

# The Point Solar Farm Fast Track project – Comments on updated information pertaining to terrestrial flora and ecosystems components of proposal.

Richard Ewans – Senior Technical Advisor Ecology, Flora & Ecosystems Team, Department of Conservation.

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## Introduction and background

These comments are provided in response to additional information provided by applicant in late February 2026<sup>1</sup>, after statutory timeframes for DOCs s.53 comments to the Fast Track panel had passed. The comments follow the format of the author's initial comments dated 11 February 2026.

## Existing vegetation

Additional survey of vegetation and habitats was carried out over 118 person hours in mid-February, including 40 person hours searching areas of likely higher value for indigenous plants around the margins of the site and in two small gullies. This level of effort is more appropriate and confirmed the vegetation within the development footprint to be dominated by exotic pasture and herbfield.

The At Risk -Declining resurrection lichen (*Xanthoparmelia semiviridis*) was the only indigenous flora taxa recorded in the **development footprint**.

Outside the development footprint but on the **property** four additional indigenous species were found including important records for *Lepidium solandri* (Threatened - Nationally Critical) in the southern gully.

Note that I concur with the most recent Wildlands reports that two native brooms previously recorded as *Carmichaelia australis* and *Carmichaelia monroi* were likely misidentified in the original Wildlands report and are in fact *Carmichaelia petriei* and *Carmichaelia vexillata* respectively.

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<sup>1</sup> Wildland Consultants. 2026. Vegetation and habitat survey of The Point solar farm, January 2026. Contract Report 6621h(v). Prepared for Far North Solar Farms. 9pp.;

Wildland Consultants. 2026. Draft Vegetation Management Plan for The Point Solar Farm. Wildland Consultants Contract Report No. 6621h-iii. Prepared for Far North Solar Farms Ltd. 23pp.;

Wildland Consultants. 2026. Draft Lizard Management Plan for The Point Solar Farm. Wildland Consultants Contract Report No. 6621h-v. Prepared for Far North Solar Farms Ltd. 44pp.;

Wildland Consultants. (2026). Draft Terrestrial Invertebrate Management Plan for the Point Solar Farm at Twizel, Canterbury. Wildland Consultants Contract Report No. 6621h-ii. Prepared for Far North Solar Farms Ltd. 31pp.;

Rough Milne Mitchell Landscape Architects. 2026. Fast-track RFI Response 2 – Landscape, Appendix 1: Proposed Landscape Mitigation Plan. 23 February 2026.; and

Rough Milne Mitchell Landscape Architects. 2026. Fast-track RFI Response 2 – Landscape Proposed Solar Farm. The Point, Mackenzie Basin. 23 February 2026.

I broadly support the proposed Threatened plant monitoring and management (Section 3.2), Adaptive seasonal grazing (Section 3.3) and Weed management (Section 4) in the Wildlands 2026 Draft Vegetation Management Plan (VMP) but note that Russell lupin should be included as a compulsory search and control weed target.

## Project proximity to Threatened and At Risk species

The additional survey work outside the site boundary found eight additional indigenous plant species, however these areas were not systematically searched.

1 Threatened and 10 At Risk plants are known to occur **in close proximity** of the site boundary and proposed landscape screening planting:

- *Lepidium solandri* (Threatened - Nationally Critical)
- *Carmichaelia monroi*, *Carmichaelia petriei*, *Raoulia australis*, *Raoulia monroi*, *Raoulia parkii*, *Convolvulus verecundus* f *verecundus*, *Muehlenbeckia ephedroides*, *Poa maniototo*, *Carex resectans*, and a lichen *Xanthoparmelia semiviridis*, (all At Risk – Declining).

As discussed in previous comments dated 11 February 2026 the population of *Lepidium solandri* is nationally important and these species (and other native species) are vulnerable to edge effects caused by irrigation of landscape screening plantings.

The Rough Milne Mitchell Landscape Architect (RMM) RFI Response 2 discusses cross boundary effects and shows the landscape mitigation planting is at least 20 m from the boundary line and therefore at least 40 m from “that At-risk plant species”, presumably referring to the Threatened - Nationally Critical plant species *Lepidium solandri*. The response also describes an irrigation regime using top down boom spraying. This does not adequately address the 10 At-Risk species in close proximity to the site which may be closer to the boundary.

The irrigation regime described is less risky than originally speculated but a larger buffer is still required to minimise risk of cross boundary effects i.e., 50 m from property boundary, this should be prescribed in consent conditions. If that cannot be achieved irrigation should not be used, and plant survival should be maximised by ensuring appropriate species and locally eco-sourced<sup>2</sup> plants are used that are properly hardened off to local conditions. Soaking plants before planting and use of water crystals should assist with survival. The plant species recommended by DOC for landscape screening planting grow naturally in the area without irrigation.

If a 50 m buffer from property boundary can be achieved and irrigation is used, the regime described is acceptable but needs to be more prescribed in the conditions. The RMM RFI Response 2 conditions lack specificity over when irrigation should not be used and should prescribe limits as to how much irrigation can be used.

For example, irrigation should only occur on still days or days with a southerly or easterly wind direction up to 20 km/hr; should use heavy droplets not fine mist spray; and be used a maximum of once per month between November and April for maximum of 3 years.

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<sup>2</sup> See authors comments 11 February 2026 for eco-sourcing meaning.

Detailed monitoring of adjacent Threatened and At Risk plant populations must be included in conditions of consent, including baseline monitoring. Monitoring described in Section 8 of the 2026 Wildlands Draft Vegetation Management Plan (VMP) does not include monitoring needed to monitor potential cross boundary effects on adjacent biodiversity values and is not adequate for the nationally important population of *Lepidium solandri* on and adjacent to the site.

## Ecological restoration plantings

Ecological restoration plantings are proposed for indigenous fauna habitat enhancement in the Wildlands 2026 Draft Lizard Management Plan (LMP) and Draft Terrestrial Invertebrate Management Plan (TIMP).

In LMP Table 6 *Carmichaelia australis* needs to be changed to *Carmichaelia petriei*.

In LMP Sections 5.4.1 and 5.4.3 it must be made clear that confirmed species to be planted should only be from those listed in Appendix 2 and Appendix 3 of the author's initial comments dated 11 February 2026. This should be prescribed in consent conditions. These are species lists compiled from known recent sources for outwash terraces and shrublands near to the project site.

In TIMP Tables 3-5, *Ozothamnus vauvilliersii* should be changed to *Ozothamnus leptophyllus*. This would maintain consistency with the landscape screening plant list. There is also some conjecture about the validity of *Ozothamnus vauvilliersii* as a species. This highlights the need for local eco-sourcing.

In TIMP Tables 3-5, there are several species listed that are inconsistent with previous DOC advice to the applicant in mid-2024 to design plantings that are compositionally similar to nearby short tussock grassland and native shrubland areas, which included species lists compiled from known recent sources for outwash terraces and shrublands near to the project site. Species to be planted should only be from those listed in Appendix 2 and Appendix 3 of the author's initial comments dated 11 February 2026. This should be prescribed in consent conditions.

## Landscape screening plantings

The updated 23 February 2026 landscape mitigation plant palette is now consistent with advice provided to the applicant in mid-2024 to design plantings that are visually and compositionally similar to nearby shrubland areas.

However the proposed consent conditions in RMM RFI Response 2 allow for substitution with unspecified plant species (proposed Condition 11) which is unacceptable. Appropriate native plant species for landscape screening planting should be limited via consent conditions to only those in Appendix 3 of the author's initial comments dated 11 February 2026.

It is noted that *Aristotelia fruticose* should read *Aristotelia fruticosa* (a common MS Word autocorrect issue), and that *Carmichaelia kirkii* is a scrambling broom that is unlikely to reach 4 m in height unless supported by other shrubs.

## Conclusions and recommendations

Table 1. Comment on updated information in relation to previous recommendations.

Recommendation 11 February 2026	Comment on additional information
1. Survey for Threatened and At Risk plant species is undertaken on terrace areas adjacent to proposed landscape screening planting and ecological restoration planting areas.	Partially completed, areas outside site boundary not systematically searched.
2. Baseline survey/monitoring of <i>Lepidium solandri</i> populations adjacent to the site is undertaken and repeated annually for the life of the project.	Suggested in Section 3 of Wildlands 2026 VMP but not adequately described in Section 8. Needs to include newly discovered population on property.
3. Baseline monitoring of the terrace plant communities to understand edge effects is undertaken and repeated bi-annually for the life of the project.	Not addressed.
4. Ecological restoration plantings are restricted to the list in Appendix 2 and are not irrigated.	Partially addressed.
5. Landscape screening plantings are restricted to the list in Appendix 3, are not irrigated, and are placed a minimum of 50m from the property boundary fence inside the property.	Partially addressed.

Progress has been made towards addressing ecological issues relating to indigenous vegetation but outstanding issues remain relating to planting of indigenous species for landscape screening, and for lizard and terrestrial invertebrate habitat enhancement.

It is recommended that:

1. Plantings for landscape screening are restricted via consent conditions to those listed in Appendix 3 of the author's initial comments dated 11 February 2026.
2. Plantings for landscape screening are not irrigated if within 50 m of the property boundary fence.
3. Plantings for landscape screening greater than 50 m from the property boundary fence are only irrigated on still days or days with a southerly or easterly wind direction up to 20 km/hr; should use heavy droplets not fine mist spray; and be used a maximum of once per month between November and April for a maximum of 3 years starting when planted; using a top down boom facing away from the property boundary.
4. Plantings for lizard and terrestrial invertebrate habitat enhancement are restricted via consent conditions to those listed in Appendix 2 and Appendix 3 of the author's initial comments dated 11 February 2026 and are not irrigated.
5. Scientifically robust monitoring of potential edge effects on the vegetation community on the terrace adjacent to the property where landscape screening planting.
6. Russell lupin is included as a weed search and control target.