

27 February 2026

Fast-track Team  
Environmental Protection Agency

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Kia ora

## **FTAA 2509-1100 THE POINT SOLAR FARM – FURTHER ECOLOGICAL REPORTS - COMMENTS FROM DIRECTOR-GENERAL OF CONSERVATION**

In its Minutes 3 and 4, the Expert Panel requested that Far North Solar Farms (FNSF) provide further information on landscape and ecology. In Minute 5, the Panel requested comments from s 53 parties on that further information. This letter responds to that request.

In preparing this response, DOC has sought advice from the technical advisors who inputted into the DOC comments on the substantive application, dated 19 February 2026.

### **More time sought for response on vegetation**

Unfortunately, the Technical Advisor dealing with the vegetation aspects of the proposal was undertaking field work in a remote location and uncontactable during the 24-27 February period for reviewing and commenting on FNSF's further information. We therefore propose that we will provide comments on the Vegetation Survey and Vegetation Management Plan by next Friday, 6 March. While we realise that it will then be at the Panel's discretion whether to accept those comments, we consider this is only a short delay which can be accommodated into the overall process, and the delay is warranted to ensure that DOC can provide well-informed and considered comments on the two documents.

### **General comments on approach**

In terms of the reports and management plans relating to lizards and invertebrates, DOC is generally comfortable with the proposed approach, subject to comments as set out below. This is on the basis that further work is required before finalising the management plans, and the consent conditions should ensure that DOC is able to have input into that process. Subject to that, DOC considers that the proposed management plans should be able to adequately manage effects on lizards and invertebrates.

The situation is different for avifauna, due to the significant uncertainty about long-term effects. DOC has worked with Far North Solar Farms (FNSF) on the proposal for avifauna compensation, and we consider that the proposed measures as outlined in their letter dated 23 February should adequately address effects relating to the loss of habitat and, along with (the experimental) mitigation measures list in the AMP, may help respond to collision risk.

However, we do not know how the actual collision risk will play out over time. DOC certainly hopes that collisions will be rare, as the applicant has indicated, such that no further action is warranted. However, there is a material risk that collisions could be at significant levels.

Particularly for the threatened species of birds in the Mackenzie Basin, this would risk population level effects beyond what the compensation would address. The compensation measures will therefore need to sit within a suite of conditions with monitoring, reporting, response triggers, review etc. Draft conditions along these lines are included in the applicant's current proposed conditions - it will be crucial that they are refined and retained in the final version to ensure that if collisions do occur they can be appropriately detected and responded to.

DOC notes the reliance of these conditions on bird carcass monitoring to trigger actions in the event Threatened or At-Risk birds are killed. Given the importance of carcass monitoring, DOC would support the Applicant or the Panel commissioning a statistical analysis similar to *Hamlin TJ, Jones TT, MacKenzie DI 2026 Statistical advice for a solar power installation at Haldon Station, Canterbury, New Zealand*, which has been submitted by Lodestone Energy for the Haldon application. DOC considers statistical analysis would be critical to inform appropriate monitoring under the Avifauna Management Plan.

### **Lizard Management Plan**

Dr Tocher has reviewed the Draft Lizard Management Plan and the Draft Pest Mammal Management Plan. She considers that in combination they mostly address lizard management, except that:

1. FNSF plan to release lizards into the eastern gullies but have not mentioned how they will stop them immediately leaving and moving into inhospitable habitats/construction footprint. Many lizards may be lost unless they are contained.
2. There is no information on timing of pest control in the gullies versus salvage – we consider pest control should occur first.
3. FNSF propose post-salvage monitoring but have not mentioned the need to do baseline quantitative monitoring first. Baseline surveys using consistent methodology will be required in order to be able to discern trends etc as per the objectives listed in the Lizard Management Plan.
4. In the monitoring overview in Section 6.1 in the Lizard Management Plan it states that post salvage monitoring “*may* need to be carried out for at least five years”, whereas in Section 6.3.1 it is stated as “*will* be undertaken” for five years – we consider that monitoring *will* be required for at least five years, and it would assist if this can be confirmed.
5. A key action - pest control - is contained in the Draft Pest Mammal Management Plan, not in the Lizard Management Plan. For this reason, it is impossible to discern additionality.

### **Invertebrate Management Plan**

Comments from Mr Chinn are attached. He considers that the Invertebrate Management Plan is generally sound, but he suggests that further consideration of the effects of shading is required and test holes for ground dwelling invertebrates would be useful, and he questions the claimed benefits of areas of concrete.

He also considers that further work is required on the planting plan for the invertebrate reserve, and that research funding should consider the effects of shading.

### **Avifauna Management Plan**

Comments from Dr O'Donnell are attached. Overall, he considers that the Avian Management Plan is light on detail, and does not reflect the Applicant's current draft conditions. DOC therefore considers that further work is required on this management plan, particularly in terms of mitigation measures and collision monitoring.

Given that long-term adverse effects on threatened avifauna are potentially the most significant ecological impact of this proposal, DOC also considers that further development of the Avian Management Plan will be needed prior to the Panel's decision. While other management plans can potentially be refined and finalised post-decision, a more complete Avian Management Plan is required to inform the decision, such that the key impacts of the proposal can be adequately understood.

We hope the Panel finds these comments helpful. If you have any questions regarding them, please contact Murray Brass on 027 213 3592 or [mbrass@doc.govt.nz](mailto:mbrass@doc.govt.nz).

Yours sincerely

A handwritten signature in blue ink, appearing to read 'JF', with a stylized flourish at the end.

Jenni Fitzgerald  
**Fast-Track Applications Manager**

Acting pursuant to delegated authority on behalf of the Director-General of Conservation.

Note: A copy of the Instrument of Delegation may be inspected at the Director-General's office at Conservation House Whare Kaupapa Atawhai, 18/32 Manners Street, Wellington 6011