

Appendix Two

Date	3 August 2026
To	Mhairi Rademaker, Senior Environmental Policy and Planning Advisor, Genesis Energy Limited
From	Dr Peter Georgiou, SLR Consulting New Zealand Limited
Project advice provided for	Foxton Solar Farm – application for resource consents
Documents referred to	• SLR Report 810.14848.00007-R01-v1.5, “Foxton Solar Farm, Glint and Glare Assessment”, 10 December 2025. • Record of Decision of the Expert Panel under Section 87 of the Fast-track Approvals Act 2024, Draft Decision: 28 July 2026. • Foxton Solar Farm: Expert Panel Draft Conditions of Consent, 28 July 2026.
Qualifications	As set out in Appendix B to Appendix G to the Substantive Application. ¹
Code of Conduct	As an expert witness I have read, and I am familiar with, the Code of Conduct for expert witnesses contained in the Environment Court Practice Note 2023. This memorandum has been prepared in compliance with that Code. In particular, unless I state otherwise, this response is 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.
Signature	

1. The highest potential for glare at ground-based receptors is when solar tracking systems have a rest angle of zero degrees during backtracking in the early morning and late afternoon (especially sunrise and sunset). This is why a key mitigation strategy for minimising glare is to adjust the rest angle to greater than zero degrees so that early morning and late afternoon reflections are directed upwards away from ground-based receptors.
2. The Baseline simulation in the glint and glare assessment assumed a rest angle of zero degrees and no perimeter vegetation screening – ie a worst-case scenario. The model indicated that reflections might be experienced at several surrounding residences.²
3. The glint and glare assessment assessed two further scenarios, both of which eliminate all reflections at surrounding receivers:³
 - a. no perimeter vegetation screening and a five-degree rest angle during backtracking;⁴ and
 - b. perimeter vegetation screening and a zero-degree rest angle.

¹ [Foxton Solar: Glint and Glare Assessment](#).

² [Foxton Solar: Glint and Glare Assessment](#) at 5.3.1.

³ [Foxton Solar: Glint and Glare Assessment](#) at 5.4.

⁴ Sub-Arrays 6 and 8 only.

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4. As currently drafted, proposed condition B12A would force the operator to return the panels to the position where there is the highest risk of causing an effect. If complaints are received regarding reflections, glint, or glare, conditions A15 and A16 provide a pathway for response, which could include altering panel rest angles until planting establishes.

Dr Peter Georgiou
3 August 2026