Memorandum

Christchurch
Level 1
141 Cambridge Terrace
Christchurch 8013
PO Box 110
Christchurch 8140

+643 366 8891

Whangarei	15 Porowini Avenue, Morningside, Whangarei 0110	+649 358 2526
Auckland	PO Box 91250, Auckland 1142	+649 358 2526
Hamilton	PO Box 1094, Hamilton 3240	+647 960 0006
Tauranga	PO Box 13373, Tauranga 3141	+647 571 5511
Wellington	PO Box 11340, Wellington 6142	+644 385 9315
Nelson	27 Vanguard Street, Nelson 7010	+643 548 8551
Queenstown	PO Box 1028, Queenstown 9348	+643 441 1670
Dunedin	49 Water Street, Dunedin 9016	+643 470 0460

Attention:	Ralph Henderson
Company:	c/- Southland District Council
Date:	5 December 2025
From:	Rhys Girvan[1]
Message Ref:	Southland Windfarm – Summary Landscape Comments
Project No:	BM230672

1. This memorandum sets out my peer review comments in response to the landscape assessments (the 'Assessments') prepared in relation to the Southland Windfarm (hereinafter referred to as the 'SWF' or 'Site'), namely:

    - Bradyn Thomas Coombs (H03 and H03A) dated 18 August 2025 ('**Isthmus Assessment'**) and

    - Shannon Bray (H04) dated 18 August 2025 ('**Wayfinder Assessment'**)

2. To complete this peer review, I have undertaken a Site visit accompanied by the authors of both Assessments on 13 November 2025. I am also familiar with Southland's landscapes generally including the location of the Site. I was a co-author of the Southland / Murihiku Regional Landscape Assessment (SMRLA) prepared for the combined Southland Regional and District Council's (Boffa Miskell, 2019) which included the purpose of identifying Outstanding Natural Features and Landscapes (ONFL) in the Southland District.

3. I was previously engaged by Southland District Council (SDC) to provide comment on the Southland Windfarm which was lodged under the COVID-19 Recovery (Fast-track Consenting) Act 2020. I understand this is a new application lodged under the Fast Track Approvals Act (FTAA) 2024 and its requirements, and I have provided my peer review comments on this basis.

4. I acknowledge that a previous Expert Consenting Panel convened under the Fast-track Consenting Act has previously considered and declined this application[2]. While I note the references within the Assessments to the previous application, its findings and earlier peer review commentary, I have prepared this peer review on the basis of the new application as lodged under the FTAA 2024.

5. The purpose of this peer review is to set out a focussed appraisal of the landscape Assessments which form part of the Substantive Application rather than a parallel assessment. This follows the concepts and

[1] My full name is Rhys James Girvan. I am a registered landscape architect employed by Boffa Miskell Limited. I hold the qualifications of master's in landscape architecture from Lincoln University and Bachelor of Arts majoring in Psychology from the University of Canterbury. I have practiced as a landscape planner for over 20 years. I am presently employed as a Senior Principal in Boffa Miskell's Christchurch office and I am Boffa Miskell's Technical Lead: Landscape Planning. This peer review has been prepared in accordance with the Environment Court Practice Note 2023 (Code of Conduct for Expert Witnesses).

[2] Expert Consenting Panel (18 March 2025) Record of Decision of The Expert Consenting Panel Under Clause 37 Of Schedule 6 of the FTCA

principles outlined in ‘Te Tangi a te Manu: Aotearoa New Zealand Landscape Assessment Guidelines’ (TTaTM, 2022), focussing on the following matters:

a) Methodology and method

b) Existing landscape

c) Proposal

d) Statutory Planning Provisions

e) Landscape Effects

f) Design Response

g) Conclusion

Methodology and method

6. The landscape Assessments provided with the FTAA Substantive Application have been prepared by experienced landscape architects based on the concepts and principles set out in TTaTM. The Isthmus Assessment sets out a detailed assessment of the level and nature of effects including landscape effects, visual effects from public and private properties and natural character effects. The Wayfinder Assessment responds to these matters and draws on professional experience through which comparative findings are expressed in terms of the level or nature of landscape and visual effects deemed ‘acceptable’.

7. The Isthmus Assessment is supported with visual simulations I consider have been prepared in accordance with best practice. During the Site visit, I was provided a hard copy of the simulations through which visual effects have been carefully reviewed.

Existing landscape

8. I consider the Assessments set out a comprehensive analysis of the existing landscape and its spatial scale, including an understanding of the area from which the potential windfarm may be visible. This includes a reasonably detailed understanding of the underlying geomorphology and land use aspects, including ecological matters identified in other technical reports, alongside identification of cultural and archaeological values also referred to in a separate Cultural Impact Assessment prepared by Te Ao Mārama Incorporated (TAMI) on behalf of Kā Papatipu Rūnaka.

9. The Isthmus Assessment identifies four landscape character areas as forming the broader landscape setting around the Site, namely the: Upper Waipahi River / Upper Mokoreta Basin, Upper Mokoreta Valley (subunits Redan and Mokoreta Stream valleys), East of Mataura River and West of Mataura River to Woodlands. More generally, the Isthmus Assessment acknowledges the Site forms part of the Inland Catlins and falls outside the Coastal Environment. I concur with this analysis and descriptions of the existing landscape.

10. When assessing important landscape values, there remains some discrepancy in expert opinion in the identification and subsequent delineation of what qualifies as “outstanding” in the context of Southland’s natural features and landscapes. Both the Isthmus and Wayfinder Assessments identify that the scarp upon which the SWF is located is likely an outstanding candidate[3]. When evaluating the nature of potential outstanding landscape values, both Assessments emphasise the nature of a singular landform feature comprising the steeper bush-clad scarp. In my opinion, delineation of natural features is not

[3] Isthmus Assessment, para. 90; and Wayfinder Assessment, para. 100.

predicated on mapping singular landform units. As reflected in the SRMLA, natural features may encompass a combination of attributes which come together and form a coherent whole.

11. Irrespective of the method used to characterise and delineate important landscape values, the extent of any potential ONFL has yet to be confirmed in this part of the Southland Region. Once confirmed, the protection obligation in s 6(b) is properly understood as protecting the specific values that make that landscape or feature outstanding[4]. The presence of important landscape values worthy of a candidate ONF within the more immediate context of this windfarm Site has been acknowledged in the Assessments and is agreed as part of the environmental setting within which the SWF is proposed.

Natural Character

12. Natural character has been identified and assessed within both the Isthmus and Wayfinder Assessments. These Assessments both draw on the findings of separate ecology input referred to as the Wildlands and Ryder Assessments and focus on natural character as a specific aspect of the environment to be preserved under s6(a) of the RMA. Areas for which natural character effects must be assessed are confined to the headwaters of the north and south branches of the upper Mimihau Stream, as well as the wetlands that have been identified and mapped within the project Site, including those with high and very high natural character mapped within the Jedburgh Plateau. There are also the headwaters of small tributaries along Redan Stream where turbines extend above the escarpment edge and below the more elevated crest within the Site.

13. There is some disparity identified between the Assessments in relation to levels of natural character values. In terms of where areas of high and very high natural character occur, the Isthmus Assessment refers to the Ecological Values in **Figures 5** and **6**: **Ecological Values Map 1** and **2** (Figure VMP -1a and 1b, Part G of the Substantive Application)[5]. This includes a substantial area of the Jedburgh Plateau as well as the adjoining southern rātā-kamahi forest gully. Beyond this, the natural character values of the south branch of the Mimihau Stream are identified as moderate-high[6]. Conversely, the Wayfinder Assessment identifies that the Jedburgh Plateau is not a natural landscape but one which is degraded as a result of stock and pest-animal grazing[7].

Proposal

14. The proposed development seeks to construct and operate a windfarm containing up to 55 turbines with a maximum blade 'tip height' of 220 metres with associated access roads and power transmission infrastructure, including a substation, 220kv line and Grid Injection Point adjacent to the existing North Makarewa to Three Mile Hill A 220kV circuit. The following landscape and ecological mitigation and offset measures are also built into the proposed conditions of the SWF Project[8]:

    a. *The establishment of a Community Benefit Fund with initial financial contributions, annual contributions and additional electricity generation-based contributions which subject to applications for funding from the local community can be distributed to locally directed projects;*

    b. *The offer of off-Site planting within private properties to residents to reduce visual effects of the SWF, where appropriate and acceptable to the residents;*

    c. *Construction management plans – to minimise the effects of construction on the landscape and local streams during construction;*

[4] King Salmon [2014] NZSC 38 at [105]
[5] Isthmus Assessment, para. 192.
[6] Isthmus Assessment, para. 181.
[7] Wayfinder Assessment, para. 124.
[8] Isthmus Assessment, para. 500.

d. *Environmental management plans – to minimise the effects on the local environment, indigenous vegetation, ecological values, and indigenous flora and fauna;*

e. *Earthworks management plans – to minimise the effects of earthworks during construction;*

f. *Vegetation management plans – to minimise effects on indigenous vegetation;*

g. *Ecological management plans - to minimise the ecological effects of construction and operation of the SWF;*

h. *Ecological offset plans – to provide improvements in ecological values in areas both within and, where effects on ecology have been impossible to avoid within the SWF Site, outside of it. This includes permanent deer fencing and stock exclusion from approximately 245ha of bush at Jedburgh Station (including enrichment planting of 5,000 plants – the 'Jedburgh Station Ecological Enhancement Area'), permanent deer fencing of 8ha of degraded copper tussock vegetation (including pest control and enrichment planting – the 'Copper Tussock Enhancement and Skink Protection Area'), creation / restoration and enhancement of wetland (totalling approximately 11.8ha) at the Davidson Road Wetland Restoration Site, large scale aerial and land based pest control across approximately 1,400ha at Jedburgh Station (the 'Jedburgh Station Pest Control Area'), targeted intensive ground based predator control at a 55-hectare Plateau Fauna Enhancement Area on the Jedburgh Plateau, the establishment of relocation Site(s) for salvaged lizards, pest control over a separate 10,000ha area focussed on long tail bat roosts in the Catlins Forest Park, specific funding towards research on invertebrates, specific funding towards research of cryptic skinks or Tautuku gecko, and restoration of existing riparian habitat to offset for the loss of stream habitat associated with culverts. These plans will have wide reaching benefits on the surrounding landscapes and indigenous habitats of conservation land in the area.*

Statutory planning provisions

15. The Application has been lodged under the FTAA (2024), the purpose of which is to facilitate the delivery of infrastructure and development projects with significant regional or national benefits.

16. The Isthmus Assessment outlines the relevant RMA context to be considered under the FTAA (2024) including the National Policy Statement for Renewable Electricity Generation (2011), the Southland Regional Policy Statement (2017) and the Operative Southland District Plan (2018) relating to renewable energy development and the maintenance of amenity values, including rural character within the Rural Zone (refer Appendix C of the Isthmus Assessment). In doing so, it also identifies the objectives and policies relating to ONFLs, noting that the Site is not located within or adjoining any confirmed ONFL.

17. The omission of ONFLs is tied to the need for more specific landscape assessments within parts of the district as identified through Policy NFL.3 of the Operative District Plan. This states:

> *Avoid, remedy or mitigate adverse effects of subdivision, land use and development on the District's natural features and landscapes that have not been assessed by Council for landscape values.*

18. With respect to Policy NFL.3, the Operative District Plan acknowledges there is a range of natural features and landscapes within the District that have not been assessed to determine their landscape values, specifically acknowledging this omission applies to the Inland Catlins. In this context the SMRLA was commissioned to identify and evaluate those values, and through that process Slopedown / Mokoreta – Pukemimihau was identified as an outstanding natural feature.

Landscape effects

19. The Isthmus Assessment provides a reasonably comprehensive analysis setting out the predicted level and nature of landscape effects. This identifies that the Site is comprised of approximately half pastoral farmland including some areas of native vegetation (including wetlands) and scrub, and half plantation

forestry[9]. In this respect, landscape effects have been considered within the context of a working rural environment[10], highlighting that the proposed layout and location of turbines typically occupy areas of more modified land cover and are associated with rural activity while ensuring physical effects along the steeper more visible and vegetated scarp have largely been avoided.

20. By comparison, when assessing the level or nature of landscape effects, the Wayfinder Assessment adopts a more general and relative approach, comparing the effects of the proposed SWF to other windfarms of a similar scale to other parts of New Zealand. In comparing effects of windfarms, the Wayfinder Assessment provides a similar frame defining the SWF Site as a rural working environment through which the nature of effects is determined to be acceptable. The findings of each Assessment in relation to the landscape, visual and natural character effects are summarised below:

	Isthmus Assessment	**Wayfinder Assessment**
Landscape Effects	Moderate-Low Adverse (minor)	Acceptable
Visual Effects	Neutral to Moderate High Adverse	Low to Moderate High
Natural Character Effects	Very-Low Adverse (less than minor)	Acceptable

Slopedown / Mokoreta – Pukemimihau Outstanding Natural Feature

21. The SMRLA identified Slopedown / Mokoreta – Pukemimihau as a candidate ONF[11]. Under the SWF proposal, a total of 27 turbines and associated access tracks as well as a substation and transmission towers are located above the steeper more visible scarp and within this ONF.

22. Based on the SRMLA, it is the assemblage of characteristics and values that form this natural feature collectively identified as 'Slopedown'. Importantly, this encompasses the more expressive parts of the underlying Southland Syncline landform including its distinctive plateau and strike ridge, areas of elevated tussock and peatland as well as indigenous forest and scrub which remains most evident on the steeper visible scarp slopes. While I acknowledge that the Slopedown / Mokoreta – Pukemimihau ONF boundary has not been formally adopted, it was identified as part of a comprehensive region wide landscape evaluation undertaken by experienced landscape architects prior to the Southland Windfarm being lodged. It also draws on an understanding of recognised physical, sensory and associative attributes in accordance with current industry best practice. Having now revisited this general area including within the Site, in my view the SRMLA has correctly identified what comprises the distinctive combination of natural elements that underpin Slopedown's integrity as a striking, coherent natural feature encompassing both topographic and vegetation / habitat features and what these mean in the specific context of Southland's landscapes. I therefore consider the mapped ONF extent to be a robust and credible basis for applying a precautionary consenting approach in accordance with RMA S6(b) and policy NFL3.

23. In physical and visual terms, the proposed access and foundations of turbines generally avoid the more visible bush clad scarp, as usually seen from beyond the Site to the east, south and west. However, impacts of constructing the wind turbines will occur throughout the dip slope, including disrupting areas of regenerating shrubland, some forested areas and some limited areas of wetland on Jedburgh Plateau where effects cannot otherwise be avoided. While I acknowledge that turbines in other parts of the Slopedown / Mokoreta – Pukemimihau ONF may have more limited and localised effects to the east, there remains potential for more substantial physical effects within the Jedburgh Plateau. Beyond this, I agree that potential physical impacts will remain relatively contained to within the Site while the wider perceptual effects of constructing and operating a windfarm in this context primarily relate to views of

[9] Isthmus Assessment, para. 174.
[10] Isthmus Assessment, para 305.
[11] Isthmus Assessment, Appendix E

elevated turbines seen along part of what can otherwise be described as an open and bold vegetated skyline.

24. In terms of natural values, I consider a coherent natural system remains apparent within parts of the Jedburgh Plateau which will continue to contrast with surrounding exotic covered working farmland and plantation forestry more obviously void of natural influences and promoting a more overtly productive working context. Given this context, I continue to consider this plateau and strike ridge read together as a coherent natural feature comprising 'Slopedown'. While much of this feature is not usually experienced from beyond the Site, I do not consider the feature's underlying natural values neatly culminate along the scarp edge or a nominal buffer through which effects are then avoided. While I acknowledge that natural values on the dip slope are comparatively reduced compared to the steeper scarp slopes and adjoining rātā-kamahi forest gully, I consider a level of naturalness remains evident and contributes to the overall coherence of the natural feature when considered as a whole.

25. Whilst the extent of existing natural values has been further explored in the Isthmus Assessment, including recognition of a candidate ONF within or adjoining the windfarm, this has not changed or influenced findings on the extent to which potential for adverse effects on landscape values occur. To this end, the Isthmus Assessment considers the windfarm would be an appropriate outcome, even if the Slopedown / Mokoreta – Pukemimihau ONF were to be confirmed via a formal plan change[12]. While I agree that parts of Jedburgh appear less natural than the more established bush clad scarp and adjoining rātā-kamahi forest gully, I disagree with the Wayfinder Assessment that this cannot be considered a natural landscape[13]. In my opinion the peatlands on Jedburgh Plateau continue to express evident natural values, including acknowledged higher levels of natural character, as an area of vegetated wetlands which remain distinct from the broader mosaic of exotic vegetation including pasture and forestry characteristic of much of the surrounding Southland landscapes.

26. The level of landscape effects ultimately relates to the consequence of landscape impacts on the specific values to be protected. In my opinion, much of the Jedburgh Plateau including its evident natural values, also contributes to what can readily be identified as 'Slopedown'. While I acknowledge that the extent of native vegetation is not uniformly intact, I consider the previous SMRLA evaluation findings in terms of "*The dominant cover and sequence of indigenous forest which culminates along grassland and scrub upon the plateau establishes an overt sense of naturalness*"[14] remains accurate. On the basis, I consider construction of the SWF would inevitably disrupt this apparent natural sequence and therefore has potential to result in more substantial adverse landscape effects. In my opinion, when considering impacts of the proposed windfarm in the context of the Jedburgh Plateau, I consider such effects are more than **moderate-low** (**minor**)**.**

27. Within the Jedburgh Plateau, the nearest wind turbines to the scarp are located at the southern end, where this culminates along a distinctive steep vegetated headland plateau. When viewed from the west (and to a lesser extent the east) this distinctive vegetated landform forms a legible sharp drop along the skyline widely recognised as 'Slopedown'. While Turbines Jed-17, Jed-27 -29 are all located within relatively close proximity of the scarp edge, I agree that these locations also ensure that views of the vegetated slope as seen from below will remain largely intact. I also agree that the relationship between the turbines and the distinctive angled slope observed over longer distances, including from the west within the Southland Plains, will remain legible as the distinctive form recognised as Slopedown.

28. When viewed from beyond the Site, particularly to the south, many of the turbines will appear highly visible and elevated above a vegetated backdrop and skyline. In such views, I agree a distinctive and memorable natural feature will continue to remain evident and will continue to contrast with the more expansive working rural landscape which continues throughout much of the adjoining lower lying areas of the Inland Catlins and continuing west into the Southland Plains. While rural land uses (pastoral grazing and forestry) also continue across parts of the dip slope, parts of the adjoining Jedburgh Plateau and the adjoining southern rātā-kamahi forest gully also remain distinctively less modified and therefore

[12] Isthmus Assessment, para. 339.
[13] Wayfinder Assessment, para. 124.
[14] Boffa Miskell (2019) Southland / Murihiku Regional Landscape Study, page 160.

more natural in this context and contribute to the legibility and coherence of the Slopedown natural feature when appreciated as a whole. In my opinion, natural values clearly extend beyond a singular scarp and do not neatly culminate along what has otherwise been traced as the scarp crest[15].

29. In this context, managing the potential for more significant adverse landscape effects depends on actively maintaining a clear distinction between the working rural landscape and the transition into what has been identified as a coherent natural feature when appreciated as a whole. This is not limited to what remains visible from below; it requires ongoing measures to protect the important natural values which contribute to this coherence within the Site from further degradation. Further recommendations to achieve this outcome are set out in the Design Response section below.

Visual Effects

30. In terms of visual effects, Appendix D of the Isthmus Assessment sets out an inventory of dwellings within 10 km of the project. Of the 165 dwellings which were assessed, 117 were identified as resulting in adverse effects, as per below:

Very Low – Adverse	**Low – Adverse**	**Moderate-Low – Adverse**	**Moderate Adverse**	**Moderate-High – Adverse**	**High Adverse**	**Very High Adverse**
32 dwellings	46 dwellings	23 dwellings	5 dwellings	10 dwellings	-	-

The Nature of Effect

31. Alongside assessing the level or degree of visual effects, the Isthmus Assessment draws a distinction between adverse and neutral effects, noting neutral effects typically, but not always, occur from dwellings which are considered to have negligible views of proposed wind turbines. A breakdown of the nature of effects identified by the Isthmus Assessment on this basis is set out below.

Nature of Effect	**Isthmus Assessment**
Adverse	117 dwellings
Neutral	48 dwellings
Beneficial	-
TOTAL	**165 dwellings**

32. In describing the nature of perception effects, the Wayfinder Assessment does not endorse the use of the term “adverse” to describe effects, on the basis that adversity can ultimately only be determined by the person affected, with the landscape architect’s role being to describe the nature and severity of potential change so people can make their own judgement[16]. In my opinion, determining the nature of effect also engages with the specific landscape context within which a proposal will occur and therefore the likely consequence of change on identified values. This approach is consistent with TTaTM and also many of the factors affecting the perception of wind turbines set out in **Appendix 2** of the Wayfinder Assessment, which acknowledge that turbines seen against the sky, across expansive vistas and at elevated positions all have potential to result in greater adverse effects.

33. In my opinion, the introduction of wind turbines representing large mechanistic and dynamic structures within an otherwise open and predominantly uncluttered area, which is often also clearly visible against the sky, will generally contrast with existing natural values to an extent which will result in material adverse landscape and visual effects. Similarly, the substantial scale of turbines and supporting infrastructure means it is generally not possible to establish a new windfarm with only minor or incidental effects, particularly within or adjoining areas with higher inherent natural values. While attitudes and values in regard to renewable energy may change through time, an underlying tension between

[15] Isthmus Assessment, Figure 3, page 42.
[16] Wayfinder Assessment, para. 132.

balancing adverse landscape and visual effects with necessary measures to mitigate impacts of climate change remains a relevant matter to be addressed.

34. I agree with the Assessments that the greatest potential level of visual effects occur from a cluster of dwellings identified as 'Redan' along the Wyndham Mokoreta Road. In this area, dwellings extend beyond 2km from the nearest turbines. Where visible, turbines will be observed over a foreground of rural land use and along a broader vegetated backdrop beyond which the construction of turbines will avoid impacts along the visible vegetated scarp. Once operational, individual turbines may appear prominent as part of a larger array extended along the skyline, however will not appear dominant or overbearing. Given this context, I agree any adverse visual effects are at most moderate-high and therefore not significant from dwellings located in this context.

35. Further to the west of the Site, including to the east of Wyndham and continuing west into the Southland Plains, potential views of turbines gradually dissipate into part of the background of a broader working rural landscape. While unobstructed views of the turbines remain, I agree that visual effects become no more than moderate-low (minor) beyond approximately 5km from the Site and gradually dissipate. The relationship between the proposed windfarm with the memorable natural vegetated form of Slopedown remains relevant in this location.

36. From the vicinity of Mokoreta to the south of the SWF, Mount Herbert forms a steep vegetated element which contributes to the broader crisp, legible and vegetated skyline. In landscape terms I consider this forms part of the visually coherent, characteristically more natural bush clad skyline along this part of the Southern Syncline, recognised as Slopedown. On this, I agree that "people tend to broadly experience the landscape and its overwhelming patterns"[17] and consider the extent of Slopedown as defined in the SMRLA, responds to this evident landscape pattern which is observed. However, I also agree that the intervening forms of Egremont and Mount Herbert, assist in screening views and/or provide foreground perspective, depth and focus to the extent that the level of visual effects in this area typically equate to minor or less.

37. To the southeast of the Site, I agree with the Assessments that turbines generally appear more subservient to the named highpoints and appear beyond the steep vegetated scarp which separates the SWF from areas contained within Mataraki Forest. I also agree such effects dissipate to the north of the SWF to the extent that views of the windfarm become negligible.

38. Having carefully considered the level of visual effects, including during my Site visit, I consider the detailed findings relating to visual effects set out in Appendix D of the Isthmus Assessment remain credible. On this basis, where potential for at least moderate adverse visual effects have been identified, I agree the offer of off-Site planting within private properties to reduce visual effects of the SWF, where appropriate and acceptable to the residents, can help reduced visual effects.

Natural Character Effects

39. The Isthmus Assessment sets out an assessment of natural character, drawing on the findings of separate ecology input within the Wildlands and Ryder Assessments. I consider this is consistent with natural character envisaged by s6(a) of the RMA as a specific matter, taking account of abiotic, biotic and experiential aspects relating to the headwaters of the north and south branches of the upper Mimihau Stream, the headwaters of Redan Stream, and the wetlands that have been identified and mapped within the project Site, including an extensive wetland complex identified with very high natural character on the Jedburgh Plateau.

40. The natural character of the Jedburgh Plateau currently reflects wetland areas with little obvious overt landform modification and supports areas of regenerating native and exotic vegetation. However, in this context, the Assessments – particularly the Wayfinder Assessment – make it clear that they consider

[17] Wayfinder Assessment, para 105.

these wetlands are already in a degraded state, for example: "…I could easily see the degradation occurring to the wetlands as a result of stock and pest-animal grazing."[18]

41. While I agree that pest animal and plant control can restore and maintain natural processes in this context, it is also the case that they can equally be hindered by substantial earthworks and ongoing or increasing grazing of domestic animals. On this basis I agree that "the prospect of removing or greatly restricting those human induced activities which are inhibiting natural processes to take place"[19] is laudable, however I do not consider this adequately addresses the potential for ongoing degradation of natural values which may otherwise occur. When enabling the continuation of more intensive ongoing productive grazing resulting from improved access is combined with the substantial earthworks as proposed, I consider the needle indicating the level of naturalness could potentially move towards further degradation. The elevated levels of naturalness which currently remain apparent across the plateau, as distinct from its more productive working rural surroundings, could be reduced. In my opinion, the level of naturalness sufficient to warrant identification as an ONF extends onto the dip slope; however, the Assessments have tended to downplay or overlook this continuation.

42. Based on differences in opinion highlighted in the Assessments and identified during my Site visit, I consider delineation of very high natural character throughout the Jedburgh Plateau remains a relevant matter through which the acceptability of the introduction of wind turbines in this area must be carefully considered. On the basis of ensuring wetlands are largely avoided and underlying ecological and natural character values will be enhanced through a comprehensive habitat and restoration package, I agree there is potential for acceptable outcomes in this context. As it stands however, I do not consider the provision for increased rural activity alongside the disruption resulting from construction of a windfarm in this location is consistent with the Isthmus Assessment rating of adverse natural character as very low[20] or the Wayfinder Assessment of being overwhelmingly positive[21].

43. I acknowledge that the proposed long-term pest animal control, particularly within the 245 ha. fenced Ecological Enhancement Area, has the potential to materially improve vegetation condition and promote rehabilitation within this area. However, over the wider plateau, the Habitat Restoration and Enhancement Plan does not address the implications that substantial earthworks also facilitate increased access enabling increased grazing and more intensive productive land use. In that context, the overall trajectory of naturalness across the dip slope is contingent on future productive land use remaining limited and not resulting in impacts leading to further degradation. Without measures to manage a reduction in natural values resulting from ongoing pastoral grazing, clear limits and ongoing monitoring, this may in fact lead to further undermining of the elevated naturalness that currently supports recognition of the ONF values extending onto the plateau.

Cumulative Effects

44. Cumulative effects have been assessed in the Isthmus Assessment in relation to the Kaiwera Downs Windfarm, located approximately 4 km to the north. As part of this work, visual simulations of the combined SWF and Kaiwera Downs Windfarm are provided from Viewpoints 1 and 2. These demonstrate that there will be cumulative effects in some views to the west of the Site and typically west of the Mataura River, where both windfarms will be visible as distant elements in the background. Based on the extent of visibility identified in visual simulations and supported in the Isthmus Assessment, I concur that the proposed SWF will not give rise to significant adverse cumulative effects on landscape or visual amenity values.

Night-Time Effects

45. It is understood the recommendations from the Civil Aviation Authority of New Zealand (CAA) have resulted in the specific design of the night lighting for the SWF, resulting in sixteen turbines requiring aviation safety lighting. This is supported by an Assessment of Environmental Effects for Proposed

[18] Wayfinder Assessment, para. 124.
[19] Wayfinder Assessment, para. 128.
[20] Isthmus Assessment para 422.
[21] Wayfinder Assessment, para 130.

Lighting of the Southland Wind Farm prepared by Leading Design Professionals (LDP). During construction of the wind farm, additional lighting is also identified in relation to when turbine foundation pads are being laid and operation of the concrete batching plant. Such construction lighting is described as relatively temporary and will be focused on the areas of active construction which will shift across the Site.

46. Based on the Isthmus Assessment, I agree that lighting will generate additional adverse effects. I also agree the extent of adverse effects will be higher when lighting is viewed within a dark sky setting including where there is a lack of intervening lighting from other sources and given the flashing function of obstacle lighting. I therefore agree that measures which ensure adverse lighting effects resulting from the proposed windfarm will be addressed are necessary, including through ensuring this remains shielded from view below the horizontal. On this basis I concur that effects resulting from nighttime lighting can be effectively managed in accordance with best practice.

Effects from Electricity Transmission Infrastructure

47. The Isthmus Assessment identifies there are likely to be up to 50 towers / poles / structures linking transmission lines between the windfarm substation on Jedburgh Plateau and the Grid Injection Point over 1km from the closest section of Davidson Road East and covering some 16km in length. In this context, transmission infrastructure extends between the more natural dip slope of Slopedown and predominantly through a working rural landscape including areas of forestry and pasture with very limited public or private views. The nearest dwelling is located at 57 Davidson Road and has been assessed as over approximately 500 metres at its nearest point within established areas of vegetation to the extent that views orientated towards the transmission remain limited[22]. Based on the detailed Isthmus Assessment, I concur any adverse landscape or visual effects of these elements are likely to be low or very low.

Design response

48. Since the SWF was resubmitted under the FTAA 2024, the subsequent identification of Slopedown / Mokoreta – Pukemimihau as a candidate ONF has not materially influenced the wind farm layout or design. The Isthmus and Wayfinder Assessments, and my Site visit, confirm that higher natural values extend across parts of the dip slope, particularly the southern rātā–kāmahi forest gully and parts of the Jedburgh Plateau, including a contiguous mosaic of induced and naturally occurring wetlands and natural habitats. While the layout largely avoids mapped wetlands and provides offsetting and compensation as described in the ecological assessments, the response to the candidate ONF largely relies on setting back turbines to provide “breathing space” to underlying natural values which the Assessments consider effectively terminate at the scarp edge.

49. Within the Jedburgh Plateau, extensive earthworks and tracking are proposed through an identified wetland complex that includes areas of high and very high natural character. Given the higher natural values apparent in this context, this level of disturbance will, in my opinion, result in more than very low adverse natural character effects, with potential for locally significant effects where natural elements, patterns and processes are removed or substantially reduced. While the Assessments refer to measures to avoid the identified areas of highest ecological value and to protect vegetation and habitats, these measures are not framed around protecting the overall extent of naturalness that has contributed to recognition of a potential ONF.

50. In my view, recognising and managing effects on the coherence of this natural feature has not operated as a primary constraint on the design and layout, nor has this resulted in refining the proposal to a point where landscape effects on the candidate ONF can reasonably be considered minor or less. In addition to pest animal and plant management, there is scope - and, in my view, a need - for further measures to avoid further reduction in natural values arising from increased access and land use change in this context. Earthworks to form access and enable greater stock access and grazing increase the potential for significant adverse effects. Although an ONF need not be pristine, the SMRLA (2019) ONF boundary

[22] Isthmus Assessment, para 466.

encompasses a clear transition of native revegetation which differs from surrounding exotic and pastoral land cover, and which risks being further disrupted by ongoing land management directly enabled by constructing the wind farm.

51. In determining the values of the landscape in which turbines, a substation, accessways and transmission lines are proposed, the Assessments place considerable weight on existing ecological modification, including ongoing grazing by domestic and feral animals, to discount natural values on the Jedburgh Plateau. On that basis, additional physical effects associated with earthworks and construction are treated as occurring within an already degraded environment. In my opinion, this underplays the role of the plateau as an open, functioning natural system and the potential for incremental change to further undermine values that contribute to its identification as a candidate ONF. The acceptability of the proposal in this context therefore turns less on relocating turbines, and more on whether sufficiently strong and enforceable land management controls are imposed to protect and enhance the natural values that remain.

Recommended conditions – landscape and natural character

52. The following conditions are intended to complement (rather than duplicate) the proposed Vegetation Management Plan (J01) and the Habitat Restoration and Enhancement Management Plan (J07). They are focussed specifically on maintaining and enhancing landscape values and natural character, particularly the legible relationship between the surrounding working rural landscape and the Slopedown / Mokoreta – Pukemimihau (candidate ONF).

a. Landscape and Natural Character Management Plan (LNCMP)

Require a Landscape and Natural Character Management Plan (LNCMP) for the parts of the Slopedown / Mokoreta – Pukemimihau (candidate ONF) occupied by the SWF, prepared by a suitably qualified landscape architect in consultation with the ecology team.

The LNCMP must:

Delineate landscape and natural character management areas, using the same base mapping and management units as the Habitat Restoration and Enhancement Management Plan (J07) where practicable.

Set objectives for each area aimed at:

- maintaining an enduring transition between the surrounding working rural landscape and the coherent natural feature associated with the scarp, southern rātā–kāmahi forest gully and areas of high and very high natural character within the Southland Windfarm Site;
- retaining or enhancing the apparent naturalness of landform, vegetation patterns and hydrological features which remain evident on the dip slope; and
- avoiding obvious fragmentation or truncation of the candidate ONF and associated natural values.

b. Landform and earthworks integration – natural character

Within LNCMP management areas, require a Landform Design Statement for all permanent earthworks associated with turbine platforms, access roads and drainage.

The Statement must demonstrate how earthworks will:

- minimise the extent of landform disturbance as far as practicable within the Slopedown / Mokoreta – Pukemimihau (candidate ONF);
- follow and reinforce existing landform grain, avoiding long, straight benches and obviously engineered platforms that undermine the perception of natural landform;

- use batters and fills that are rounded, rolled and tied into existing slopes, so that once revegetated they contribute to the apparent naturalness of landform rather than reading as discrete cuts or fills; and

- configure any surplus fill as landform restoration features that support natural drainage and landform patterns, rather than visually isolated mounds.

c. Stock exclusion and grazing controls

- Require permanent stock exclusion from mapped wetland complexes, seepage areas and areas of indigenous vegetation in the southern rātā–kāmahi forest gully.

- Where grazing is to continue in adjacent areas, specify maximum grazing intensity and seasonal constraints to avoid further degradation of wetland margins and regenerating shrubland/forest.

d. Monitoring, review and adaptive management

- Require periodic monitoring (e.g. every 3–5 years) of wetland condition, indigenous vegetation condition, and landscape mitigation performance by a suitably qualified expert, with results reported to Council.

- Include an adaptive management clause enabling Council to require adjustments to grazing, pest control or restoration measures if monitoring shows ongoing degradation of identified landscape and natural character values.

Conclusions

53. Overall, I am satisfied that the Isthmus and Wayfinder Assessments adopt an appropriate methodology, draw on adequate site and desk-based analysis, and generally provide a credible baseline for understanding the landscape, natural character and visual effects of the Southland Wind Farm. I agree that the proposal will introduce a large-scale wind farm which is largely seen from within a modified working rural landscape where large infrastructure is not inherently out of place.

54. Notwithstanding this, I consider the treatment of the Slopedown / Mokoreta – Pukemimihau area as a candidate ONF, and of the natural character of the Jedburgh Plateau and associated wetlands in particular, understates the sensitivity and importance of these landscape values. In my opinion, the combination of the scarp face, intact and regenerating indigenous vegetation, wetland systems and landform patterning collectively exhibits characteristics consistent with an outstanding natural feature extending beyond the scarp crest onto parts of the dip slope and plateau.

55. On that basis, I consider that, without additional controls, adverse effects on the values of this candidate ONF and associated high natural character areas would be more than minor at the scale of the ONF and its immediate setting, due primarily to the extent of enabling earthworks, access formation and the potential for intensified grazing and associated degradation of natural patterns on the Jedburgh Plateau.

56. The layout of turbines avoids the scarp face itself and, in my view, broadly maintains an appropriate separation between the most visually legible parts of the scarp and the main turbine array. I therefore do not consider that relocation of turbines off the plateau is necessary to achieve an acceptable landscape outcome. However, I do consider that the acceptability of the proposal turns on stricter controls over land management, access formation and restoration within the candidate ONF and high natural character areas than are currently proposed.

57. If the additional mitigation and management measures outlined above are secured by robust and enforceable conditions – including clear limits on earthworks and access tracks within high-value areas, stock exclusion and grazing controls, wetland and indigenous vegetation restoration, and ongoing pest plant and animal control with measurable performance outcomes – I consider that adverse effects on the

candidate ONF values and natural character of the Jedburgh Plateau can be reduced to low-moderate (ie. at the “minor” threshold).

58. Subject to those strengthened conditions, I consider the landscape, natural character and visual effects of the SWF can be reconciled with the intent of the FTAA to facilitate regionally and nationally significant renewable energy infrastructure while protecting high-value landscapes and natural character as far as practicable. In the absence of such conditions, I am not able to conclude that effects on the candidate ONF and associated high and very high natural character areas are acceptable.