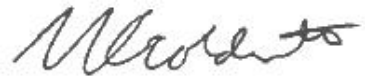
The Point Solar Farm: Response to S53 Comments on Draft Management Plans

Prepared for:	Far North Solar Farms Ltd	Reviewed and approved for release by:	 Nick Goldwater Senior Principal Ecologist
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1.0 Introduction

Wildland Consultants has reviewed the submissions and expert comments provided under s53 of the Fast-track Approvals Act process relating to the proposed Point Solar Farm. Submissions from the Department of Conservation (DOC), Canterbury Regional Council (CRC), Forest & Bird, Environmental Defence Society (EDS), and independent ecological reviewers raised several matters relating to ecological uncertainty, monitoring robustness, protection of Threatened species, and the adequacy of adaptive management frameworks.

In response, Wildlands has revised the suite of ecological management plans prepared for the project, including the:

- Avifauna Management Plan (AMP).
- Lizard Management Plan (LzMP).
- Terrestrial Invertebrate Management Plan (TIMP).
- Vegetation Management Plan (VMP).
- Pest Mammal Management Plan (PMMP).

The revisions focus on strengthening monitoring design, addressing uncertainty through precautionary management, clarifying trigger thresholds and adaptive responses, and improving integration between plans. Collectively, these updates provide a more robust framework for managing ecological effects associated with the solar farm. Where required, the consent conditions will be updated to reflect changes in the management plans.

2.0 Avifauna Management Plan (AMP)

The updated AMP has been revised to address concerns raised by DOC, CRC, and Forest & Bird regarding collision risk, monitoring adequacy, and the need for clear adaptive management mechanisms.

The revised plan requires preparation of a statistically robust Avifauna Carcass Monitoring Programme (ACMP) prior to construction commencing. The ACMP will be designed by a Suitably Qualified Avifauna Ecologist in collaboration with a biostatistician, and will incorporate observer efficiency trials, carcass persistence trials, and correction factors to estimate true mortality rates.

Monitoring will adopt a risk-stratified sampling design, prioritising areas with the highest collision risk, including site perimeters adjacent to waterways, infrastructure zones, and any additional areas identified through expert assessment. This approach ensures monitoring effort is concentrated where ecological consequences are greatest.

The AMP also introduces clear trigger thresholds and adaptive management responses, including immediate notification and expert review where collisions involving Threatened or At Risk species are detected. Ancillary infrastructure, such as fencing, overhead lines, and lighting, is now explicitly addressed through mitigation measures, including visibility enhancements and lighting minimisation.

Monitoring is proposed to continue throughout the operational life of the solar farm, ensuring that rare but consequential events can be detected over time.

3.0 Lizard Management Plan (LzMP)

The Lizard Management Plan has been revised to address matters raised by DOC, CRC, and Forest & Bird.

DOC identified several matters requiring clarification, including the containment of salvaged lizards, the sequencing of pest control relative to salvage, the need for baseline monitoring, and the duration of post-release monitoring.

The updated LzMP now provides:

- Baseline quantitative surveys prior to salvage to establish population baselines and enable meaningful assessment of trends over time.
- Sequencing of pest mammal control prior to salvage, ensuring predator pressure is reduced before lizards are relocated to enhancement areas.
- Defined monitoring requirements, confirming that post-translocation monitoring will occur for at least five years, providing sufficient time to detect population trends.
- Habitat enhancement measures, including rock refugia and habitat corridors designed to increase available habitat for lizards within the site margins.

The plan also clarifies how pest control actions implemented through the PMMP support lizard management outcomes, addressing concerns regarding the integration of these two plans.

CRC also noted the importance of ensuring that lizard habitat enhancement works do not inadvertently affect other ecological values, such as threatened plants or invertebrate habitats. The revised LMP therefore includes provisions for ecological pre-checks prior to habitat enhancement works, ensuring that works avoid significant vegetation or invertebrate habitat where present.

Forest & Bird raised concerns regarding the use of percentage-based monitoring targets (e.g. a 10% increase in lizard numbers within newly created habitat corridors), noting that such targets may be difficult to interpret where baseline populations are very low. In response, the monitoring framework has been clarified to emphasise population trends and habitat utilisation, rather than relying solely on percentage increases.

4.0 Terrestrial Invertebrate Management Plan (TIMP)

The updated TIMP responds to concerns raised by DOC, CRC, Forest & Bird, and EDS regarding survey adequacy, habitat loss, predator pressure, and monitoring certainty.

The revised plan acknowledges the limitations inherent with surveying and addresses uncertainty through suggesting additional quantitative baseline transects, identification of habitats most likely to support notable species, and implementation of an Incidental Discovery Protocol for Threatened species. Wildlife Act requirements are explicitly recognised should robust grasshopper be detected.

The plan identifies solar panel shading as the principal ecological risk mechanism, particularly within the eastern paddock where higher-quality grasshopper habitat occurs. To address this risk, a 13.8-hectare predator-proof “Point Grasshopper Reserve” will be established in retained habitat. Predator control within the reserve and broader predator suppression measures will be implemented through the Pest Mammal Management Plan.

Monitoring will occur annually for the first three years and then three-yearly for a further twelve years, using consistent transect methodologies. Adaptive management responses are triggered if monitoring indicates sustained population decline, with contingency research funding proposed if additional measures are required.

5.0 Vegetation Management Plan (VMP)

The updated VMP addresses concerns raised by CRC, Forest & Bird, and EDS regarding protection of threatened plants, potential edge effects from solar infrastructure, and the risk of weed invasion following land-use change.

Vegetation surveys confirm that the development footprint is dominated by improved pasture and depleted exotic grassland, with the most significant indigenous vegetation occurring around the site margins and terrace edges. These peripheral habitats support several Threatened and At Risk plant species, including Maniototo peppercress (*Lepidium solandri*).

Section 3.2 of the VMP has been expanded to include a targeted monitoring and enhancement programme for Maniototo peppercress, including baseline surveys, mapping of plants and suitable habitat, establishment of monitoring photopoints, seed collection and local propagation, and annual planting of propagated individuals into suitable habitat, as well as monitoring responses specific to Maniototo peppercress management.

The plan also introduces quantitative vegetation monitoring using permanent transects extending from the solar farm footprint across adjacent terrace habitats, enabling detection of potential edge effects associated with microclimate changes or irrigation. Monitoring will be undertaken prior to construction and at three-year intervals for at least fifteen years, with adaptive management responses triggered if edge effects and/or significant declines in indigenous vegetation are detected.

The VMP also strengthens weed surveillance and biosecurity measures, with systematic searches and control of woody weeds such as broom, sweet brier, and wilding conifers.

Additionally, it introduces quantitative measurement and reporting for the experimental disturbance treatment site, where ecological data on indigenous dryland vegetation and invertebrate populations are collected and analysed.

Potential edge effects relating to application of water (irrigation) to landscape screening plants are addressed in the RMM planting plan. This includes watering by hose (not using spray), not watering on windy days, and only watering towards site (i.e. no water will be directed towards the terrace edge). The landscape screening plantings are also set back a minimum of 10 metres from the site boundary. This setback will be managed through grazing as a dryland habitat, with only short grass in the location of the scrape sites (disturbance treatments).

6.0 Pest Mammal Management Plan (PMMP)

The Pest Mammal Management Plan has been updated in response to comments regarding predator control intensity within the proposed invertebrate reserve.

The revised plan reduces bait-station spacing to **10-metre grid within 30 metres of the fence**, which will increase the effectiveness of managing mouse incursions. Bait stations will be spaced at 25-metres throughout the remainder of the reserve (totalling *c*.600 bait stations inside the reserve).

While CRC suggested a 10-metre grid, this would require approximately 1,450 bait stations, which is considered operationally impractical and would substantially increase toxin deployment. The

proposed approach using a combination of 10-metre and 25-metre grids therefore represents a balanced and effective control regime that significantly strengthens rodent management while remaining operationally feasible.

Forest & Bird has indicated support for the overall predator-control approach described in the PMMP.

7.0 Overall Conclusion

The updated management plans respond directly to the ecological matters raised by s53 parties and materially strengthen the environmental management framework for the project.

Across the plans, key improvements include:

- More robust monitoring design and longer monitoring timeframes.
- Explicit trigger thresholds and adaptive management responses.
- Enhanced protection of Threatened species, including Maniototo peppercress and dryland invertebrates.
- Improved predator control and habitat enhancement measures.
- Stronger integration between the various ecological management plans.

Taken together, these updates provide a precautionary and structured framework for managing ecological effects and addressing the uncertainties identified by the Section 53 submitters.