

Under the **FAST-TRACK APPROVALS ACT 2024**

In the matter of an application for resource consents, concessions, wildlife approvals, an archaeological authority, and approvals relating to complex freshwater fisheries activities in relation to the Southland Wind Farm project

By **CONTACT ENERGY LIMITED**

Applicant

**STATEMENT OF EVIDENCE OF ROGER JOHN MACGIBBON (REVIEW OF
TERRESTRIAL AND WETLAND ECOLOGY AND ECOLOGY OFFSETTING AND
COMPENSATION) ON BEHALF OF CONTACT ENERGY LIMITED**

14 January 2026

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INTRODUCTION

1. My full name is **Roger John MacGibbon**.
2. My evidence is given on behalf of Contact Energy Limited (**Contact**) in respect of Contact's proposed Southland Wind Farm project (**Project**) in response to comments made under section 53 of the Fast-track Approvals Act 2024 (**Act**) by:
 - (a) Department of Conservation (**DOC**);
 - (b) Environment Southland (**ES**);
 - (c) Southland District Council (**SDC**);
 - (d) Mr Tim Story;
 - (e) Environmental Defence Society (**EDS**); and
 - (f) Parliamentary Commissioner for the Environment (**PCE**).
3. I prepared Technical Assessment #7: Review of Terrestrial and Wetland Ecology and Ecology Offsetting and Compensation, dated 18 August 2025, in Part H of the application for the Project. My qualifications and experience are set out in paragraph 17 of my technical assessment.

Code of conduct

4. I confirm that I have read the Code of Conduct for expert witnesses contained in the Environment Court Practice Note 2023 and have complied with it in preparing this evidence. In particular, unless I state otherwise, the issues addressed in my evidence are within my area of expertise and I have not omitted to consider material facts known to me that might alter or detract from the opinions I express.

DEPARTMENT OF CONSERVATION (DOC)

Bats

5. DOC has acknowledged (paragraph 3.2) that the proposed Contact-funded 10,000 hectare intensive predator control programme in the Beresford Range of the Catlins Conservation Park and the implementation of 'live' and 'modelled/set' turbine curtailment are appropriate measures to achieve a no net loss outcome for the local bat population. I agree with this position and re-emphasise the substantial additional ecological benefits that intensive

predator control over 10,000 hectares will have for forest birds, lizards, invertebrates and forest canopy health and regeneration.

6. I have been directly involved in several projects over the past 20 years (including my current management of the Mt Messenger pest management programme in Taranaki) where intensive predator control has been undertaken at scale and has resulted in substantial recovery of indigenous plant communities, animal populations and ecological processes. In specific regard to the Southland Wind Farm Project, these benefits are additional to those required to offset and compensate for the residual ecological effects of the Project and are a key reason why I have confidence that Contact's proposed effects management package will result in a net gain outcome for biodiversity.

Wetlands

7. As I have stated in my technical assessment, the additional wetland survey and mapping work undertaken by Wildland Consultants (Wildlands) has increased my confidence that the information provided is representative of the extent, type and location of wetland vegetation across the Project site and can be relied upon to quantify the effects of the Project and serve as the basis for determining appropriate offset and compensation measures. DOC supports this view (paragraph 3.18) and acknowledges that the proposed compensation actions will be beneficial for the wetland, shrubland and forest ecosystems.
8. DOC has stated (paragraphs 3.16 and 3.17) that there should be long-term monitoring of the effects of the Wind Farm on wetlands with particular focus on changes to hydrology, weed invasion and increased edge effects. They have proposed changes to Condition EC11B to more clearly define what is to be monitored and the duration of monitoring. In particular, DOC has proposed that after an initial period of three years following commissioning of the first turbine wetland monitoring should occur every five years for the duration of the operation of the Wind Farm. The issue of wetland monitoring has also been raised by ES and Mr Harding on behalf of EDS.
9. I support the requirement for monitoring of potential effects on the wetland areas but do not believe there is justification for this monitoring to continue for the life of the Wind Farm. Any effects resulting from the construction and operation of the wind farm on hydrology, weed presence, edge effects and plant community changes in general will become apparent within a few years

of full-time operation of the Wind Farm. Beyond that, it will be very difficult to separate the effects of the Wind Farm from other influences unrelated to the Wind Farm operations (such as the impacts of climate change). For this reason, I recommend that monitoring occurs annually for the first three years following completion of Wind Farm construction and then at five yearly intervals for ten years (i.e., annual monitoring in years 1-3 and then year 8 and year 13).

10. I consider this is an appropriate update to the current draft consent conditions offered by Contact, which propose wetland monitoring for two years following completion of Wind Farm construction. Having considered the comments of DOC and others, I agree that any changes caused by the Wind Farm may take longer than two years to become apparent hence my preference for annual monitoring for three years followed by two additional monitoring sessions at years 8 and 13.
11. Mr Harding, in his technical commentary for EDS, suggests that wetland monitoring should include the establishment of control plots located away from the footprint and effects of the Wind Farm. I agree with this proposal as it will enable the effects of Wind Farm construction and operation to be isolated from changes occurring naturally.

Feral cats

12. DOC (paragraph 3.26) has emphasised the risk of feral cat predation at the Project site which could increase with the installation of the Wind Farm roading network. They state that “cat control should be undertaken in the three lizard release sites, in areas where green skinks are found, and in the copper tussock enhancement and skink protection area (should lizards be released there)”.
13. I support this recommendation. The impact of cats as significant predators of birds, lizards and invertebrates is now well understood and they rate alongside mustelids and rats in terms of their impact on indigenous fauna. I propose the use of a range of control methods, including live capture traps, because of their natural wariness of novel devices.

Avifauna

14. DOC has highlighted what it considers to be gaps or potential gaps in the avifauna surveys undertaken at the site and suggests that South Island pied oystercatcher (SIPO) and migratory species, such as sooty shearwater, may

have flight paths over the Wind Farm site but have not been detected because survey effort was less intense when birds migrate north and south (SIPO) and because some, such as sooty shearwater, may not be detected by acoustic recorders. A figure showing the months of the year when SIPO migrate north and south is shown in the DOC statement and the text refers to a DOC study that was undertaken to produce this information. The reference for this study does not appear to have been provided so it has not been possible to verify the relevance of this information.

15. DOC has proposed adjustments to consent conditions EC37 and 37A. As lodged, those conditions require quarterly turbine collision monitoring for three years following the commissioning of the first turbine and then quarterly every five years thereafter for the operation of the wind farm. I understand DOC's changes would require an additional year of quarterly monitoring once all turbines are commissioned. I do not have a strong view in respect of DOC's proposed amendment to EC37, but generally I support the requirement for quarterly monitoring as it will increase the likelihood of intercepting the migratory flight times of a wider range of species.

ENVIRONMENT SOUTHLAND (ES)

Deer and feral pig control

16. ES has acknowledged (Section 2.1) deer and feral pigs as key contributors to the decline of ecological values on the Project site and emphasised the importance of adequate deer and feral pig control to achieve the stated offset improvements.
17. As I have stated in my technical assessment, I believe the adverse impact of deer and feral pigs on the ecological values of the Jedburgh Plateau has been considerably under-estimated and understated in many reports and submissions. During my site visit, deer and pig sign and damage was substantial and widespread across wetland, shrubland and forest margin areas on the Plateau and, in my opinion, reflected high population densities of both animals. This view is aligned with the comments of the Jedburgh Station landowner, Mr Tim Story (see my response to his comments in a section below).
18. The significance of this observation is that the vegetative and habitat recovery that will ensue when the pest control aspects of the effects management package are implemented is likely to be substantially greater

than accounted for and will apply across all affected vegetation types on the Plateau and beyond (i.e. within the entire 1400 ha pest control area).

19. Deer selectively browse on palatable native seedlings and when in high numbers, as they are on the Jedburgh Plateau, they remove most of the successional growth of those palatable species. This results in a modified and much narrower range of species that are able to regenerate and grow to maturity and creates less favourable habitat for the native fauna, especially the smaller animals - lizards and invertebrates – that live in those plant communities. For some species, the removal of palatable plant species is likely to create a barrier to dispersal (i.e. fragmentation).
20. 18 hectares of fen and 1.5 hectares of natural bog wetlands will be contained within the proposed 245-hectare Jedburgh Station Ecological Enhancement Area. This area will be fenced to exclude deer, pigs and farm livestock (and any existing feral ungulates will be hunted). This will enable the full range of plant species to regenerate and grow without the pressure of ungulate browsing and will produce habitat for fauna that is of higher quality than that currently on the Plateau. While it is not possible to fully replace the 0.94 ha of bog and 1.08 ha of fen that will be removed by the Project,¹ the improvement in habitat quality within the protected wetlands can be expected to be considerable and result in increased plant and animal diversity.
21. The proposed three yearly aerial-deployed pest control over the 1400 ha Pest Control Area and the additional targeted deer and pig control across the 530ha of the Plateau can also be expected to result in improvements in plant diversity in all vegetation types and improved habitat value for fauna across the Wind Farm Site.

Habitat fragmentation

22. In paragraph 2.2.1 of the ES comments, reference is made to habitat fragmentation being a key terrestrial ecological consideration and increased fragmentation can result in increased risk of plant and animal pest species invasion and *“increases in discontinuity in the spatial patterning of food availability, negatively affecting the conditions for species occupancy”*.

¹ Noting the maximum total permissible wetland loss is 2.5ha.

23. ES also correctly state in respect of fragmentation that “...it can be harder to quantify its impacts due to the complexity of ecological processes and differences between species”.
24. Focus has been placed in some submissions on the potential impact of the Project road network on habitat fragmentation. However, it is important to acknowledge that the Jedburgh Plateau environment is already fragmented, both naturally and because of land clearance, farm management practices (notably including farm tracks) and the impact of browsing ungulates, especially deer and pigs.
25. The tendency is to highlight man-made features such as roads and structures as being the main form of fragmentation but habitat fragmentation can occur in a variety of less visually obvious ways. For example, the removal of palatable plant species by browsing animals on the Plateau is likely to have created habitat fragmentation for some species by severing the “spatial patterning of food availability”. This form of fragmentation can be expected to be reduced as a result of the offset and compensation measures proposed by Contact, especially the creation of the ungulate-free Jedburgh Station Ecological Enhancement Area, the three yearly aerial-deployed pest control over the 1400 ha Pest Control Area and the targeted control of deer and pigs over the Plateau.
26. It is also important to note that wetlands are naturally fragmented systems because they only occur where the geology and hydrology of the site support the retention of water. The indigenous plant and animal species that occupy those wetlands have evolved and are adapted to move between wetland patches past and over areas of unfavourable habitat.
27. In paragraph 2.2.5, ES suggests that longer term monitoring of wetlands should occur and they propose five yearly monitoring intervals after the initial two-year monitoring. As discussed in my response to the DOC comments, I support an increased wetland monitoring duration because vegetation change due to hydrological disturbance can take time to occur but propose an adjusted initial period of annual monitoring for three years, and then two more monitoring sessions at five yearly intervals. Any changes caused by construction and operation of the wind farm can be expected to have become apparent by year 13.

SOUTHLAND DISTRICT COUNCIL (SDC; MR DAVIS)

Fill disposal sites

28. My response to the Southland District Council comments is specifically to the technical report provided by Mr Glenn Davis of e3Scientific.
29. I note that Mr Davis has stated (section 2.1.1) his support for the ecological survey methods undertaken, including wetland delineation, and considers they provide *“a strong basis for understanding the ecological effects of the windfarm and the management measures required to mitigate, offset and compensate for ecological effects that will occur.”*
30. In Section 2.2.1 (Construction Effects, page 5) of his review, Mr Davis has suggested that the 90% plant survival target at 10 years for the enhancement planting in the Jedburgh Station Ecological Enhancement Area should be brought forward to 5 years. I would encourage the retention of the 10 year requirement because long term survival is the purpose of the enhancement planting but I would suggest that the wording in section 9.1 of the Habitat Restoration and Enhancement Management Plan (HREP) is strengthened to require: *“A target survival rate ten years after initial planting of 90% of well-established plants that have been planted for two years or more is required for the enhancement planting”*. Without a change to the existing wording, Contact could technically meet its requirements by filling the planting blanks in year 9.

TIM STORY

Impact of deer and pigs

31. Mr Story is the current owner of Jedburgh Station and has farmed on this land since the 1960's. His comments regarding increasing pest animal densities and impact are telling and, unfortunately, are sentiments that have been repeated across many parts of New Zealand in recent years, especially with reference to deer, pigs and goats (though goats are not an issue at Jedburgh Station).
32. Specifically, Mr Story has stated: *“Over the past five years, the number of pest animals on the land has significantly increased”* and *“Three years ago it was difficult to walk through the large gully vegetated with Southern rata and kamahi because of the dense vegetation. Today, the entire understory has*

been browsed out. It is not stock doing this damage – it is the feral deer, pigs, possums etc.”

33. Mr Story’s statement aligns with my observations during my site visit and reinforces my view that the planned pest control across the Wind Farm site will generate ecological recovery that will likely exceed what is predicted in the Southland Wind Farm Fast Track application.

ENVIRONMENTAL DEFENCE SOCIETY (EDS; MR HARDING)

34. My response to the EDS comments applies specifically to the technical statement provided by Mr Mike Harding.

Vegetation mapping

35. Mr Harding continues to express doubt about the accuracy of the vegetation mapping presented by Wildlands, despite the considerable amount of additional mapping and ground-truthing work undertaken since the Covid Fast-track application. As I have expressed in my technical assessment, I am comfortable that the extent, type and location of the vegetation types recorded in the ecological assessments are representative of what is present. Any errors that may still exist are of such a small scale to be of little or no consequence in terms of assessing the effects of the Project on wetland ecology or setting appropriate offset and compensation measures.

Assessment of ecological significance and ecological value

36. Mr Harding criticises (paragraph 30) the Applicant’s use of the Environmental Institute of Australia and New Zealand (EIANZ) Ecological Impact Assessment (EclA) Guidelines for the assessment of ecological value and ecological effects. He states: “*These guidelines are non-statutory and not universally accepted as best practice by ecologists or consent authorities*”.
37. While he is correct that the guidelines are not statutory, they are widely and effectively used by many of the leading ecologists in New Zealand including for the presentation of ecological evidence under the RMA. There is currently no statutory method for assessing ecological value or effects in New Zealand, nor is there an alternative standard approach (to the EIANZ guidelines) used by the majority of ecologists in New Zealand.
38. As is the case irrespective of the method used to assess ecological value and effects, significant ecological experience is required to assign

appropriate ecological values and assess the magnitude of potential effects. Having visited the Project site and reviewed the Applicant's ecological assessments I am comfortable that the assigned ecological values and effects are appropriate.

39. In addition, I note that Wildlands also assessed all habitat types against the significance criteria stated in the SRPS.

Fragmentation

40. Mr Harding asserts that the effects of the Project on habitat fragmentation have been understated by the Applicant and that the Applicant's claim that the Jedburgh Plateau vegetation/habitat is already fragmented by the effects of grazing and pests is misleading. In paragraph 14, Mr Harding states: "*In any case, the effects of wind farm construction are of a much greater magnitude and permanence than the effects of grazing and pests.*"
41. I agree that the construction of new roading and the formation of turbine platforms will result in additional habitat fragmentation on the Jedburgh Plateau. However, I do not agree that the wind farm will create fragmentation effects that are of much greater magnitude than the effects of grazing and pests.
42. Areas of vegetation of reduced diversity caused by the removal of favoured plant species by browsing pests, zones of pugged, sodden open areas of mud due to pig rooting and farm tracks, and forest areas with no understorey due to deer browsing are examples of barriers to small animal movement on the Plateau that are numerous in volume and significant in terms of disruption to ecological processes. They may not be as visually obvious as man-made roads but they can have an equal or greater effect.
43. As I have stated earlier in this statement, many plant and animal species are well adapted to moving between fragments. Wetlands, by their very nature, are scattered across the landscape but the plants and animals that occupy wetlands are generally adapted to find new wetlands. The Project is unlikely to cause an increase in wetland fragmentation other than in a minor way.
44. The mitigation and ecological restoration measures proposed by Contact (on the advice of Wildlands) also need to be taken into account when considering fragmentation. In particular, the removal of browsing pests from the proposed 245-hectare Jedburgh Station Ecological Enhancement Area can be expected to reduce fragmentation and increase habitat quality by

encouraging the regeneration of palatable plant species and repopulation by their animal inhabitants. Proposed additional measures such as infill planting along existing farm tracks that will no longer be required, enrichment planting within the 245 ha Jedburgh Station Ecological Enhancement Area and the reduction of mammalian pests and predators across the 1400 ha Jedburgh Station Pest Control Area will all contribute to reduction of the physical and biotic boundaries that are currently causing habitat fragmentation.

45. The construction of new roads to service the Wind Farm will provide potential for increased pest animal dispersal and increased predation. This applies especially to feral cats (referred to earlier in my statement) and mustelids (ferrets, stoats and weasels) who move over large areas in search of prey. Predation of this nature is a form of fragmentation because it results in reduced ability of flightless animals to move from patch to patch. Effective pest control, as proposed in the offset and compensation package for the Project, will be essential to counter this potential effect.

Conditions

46. Mr Harding proposes that Condition EC11B, related to wetland monitoring, should include a requirement for control plots located away from the Wind Farm footprint and/or areas likely to be affected by the Wind Farm. I agree that control plots would be a useful inclusion as they would serve to separate naturally occurring changes from those likely to have been caused by the construction and operation of the Wind Farm.

PARLIAMENTARY COMMISSIONER FOR THE ENVIRONMENT (PCE)

Matters to consider

47. The PCE has summarised the key issues for the Panel to consider, as he sees it, without giving an opinion as to his views on each issue. The three issues noted are:
- (a) How the ecology of the plateau should be appropriately defined/delineated;
 - (b) How the ecology of the plateau is likely to change in the future, both under current management and under the proposed changes; and
 - (c) Whether the cost of the “*almost certain material harm*”, and potential ‘loss’ of significant indigenous biodiversity, is in proportion to the

benefits of the proposal and the extent to which those costs can be mitigated by restoration, the success of which is likely to be uncertain.

48. The first two listed apply directly to ecology; the third is for the Panel to assess against the other benefits and costs that will arise from the Project.
49. In response to (a) above, my view is that the extra work undertaken by Wildlands has improved the accuracy of the assessment of ecological values and provided a sound basis on which to determine likely ecological effects.
50. In response to (b), I believe that the extra ecological and hydrological assessments undertaken have improved the level of confidence about the likely nature and extent of ecological effects of the Project.
51. The PCE has suggested in (c) above that the success of proposed restoration is likely to be uncertain. While there is a degree of uncertainty with anything of a biological nature, many of the restoration techniques proposed by the Applicant – especially pest control, exclusion fencing and planting – are proven methods and have a high likelihood of success provided they are implemented by experienced professionals.
52. As stated in my technical review submitted as part of the Southland Wind Farm Fast-track application, I remain of the view that the offset and compensation measures offered by the Applicant have a high likelihood of achieving an overall net gain for biodiversity.

Roger John MacGibbon

14 January 2026