Bray.

28. Contact does not understand SDC to have any specific concerns in respect of operational noise or ecology, but remains ready and willing to discuss those matters as necessary.

29. The Panel Convener's minute records that ES is broadly supportive of the Project, and that *"its key issues are those in relation to the construction and on-going activities on the wetland complex"* (being the wetlands located on the 'Jedburgh Plateau'). The minute then records that ES noted Contact's refined understanding of those matters, and of earthworks effects, and that the proposed offsetting (and compensation) package will require careful analysis by the Panel.[22]

30. Contact has continued to engage with ES on wetland-related matters since the Panel Convenor's Conference, including by providing a memorandum prepared by Mr Goldwater of Wildlands. That memorandum was also provided to DOC, and is **attached** to this memorandum of counsel for the Panel's information. Contact looks forward to continuing to work with ES to discuss and resolve any remaining queries / issues in respect of these matters.

Director-General of Conservation (DOC)

31. DOC has been involved in detailed discussions with Contact about the Project since 2022. By the end of the previous Covid Fast-track consent process, DOC and its experts formally confirmed to the decision-making panel that they were satisfied that all concerns they had raised with the Project were suitably addressed (including in terms of the conditions).

[22] For completeness, the Regional Council also noted that *"there are likely to be strong views held by individual landowners and occupiers and others who are not at this conference"*. Refer to paras [27] - [28] of the Panel Convenor's Minute for the discussion re ES.

32. The resource consent conditions proposed through that previous process have effectively been carried through to this FTAA process, with Contact engaging with DOC in respect of the updates that have been made.

33. Contact has also engaged closely with DOC in respect of the wildlife approvals, concessions and Fisheries Regulations approvals being sought under the FTAA. DOC provided comments on the complexity of those approvals at the Panel Convener's Conference.

34. Following the Panel Convener's Conference, Contact has provided DOC with specific additional information it sought in relation to the concessions, and the results of the final round of pre-construction avifauna surveys that were discussed towards the end of the Covid Fast-track Act process (and provided for in proposed resource consent condition EC30).

35. Contact and DOC have also met to discuss DOC's view expressed at that conference that additional wildlife approvals may be required for the Project. In particular, Contact intends to consider what additional approvals may be required for the 'operational phase' of the wind farm after this FTAA process, noting that any such approvals would not be needed for several years. It is likely that Contact will seek specific approval to handle any dead or injured birds or bats collected as part of the proposed post-construction monitoring regime.[23] Contact understands DOC to be generally supportive of this approach, in terms of timing.

36. Contact remains motivated to work with DOC to resolve any residual issues in advance of DOC providing its formal comments on the application. That approach is in line with the engagement between DOC and Contact on this Project over a number of years.

Heritage New Zealand Pouhere Taonga (HNZPT)

37. Contact understands HNZPT to be broadly supportive of the 'site-wide' archaeological authority approach taken by Contact. Following the Panel Convener's Conference, Contact and HNZPT have met to discuss the conditions for the archaeological authority. Relatively minor changes to the proposed conditions have been discussed, and Contact is seeking any feedback on those changes from Te Ao Marama.

[23] Refer to resource consent conditions EC37 – EC37E.

Ministry for the Environment (MfE)

38. No substantive issues have been raised by MfE.

Key issues

39. In the memorandum of counsel filed in advance of the Panel Convener's Conference, Contact provided commentary on the complexity of the Application, and on the key issues that the Panel will need to consider. As recorded in that memorandum, the Covid Fast-track Act decision identifies that the key disputed matters – which ultimately led to that panel declining to grant the RMA approvals sought by Contact – were landscape / visual effects and certain ecological effects.

40. Contact anticipates that those effects will also be key points of focus for commenters in this FTAA process. As summarised in the memorandum filed in advance of the Panel Convener's Conference, Contact has gone to significant lengths to ensure that landscape / visual and ecological effects are identified and will be appropriately addressed. Contact's overall approach to, and position on, those matters is set out in:

    (a) Part A of the Application and the appended legal analysis document;

    (b) Part B of the Application (the RMA application document); and

    (c) the relevant technical assessments, the proposed conditions, and the draft ecology management plans.

41. For completeness, Contact reiterates that:

    (a) there is agreement that cultural values have been appropriately addressed, and the relevant conditions are settled;

    (b) construction effects – including in terms of erosion and sediment control, dust, construction traffic and construction noise – have largely been resolved, at least between Contact and the councils; and

    (c) operational noise effects have also been assessed as acceptable, with conditions largely settled between Contact and the district councils.

42. At the panel briefing, Mr Coombs (landscape) and Mr Goldwater (terrestrial and wetland ecology) will provide a brief overall summary of their analysis and key conclusions. They will, along with Mr Bray (who has also prepared a primary landscape assessment) and Mr MacGibbon (peer reviewer in respect

of terrestrial and wetland ecology), be able to address any questions the Panel has in respect of these matters.

43. Mr Halsted (noise), Mr Gordon (design / construction) and Mr Botha (wind turbine technology / design / construction) will also be available to address any questions from the Panel.

Site visit

44. Counsel understand that a site visit is being arranged for the Panel for 27 November (the day after the conference). The details of the site visit can be discussed and confirmed at the briefing.

Dated this 24th day of November 2025

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Our Ref: 6656s

10 November 2025

WETLANDS AT SOUTHLAND WIND FARM

Introduction

This memorandum provides a summary of the information in the Southland Wind Farm (SWF) substantive application regarding the values of and potential impacts on wetlands at the SWF site. It has been compiled at the request of Contact Energy to highlight the key features of the wetlands and, in particular, to describe the ecological context and values of the wetlands within the wetland mosaic on the Jedburgh Plateau - an area of approximately 530 hectares of elevated land at the southern end of Jedburgh Station. It also summarises the hydrological and ecological effects of the proposed wind farm construction activities and the proposed compensation and enhancement measures to address residual effects.

In our opinion, the effects of the proposed wind farm construction on the wetlands at the SWF site can be appropriately managed, and residual effects offset and compensated.

Methods

Collectively, Wildlands ecologists have spent approximately 550 person hours in the field since December 2022 mapping the vegetation at the SWF site, much of which has been spent undertaking 10×10 metre RECCE plots and 2×2 metre wetland delineation plots. For wetland mapping, we initially used a desktop analysis to identify wetlands in and around the proposed Wind Farm Project Site using high-resolution aerial imagery. This focused particularly on wetlands near turbine sites and along proposed construction access tracks. Field-based wetland delineation was undertaken next using protocols from Clarkson (2013) and the Ministry for the Environment (2022). Three main vegetation tests were applied:

i. Rapid test, identifying wetland areas based on dominant species presence.

ii. Dominance test, which classifies a site as wetland if wetland plant species (OBL, FACW, or FAC[1]) make up over 50% of dominant cover.

iii. Prevalence Index, a weighted index indicating wetland status when the dominance test is inconclusive.

Additional hydrological and soil assessments were used when vegetation data were insufficient. Indicators such as low chroma soils and shallow groundwater supported classification. A total of 73 wetland delineated plots were completed across the Jedburgh Plateau and a further nine 10×10 metre vegetation plots were measured in wetland habitats at Port Blakely and Davidson Road

[1] OBL: Obligate Wetland. Almost always is a hydrophyte, rarely in uplands (non-wetlands)
FACW: Facultative Wetland. Usually is a hydrophyte but occasionally found in uplands
FAC: Facultative. Commonly occurs as either a hydrophyte or non-hydrophyte

East. The locations of the plots are shown in Figure Terrestrial Ecology-1 in Part G of the application, attached to this memorandum as Appendix 1.

The wetland delineation plots occurred in March-April 2023, October 2023, March 2024, and April 2025, and together have given us a very good understanding of the nature and extent of the wetlands across the Project Site (particularly in, and near, the indicative Project footprint). The April 2025 surveys followed on from the previous Covid Fast-track consenting process and were designed partly in response to the discussions between experts during that process. Analysis of very high-resolution aerial photography captured in January 2025 was also helpful in being able to extrapolate the site survey data and provide further refinement - and ultimately produce a more robust mapping of the wetland mosaic on Jedburgh Plateau than was previously possible.

Wetlands on the Jedburgh Plateau

Overview

The current extent of wetland vegetation across the Wind Farm Site is 134.2 hectares, categorised as below:

- Fen (102.9 hectares)
- Natural bog (11.7 hectares)
- Induced bog (17.0 hectares)
- Copper tussock/rautahi marsh (0.7 hectares)
- Copper tussock-rautahi swamp (0.2 hectares)
- Mānuka-inaka/copper tussock marsh (1.7 hectares)

With the addition of 43.8 hectares of copper tussock/rautahi marsh in Port Blakely Forest, the total extent of wetlands within the Project Site is *c*.178 hectares.

Of the 134.2 hectares of wetlands on the Wind Farm Site, the vast majority (127.3 hectares) are on the Jedburgh Plateau. Of the wetlands on the plateau, 99.2 hectares are fen and 28.1 hectares are bog (of which 11.1 hectares are *Natural* and 17.0 hectares are *Induced*). The remainder of the fen wetlands (3.7 hectares in total) are located to the west of the plateau within mānuka forest and scrub. The remainder of the bog wetlands (0.6 hectares) are in one narrow natural bog, located to the north of the plateau and to the north of a deeply incised gully. The spatial extent of fen and bog wetlands on the Wind Farm Site is illustrated in Figure 1. The spatial extent of all wetlands across the entire Project Site is illustrated in Figure 2.

Fen and bog wetlands

Fens receive water and nutrients from both groundwater and surface water resulting in moderate fertility, less acidic conditions, and a typically greater diversity of plant life. Acidity levels are low to moderate, often nearly neutral or slightly acid. Fens at the Southland Wind Farm Site typically support plant species such as rautahi (*Carex coriacea*), comb sedge (*Oreobolus pectinatus, O. strictus*), and sphagnum moss (*Sphagnum* spp.) with scattered inaka (*Dracophyllum longifolium*) and occasional upland shrubs (*Veronica odora* and mānuka/ *Leptospermum scoparium*) (Plate 1). Herbs and grasses are also common, particularly on fen margins, including sweet vernal, *Rytidosperma gracile,* catsear*,* slender mountain daisy, and scattered shrubs of *Androstoma empetrifolium.* Gorse is occasionally present in these areas.

Bog wetlands are typically located on broad ridges and gentle slopes. Water movement in bogs is restricted, with little to no water flow. Bogs receive water and nutrients only from precipitation (rain, mist, snow). Soils are typically strongly acidic and nutrient levels are very low (although this is likely to change with nutrients inputs from browsing mammals).

Vegetation within the natural bogs at the Project Site is typically dominated by low stature inaka with occasional mānuka, *Olearia laxiflora*, and *Coprosma elatirioides* (Plate 2). Rautahi and comb sedge or

sphagnum moss comprise most of the ground cover with *Carpha alpina*, swamp kiokio (*Parablechnum minus*), prostrate snowberry (*Gaultheria macrostigma*), *Androstoma empetrifolium,* little hard fern (*Blechnum penna-marina*), *Rytidosperma gracile*, and localised wire rush (*Empodisma minus*).

More than half of the bogs present on the Jedburgh Plateau (60%, *c*.17 hectares) are induced, with the remainder naturally occurring. Induced bogs have formed following deforestation of pahautea/cedar cloud forest within the last century or so and are prone to drying out over summer. Vegetation in induced bogs is typically dominated by comb sedge, with frequent herbaceous species and frequent rushes (*Juncus* spp.) (Plates 3 and 4). The presence of sub-fossil wood (pahautea/cedar) provides clear evidence that forest once stood in the locations of the induced bogs (Plate 4).

Put another way, the bogs and fens present on Jedburgh Plateau are not peat-based wetlands which have taken millions of years to form. They are the product of the shallow underlying geology: a low permeability rock formation, typically just one metre below the surface, that traps rainfall and other precipitation. The fact that many of the bogs are induced and have formed relatively recently as a result of deforestation and ungulate grazing, exemplifies this.

The actions of ungulates, but in particular, feral deer and pigs are having detrimental effects on habitats and ecosystem processes within the Project Site. Within wetlands on the Jedburgh Plateau, browsing of soft-stemmed species like sedges and ferns has led to reduced plant cover, diminished habitat complexity, and reduced species diversity. Pugging – the trampling of soils by hooved animals – exacerbates these impacts by compacting soil, damaging root structures, and creating anaerobic or waterlogged conditions that further inhibit seed germination and seedling establishment (Plate 5).

Plate 1 - A large fen wetland in a shallow depression on Jedburgh Station plateau. 4 April 2023.

Plate 2 – Inaka-dominant (natural) bog on the Jedburgh Plateau. 4 April 2023.

Plate 3 – Induced bog on broad ridge on the Jedburgh Plateau. Comb sedge is abundant with scattered rushes. 13 October 2023.

Plate 4 – Induced bog dissected by farm track on the Jedburgh Plateau. Sub-fossil wood is circled in yellow. 13 October 2023.

Plate 5 – Pugging from ungulate movements in a fen on the Jedburgh Plateau. 13 April 2024.

Threat Classifications, Ecological Values, and Ecological Significance of Wetlands at the Project Site

Regional threat classifications

The threat classifications for habitat types listed in Appendix 2 of the Southland Regional Policy Statement (RPS) are relevant with respect to the rarity of forest and wetland habitats present at the

Project Site. The RPS lists a range of indigenous terrestrial and wetland habitat types under three categories: 'Threatened', 'At Risk', and 'Rare'.

Copper tussock/rautahi marsh habitats at the Project Site – and also those located on the Contact Energy property to the north of the Project Site, at Davidson Road - meet the criteria of a 'Threatened' wetland type.

The types of fen and bog present at Jedburgh Plateau, however, are different to the 'Threatened' or 'Rare' wetland types listed in Appendix 2 of the RPS. For example, cushion bogs (a 'Rare' wetland type that is present in Southland) have a different structure and species composition to the bogs present at SWF. Cushion bogs primarily occur in mountainous, typically alpine, situations, and appear to be unique to the Southern Hemisphere and wet tropics. Some of the most widespread wetland cushion plants include *Centrolepis ciliata*, *Donatia novae-zelandiae*, *Gaimardia setacea*, the comb sedge (*Oreobolus pectinatus*), and *Phyllachne colensoi*, and the mat-formers *Coprosma perpusilla* subsp. *perpusilla* and *Pentachondra pumila*[1] (Plates 6 and 7). Only two of these plant species (*Oreobolus pectinatus* and *Pentachondra pumila*) were recorded in wetlands at SWF. Key cushion-forming species such as *Donatia novae-zelandiae* and *Phyllachne colensoi* are absent from the site.

Plate 6 - *Phyllachne colensoi* in cushion bog at Arthur´s Pass. Credit: Peter Williams.

Similarly, raised (or domed) peatland bogs are a 'Threatened' wetland type in Southland. These ecosystems are dominated by wire rush and sphagnum moss species, and are characteristic of the flat, poorly drained areas of the Southland Plains Ecological District[2], often close to the coast (<200 metres a.s.l.). This type of peat wetland develops extensive convex domes where the middle of the wetland is raised above the local topography[3]. Prominent examples in Southland include the Awarua peatland complex. While sphagnum moss does occur in the bogs on the Jedburgh Plateau, wire rush is restricted to fens. Structurally and geologically, the bogs at Southland Wind Farm differ from raised peatland

1 https://www.landcareresearch.co.nz/publications/naturally-uncommon-ecosystems/wetlands/cushion-bogs

2 Clarkson B.R. 2003: Significance of peatlands in Southland Plains Ecological District, New Zealand. https://www.doc.govt.nz/documents/science-and-technical/dsis116.pdf#:~:text=For%20the%20purposes%20of%20this%20report%2C%20peatlands,such%20as%20Empodisma%20minus%20(wire%20rush)%20and

3 Environment Southland. Peat Wetlands: Technical information. https://www.es.govt.nz/repository/libraries/id:26gi9ayo517q9stt81sd/hierarchy/community/farming/physiographics-of-southland/physiographics-and-farm-management/Peat%20Wetlands%20zone%20web.pdf

bogs in that deep peat soils are not present, and the bog vegetation does not form convex domes. More specifically, and as noted previously, the bogs on the Southland Wind Farm site occur on relatively shallow soils - typically less than one metre to bedrock.

Plate 7 - Intact cushion bog at Waituna Lagoon, Southland. Credit: Peter Johnson.

Ecological values and overall character

Ecological values of the wetland at SWF were assessed against the criteria in EIANZ Guidelines (Roper-Lindsay et al. 2018). We assigned a 'Very High' ecological value to all wetlands at SWF, apart from copper tussock/rautahi swamp, which we assessed as 'Moderate' because it is a very small, isolated, and heavily pugged area within a pastoral landscape.

Bog and fen wetlands were scored 'Very High' based on their representativeness, rarity/ distinctiveness, diversity and pattern. However, we note that this is a very conservative position – some of the bogs and fens are adversely impacted to such an extent by ungulates that a lower rating is perhaps more appropriate – and on reflection it would have been prudent to categorise the natural bogs as being different from the induced bogs, the latter of which are more likely to be of 'Moderate' value, not 'Very High'.

The natural wetlands on the Jedburgh Plateau would have once been ecologically similar to upland wetlands in the Catlins, such as Ajax Bog and those in the McLennan Range, which share gentle topography, broad ridges, and high humidity. However, while pahautea/cedar cloud forest remains intact in these other areas, it has largely disappeared from the Jedburgh Plateau due to historic fires and grazing. As previously mentioned, unlike natural bogs, induced bogs will ultimately revert to pahautea/cedar cloud forest if their climax community state is reached.

Ecological Significance

All vegetation types were assessed against the significance criteria listed in Appendix 3 of the Southland RPS. All wetland types were assessed as meeting Representativeness (sub-criterion (i)), which includes indigenous vegetation that is typical or characteristic of the relevant ecological district. Fen and marsh wetland met Rarity/Distinctiveness (sub-criterion (ii)), given that they support matata/South Island fernbird, a species that is classified as 'At Risk – Declining'. Fen and bog wetlands

on the plateau are also considered to meet Ecological Context (sub-criterion (ii))[1], given they deliver relatively clean water the headwaters of several streams.

Impacts on Wetlands

Direct loss

Based on the indicative design, the proposed wind farm will result in the total loss of 2.03 hectares of wetland across the Project Site, comprising 1.08 hectares of fen, 0.94 hectares of bog, and 0.01 hectares of copper tussock/rautahi marsh. All of this loss, apart from the 0.01 hectares of copper tussock/rautahi marsh, occurs on the fen and bog wetlands located on the Jedburgh Plateau. This loss represents just 1.6%, 1.5% and 1.1% of the total area of wetlands across the Jedburgh Plateau, Wind Farm Site, and Project Site respectively. Of the 0.94 hectares of bog wetland affected, 0.3 hectares are natural bog and 0.64 hectares are induced bog.

Table 1 – Breakdown of extent and impact per wetland type at the Southland Wind Farm Site.

Wetland Type	Total Extent Within Wind Farm Site (ha)	Total Extent Within Jedburgh Plateau (ha)	Total Extent Outside Jedburgh Plateau (ha)	Impacted Area Within Jedburgh Plateau (ha)	Impacted Area Outside Jedburgh Plateau (ha)
Fen	102.9	99.2	3.7	1.08	-
Bog (natural)	11.7	11.1	0.6	0.30	-
Bog (induced)	17.0	17.0	-	0.64	-
Copper tussock/ rautahi marsh	0.73	-	0.73	-	0.01
Mānuka-inaka/copper tussock marsh	1.67	-	-	-	-
Copper tussock-rautahi swamp	0.19	-	-	-	-
Total	**134.2**	**127.3**	**5.03**	**2.02**	**0.01**

These figures are based on the indicative (but detailed) layout proposed in this application, rather than final design. The proposed conditions of consent require:

- Contact to continue to focus on further minimising adverse effects on wetlands during (final) detailed design (EC4B and EC7); and
- Contact to meet an absolute 'bottom line' limit of 2.5 hectares (or 2.0%, 1.7% and 1.4% of the total wetland extent on Jedburgh Plateau, the Wind Farm Site, and the Project Site respectively). This ensures that any loss of wetlands within the plateau as a result of the Project will not exceed this limit, providing certainty about the extent of potential wetland loss.

The proportion of wetland habitat directly affected on the Jedburgh Plateau is therefore minimal relative to what remains in the wider Catlins upland area, or indeed, relative to what remains on Jedburgh Plateau. In addition, as discussed below, the ecological condition of the wetlands unaffected by the proposed wind farm (i.e. the 98% of the wetlands on the Jedburgh Plateau) will improve because of the actions proposed to address residual adverse terrestrial and wetland ecology effects.

[1] Reference to Ecological Context with respect to wetlands is mentioned in Paragraph 154 of the Ecological Impact Assessment (EIA); however, it was omitted in error from Table 3 of the EIA.

Potential hydrological effects

During the previous (Covid-19) consent process, concerns were raised about the potential effects of the wind farm construction on the wetland hydrology at the Jedburgh Plateau. In particular, whether an indirect loss of wetland habitat might be caused through creating pathways for water to 'escape' from wetland areas and result in the drying of wetlands resulting in a much greater extent of loss than that associated with the direct loss that had been calculated in the consent application.

To address these concerns, Contact engaged Williamson Water & Land Advisory to carry out detailed hydrological analysis and provide a conceptual hydrological model to identify a potential water management design (focussing on the use of culverts and clay bunds) to ensure wetland hydrology is maintained during, and post, wind farm construction[1]. Based on the indicative design, Williamson Water & Land Advisory anticipates only a very small area of wetland (<0.1ha) beyond that directly impacted by the Project footprint may be adversely affected in hydrological terms. The hydrological model will be revised and updated as part of detailed design to inform the most appropriate design of culverts and bunds to mitigate the effects on wetlands on the Jedburgh Plateau.

We note that Contact is obligated to undertake wetland monitoring during construction and continuing for a minimum of two years following the completion of the wind farm (as per Condition EC11B).

Compensation for Loss of Wetland Vegetation

Overview

Biodiversity compensation – as opposed to offsetting - is being proposed as the primary mechanism to address the unavoidable loss of wetland extent and value at the Wind Farm Site. This is because it is not possible (or appropriate) to recreate the types of wetlands being impacted, noting again that most of the bog wetlands have resulted from land clearance of previous indigenous forest cover. Compensation must be used when the habitats being traded are not 'like-for-like'.

'Limits to offsetting': irreplaceability and vulnerability

We have specifically considered whether the irreplaceability and vulnerability of the wetlands that will be lost through the construction of the SWF, in terms of the 'limits to offsetting'.

Wetlands on the Jedburgh Plateau do not have high irreplaceability because of past land practices, including the clearance of the original indigenous vegetation cover (and so have lost their terrestrial context), and the presence of stock, feral deer and other introduced pest animals, which suppress natural regeneration and ecological succession. This is particularly the case for some areas of induced bog, which, as previously mentioned, would have historically supported pahautea/cedar cloud forest. Furthermore, the types of fen and bog habitats present at SWF do not meet any of the threat classifications listed in Appendix 2 of the Southland RPS (see above).

The external review conducted by Mike Harding for the Covid-Fast Track application overlooked this significant detail: that approximately 59% of the bogs at the Jedburgh Plateau are induced. If browsing animals such as feral deer were reduced in number, these induced bog areas would gradually transition back to pahautea/cedar cloud forest. Essentially, the current state of these wetlands is a direct consequence of forest depletion and browsing animals.

We emphasise that Southland is notable as a national stronghold for bog and fen wetlands, with Southland bogs occupying 32% of the national extent, and Southland fens comprising 23% of the

[1] Williamson Water and Land Advisory 2025: Conceptual Hydrological Design for Southland Wind Farm at Jedburgh Plateau. Included in Part H to the application.

national extent[1]. Many of these wetlands are present across farmed landscapes (e.g. Te Anau Basin) and are in very good condition. There are also many more wetlands at a similar altitude to Jedburgh plateau along the southern coast of Fiordland, although they are not the same type and are likely to be in better condition.

For similar reasons, we do not consider the wetlands on the Jedburgh Plateau have high vulnerability. This is because they are relatively intact (but by no means 'pristine') despite the current impacts of ungulate browsing and trampling (causing pugging), and the effects of historic land practices, including burning and wholesale vegetation clearance.

The Jedburgh Plateau has been used for farming for over 100 years. It is still being intermittently grazed by approximately 300 head of cattle during the winter months and sheep in summer, and it is browsed by high numbers of feral deer. The fact that these wetlands still persist after clearance of vegetation by fire and historic grazing, and currently withstand the effects of cattle and feral deer, suggests that they have low vulnerability.

Ecosystems with high vulnerability are at immediate risk and may require urgent intervention to prevent irreversible damage. We do not consider that the wetlands on the Jedburgh Plateau are at immediate risk or under significant threat – and furthermore, the offset and compensation measures proposed to address the environmental effects of the Project will promote an overall improvement to the 98% of wetlands unaffected by the wind farm development.

Noting the above, we consider the effects of the Project on wetland values and extent can appropriately be compensated for.

Offsite compensation: Davidson Road site

As well as the steps it is taking to avoid, remedy, mitigate and offset the Project's effects on wetlands, Contact is proposing to compensate for the loss of wetland through restoration and enhancement of an area of copper tussock-rautahi marsh wetlands, referred to as the Davidson Road wetlands, located on a property owned by Contact Energy, located to the north of the Wind Farm Site (see Figure HREP - 4 appended to this memo as Appendix 2). This will include:

- Restoring approximately 5.1 hectares of exotic grassland on hydric soils to indigenous copper tussock-rautahi marsh. This represents a 2:1 ratio compared to the maximum loss of wetland extent (noting again the 2.5 hectares of maximum wetland loss as proposed in the consent conditions).
- Enhancing the existing 6.7 hectares of copper tussock-rautahi marsh wetlands at this site through planting and pest plant control.
- The revegetation of approximately one hectare of terrestrial vegetation and buffering between areas of wetland.

While currently of lower quality than the wetlands that will be lost to the construction of the Southland Wind Farm Project, the copper tussock-rautahi marsh wetland at Davidson Road will quickly improve in quality, being protected from stock (by fencing), and following hydrological corrections through drain removal, vegetation enhancement and pest and predator control measures. It will also be subject to permanent legal protection. In addition to this, it is important to note that the area of

[1] Ausseil A-G.E., Gerbeaux P., Chadderton W.L., Stephens T., Brown D., and Leathwick J. 2008: Wetland ecosystems of national importance for biodiversity: criteria, methods, and candidate list of nationally important inland wetlands. *Landcare Research Contract Report LC0708/158*. Prepared for the Department of Conservation.

Davison Road wetlands will total 11.8 hectares (after restoration activities have progressed) and is of higher regional threat status than the wetlands that will be lost at the Wind Farm Site.

We anticipate the time lag between wetland loss and wetland restoration will be minimal. It is currently proposed to undertake planting at the Davidson Road wetlands in Year 2 of the construction phase (as per the schedule in the Habitat Restoration and Enhancement Plan). Planting conditions will be ideal once site preparation has been implemented (i.e. removing exotic grasses and herbaceous species from areas with hydric soils). We note that copper tussock can be slow-growing; however, rautahi (*Carex coriacea*) - one of the other key species to be planted - is fast-growing and spreads by rhizomes, quickly achieving a dense cover.

Overall, given the ease of access, optimal planting conditions, and relatively straightforward requirements in terms of site preparation and pest plant control, we consider the proposed compensation site at Davidson Road to be highly suitable.

Onsite offsetting

It is also important to note that benefits to wetlands will not be restricted to the compensation site at Davidson Road. Key offsetting actions that will have significant benefits for the wetlands at the Jedburgh Plateau include:

- Large-scale aerial and ground-based control of introduced mammalian pests (deer, possums, rats, stoats, and potentially pigs and hares) across indigenous vegetation and habitats over the approximate 1,400-hectare Jedburgh Station Pest Control Area (which includes all of the wetlands within the Jedburgh Plateau and those adjacent to it).
- Additional efforts within the 245-hectare Ecological Enhancement Area (within the Jedburgh Station Pest Control area), which will be fenced to exclude stock, feral deer, and pigs, and protected in perpetuity. That area includes 18.2 hectares of fen and 2.3 hectares of natural bog wetlands. Targeted deer and pig control will be undertaken on a six-monthly basis (spring and late summer) across the Jedburgh Plateau for two years following the commissioning of the wind farm, and no less than every three years thereafter for the life of the wind farm.
- Intensive ground-based pest animal control within a *c.*55-hectare Plateau Fauna Enhancement Area at the southeastern end of the Jedburgh Plateau, targeting rodents and mustelids (noting there are 13.2 hectares of fen and 1.3 hectares of induced bog within this area).

These actions will enhance existing wetland values for naturally occurring wetlands and encourage the return of pahautea/cedar cloud forest for those that have been induced. Put another way, the ecological condition of the 98% of the wetlands on Jedburgh Plateau unaffected by the proposed wind farm will improve as a result of the actions proposed to address residual adverse terrestrial and wetland ecology effects.

Demonstrating gains in wetland values

As previously discussed, the approach we have taken to address effects on wetlands is primarily through compensation. We have, however, developed a Biodiversity Offsetting and Accounting Model (BOAM) as a proof of concept to demonstrate that net gains in wetland values can be achieved. The modelling has been undertaken from an approach that emphasises an abundance of caution to ensure that quantitative evidence exists that compensation is sufficient for this habitat type.

The BOAM demonstrates that the proposed off-site restoration at Davidson Road, combined with the on-site enhancement measures (which will improve the quality of the 98% (*c.*130 hectares) of unaffected bog and fen wetlands on the Wind Farm Site), will deliver a net gain in wetland biodiversity within ten years. We have undertaken this work to provide an additional layer of confidence in respect of the proposed measures to address effects on wetlands, noting that, overall, there will be a net gain in extent of indigenous wetland habitat because of the Project.

Conclusion

The proposed approach to offsetting and compensation has undergone rigorous testing by our team and an independent review by Roger MacGibbon of Tonkin + Taylor Ltd. Mr MacGibbon has similarly concluded that the offset and compensation measures proposed will adequately address the ecological impacts associated with the proposal and are expected to result in an overall net benefit to biodiversity.

Yours sincerely

Nick Goldwater
Senior Principal Ecologist
Wildland Consultants Ltd

Wildlands

LEGEND

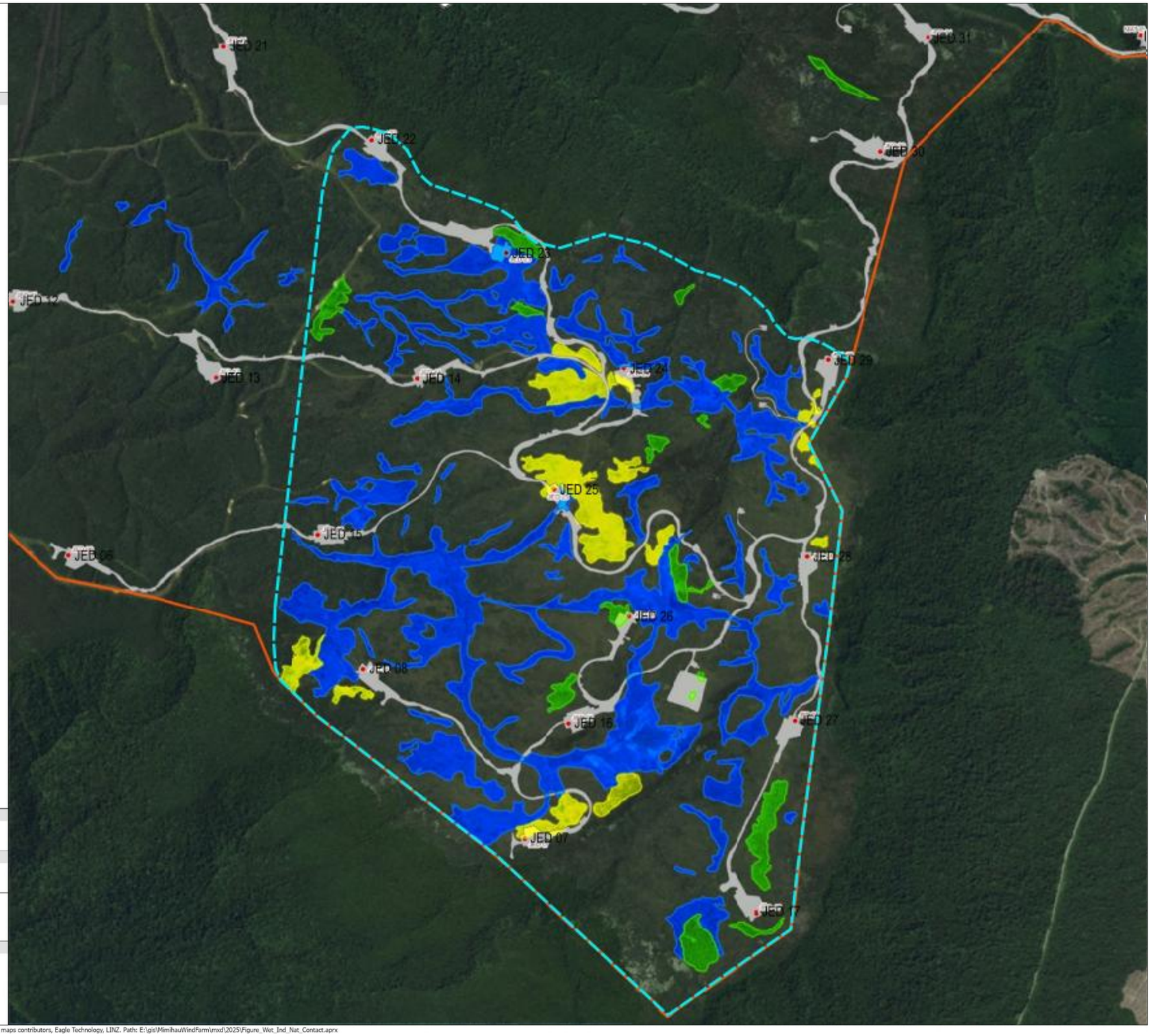
Wind Farm

- Wind Turbines
- Civil Works Design
- Wind Farm Site

Ecology

Extent of natural and induced wetlands

- Induced bog
- Natural bog
- Fen (natural wetland)
- Jedburgh Plateau



MAP SCALE	PRINT DATE
N Scale: 1:14,000	15/10/2025
	VERSION 1.0

Meters
0 200 400

TITLE

FIGURE 1

EXTENT OF NATURAL AND INDUCED WETLANDS ON THE JEDBURGH PLATEAU, SOUTHLAND WIND FARM

Service Layer Credits: Eagle Technology, Land Information New Zealand, GEBCO, Community maps contributors, Eagle Technology, LINZ. Path: E:\gis\MimihauWindFarm\mxd\2025\Figure_Wet_Ind_Nat_Contact.aprx

Wildlands

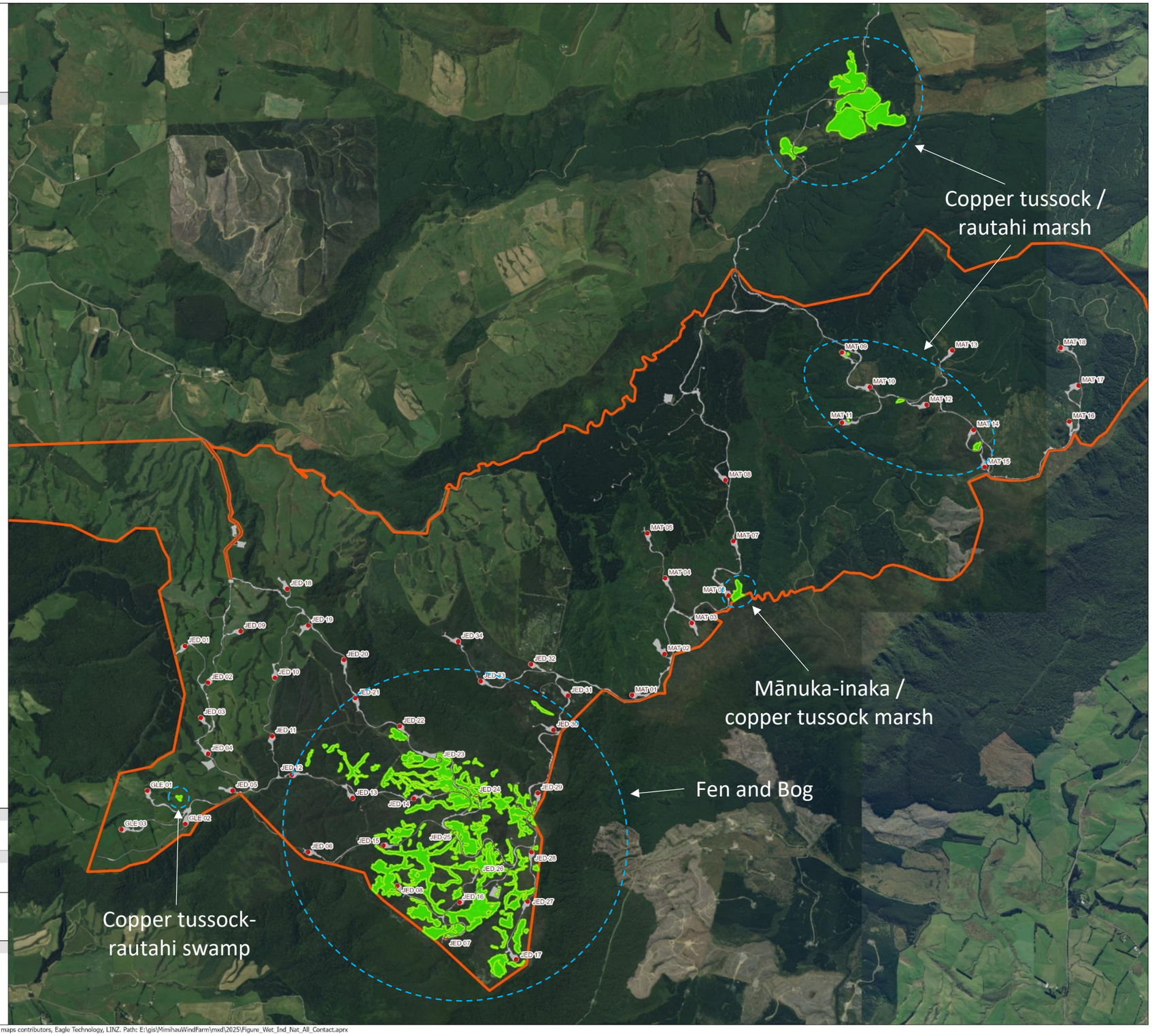
LEGEND

Wind Farm

- Wind Turbines
- Civil Works Design
- Wind Farm Site

Ecology

- Extent of natural wetlands



MAP SCALE	PRINT DATE
N Scale: 1:46,314	31/10/2025
	VERSION 1.0

Meters
0 200 400

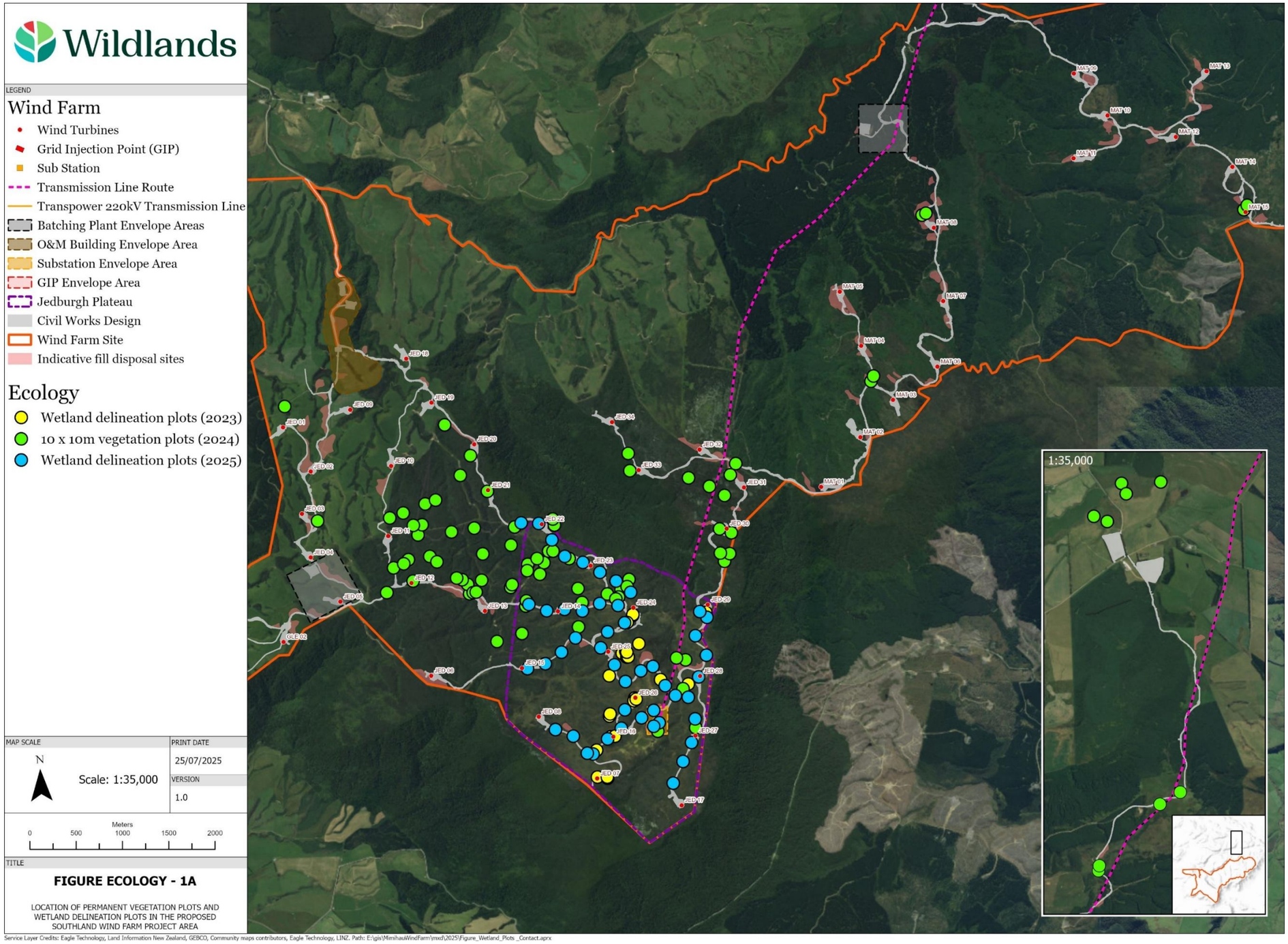
TITLE

FIGURE 2

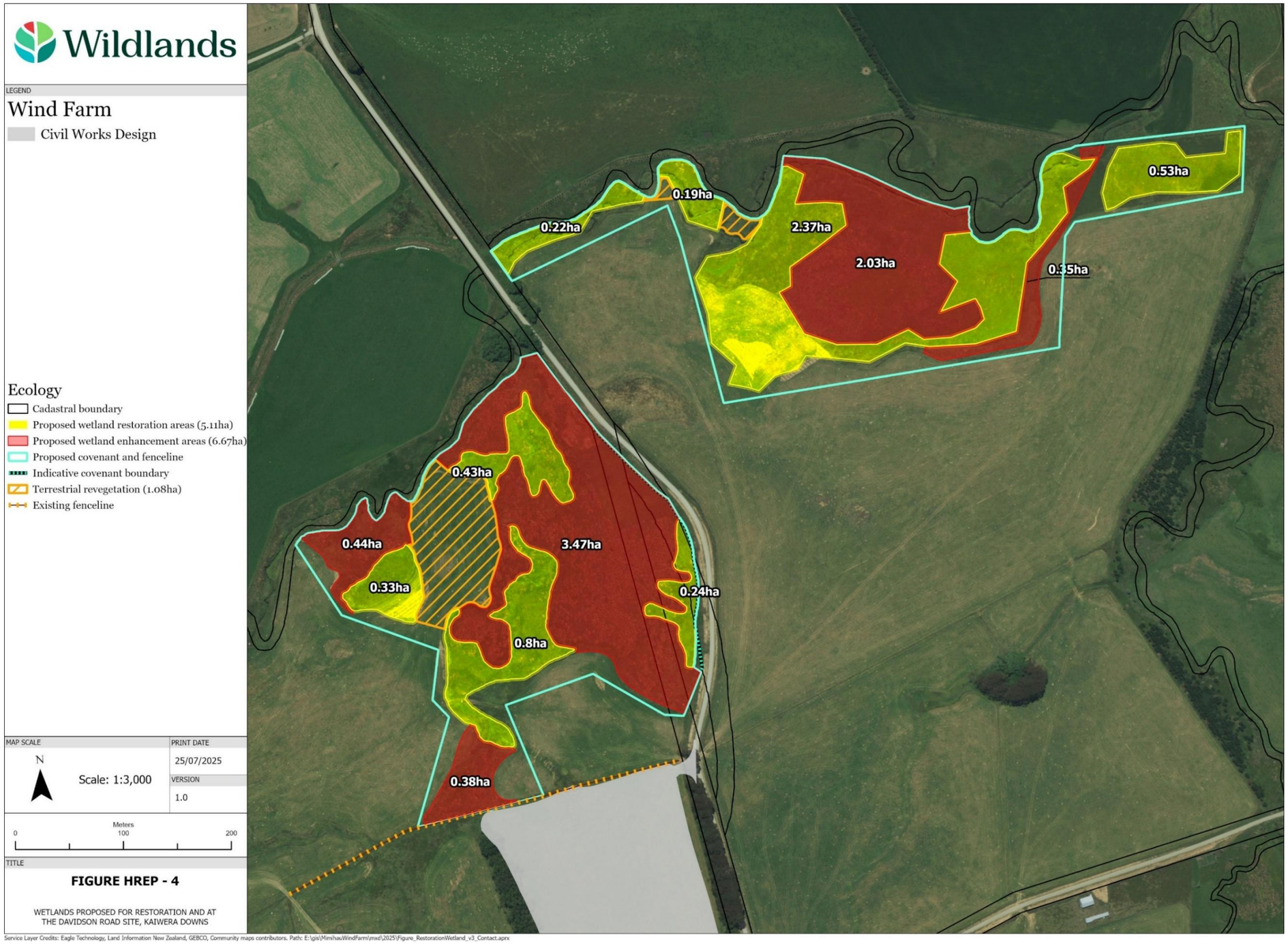
EXTENT OF NATURAL WETLANDS AT
THE SOUTHLAND WIND FARM PROJECT SITE

Service Layer Credits: Eagle Technology, Land Information New Zealand, GEBCO, Community maps contributors, Eagle Technology, LINZ. Path: E:\gis\MimihauWindFarm\mxd\2025\Figure_Wet_Ind_Nat_All_Contact.aprx

APPENDIX 1 – LOCATION OF VEGETATION PLOTS AND WETLAND DELINEATION PLOTS AT THE SOUTHLAND WIND FARM



APPENDIX 2 – PROPOSED WETLAND RESTORATION AND ENHANCEMENT ON CONTACT ENERGY PROPERTY, DAVIDSON ROAD



Note that covenant boundary will be subject to approval from Gore DC (to occupy the paper road).

Southland Wind Farm Conditions Overview

Panel Conference

26 November 2025

Southland Wind Farm Conditions

- Five sets of proposed conditions included in **Part I** to the application documents for the following approvals sought:
  - Resource Consents
  - Concessions
  - Wildlife Act Authorisations
  - Archaeological Authority
  - Complex Freshwater Fisheries Approvals

Southland Wind Farm Conditions

Conditions have been drafted:

- To address the environmental effects associated with the Project based on the technical advice
- To set clear objectives and monitored performance targets
- To accord with best-practice principles
- In consultation with mana whenua, Councils, DoC and other key stakeholders

Resource Consent Conditions

- Developed extensively through the previous consenting process and address a number of matters including:
  - Management Plan Preparation and Certification
  - Construction Management
  - Ecology
  - Mana Whenua
  - Wind Farm and Turbine Characteristics
  - Noise
  - Traffic
  - Stakeholder Communication and Engagement

Resource Consent Conditions

Construction Management

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Conditions include:

- Surplus fill disposal criteria (CM3(d))
- Erosion and sediment control (CM5)
- Stormwater management (CM6)
- Water quality monitoring (CM7)
- Measures for works within or near wetlands (CM11B)
- Water management system for wetlands (CM12)
- Culvert design (CM14)
- Water take management (CM17)
- Dust management (CM19-CM21)

Resource Consent Conditions

Construction Management

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Management plans include:

- Construction Environmental Management Plan, including:
  - Earthworks Management Plan, including an Erosion and Sediment Control Plan
  - Flocculant Management Plan
  - Construction Noise Management Plan
  - Construction Traffic Management Plan
- Site or Activity-Specific Management Plans

Resource Consent Conditions

Ecology

- **Vegetation:** Mapping and clearance process (EC3-EC11), including hard caps on vegetation clearance (EC8)
- **Lizards and Invertebrates:** Lizard and Helm's stag beetle salvage and relocation (EC15A-15B and EC24), vegetation clearance protocols (EC10, EC23)
- **Avifauna:** Pre-vegetation clearance nest checks (EC31), post-construction bird monitoring and collision monitoring (EC35-37), including annual mortality compensation triggers for individual bird species (EC37B)
- **Bats:** Curtailment approach and monitoring (EC66-74), compensation requirements (EC75-79), Expert Bat Panel (EC79A-79G)

Resource Consent Conditions

Ecology

- Habitat Restoration and Enhancement measures include:
  - Timing triggers (EC51, EC54)
  - Actions required (EC51, EC54)
  - Performance targets (EC52)
  - Pest control management targets (EC57)
  - Monitoring requirements (EC56, EC58)
  - Review of the restoration and enhancement measures to ensure outcomes are achieved (EC58A)

Resource Consent Conditions

Ecology

- Terrestrial and Wetland Ecological Management Plan, including:
  - Vegetation Management Plan
  - Bat Management Plan
  - Avifauna Management Plan
  - Lizard Management Plan
  - Terrestrial Invertebrate Management Plan
  - Biosecurity Management Plan
  - Habitat Restoration and Enhancement Management Plan
- Separate Riparian Offsetting Management Plan

Resource Consent Conditions

Mana Whenua

- Establishment of the working group Ngā-Pou-Whai-Hua (TW1-TW3)
- Tuia Te Mana ō Pawakataka – a programme of works to provide for the mana whenua values of the area affected by the Project (TW5)
- Establishment of a Rūnaka Community Contribution pūtea/fund (TW8)
- Cultural induction and access to the site (TW9)
- Provision of power to the four marae of Kā Papatipu Rūnaka and education / training fund (TW10)

Resource Consent Conditions

Amenity

- Restrictions on wind turbine lighting (WF25)
- Planting/landscaping plan for visual effects mitigation (WF26)
- Rehabilitation planting (CM3, EC9)
- Construction and operational noise standards (NO1-N09)
- Community Liaison Group (SC6-SC9)
- Community Benefit Fund (SC10)
- Base condition report for sections of roads to be used during construction and regular monitoring and maintenance (TR4)

Concession Conditions

- Drafted in accordance with DoC's standard concession conditions
- Special conditions include provision for:
  - Compliance with relevant resource consent conditions and management plans
  - Property law
  - Construction and maintenance
  - Climate change considerations
  - Monitoring and compliance

Wildlife Act Authorisation Conditions

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- To authorise salvage and relocation of lizards and Helm's Stag Beetles
- Drafted in accordance with DoC's standard wildlife approval conditions
- Special conditions include provision for:
  - Compliance with management plans and resource consent conditions
  - Ownership and holding
  - Response in the event of the death of any lizard or Helm's Stag Beetle
  - Recording and reporting requirements

Archaeological Authority Conditions

- Prepared in accordance with HNZPT's standard archaeological authority conditions
- Include requirements for:
  - Archaeological Management Plan
  - Accidental discovery protocol
  - Supervision for works near archaeological sites
  - Notification
  - Reporting

Freshwater Fisheries Conditions

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- Drafted in accordance with advice received from DoC, including:
  - Requirement for all other culverts to be constructed in accordance with the NES-FW 2020
  - Use of fish passage assessment tool
  - Maintenance requirements
  - Response to an extreme rainfall event

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Thank you