Your Comment on The Point Solar Farm Fast-track substantive application

Please include all the contact details listed below with your comments and indicate whether you can receive further communications from us by email to substantive@fasttrack.govt.nz

1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
Organisation name (if relevant)	Canterbury Regional Council		
First name	[redacted]		
Last name	[redacted]		
Postal address	200 Tuam Street Christchurch 8011		
Home phone / Mobile phone		**Work phone**	(03) 365 3828
Email ***(a valid email address enables us to communicate efficiently with you)***	[redacted]		

2. We will email you draft conditions of consent for your comment			
X	I can receive emails and my email address is correct	☐	I cannot receive emails and my postal address is correct

Please provide your comments below, include additional pages as needed.

Thank you for your comments

19 February 2026

Environment Canterbury Regional Council
Kaunihera Taiao ki Waitaha

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Hon. Rayon Asher
The Point Solar Farm Expert Panel Chair
C/O - Fast-track Team
Environmental Protection Authority
substantive@fasttrack.govt.nz

Tēnā koutou,

Attention: The Chair and Members of the Expert Panel for The Point Solar Farm Proposal by Far North Solar Farm Limited

FTAA-2509-1100 – Far North Solar Farm Limited - Fast Track Proposal - The Point Solar Farm – 670ha north of Lake Benmore.

Section 53 Panel Invitation to Comment on Substantive Application

Thank you for your email dated 21 January 2026 inviting comment on The Point Solar Farm under sections 53 and 54 of the Fast Track Approvals Act (FTAA).

I understand that comments are due back to the panel by 19 February 2026 and that no waiver to this time limit can be applied.

Please find the Canterbury Regional Council's comments attached below. If you have any questions, please don't hesitate to get in touch.

Canterbury Regional Council (CRC) has reviewed the substantive application for the Point Solar Farm Fast-track application and provides the following written comments, made in accordance with section 53(2) of the FTAA.

These comments summarise CRC's overall feedback on the proposal. The technical advice supporting the feedback is contained in Appendices 1 - 7 of this document. CRC's comments on the 5 February 2026 version of the Applicant's proposed conditions are contained in Appendix 8.

CRC notes that a new set of conditions was received from the Applicant on 18 February 2026. Because s53 comments are due on 19 February 2026, CRC did not have appropriate time to be able to review and incorporate comments on this condition set. The Applicant has also indicated that they will engage a specialist to review these conditions, so further revision to the proposed conditions is possible, and CRC could provide further comment once a finalised set is received from the Applicant.

Canterbury Regional Council look forward to continuing to work with the Panel on this project.

Overview

1. Canterbury Regional Council (CRC) has been invited by the Expert Panel, via the Environmental Protection Authority (EPA), to comment on Far North Solar Farm Limited's (FNSF / the Applicant) substantive application under the Fast-track Approvals Act 2025 (FTAA) for The Point Solar Farm.
2. CRC considers that the proposal is generally consistent with the relevant objectives and policies set out in the Canterbury Regional Policy Statement (CRPS), Canterbury Land and Water Regional Plan (LWRP), and the Canterbury Air Regional Plan (CARP). The activities requiring consent under the LWRP are listed in Table 1 below. Further discussion of the number and structure of consents required is given below.

Table 1. Activities Requiring Consent From CRC

Activity	RMA Section	Duration Sought	LWRP Rule	LWRP Activity Status
Use of Land for earthworks over an aquifer	Section 9 – Land Use Permit	5 years	Rule 5.176	Restricted Discretionary
Discharge of construction-phase stormwater to land	Section 15 – Discharge Permit	5 years	Rule 5.94B	Restricted Discretionary
Discharge of operational stormwater to land	Section 15 – Discharge Permit	35 years	Rule 5.97	Discretionary

3. CRC considers that any adverse environmental effects that may arise from the proposal can be appropriately avoided, remedied, mitigated, or offset/compensated, subject to appropriate conditions of consent.
4. However, CRC does highlight that uncertainty around adverse effects on avifauna is a key consideration. CRC considers that appropriate compensation and/or offset measures (including adaptive management) should be included as conditions to ensure that any residual adverse effects to threatened avifauna are appropriately addressed.
5. CRC also consider that more work is necessary to modify the form and content of conditions generally to ensure they are appropriate and enforceable. As substantive revisions are expected to the condition set, CRC considers that it would be appropriate for the invited parties to have further opportunity to comment on the condition set, including potential compensation / offsetting provisions. CRC is open to continuing to work with the Applicant on the conditions, including adaptive management conditions for avifauna, as we move forward.

<u>Background</u>

Previous RMA Consent Applications

6. In September 2023, FNSF applied to CRC for two resource consents for The Point Solar Farm under the Resource Management Act 1991 (RMA). The applications covered construction-phase stormwater discharges (CRC240933) and operational stormwater discharges (CRC240932), each covering the entire 670 ha site.
7. The application was publicly notified at FNSF's request in November 2023 with 19 submissions received. After the submission period closed, FNSF placed the application on hold awaiting availability of the Fast-track process. FNSF subsequently withdrew the RMA applications on 18 January 2024.

Substantive Application

8. The substantive application by FNSF was lodged on 1 September 2025 and deemed complete under section 46(2) of the FTAA by the EPA on 16 October 2025.
9. CRC has reviewed the substantive application documents and all appendices.

Consultation

10. Consultation between CRC and the Applicant commenced prior to lodgement of the Fast-track application and has been ongoing throughout the process. Internally, CRC staff have met to discuss the application to provide an opportunity for staff across different relevant disciplines to raise questions, identify issues and provide comments within their respective areas of expertise. Wherever appropriate to do so, CRC have communicated these questions, issues or comments back to the Applicant.
11. CRC has received additional information since lodgement of the substantive application and have had on-going contact with the Applicant to discuss details of the application.
12. CRC have also been in communication with the Department of Conservation (DOC) to better understand ecological issues, as well as Te Rūnanga o Ngāi Tahu, Aukaha Ltd (providing advice on behalf of Te Rūnanga o Waihao and Te Rūnanga o Moeraki), and Aoraki Environmental Consultancy Ltd (Te Rūnanga o Arowhenua) in order to understand the opinion of papatipu rūnanga on the proposal.

Key Issues

13. CRC's review of key issues has been undertaken across the relevant areas of technical expertise (refer Appendices 1 - 7). The advice of CRC's technical experts is summarised in Table 3 of this document. Table 3 captures a summary of the Applicant's assessment, a summary of CRC's technical expert's assessment, and CRC's recommended actions and/or comments on conditions.
14. CRC agrees that overall, the Applicant has identified the key issues associated with the proposal. While the majority of key issues have been appropriately addressed, there are a number of remaining issues that require further work to address.
15. The key remaining issues for the application are:

    i. Terrestrial ecology effects (particularly avifauna)
    ii. Consent requirements and scope
    iii. Conditions

16. Commentary on these issues is provided below.

Terrestrial Ecology Effects

17. The Panel's request for further information from the Applicant (hereafter the RFI), dated 23 January 2026, included a request for draft ecological management plans with details on the applicant's proposed compensation for residual adverse effects on avifauna.
18. CRC understands that the Applicant is still in conversation with DOC around an appropriate mechanism to offer compensation. While an initial, fixed compensation package is laudable, the main ecological concern of CRC's Land Ecology Team is the uncertain effects of avian mortality associated with utility-scale solar farms.
19. If the proposed solar farm results in significant adverse effects to sensitive avifauna, any initial compensation package may not be in proportion to the adverse effects. As such, CRC considers that the suite of ecological management plans should include adaptive management requirements that provide for additional compensation if residual adverse effects to avifauna are greater than anticipated.
20. Specific thresholds for further compensation, as well as the specific value of that compensation, should be included in the management plans, and ongoing consultation with DOC is advised to determine their appropriate values
21. CRC do not consider conditions requiring management plans that include adaptive management requirements for additional compensation would be more onerous than necessary to address adverse effects on avifauna.

Consent Requirements and Scope

Construction and Operational Phase Stormwater

22. The Panel's RFI queried consent requirements for stormwater. The applicant's RFI response dated 9 February 2026 confirmed that the Applicant seeks construction phase stormwater consents for the site as a whole, and that consents are sought for operational phase stormwater consents for the solar panels, the Grid Injection Point (GIP) and the substation.
23. CRC agrees with the Applicant that this is broadly correct, but further comment on this matter is discussed below.

Number and Format of Consents

24. As identified by the Panel, the Applicant's table of required consents does not clearly outline the specific consents required from CRC. While the general activities requiring consent have been identified in Table 1 above, the specific number and format of consents required depends on the Applicant's intention with these consents if they are granted by the Panel.
25. As outlined in the Application, and from conversations between the Applicant and CRC, CRC understands that the Applicant's intent is for Transpower New Zealand Ltd (Transpower) to own/operate the GIP Substation situated within the wider Solar Farm, while the Applicant would retain ownership and operation of the Solar Farm Substation.
    i. To avoid confusion, CRC uses the following terminology to identify specific areas of the project:

a. ‘Solar Farm’ – The entire site (as identified in Map 1 of Minute 2), including the Solar Farm Substation, but excluding the GIP Substation for the purposes of operational stormwater consents (as below).

b. ‘Solar Farm Substation’ – The portion of the site containing two large transformers leading into the GIP Substation.

c. ‘GIP Substation’ – The portion of the site containing the switchyard/substation that connects directly to the 220kV overhead lines.

ii. Design of the GIP Substation and Solar Farm Substation are included in Appendix L – GIP Civil Design Plans, submitted with the Application, with separation of the Applicant’s and Transpower’s assets outlined in Section 1.3 of Appendix L.

26. As such, CRC understands that it is the Applicant’s intention to transfer consents managing the GIP Substation to Transpower. To facilitate that transfer, two operational stormwater consents would be required, with each consent specifying the area managed.

27. If the Applicant confirms this approach, CRC considers that four resource consents would be required, as outlined in Table 2 below.

Table 2.

Activity	**RMA Section**	**Duration Sought**	**Consent Numbering (Indicative)**	**LWRP Activity Status**
Use of Land for earthworks over an aquifer – entire site.	Section 9 – Land Use Permit	5 years	CRC000001	Restricted Discretionary
Discharge of construction-phase stormwater to land – entire site.	Section 15 – Discharge Permit	5 years	CRC000002	Restricted Discretionary
Discharge of operational stormwater to land – Solar Farm including Solar Farm Substation	Section 15 – Discharge Permit	35 years	CRC000003	Discretionary
Discharge of operational stormwater to land – GIP Substation	Section 15 – Discharge Permit	35 Years	CRC000004	Discretionary

28. This would allow for all construction-phase activities to be managed on a unified, site-wide basis, and for the operational consents to be appropriately divided between the Applicant and Transpower.

29. The operational stormwater consents would need to clearly outline the areas they cover, as well as any specific operational stormwater consent requirements, e.g., the oil separator system (See comments on Condition (122) in Appendix 8).

Contaminated Land

30. The application states that consent is not sought under the National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health Regulations 2011 (NES-CS). However, the Applicant proposes a Preliminary Site Investigation (PSI), a Detailed Site investigation (DSI) and, if contaminants are encountered, a Remedial Action Plan (RAP) as conditions of consent. The conditions therefore anticipate that consent under the NES-CS would be required in some circumstances. CRC suggests that the Applicant could seek consent under the NES-CS on a precautionary basis to ensure that the consent is in place (if granted), if it is needed.
31. LWRP Rules 5.185 and 5.187 provide for the investigation of contaminated land and for the passive discharge of contaminants from contaminated land respectively as a permitted activity. If those rules cannot be met, resource consent is required under LWRP Rules 5.186 and 5.188. The applicant will need to consider those rules and could seek precautionary consent if the Applicant considers that Rules 5.185 and 5.187 may not be able to be met. This has been communicated to the Applicant

Earthworks

32. In the RFI response, the Applicant states that works along the access road within Lot 2 DP 470213 would be covered by the regional consents already sought in the substantive application. However, CRC consider these works to be out of scope of the application. This is discussed further below in relation to the scope of the application.
33. The nature and scope of upgrade works along the access road are not entirely clear from the application, and additional consents may be required. This was communicated to the Applicant who has undertaken an assessment against LWRP rules to determine consent requirements.
34. The Applicant provided their assessment to CRC on 17 February 2026. CRC have not had sufficient time prior to the s53 deadline of 19 February 2026 to review this and provide substantive comments back to the Applicant. CRC will provide the applicant with a review of their assessment by 27 February 2026.

Sheep Grazing / Farming

35. The Application states that the Solar Farm would allow for sheep grazing around and below the solar arrays (Section 4.1 – page 23).
36. CRC notes that sheep grazing, as a farming activity, would likely trigger farming land use (FLU) consent requirements under the Waitaki sub-regional plan as part of the LWRP (Rules 15B.5.8-12).
37. CRC notes that the party requiring the FLU would be the owner of the sheep to be grazed. As such, CRC does not consider that the Applicant is required to have a FLU to undertake the overall Solar Farm activities.

Scope

38. In CRC's view, the inclusion of additional consents for stormwater and / or contaminated land could be considered within scope, as these consents would be reasonably anticipated based on the nature of the proposal described in the application, the assessments provided, and proposed conditions.

39. Unlike stormwater, there is no assessment of any farming activity in the application, nor conditions proposed. As such, CRC considers that a FLU consent is not in scope and could not be included in the current Fast-track process. If a FLU consent is required, as far as CRC is aware, there would be no impediment to the Applicant seeking those consents separately under the RMA.

40. Additionally, works along the access road through Bendrose Farm (Lot 2 DP 470213) would not be within scope of the substantive application. This is because Lot 2 DP 470213 is not described in the application as part of the site, and the access road and any associated works thereon were not described in the application.

41. However, if any consents are needed for works within Lot 2 DP 470213 for the access road, as far as CRC are aware, there would be no impediment to Applicant seeking those consents separately under the RMA.

Procedural Correctness

42. Consideration of Lot 2 DP 470213 as part of the site would present a procedural issue as Lot 2 DP 470213 is not described as part of the site in the application.

43. Section 53(2) of the Fast-track Approvals Act 2024 states that, in relation to the opportunity to comment on a substantive application, comments must be invited from the parties listed in (a) – (n) of subsection 2, which includes;

    (h) the owners of the land to which the substantive application relates and the land adjacent to that land;

44. If Lot 2 DP 470213 were to be included as part of the application site, this would require additional landowners that have not to-date been invited to comment under s53(2), to be invited to comment under s53(2)(h).

45. CRC is not aware of a mechanism in the FTAA that allows for additional parties to be invited to comment after the original invitation to comment has been made under s53.

<u>Conditions</u>

46. While the Applicant's proposed conditions dated 5 February 2026 generally cover the appropriate matters to manage the effects of the proposal, CRC's view is that more work is necessary to modify the form and content of these conditions to ensure they are appropriate and enforceable.

47. CRC notes the Panel's request (1.9) in their RFI regarding conditions and agrees with the issues the Panel has raised.

48. Comments and recommendations regarding the conditions have been made by CRC's technical experts. These are outlined in Table 3 and in Appendix 8.

49. The Applicant provided a further iteration of the proposed conditions on 18 February 2026. As s53 comments are due on 19 February 2026, CRC have not had time to circulate these internally or review this version of conditions. As noted in the cover letter, the

Applicant is also undertaking further specialist review of the conditions, and CRC can provide further comment on any final set provided by the Applicant.

50. CRC also acknowledges that, due to an error of process, CRC's ecological assessments were not passed to MDC for review until 18 February 2026. As such, where CRC's ecologist has commented directly on MDC conditions (e.g., Avifauna Management Plan, Lizard Management Plan etc.), those comments are included against the relevant conditions in Appendix 8 below.

Table 3. Summary of CRC technical comments on application. (See full advice in Appendices 1-7 attached below)

Applicant's assessment summary	CRC technical assessment summary	CRC Changes required/conditions sought to address CRC's comment
(1) Terrestrial Ecology – Appendix 1		
• Application Section 6.3: Ecological Enhancement – page 42. • Funding the creation of an invertebrate sanctuary is to be maintained by DOC. ○ **[**Note that Section 6.3 of the application is now outdated, as the Applicant, through discussions with DOC, has altered the ecological enhancement plan. Planting will no longer occur across 80ha, but it is understood that more directed management, including planting and predator fencing, will occur over 15ha in the east/northeast of the site.**]** • Application Section 6.14: Ecological Effects • Section 6.14.2 - Applicant considers potential effects to avifauna from habitat loss, breeding displacement, construction effects, and bird strike to be minor overall.	• CRC's Terrestrial Ecology Team have considered the application. • CRC's main concern is uncertainty around magnitude of avifauna mortality effects and uncertain efficacy of mitigations for avifauna mortality. • Potentially affected avifauna include Threatened – Nationally Critical and Threatened – Nationally Endangered birds. • While conditions are generally appropriate, given the uncertainty around effects to endangered and nationally critical avifauna, further conditions should be included to provide for appropriate compensation/offset should mitigations provide ineffective. • **[***Note that further ecological surveys are due after the s53 comment deadline, which may inform further mitigations/conditions.***]**	• Include further adaptive management conditions requiring offset/compensation if the AMP/BCMP cannot appropriately mitigate effects. • That the Applicant consult further with DOC on Condition (112) (Appendix 8) relating to nighttime positioning of solar arrays to avoid bird deaths. • That the Applicant continues consultation with CRC / DOC around appropriate mitigation and appropriate offsetting/compensation. • **[***Note: DOC have acknowledged continued engagement with the Applicant, and that DOC will provide comment around these discussions in their s53 comments***]**.

Applicant's assessment summary	CRC technical assessment summary	CRC Changes required/conditions sought to address CRC's comment
(2) Groundwater - Appendix 2		
• Application Section 6.10: Groundwater Effects – page 49. • Groundwater not encountered in shallow site investigations. Existing wells show groundwater depth of 9m below ground level (BGL) at north of site, deepening to 17m BGL at south of site. • Substation site will have sub-soil drainage system to discharge into soakpit. Transformer bunds and drainage from hardstand would be captured and treated prior to discharge to groundwater via soakpits.	• CRC's Water and Land Science Team have considered the application • The main concerns were: i) hazardous chemicals (mainly PFAS) leaching from the solar panel coatings reaching groundwater, and ii) Sufficient bunding and spill containment to prevent hazardous chemical spills from reaching groundwater. • From applicant's proposed conditions (5/2/26): i) Condition 71 requires that panel coatings must not contain PFAS, ii) Condition 131 requires bunding around oil-filled transformers. • CRC is comfortable that these concerns have been addressed.	• The Applicant's proposed conditions are sufficient and no changes are needed.

Applicant's assessment summary	CRC technical assessment summary	CRC Changes required/conditions sought to address CRC's comment
(3) Contaminated Land – Appendix 3		
• Application Section 7.4.1 – page 58. • Consider no HAIL activities have occurred on the site, so no NES-CS consent is required.	• CRC's Contaminated Land and Waste Team have considered the application. • Concerns raised related to: i) Leaching of heavy metal contaminants, and remedial action if soil contamination limits were exceeded ii) Waste management and decommissioning of the solar farm iii) Consideration of HAIL matters and the absence of a Preliminary Site Investigation (PSI). • Concerns raised have been addressed by additional conditions offered by the applicant relating to: i) a PSI / Detailed Site Investigation (DSI) / Remedial Action Plan (RAP) ii) Monitoring of soil for heavy metals every 5 years iii) Adoption of WasteMINZ Class 4 (Table C-3) values for monitoring of heavy metals • A Decommissioning Plan	• Solar panels should not be broken down or stored on mass in a degraded state during decommissioning or panel replacement to avoid discharges of panel components and contaminants to the environment Within the condition for the Decommissioning Management Plan, include a requirement that degraded/broken panels not be stored on-site. See comment on Condition (30) in Appendix 8 below. **[***Note: CRC would be happy to work with the Applicant on a suitable condition.***]**.

Applicant's assessment summary	CRC technical assessment summary	CRC Changes required/conditions sought to address CRC's comment
(4) Land Resources - Appendix 4		
• Application Section 6.4 – page 45. • Site is LUC 6, so project will have on effect on prime soils. • Project allows for sheep or seasonal crop farming between panels. The carbon status of the soils will be maintained, and solar panels can easily be removed and the site reinstated to full grazing on completion of solar use. • No effects on soils	• Key outstanding matters are conditions managing soil monitoring and vegetation management, rather than a fundamental disagreement about whether the project should proceed. • The soils at the site are inherently vulnerable: shallow, stony, erosion-prone, and in a dry subhumid climate, and their condition has likely been degraded by previous land use. • The scale and duration of the project means that inadequate monitoring or poorly specified conditions could allow gradual soil degradation to go undetected.	• That the Applicant make the suggested amendments to SEMP soil health/monitoring conditions. . • Recommended soil health parameters to be monitored: ○ Organic carbon ○ Total nitrogen ○ Aggregate stability ○ pH ○ Electrical conductivity • See full advice in Appendix 4 below. • Relevant comments have been added to CRC's general comments on Conditions (12), (15) and (16) in Appendix 8.
(5) Policy Planning - Appendix 5		
• Application Section 7.7, Table 17 – page 69. • Provides assessment against CRPS. While no summary is provided, the application does not identify any significant inconsistencies with the CRPS.	• CRC's policy planning team have considered the application. • There are potential cultural impacts on mana whenua, particularly cultural landscape and ecological values, noting that papatipu rūnanga did not initially support the proposal. **[**Note	• Relevant comments have been added to CRC's general comments on Conditions (9), (44) and (80) in Appendix 8 below.

Applicant's assessment summary	CRC technical assessment summary	CRC Changes required/conditions sought to address CRC's comment
	ongoing consultation between Applicant and iwi authorities has occurred, and CRC would defer to comments from iwi authorities on cultural effects**]**. • Confirmation of the suitability and workability of the Kaitiaki Forum has not been received from mana whenua **[**relevant iwi authorities**]**. • The site is within an Outstanding Natural Landscape. While the applicant considers landscape effects will be low-moderate, the proposed Landscape Management Plan has not been supplied, so it is not possible to determine the extent to which landscape effects will be mitigated. • The Ecological Enhancement Plan states that land use would change from dairy support to light sheep grazing, which could decrease rural production from the land. Any growth of pasture species to graze sheep could have adverse effects on any remaining indigenous flora and fauna. • The Pest Animal and Weed Management Plan needs to give effect	

Applicant's assessment summary	CRC technical assessment summary	CRC Changes required/conditions sought to address CRC's comment
	to the Canterbury Regional Pest Management Plan. • The Traffic Management Plan has not yet been developed.	
(6) Surface Water Ecology - Appendix 6		
• Application Section 6.11 – page 49. • Potential for construction works to affect water quality, but will be correctly managed with an Erosion and Sediment Control Plan (ESCP). Water quality effects expected to be less than minor.	• CRC's surface water ecology team have considered the application. • The main risk identified was overland flow paths discharging to the Pukaki/Tekapo rivers on the eastern side of the property. If overland flows paths are altered such that increased/concentrated flow occurred into the gullies, this may increase erosion of the gullies into the Pukaki/Tekapo rivers. • As the side braids on the true right of the Pukaki/Tekapo rivers would not naturally receive high sediment loads, even during moderate flood events, sediment laden discharges to these reaches could damage instream habitat for aquatic fauna. rTo avoid this issue, the Applicant's stormwater assessment recommends that no bunding earthworks or raised access tracks be permitted, as these will	• Subject to appropriate controls in the ESCP conditions, CRC is satisfied that construction-phase effects can be appropriately managed. Note specific comments on ESCP Condition (79) in Appendix 8 below. • The Applicant's proposed conditions do not include conditions around bunding or raised access paths for the operational phase stormwater discharges. CRC requests a condition to this effect. • We note that this issue was not raised with the Applicant until a draft copy of these comments was supplied to them. • **[***Note: CRC would be happy to work with the Applicant on a suitable condition.***]**.

Applicant's assessment summary	CRC technical assessment summary	CRC Changes required/conditions sought to address CRC's comment
	concentrate flowrates into channels at points along the eastern drop-off. • CRC's Water and Land Science Team support this recommendation.	
(7) Compliance - Appendix 7		
• No specific comments around "Compliance" in application. • Amended conditions provided 5 February 2026.	• CRC's compliance team have considered the application. There is a general lack of detailed management plans provided with application.	Relevant comments have been added to CRC's general comments on Conditions (1), (3), (7-9), (11-13), (18), (25), (79), (123), (133), (137), and (142) in Appendix 8 below.

Regional benefits

51. The purpose of the FTAA is to facilitate the delivery of infrastructure and development projects with significant regional or national benefits.
52. While ultimately a matter for the Panel, the application has described the regional and national benefits of the proposal in Section 6.2 of the application (page 41), including:

    a. Supporting national goals around renewable energy generation and phasing out fossil-fuel based electricity generation.
    b. Enhancing security and resilience of Aotearoa's electricity network.
    c. Producing electricity to power approximately 100,000 households.

53. Neither the Applicant, nor CRC have undertaken an economic review of the project's proposed benefits. Notwithstanding that, CRC generally agrees that the project would produce national benefits in terms of renewable energy generation.

Concluding Comments

54. Overall, CRC's view is that there are no fundamental issues that cannot be resolved through amendments to the Applicant's proposed conditions.
55. However, CRC does highlight that uncertainty around adverse effects on avifauna is a key consideration. CRC considers that appropriate compensation and/or offset measures (including adaptive management) should be included as conditions to ensure that any residual adverse effects to threatened avifauna are appropriately addressed.
56. CRC considers that if Lot 2 DP 470213 were to be included as part of the application site this would create a procedural issue under s53(2).
57. CRC considers that some activities associated with the proposal are not within scope of the application and cannot be included in the current FTAA process. However, any necessary consents can be sought under the RMA.
58. CRC notes the Applicant is engaging a specialist to review their latest set of proposed conditions (18[1]. As such, CRC considers it appropriate for the invited parties to have the opportunity to comment on any further amended set of conditions.
59. CRC will continue to engage with the Applicant at their request to assist with drafting of conditions or on any other matters.
60. The Applicant is required to provide further information in response to the Panel's RFI on 23 February 2026. Council's advice presented in this letter may change based on the nature of that information and further changes to conditions may be required. CRC appreciate that the Panel has provided us further opportunity to comment on this information in Minute 5.
61. We trust these comments will assist the Panel in making a determination on the application.

[1]Communicated to CRC by Applicant 18 February 2026.

Brett Aldridge
Director Operations

Appendices attached below

Appendix 1: CRC Technical Advice – Terrestrial Ecology: Dr Jean Jack

Appendix 2: CRC Technical Advice – Groundwater: Dr Carl Hanson

Appendix 3: CRC Technical Advice – Contaminated Land: Ms Madeline Sinha

Appendix 4: CRC Technical Advice – Land Resources: Dr Ognjen Mojsilovic

Appendix 5: CRC Technical Advice – Policy Planning: Ms Rachel Tutty

Appendix 6: CRC Technical Advice – Surface Water Ecology: Dr Shirley Hayward

Appendix 7: CRC Technical Advice – Compliance: Ms Georgia Simmonds & Ms Katie Nagy

Appendix 8: Conditions Table with CRC Comments

Fast Track Approvals Act 2024 (FTAA) Technical Advice

Date	12.02.2026
To	Reuben Herz-Edinger, Senior Consent Planner
From	Dr Jean Jack, Land Ecology Team Leader, Science
Project advice provided for	The Point Solar Farm - FTAA-2509-1100 / RMA261598
Documents referred to	• The Application & AEE, dated 27 August 2025 - C25C/233430-2 • Appendix G - Ecological Assessment - Wildlands Ltd. (2023) - C25C/169012-13 • Appendix H - Site Layout Plan and Drawings - C25C/233430-17 •Appendix P - Ecological Enhancement Plan - Wildlands Ltd. (2025) C25C/233430-25 •Appendix T - Bird Strike Reports - C25C/233430-30 • Amended Conditions, dated 5th February 2026. •AgScience Ecological Assessment, undertaken Dec 2026 - C26C/20872 • RFI – February Response Appendices 6, 9, 10, 11, 13 & 12 (amended conditions).

Introduction/Summary

1. My comments provide advice regarding the potential effects of The Point Solar Farm proposal on terrestrial ecology.

2. I have provided advice throughout this project (from pre-application discussions) and attended a site visit on 2nd February 2024 alongside other Environment Canterbury staff and Mackenzie District Council staff and their ecology consultant.

3. I agree with the description of the environment and the listed potential effects on the site's ecology provided by Wildlands Ltd. (2023) which was provided as part of the applicants initial s92 response.

4. The layout of the solar farm (C25C/233430-17) presented within the Application adopted recommendations of the Wildlands Ltd. (2023) report, avoiding areas of ecological value and thereby many of the potential effects of the original layout.

5. Ecological values within the project area which may be impacted by the proposal include indigenous vegetation and habitats of indigenous fauna including avifauna (birds), terrestrial invertebrates, and herpetofauna (lizards).

6. A suite of management plans and conditions are proposed to manage or compensate for ecological effects. I understand these are being developed (by Wildland Consultants

Ltd) in association with DOC and that the compensation would likely sit within a wider set of consent conditions, management plans, monitoring and reporting as part of overall effects management.

7. Key areas of concern relate to the efficacy of management plans and the residual ecological effects regarding avifauna, specifically potential effects including bird strike and loss of feeding and breeding habitat.

8. The site is located at a hot spot for Nationally Threatened and At-Risk bird species which frequent the Ohau-Tekapo river delta at Lake Benmore. Flight paths of these birds are known to traverse directly across the proposed solar farm site. This is known for at least one species – black fronted tern - from recent research which placed transmitters on birds revealing their flight routes (Gurney, 2022).

9. The best way to avoid the impacts is to locate solar farms outside the Mackenzie Basin, within less sensitive habitats, and to undertake research to ascertain the risks these solar developments pose to avifauna. In lieu of this, offsetting or compensatory measures should be provided.

Agreement with the applicant

10. I agree with the description of the environment and the listed potential effects on the site's ecology provided by Wildlands Ltd. (2023) which was provided as part of the applicants initial s92 response.

Benefits of the project

11. Potential benefits of this project with respect to my area of expertise are:
    a. The protection and restoration of indigenous faunal habitats and specifically:
        i. Research into the issue of solar farm bird strike risk.
        ii. Funding for a predator-free dryland reserve (12-15ha) to be administered by DOC (and which might provide for Robust Grasshopper conservation).

Outstanding areas of contention and significance of these.

Outstanding areas of contention

12. Bird strike pre- and post-construction during solar farm operation – particularly concern is for the rare and Nationally Critical species kakī/black stilt which has a very small wild population (150 birds).

13. Loss of avifauna feeding (black-fronted tern banded dotterel, SI pied oystercatcher, NZ pipit, black-billed gull) and breeding (NZ pipit, banded dotterel, SI pied oystercatcher) habitat. These potential effects on avifauna were considered more than minor (without mitigation) by the applicant's report (Appendix G; page 30-31).

Significance of these matters

14. Avifauna populations and their habitat found within the MacKenzie Basin are ecologically significant and nationally important. Nationally Threatened and At-Risk bird species which may be affected by the proposal include the kakī/black stilt, matuku

hūrepo/Australasian bittern, kōtuku/white heron, black-billed gull, black-fronted tern, wrybill, and banded dotterel.

15. Bird mortality associated with solar farms—due to collisions and secondary predation of injured or disoriented birds—has long been recognised as a significant environmental impact overseas. In New Zealand, the risk posed by collisions with solar panels remains an unresolved concern, particularly for mobile wetland species and at sites where a relatively high proportion of threatened bird species are present – such as in the MacKenzie Basin.

Solutions and/or comments on conditions

16. I have reviewed proffered conditions, and note the following:

    a. Conditions now align with my previous recommendations including for the ecological enhancement plan (EEP) to be reviewed by Department of Conservation (DOC), for the Landscape Management Plan (LMP) to be informed by the other ecology plans - which in turn are aligned with each other. Also, for the pest management plan (PAWMP) to identify measures and reporting outcomes, and for the lizard management plan (LzMP) to align to existing DOC guidelines.

    b. Notably, proposed conditions 57 to 67 provide provisions to assess bird strike occurrence through avifauna monitoring, and development of a Bird Collision Management Plan (BCMP) with associated mitigation options should collision thresholds be detected. These generally align with recommendations made by DOC technical staff shared with Environment Canterbury for other solar farm developments. I would however recommend Condition 66 / 67 – which provide for a BCMP Bird Collision Management Plan - might include a clause that provides for relevant and appropriate compensation should mitigations prove ineffective, and collision thresholds are repeatedly exceeded.

    c. Condition 112 requires solar panels to be positioned vertically at night. While this has presumably been included as a mitigation to address the ‘lake effect’ there is the possibility that this action may create an equally concerning issue for collision – an upright structure. I recommend this is considered further by ornithologists / DOC avifauna experts. Rather than one angle being set as a default, the panels might better be at alternating angles and or informed by the time of year/month. i.e. individual panel set to different angles to break the polarised light visual cue from above and or positioning the panels at night in directions away from sources of polarised moonlight.

    d. Lastly, the Application proposes *funding the creation of an invertebrate sanctuary set up and maintained by DoC for the Robust Grasshopper* (Application, Page 44). While a management plan for this species is provided for by proposed condition 68 it does not explicitly refer to a sanctuary. Given robust grasshopper has not been confirmed as potentially affected by the proposal (?), presumably the Application’s proposal would be an Augier condition.

17. Regarding potential bird strike effects, I would maintain that the best way to approach the potential bird strike risk is to locate solar farms outside the Mackenzie Basin, within less sensitive habitats, and to undertake research to understand the risks these solar developments pose to avifauna and the efficacy of mitigation measures prior to their establishment within important bird habitat including flyways.

18. In lieu of this, offsetting or compensatory measures should be provided.

19. I understand multiple solar farms are proposed within the Lake Benmore area. I would recommend a precautionary approach towards the potential for cumulative effects of multiple solar farms being constructed simultaneously – i.e. to determine the impacts of one solar farm on avifauna before building another.

References

Gurney F.E. 2022: Breeding movements and post-breeding dispersal of black-fronted terns/tarāpirohe (Chlidonias albostriatus) in the Mackenzie Basin. Master of Science thesis, Lincoln University. 96p.

From: Jean Jack <Jean.Jack@ecan.govt.nz>
Sent: Thursday, 12 February 2026 9:49 am
To: Dwayne Daly <Dwayne.Daly@ecan.govt.nz>; Reuben Herz-Edinger <Reuben.Herz-Edinger@ecan.govt.nz>
Subject: RE: ECan - The Point/FNSF - RFI info to panel / catch-up? - RMA261598

Morning.

Yes, essentially there is uncertainty.
Low risk, high consequence.

The inclusion of the literature review is perhaps just getting into the detail of how a bird collision monitoring plan would be designed. So they might just as easily have left it out of conditions, but it would be expected during the design of a BCMP / the AMP.

The most recent advice from DOC scientist Dr O'Donnell I have seen was provided in the context of the Haldon / Lodestone application – attached email file with excerpts below.
I concur with this advice.
I see in the files DOC-Applicant comms agreeing on possible compensatory measures or 'augier' conditions – Appendix X.

Seems like the current Condition 66 / 67 - providing for a BCMP Bird Collision Management Plan - might add a clause that if mitigations don't work, and thresholds are repeatedly exceeded that some compensation would be required – i.e to offset loss of kaki, increased compensation for kaki conservation/breeding programme etc – as

per the DOC-Applicant comms – which mentioned them offering to rebuilt an aviary etc etc.

Dr O'Donnell's advice below touches on the cumulative issue of multiple farms going up at once. From the panels minutes I understand this is on the radar, and that both The Point and Haldon are being considered by the same panel.

Just that point about the condition 112 regarding Night-time resting position.
Rather than one angle being set as a default, this might better be alternating and or informed by the time of year/month.

- *i.e. individual panel set to different angles to break the polarised light visual cue from above and*
- *Positioning the panels at night in directions away from sources of polarised moonlight.*

I'm around this morning and can pop up to discuss after 11am if that suits.
Jean

Dr Colin O'Donnell – December 2025 letter excerpt from advice related to the Haldon / Lodestone Solar Farm application.

Collision risk is likely to vary among different species. However, as there has been no monitoring of bird displacement or mortality associated with PVSFs in New Zealand, it is currently impossible to estimate the scale of adverse effects that may occur at each site and the long-term impact on bird populations.
In addition, we only have available the limited reporting on adverse effects from a few published studies from overseas. These studies indicate that adverse effects are highly likely and potentially significant for Threatened and At-Risk species and therefore need to be avoided. Given circumstances (e.g., habitat use patterns, risk profiles) may be different in New Zealand, it is challenging to determine the level to which we can infer effects from overseas. In the absence of New Zealand data, I consider a precautionary approach to consenting PVSFs in areas with high usage by Threatened and At-Risk bird species is needed.
This precaution should be extended to cumulative effects of the several solar farms currently being proposed for development. If one solar farm was consented and its effects were closely studied for short and long-term impacts, there would be more confidence that additional solar farms could be safely added if these results were negligible. However, there are several solar farms seeking consent at the same time in this area of particularly high importance for these threatened species. If effects are significant from one solar farm, the simultaneous construction of several solar farms could lead to unsustainable impacts on these threatened bird populations.

How to avoid, remedy, mitigate or compensate for risks
Given the very high value of the general area for birdlife, the potentially high (yet unquantified) impacts of collisions with infrastructure, and the uncertainty about the effectiveness of potential mitigation, the precautionary approach would be best applied

to this proposal, as the only way to avoid potentially significant impacts on Threatened and At-Risk species would be not to construct the solar farm at this location. Alternatively, is to try an adaptive management approach with staged construction of one solar farm. For example, build a small part of it (say 10%), fully document its effects, and then either proceed with construction of another small stage (e.g., another 10%), or abandon all projects in the vicinity, if things negative effects are detected and unsustainable. However, even this approach could have a profound adverse impact on populations of these threatened species if collision rates with solar infrastructure are significant.

Global best practice for siting solar farms, including from IUCN and Birdlife International, suggests that a primary guideline is not to place such infrastructure near sensitive habitats (e.g., Jenkins et al. 2015; Bennun et al. 2021; SolarPower Europe 2022; Lightsource bp 2023; Jobson et al. 2024).

Unfortunately, I have not come across any tested methods, or information on effectiveness, for mitigating risks of bird collisions with solar infrastructure, especially in the New Zealand context. However, if the project were to be consented, there a several commonsense possibilities to manage some of the risks:

1. *Place all transmission cables underground to avoid collisions with power lines.*
2. *Minimise or eliminate bird-attracting lighting at night*
3. *Insulate all electric connections to avoid electrocuting birds*
4. *Construct low-security fences to avoid collisions with tall fences.*
5. *Minimise or avoid installing night lighting (which may attract birds).*

This still leaves some potentially high impact residual risks to deal with, largely around collisions with the panels and associated infrastructure.

One approach to dealing with uncertainty is to instigate a rigorous carcase monitoring programme, and if carcases are detected, to then trigger compensation focussed on reversing any impacts - so that over time there is an objective of no net loss in sensitive bird populations. This would require identifying adaptive management methods and/or appropriate compensation activities before construction is consented. It also would require scientifically robust monitoring of bird populations. 9

Carcase monitoring protocols need careful design by a suitably qualified biostatistician and need to account for the fact that it is unlikely that the entire PVSF can be monitored completely and constantly. Design needs to include determining correction factors to apply to the results – a correction factor for observer effectiveness (i.e. how many carcases do observers detect and how many do they miss?) and a correction factor for carcase persistence (how long does a carcase remain on the ground before it degrades or is scavenged by a mammalian or avian predator?). A further correction is likely needed to account for birds that may collide with infrastructure but then fly or walk off site before dying. Recent research indicates that frequently carcasses are not found (likely because of predation of stunned, injured or killed birds) but imprints on panels can now be swabbed and the eDNA extracted to identify species with high certainty (Gruppi et al 2023; Harrigan et al. 2023).

A second strategy to deal with unresolved residual risks would be to include experimental mitigation techniques that show some promise, although they have never

been trialled at solar farms in New Zealand to my knowledge, so their effectiveness is unknown. This could include:

- *Bird-friendly-designed site layout and panel arrangement (e.g., greater and/or irregular spacing between panel sets to break up the visual profile of the PVSF from above.*
- *Angling individual panel sets to different angles to break the polarised light visual cue from above.*
- *Positioning the panels at night in directions away from sources of polarised moonlight.*
- *Design and apply bird-sensitive anti-reflective coatings to minimise polarisation and ultraviolet reflectance in the wavelengths birds might find attractive.*
- *Investigating and testing a range of bird deterrents.*

If this approach were taken, it should require appropriate careful monitoring of the effectiveness of each method.
However, an overall problem is that because the species at risk at this site include Nationally Critical species, if fatalities at PVSFs cannot be prevented, then they could incrementally or solely contribute to species extinction. The lack of any comprehensive study on these interactions in a New Zealand context as well as the lack of clear methods to avoid and mitigate risks to birds means that a conservation precautionary approach is justified in the interim.

Fast Track Approvals Act 2024 (FTAA) Technical Advice

Date	26/01/2026
To	Reuben Herz-Edinger, Senior Consents Planner
From	Carl Hanson, Senior Scientist, groundwater quality
Project advice provided for	The Point Solar Farm - FTAA-2509-1100 / RMA261598
Documents referred to	C25C/233430-2 (Substantive Application for a Listed Project under the Fast Track Approvals Act 2024, The Point Solar Farm, dated 27 August 2025)

Introduction/Summary

1. I provided advice on this project when the application was lodged in July 2025. I have not been involved in any technical discussions:

Missing information – pre application advice and substantive check

2. The following information is needed to fully understand the proposal/effects of the proposal:
    a. A description of the solar panel coating (described as "low-reflectivity material" in Section 6.8.2 of the application) and an assessment of the risk that any contaminants, in particular PFAS (per- or poly-fluoroalkyl substances), that might be leached from the coating with rainfall runoff and potentially contaminate groundwater.
    b. Clarification and confirmation that transformers and any other hazardous chemical storage areas will be adequately bunded to capture any spills and prevent spilled chemicals from entering the groundwater.

Agreement with the applicant

3. Provided that the applicant can confirm that no hazardous chemicals will be leached from the solar panel coatings and that bunding and spill containment will be sufficient to prevent hazardous chemical spills from reaching groundwater, then I am in agreement with the applicant's assessment that the proposed activity will have no adverse effects on groundwater quality.

Solutions and/or comments on conditions

4. I have reviewed proffered conditions (The Point Solar Farm – Proposed Conditions, dated 22 January 2026)[2], and note the following:

[2] Note follow-up email on 5 Feb 2026 condition set below.

Issue	Solution	Condition wording	Consideration against FTAA
Risk of PFAS contamination	Include a condition that the solar panel coatings must not contain PFAS	The solar panel coatings must not contain per- or poly-fluoro-alkyl substances (PFAS).	n/a
Risk of hazardous chemical spills	Require that all transformers and hazardous chemical storage facilities must be bunded sufficiently to capture any hazardous chemical spills.	All transformers and hazardous chemical storage facilities must be bunded sufficiently to capture any hazardous chemical spills.	n/a

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<Email below received after request to review updated 5 February 2026 condition set from Applicant>

From: Carl Hanson <carl.hanson@ecan.govt.nz>
Sent: Wednesday, 11 February 2026 3:08 pm
To: Reuben Herz-Edinger <Reuben.Herz-Edinger@ecan.govt.nz>
Subject: RE: ECan - The Point/FNSF - RFI info to panel / catch-up? - RMA261598

Hi Reuben,

Proposed Condition 71 (Appendix 12, p 30/50) states clearly that the panels must contain no PFAS, and the proposed soil monitoring for PFAS in Condition 17 (p 13/50) should be sufficient to confirm the absence of PFAS.

Proposed Condition 131 (p 45/50) requires bunding around oil-filled transformers. Between this and other conditions requiring appropriate handling and storage of hazardous chemicals, along with spill response procedures, should be sufficient to avoid releases of hazardous chemicals that would threaten groundwater.

These were the two issues that I pointed out with regard to groundwater, and based on the above, I'm comfortable that they've both been addressed.

Carl

Fast Track Approvals Act 2024 (FTAA) Technical Advice

Date	10 February 2026
To	Reuben Herz-Edinger, Senior Consents Planner
From	Madeline Sinha, Scientist in Contaminated Land and Waste
Project advice provided for	The Point Solar Farm - FTAA-2509-1100 / RMA261598
Documents referred to	RMA261598 - Fast-track - The Point Solar Farm - K - Stormwater Assessment (solar farm),

Introduction/Summary

1. I have provided advice during this project and have been involved in the following technical discussions: offering technical advice on CRC240932 – Operational-phase stormwater discharge to land, and CRC240933[3] – Construction-phase stormwater discharge to land which was delivered to Reuben on the 22nd July 2025.
2. My previous advice from July 2025 focused on the stormwater assessment and concluded that there had been no assessment on trace elements or heavy metals, or PFAS. These are contaminants associated with solar farms which are often included in an assessment, but were absent in this application.
3. Dr. Hannah Mirabueno, in conjunction with my advice, provided advice to Reuben on 31st August 2025 which highlighted the need for a PSI, DSI, and a decommissioning report.
4. Dr. Michael Massey provided technical advice on CRC240933 – Construction-phase stormwater discharge to land on the 17th October 2023 to Reuben.
5. Dr. Massey's advice included a request for information on the photovoltaic (PV) construction including whether glass encapsulation was a feature of the panel, which would prevent leaching of contaminants. Batteries onsite were also identified as sources of heavy metal contamination.
6. The proposed consent conditions addressed many of the issues that were originally identified (points 2, 3 & 4), including soil monitoring for heavy metals and per- and poly-fluorinated compounds, as well as a decommissioning plan.
7. The proposed consent conditions were thorough, and only minor changes have been suggested.

[3] Applicant's previous RMA applications for The Point, now withdrawn.

Table 1

Expert and date of discussion	Subject	Summary	Matter resolved? Y/N
Dr. Michael Massey 17/10/2023	LLUR Enquiry 356465: Consent advice	Questioned whether solar panels will be glass encapsulated which would prevent contaminant leaching, and noted industrial batteries onsite could be a source of heavy metal contaminants.	Y – addressed in proposed consent conditions.
Madeline Sinha 21/07/2025	RE: Far North Solar Farm - The Point - Fast-track application	Heavy metals are a contaminant of concern and monitoring of these in stormwater is not proposed.	Y – addressed in proposed consent conditions.
Dr. Hannah Mirabueno, Madeline Sinha 31/08/2025	RE: FAST TRACK - RMA260500 - The Point Solar Farm	A summary of key issues: -Included previous points of concern noted; - Waste Management was not proposed. This is the largest solar farm in the south island, and significant waste from panel replacement is expected. Questioned on how this would be managed; - No information on end-of-life site decommissioning management, a decommissioning plan should be provided; -No site assessments for HAIL activities on the proposed was included, -Remedial actions if limits in soil exceeded, end-of-life and waste panel management to be included as consent conditions	Y – addressed in proposed consent conditions.

Missing information – pre application advice and substantive check

8. The following information is needed to fully understand the proposal/effects of the proposal:

a. Information that was missing from the application has been addressed in the proposed consent conditions. Therefore, I am content that this information shall be produced if the consent conditions are adopted.

Summary of effects

9. I am in agreement with the applicant's assessment that soil contamination, the presence of HAIL activities onsite, and a decommissioning plan which were key issues, have been resolved by being included in the proposed consent conditions.

Agreement with the applicant

10. I have not provided further discussion for where I agree with conclusions of the applicant. Of particular note:

    a. The proposed DSI and (if relevant) RAP and SVR following decommissioning is acceptable;
    b. Soil monitoring for the proposed contaminants of concern including the analysis of the contaminants of concern: Silver – Ag, Cadmium – Cd, Copper – Cu, Lead – Pb, Antimony – Sb, Zinc – Zn, and Per and Polyfluoroalkyl Substances Compounds - (PFAS);
    c. The frequency of soil monitoring being at the specified milestones and 5 yearly;
    d. The proposed decommissioning plan which shall be provided to CRC for certification, however it is recommended to include an exclusion on panel processing or breaking down onsite;
    e. The adoption of WasteMINZ Adopted Values of Class 4 Table C-3 is a suitable guideline for contaminants in soil.

11. I do wish to make the following comments:

    a. Solar panels should not be broken down or stored on mass in a degraded state during decommissioning or panel replacement to avoid discharges of panel components and contaminants to the environment. This aspect should be included in the decommissioning plan, and I note that the proposed consent conditions do have a provision for plan certification from CRC, so this aspect can be addressed at that time.

Appendix 4: CRC Technical Advice – Land Resources

Dr Ognjen Mojsilovic – Senior Scientist - Land Resources Science

Fast Track Approvals Act 2024 (FTAA) Technical Advice

Date	11 February 2026
To	Reuben Herz-Edinger
From	Ognjen Mojsilovic, Senior Scientist
Project advice provided for	FNSF / The Point – Land Science Technical Advice FTAA-2509-1100 / RMA261598

Missing information – pre application advice and substantive check

1. The following information is needed to fully understand the proposal/effects of the proposal:
    a. Site-specific soil survey and baseline soil condition. The application relies on regional soil maps rather than a site-specific investigation to characterise soil and soil properties. Given the scale of the activity, the vulnerability of the mapped soils (shallow, stony, erosion-prone and degraded from agricultural activities), and the intention for dual agricultural and energy use, a baseline soil survey is valuable for characterising variability in soils and establishing a meaningful baseline.
    b. Seasonal frost impact assessment. No consideration of vulnerability on soil structure, infiltration, and erosion risk, despite the expected potential of frost heave at the site. Severity of effects will be dependent on soil properties, including texture.
    c. Dripline erosion assessment. The effects of concentrated water flow along paned edges on soil stability have not been assessed, given the vulnerability of soils.
    d. Long-term soil monitoring framework. Limited detail on the protocols involved in the ongoing monitoring.
    e. Soil-specific infiltration rates. Limited site-specific permeability data, although I accept that soils mapped in the regional maps are freely drained with rapid permeabilities, so this is not a major concern.
    f. Microclimate impact assessment. The application lacks an analysis of how panel shading and water redistribution will affect soil temperature, moisture, biological activity, and nutrient cycling. This is not an immediate concern but is relevant to viability of dual land use over the operational period or future land use options following decommissioning.

Summary of effects

2. The project/activity has not materially altered since the RMA application. I draw on my earlier Section 42A assessment in this summary. There is potential for adverse effects on long-term soil stability and services due to the combination of the scale of the proposed activity (670 ha) and the site's unique setting: very shallow stony sandy/loam soils in a dry subhumid climate with moderate to high inherent susceptibility to erosion.
3. Key risks include:
    a. Soil compaction during construction.
    b. Dripline erosion from concentrated water flow off panel edges, particularly where vegetation is sparse and frost heave has potential to affect surface soil structure.
    c. Gradual soil quality changes through altered microclimates affecting biological activity, nutrient cycling, and vegetation cover over the operational period.
4. Without adequate management and monitoring, these effects could compromise the site's ability to maintain vegetation cover, support dual use agrivoltaic land use, and provide soil services including carbon storage, nutrient cycling, and erosion resistance.
5. I acknowledge that the effects are uncertain and could be positive as well as negative. Given the aridity of the environment and likely existing soil degradation, shading from panels may reduce moisture loss and temperature extremes, supporting gradual soil recovery over time.

Agreement with the applicant

6. I have not provided further discussion for where I agree with conclusions of the applicant. Of particular note:
    a. The proposed activity, assuming only very limited earthworks and no removal of soil, can be considered reversible from a soil resource perspective.
    b. I accept that the soils are highly permeable and that major run-off generation from the soil surface is unlikely under normal conditions.
7. I do wish to make the following comments:
    a. The applicant's stormwater modelling assumes panels are effectively permeable to rainfall. This is not sufficiently conservative; precipitation intercepted by panel surfaces will converge and flow off panel edges in a concentrated manner, which may cause rill erosion along driplines, particularly where vegetation cover is sparse.
    b. The applicant's assessment does not address the long-term effects of altered microclimates on soil quality, nutrient cycling, or the feasibility of sustained dual land use.

Outstanding areas of contention and significance of these.

Outstanding areas of contention

8. The key outstanding matters relate to the adequacy of conditions governing soil monitoring and vegetation management, rather than fundamental disagreement about whether the project should proceed. Specifically:
    a. The soil health monitoring requirements in the State of Environment Monitoring Plan (SEMP) conditions are too general to provide clear direction for the applicant, or to enable meaningful certification. And, while the conditions introduce adaptive management framework, which is a positive step, it too lacks specificity on evaluation and response. There is no defined basis for detecting meaningful change. The Operational Management Plan does not reference the environmental monitoring processes.
    b. The specified soil health parameters include bulk density, which may be impractical to measure reliably on the stony soils at this site.
    c. The vegetation cover condition (Condition 43) requires cover to be maintained "at all times" and "immediately replaced", which is not achievable in practice given drought conditions, reseeding periods, and the nature of the environment.
    d. There is no specific requirement for soil protection during construction, when the greatest compaction risk occurs. The Erosion and Sediment Control Plan is focused on offsite sediment effects (ESCP conditions 79, 133).

Significance of these matters

9. The soils at this site are inherently vulnerable: shallow, stony, erosion-prone, and in a dry subhumid climate, and their condition has likely been degraded by previous land use. The scale of the project (670 ha, 35-year operation) and uncertainty of effects means that inadequate monitoring or poorly specified conditions could allow gradual degradation to go undetected until it becomes difficult to remediate. Conversely, well-designed monitoring provides the evidence base to confirm whether the project is having a net positive or negative effect and to intervene.

Fast Track Approvals Act 2024 (FTAA) Technical Advice

Date	5 February 2026
To	Reuben Herz-Edinger, Senior Consents Planner
From	Rachel Tutty, Principal Planner
Project advice provided for	The Point Solar Farm - FTAA-2509-1100 / RMA261598
Documents referred to	The Point Solar Farm Site Inspection – December 2025 CRC Section 46 Substantive Completeness Check Response Letter October 2025 Application Appendix P – Ecological Enhancement Plan Application Appendix F – Landscape and Visual Assessment The Point Solar Farm – Proposed Conditions February 2026 The Point Solar panel request for information January 2026

Introduction/Summary

1. I have provided advice throughout this project, but I have not been involved in technical discussions.

Missing information – pre application advice and substantive check

2. The following information is needed to fully understand the proposal/effects of the proposal:
    a. The management plans mentioned in the proposed consent conditions. In particular the:
        i. Traffic Management Plan
        ii. Erosion and Sediment Control Plan
        iii. Landscape Management Plan
        iv. State of Environment Monitoring Plan

    Understanding the detail of those management plans will be necessary to determine whether the proposal is consistent with the Canterbury Regional Policy Statement.

    b. The information requested by the Panel, in particular:
        i. A traffic and transportation assessment

Summary of effects

3. There are a number of outstanding issues, specifically:
    a. Mana whenua initially indicated that they do not support the proposal because of the impacts on cultural landscape and ecological values. Although it is now proposed to set up a Kaitiaki Group for the site once resource consents have been granted, the applicant has not provided confirmation from Mana whenua that this approach is acceptable to them. Impacts on cultural values need to be

identified to determine whether the proposal is consistent with the Canterbury Regional Policy Statement.

b. The site lies within the Mackenzie Basin Outstanding Natural Landscape. The Landscape and Visual Assessment supplied by the Applicant concludes that the project will have low-moderate effects on the values of that landscape. A Landscape Management Plan has been proposed in the draft consent conditions but as that plan is not yet available it is not possible to determine the extent to which effects on landscape values will be mitigated.
c. According to the Ecological Enhancement Plan provided by the applicant, the land use will change from dairy support to light grazing by sheep. While this will have undoubted environmental benefits, it will result in less rural production from the land. Details have also not been provided on the types of plants the sheep will be grazing on. Growth of pasture species for grazing sheep could have adverse effects on any remaining indigenous vegetation and habitats of indigenous fauna.
d. Several solar arrays are proposed for the Mackenzie Basin, including the proposed Lodestone development on nearby Haldon Station. Cumulative effects of those developments on landscape and ecological values and the roading network have not been considered in this application but are important in determining consistency with the Canterbury Regional Policy Statement.
e. More detail is needed to determine the effects of heavy vehicle movements to and from the site, and whether this will be consistent with the Canterbury Regional Policy Statement.

Agreement with the applicant

4. I have not provided further discussion for where I agree with conclusions of the applicant. Of particular note:

    a. The hazard assessments provided have resolved the lack of information needed to assess the proposal against the Natural Hazards Chapter of the Canterbury Regional Policy Statement. The proposal is likely to be consistent with those provisions.

    b. The proposed consent condition requiring a contaminated land assessment resolves the lack of information needed to assess against the Contaminated Land Chapter of the Canterbury regional Policy Statement. The proposal is likely to be consistent with those provisions.

Benefits of the project

5. Benefits of this project with respect to my area of expertise are:
    a. The proposal would improve the efficiency, reliability and resilience of electricity generation in Canterbury, and provide generation capacity that does not rely on the use of fossil fuels.

Outstanding areas of contention and significance of these.

6. Key outstanding issues are outlined in more detail in paragraph 3 above. The significance of these issues can be summarised as follows:
    a. Lack of Mana Whenua support for the proposal. This is a significant issue, as impacts on cultural values need to be considered when determining consistency with the Canterbury Regional Policy Statement. Although the proposed conditions include setting up a Kaitiaki Forum, no information has been provided to confirm that Mana Whenua agree with the approach taken.
    b. Impacts on landscape values. This is a significant issue, as the site lies within the Mackenzie Basin Outstanding Natural Landscape. Although a Landscape Management Plan has been proposed in the draft consent conditions, this is not yet available.
    c. Cumulative effects on landscape and ecological values and the roading network from multiple solar array proposals in the area have not been adequately considered in the application. This is a significant issue and is necessary to determine consistency with the Canterbury Regional Policy Statement.
    d. Growing exotic pasture species beneath and around the solar panels is likely to result in loss of indigenous biodiversity. No details have been made available. This could be a significant issue depending on what is grown and how it is managed.

Solutions and/or comments on conditions

7. I have reviewed proffered conditions, and note the following:

    a. Many of the proposed consent conditions rely on management plans that have not yet been written so it is not possible to assess the effectiveness of those conditions.

    b. Proposed conditions 9 and 10 cover the setting up and operation of a Kaitiaki Forum. While I support the intent of those proposed conditions, no information has been supplied to indicate whether and to what extent Mana Whenua agree to the proposed approach.

    c. Proposed condition 36 states that:

    The Consent Holder shall ensure that the ground underneath the solar panels is covered in established vegetation at all times to prevent sediments entering stormwater. Should the vegetation under the solar panels not thrive in the shade of the solar panels then the vegetation shall be immediately replaced with shade tolerant species.

    Careful consideration will be needed to determine what species should be allowed to grow beneath the solar panels to ensure no loss of indigenous biodiversity or habitats of indigenous fauna.

    d. Proposed consent condition 37 sets out the plans to be considered when producing the proposed Pest Animal and Weed Management Plan (PAWMP). It

should be noted that the PAWMP needs to give effect to the Canterbury Regional Pest Management Plan.

e. Proposed condition 75 relies on a Transport Management Plan that has not yet been developed. The Panel have requested a traffic and transportation assessment. The assessment and management plan are necessary to determine the effects of traffic to and from the site and consistency with the Canterbury Regional Policy Statement. The assessment should include cumulative effects of the development of multiple solar arrays in the area.

Appendix 6: CRC Technical Advice- Surface Water Ecology

Dr Shirley Hayward – Team Leader – Water Ecology Science

Note: The 30/7/25 advice below was received based on the applicant's initial Fast-track application.

From: Shirley Hayward [redacted]
Sent: Friday, 13 February 2026 1:00 pm
To: Reuben Herz-Edinger [redacted]
Cc: Dwayne Daly [redacted]
Subject: RE: FAST TRACK - RMA260500 - The Point Solar Farm

Kia ora Reuben, based on the info I've seen, I don't have anything further to add in addition to my comments below.
Its overall a low risk to surface waters providing the stormwater side of things are appropriately managed, and should be able to in this setting.

Ngā mihi
Shirley

From: Shirley Hayward [redacted]
Sent: Wednesday, 30 July 2025 10:34 am
To: Sam Prystupa [redacted]
Cc: Reuben Herz-Edinger [redacted] Jean Jack [redacted] Stephanie Koviessen [redacted] Georgia Simmonds [redacted] Katie Nagy [redacted] Isolina O'Brien [redacted]
Subject: RE: FAST TRACK - RMA260500 - The Point Solar Farm

Kia ora Sam,

Following Jean's excellent response template…I provide the following assessment…
I also note from Katie's advice that have at least rudimentary ESCP would be helpful.

Cheers
Shirley

RE: FAST TRACK - RMA260500 - The Point Solar Farm

Documents considered:

- AEE C25C/169012-4
- Appendix H Site Layout Plan and Drawings C25C/169012-14
- Appendix K Stormwater Assessment (solar farm) C25C/169012-17
- Appendix J Proposed Conditions C25C/169012-16

Note in CM- Appendix M is supposed to be the GIP flood assessment, but the document is a repeat of Appendix K (Stormwater assessment).

Ecological values within the project area which may be impacted by the proposal include indigenous vegetation and habitats of indigenous fauna including avifauna (birds), terrestrial invertebrates, and herpetofauna (lizards).

Potentially significant effects:
Discharge of sediment laden waters to side braids of the Pukaki/Tekapo rivers could result in localised habitat degradation.

Gaps in the technical reports
No significant gaps.

Other effects
I couldn't find any information about the quantity and source of water that might be needed for fire fighting purposes.

What is the issue?
The stormwater assessment has provided a robust assessment of risks associated with construction phase and operational phase discharge of stormwater. The general assumption is that there is unlikely to be an increase in stormwater run-off (there may be slightly less), and the free draining and generally flat nature of the property means that much of the stormwater can be discharged to land with infrequent overland flow. The main risk they identified was that there are a couple of overland flow paths (two gullies areas) that discharge to the Pukaki/Tekapo rivers on the eastern side of the property. If overland flows paths are altered such that increased/concentrated flow occurred into the gullies, this may increase erosion of the gullies into the Pukaki/Tekapo rivers.

Why is it significant?
The side braids on the true right of the Pukaki/Tekapo rivers would not naturally receive high sediment loads, even during moderate flood events. Sediment laden discharges to these reaches could damage instream habitat for aquatic fauna.

How can it be resolved?
Ensure recommendations in the Stormwater assessment is followed "It is recommended that no bunding earthworks or raised access tracks be permitted, as these will concentrate flowrates into channels at points along the eastern drop-off."

<u>Proposed Conditions</u>

I have considered the proposed conditions.
I recommend that the recommendations of the stormwater assessment identified above are included in the conditions, this could be in the Construction Management S42 conditions.

Appendix 7: CRC Technical Advice – Compliance

Ms Georgia Simmonds – CRC Resource Management Technical Lead

Ms Katie Nagy – CRC Resource Management Technical Lead

From: Georgia Simmonds [redacted] CRC Resource Management Technical Lead (Compliance)
Sent: Thursday, 12 February 2026 4:43 pm
To: Reuben Herz-Edinger [redacted]
Subject: RE: FNSF/The Point - Additional conditions & info before meeting - RMA261598

Hi Reuben,

Following our meeting yesterday to work through the draft conditions that have been provided here is my brief summary of points.

As it stands the conditions are very confusing even with all the work we did on them yesterday. They need to ensure that any conditions wouldn't automatically cause them to be non compliant with another one. Its really hard to assess anything from a compliance perspective without half the information. Since we don't even have draft ESCPs or construction management plans I'm not sure that any conditions placed on them would actually make sense.

I can't tell if they are planning on consenting that access road as well and what the actual scale of the disturbance would be.
To me it seems that the sheer volume of different plans they are intending on supplying after consent is granted, and then in turn complying and following each of these plans will be seriously onerous on any contractor or person attempting to follow them.

My concerns are:

a) who will be writing each of these plans?

b) will they talk to each other in terms of not having contradicting information within each plan?

c) who will be in charge of managing any required updates? And d) some of these plans seem to be almost double ups and could possibly be managed through updating them for various stages as opposed to being split out. Plans relating to construction could be managed via one Environmental Management Plan (EMP) beneath which could sit construction plans, ESCP, landscaping and any others relating to the construction phase. An Ecological Management Plan (EcMP) could contain all documents relating to the management of wildlife such as avifauna and lizards etc.

Overall I feel that the comments made previously by Katie Nagy are still relevant unless they have been specifically addressed and I am not aware.

Please let me know if there are any additional comments you feel are missing from above.

Kind Regards,
Georgia

From: Katie Nagy [redacted] **CRC Resource Management Technical Lead**
Sent: Tuesday, 29 July 2025 3:46 pm
To: Sam Prystupa [redacted] Shirley Hayward [redacted]
Cc: Georgia Simmonds [redacted] Stephanie Koviessen [redacted] Reuben Herz-Edinger [redacted]
Subject: RE: FAST TRACK - RMA260500 - The Point Solar Farm

Hi Sam,

As usual, there isn't much in these applications that would allow a proper assessment. Having said that, these are my comments:

- The proposal does not definitively state that construction phase stormwater will be discharged to surface water (unless I missed that somewhere), so I deduce from reading the AEE that it is proposed to contain any construction phase stormwater on site and discharge into land but it hasn't been specifically stated; I just infer from the lack of mention otherwise. It would be good to get clarification on that part.
- They state that work will be staged up to 36 months in total, but have not provided details other than within the rule assessment to state that earthworks will be >2ha at any one time, as expected
- The stormwater assessment is mostly relevant for the operational phase
- Majority of the construction phase stormwater will come from the construction of site access tracks and the platform developments; they haven't provided any indication of depths of earthworks either. The volume of earthworks proposed is comparable to what may be expected from a single stage (medium size) of a subdivision development but is spread across a significantly larger area, so agree when they state that earthwork volumes are minor comparatively
- The references Erosion and Sediment Control Plan has not yet been prepared but is proposed to be prepared in accordance with the CRC Toolbox (as per proposed conditions)
- Given that the soils are permeable, the site is relatively flat, the only concern would be some runoff escaping past the boundary but it's more likely that stormwater will remain in road excavations and infiltrate. There will be enough space and machinery on site to manage any unanticipated runoff tracks towards the rivers – but these are below the terrace anyway, at a 10-15 m drop. There is a more gentle gradient towards the Ohau River to the south. Again, I presume that the proposal is to contain construction phase stormwater within the boundary of the site/stage

- Dust will likely be the bigger problem; but there are no immediate (human) receptors.

Overall, I would be comfortable with construction phase SW being managed stage by stage with prior submission of ESCP for certification/ approval as proposed in the conditions. Preference would be that these align with our standard conditions. The wording is slightly different at this stage. I don't anticipate any out of the ordinary structural controls will be necessary. If the discharge is proposed to enter surface water, my comment would be slightly different.

For completeness, a rudimentary draft ESCP for one of the stages could be helpful to answer or confirm some of my assumptions above, and likely will also answer some of Shirley's questions.

Katie

Appendix 8: Conditions Table with CRC Comments

CRC notes that, since the Substantive Application submission, CRC has received five additional versions of the Applicant's proposed conditions. These sets are dated:

- 15 January 2026
- 22 January 2026
- 4 February 2026
- 5 February 2026 (Applicant's response to Panel's RFI)
- 18 February 2026

The Applicants Proposed Conditions listed below are taken from the 5 February 2026 version.

CRC technical staff reviewed the conditions available at the time of their review, and condition numbers referenced in technical advice appendices may not reflect the updated condition numbers of the 5 February 2026 or 18 February 2026 versions.

CRC also notes that the Applicant has indicated they will engage a specialist to review the 18 February 2026 conditions, so further amendments from the Applicant are considered likely.

We reiterate that CRC would be happy to work with the Applicant to develop suitable conditions.

Definitions and Abbreviations with the Conditions Schedule

Abbreviation / Term / Acronym	Term / Definition	CRC Comments
Above-ground solar infrastructure	means all solar panels, inverters, transformers, cabling or structures associated with the Solar Farm operations.	
AMP	Avifauna Monitoring Plan	
BCMP	Bird Collision Management Plan	
CFRMP	Construction Fire Risk Management Plan	
CLMG	Contaminated Land Management Guidelines No.1: Reporting on Contaminated Land in New Zealand	
CMP	Construction Management Plan	
CMP	Construction Management Plan	Remove duplicate.
CNMP	Construction Noise Management Plan	
Commencement of physical works	means activities undertaken to construct the solar farm including bulk earthworks (cut and fill activities), installation of solar panels and ancillary infrastructure (such as inverters, cabling and transformers), but excludes the following activities: • Pre-construction site investigations including access for such activities; • The establishment of erosion and sediment control measures; • Site establishment activities for the purposes of providing any temporary site construction office compound; • Ecological survey(s); and	**CRC Consent Planning:** Commencement is different to exercise, so need to align this language with RMA language. I.e., CRC considers "commencement" of a resource consent to be the date it is issued. The "exercise" of a resource consent is the date when the Consent Holder undertakes the activities authorised by the consent.

Abbreviation / Term / Acronym	Term / Definition	CRC Comments
	• Any vegetation removal associated with the activities listed above.	
Commencement of this resource consent	means the date on which the Consent Holder first exercises this resource consent, being the earlier of: • the commencement of physical works authorised by the consent; or • the use of the land in reliance on the consent, and includes any site establishment works, but excludes investigations, surveying, monitoring, or preparatory activities that do not involve earthworks or construction.	**CRC Consent Planning:** As above.
Consent Authorities	Means Canterbury Regional Council and Mackenzie District Council jointly.	
Consent Holder	means Far North Solar Farm Ltd, its successor, or any person(s) acting under the written approval of Far North Solar Ltd or its successor.	
DMP	Decommissioning Management Plan	
DoC	Department of Conservation	
DSI	Detailed Site Investigation	
Earthworks	Alteration or disturbance of land, including by moving, removing, placing, blading, cutting, contouring, filling or excavation of earth (or any matter constituting the land including soil, clay, sand and rock); but excludes gardening, cultivation, and disturbance of land for the installation of fence posts.	**CRC Consents Planning:** This should use the LWRP definition for earthworks: *means the excavation of, and/or filling with topsoil, subsoil, sediments, rock and/or other underlying materials on which the soil is formed. Earthworks include, but are not limited to, the*

Abbreviation / Term / Acronym	Term / Definition	CRC Comments
		construction and maintenance of roads, tracks, firebreaks and landings, and ground shaping (recontouring), root raking and blading. *Earthworks excludes:* *(a) cultivation of the soil for the establishment of, or harvesting of, crops or pasture; or* *(b) digging of postholes for the construction of fences;* *(c) works for research and monitoring such as coring, water bores and the use of piezometers;* *(d) ripping in of water pipes or cables;* *(e) establishment, maintenance and/or enhancement of wetlands, domestic gardens or amenity planting;* *(f) harvesting of horticultural crops.*
EEP	Ecological Enhancement Plan	
EMF	Electric and Magnetic Fields	
ERP	Emergency Response Plan	
ESCP	Erosion and Sediment Control Plan	
GIP	Grid Injection Point	**CRC Consents Planning:** Should have separate "GIP Substation" and "Solar Farm Substation" to clearly define these two areas, further noted against some conditions below. For example, see Meridian Energy Ltd.'s consent CRC252388 via CRC's website[4].

[4] See CRC's Consent Search website - https://www.ecan.govt.nz/data/consent-search/consentdetails/CRC252388/crc252388

Abbreviation / Term / Acronym	Term / Definition	CRC Comments
HAIL	Hazardous Activities Industries List	
Landscaping	means the planting, establishment, and maintenance of vegetation for visual and amenity purposes, in accordance with the approved and certified Landscape Management Plan.	
LMP	Landscape Management Plan	
LzMP	Lizard Management Plan	
NES-CS	National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health	
OMP	Operational Management Plan	
Operation of the Solar Farm	means the phase following commissioning during which the Solar Farm generates electricity to the National Grid and is routinely maintained and monitored.	
PAWMP	Pest Animal and Weed Management Plan	
PFAS	Per- and Polyfluoroalkyl Substances	
PSI	Preliminary Site Investigation	
RAP	Remediation Action Plan	
RGMP	Robust Grasshopper Management Plan	
RMA	Resource Management Act 1991	
SEMP	State of the Environment Monitoring Plan	
Site	All land to the used for the Solar Farm operations on Section 3 SO 384036.	**CRC Consent Planning:** This should refer to a clear map defining the site for Compliance Officer reference.

Abbreviation / Term / Acronym	Term / Definition	CRC Comments
		Further, if the access road/easement from SH8 is covered by the construction-phase consents, the extent of those works should also be defined, and suggest specifically separating definition of "Site" from "Access Road" or similar.
SMMP	Soil Mitigation Management Plan	
Solar Farm	means utility-scale renewable energy facility comprising ground-mounted photovoltaic (PV) panels and associated infrastructure (including inverters, transformers, cabling, access tracks, security fencing, stormwater management measures, and ancillary buildings) used to generate electricity from solar radiation for supply to the National Grid.	**CRC Consent Planning:** As noted above, does this include the Solar Farm Substation (as separate from the GIP Substation?). The definition should specify if so.
Solar Farm decommissioning	means the permanent removal of the Solar Farm and associated infrastructure following the end of its operational life.	
SQEP	Suitably Qualified and Experienced Person(s) means a person with a tertiary qualification in the field to which a particular condition relates; or having sufficient technical expertise that is at least equivalent; and having at least five (5) years working experience and (where applicable) chartered professional membership to an accredited organisation, unless otherwise specified in the conditionsPerson(s) **[sic]**	

Abbreviation / Term / Acronym	Term / Definition	CRC Comments
SVP	Site Validation Plan	**CRC Compliance:** This is usually referred to as a "Site Validation Report" (SVR). SVR should be used for consistency with established norms. Relevant conditions should be updated.
TCMP	Transpower Construction Management Plan	
TMP	Traffic Management Plan	

Table 1. Management Plans ***[****For Condition (1) below****]***

Management Plan	Canterbury Regional Council	Mackenzie District Council	Condition Reference	Documents to Council for Certification – Minimum Timeframe	CRC Comments
Avifauna Monitoring Plan (**AMP**)		✓	XX	15 working days from when monitoring is undertaken.	
Construction Fire Risk Management Plan (**CFRMP**)		✓	XX	30 working days before commencement of physical works on Site.	
Construction Management Plan (**CMP**)		✓	X	30 working days before commencement of physical works on Site.	**CRC Compliance:** Also relevant for CRC.

Management Plan	Canterbury Regional Council	Mackenzie District Council	Condition Reference	Documents to Council for Certification – Minimum Timeframe	CRC Comments
Construction Noise Management Plan (**CNMP**)		✓	XX	30 working days before commencement of physical works on Site.	
Decommissioning Management Plan (**DMP**)	✓	✓	XX	Three months before the commencement of Solar Farm decommissioning.	
Ecological Enhancement Plan (**EEP**)		✓	XX	30 working days before commencement of physical works on Site.	
Emergency Response Plan (**ERP**)		✓	XX	- 30 working days before commencement of physical works on Site - 30 working days before the commencement of Solar Farm operations.	
Erosion and Sediment Control Plan (**ESCP**)	✓	✓	XX	30 working days before commencement of physical works on Site.	
Landscape Management Plan (**LMP**)		✓	XX	30 working days before the commencement of landscaping.	
Lizard Management Plan (**LzMP**)		✓	XX	Three months before the commencement of physical works on Site.	

Management Plan	Canterbury Regional Council	Mackenzie District Council	Condition Reference	Documents to Council for Certification – Minimum Timeframe	CRC Comments
Operational Management Plan (**OMP**)		✓	XX	30 working days before the commencement of the Solar Farm operations.	**CRC Compliance:** Also relevant for CRC as it is expected the OMP would include stormwater discharges.
Pest Animal Weed Management Plan (**PAWMP**)		✓	XX	30 working days before the commencement of landscaping.	
Robust Grasshopper Management Plan (**RGMP**)	✓	✓	XX	Three months before the commencement of physical works on Site.	**CRC Consent Planning:** This is the only ecological plan that is listed as relevant for CRC by the Applicant. However, CRC considers it appropriate to include the ecological plans in MDC consents. Noting that CRC has ecologists on-staff, MDC could defer certification of those management plans to CRC, as allowed by Condition (1) below.
State of the Environment Monitoring Plan (**SEMP**)	✓	✓	XX	30 working days before commencement of physical works on Site.	

Management Plan	Canterbury Regional Council	Mackenzie District Council	Condition Reference	Documents to Council for Certification – Minimum Timeframe	CRC Comments
Substation Construction Management Plan (**SCMP**)	✓		XX	20 working days before the commencement of any physical works for the initial construction of the Transpower Grid Injection Point Substation.	**CRC Compliance:** This could be included in the CMP to cover the whole site with stages. Not necessary to have duplicate for substation.
Traffic Management Plan (**TMP**)		✓	XX	30 working days before commencement of physical works on Site.	
Transpower Construction Management Plan (**TCMP**)		✓	XX	30 working days before commencement of physical works on Site.	

Condition Number	Applicant's Proposed Conditions	CRC Comments
1.	The Consent Holder must prepare the following management plans in Table 1 for certification by the Canterbury Regional Council and Mackenzie District Council (**Consent Authorities**) or by their nominated appointee. The Consent Holder must prepare the following management plans in accordance with the requirements of the relevant conditions and in general accordance with the application documents listed in **Annexure A**.	**CRC Consent Planning:** Other than a Dust Management Plan, the Application did not include any draft or finalised Management Plans. The reports from technical specialist supporting the application to varying degree comment on objectives of management plans. However, the Application does not provide any substantive detail on the objectives of the management plans or the methodological principles to achieve the objectives. All conditions relating to management plans require clear, specific objectives in order for them to be certified.

Condition Number	Applicant's Proposed Conditions	CRC Comments
	Advice Note: *Responsibility for certification, monitoring and enforcement of the various plans and management plans is set out in Table 1.* ***[****Table 1 is Included above****]***	Preparation of Management Plans should not be in accordance with "application documents" but in accordance with the conditions of consent. Should read "must prepare the Management Plans listed in Table 1…".
Management Plans		
2.	The Consent Holder must ensure that all management plans are prepared by a suitably qualified and experienced person (**SQEP**).	
3.	The Consent Holder must comply with all certified management plans set out in Table 1.	**CRC Compliance:** Works/activities must be undertaken in accordance with all certified Management Plans set out in Table 1.
4.	The Consent Holder must ensure that all contractors engaged to undertake activities authorised by this resource consent are supplied with a copy of and made aware of the conditions and management plans that apply to this resource consent that are relevant to their work area and the measures required for compliance with the conditions.	
5.	The Consent Holder may make amendments to the management plans specified in Condition 1 that are consistent with the objectives and performance requirements of the management plan and relevant consent conditions. The amended management plan must be submitted to the Consent Authorities for certification in accordance with Conditions X-X (including but not limited to the Council Certification Response in	**CRC Consent Planning:** This condition is out of place here. It relates to certifying amendments to management plans before the conditions that relate to certification of the original management plans. Rather than "specified in Condition 1", should read "specified in Table 1".

Condition Number	Applicant's Proposed Conditions	CRC Comments
	Condition X), and all relevant works must not continue until the amended management plan is certified.	"(including but not limited to the Council Certification Response in Condition X)" is not needed. Requiring relevant works not to continue is potentially problematic. Typical wording allows for works to continue under existing management plans, but proposed amendments must be approved before the amendments are implemented.
6.	The Consent Holder must submit the management plans in Table 1 to the Consent Authorities for certification in accordance with the timeframe specified in each relevant condition below. Works must not commence until the relevant management plan(s) are certified.	**CRC Consent Planning:** Note that timeframes are already set out in Table 1 above, so no need to refer to "relevant condition below", should just refer to Table 1 for ease of compliance reference. Should specify "…in Table 1 to the relevant Consent Authorities for certification…" as this is made clear in Table 1. Final sentence could also be clarified by adding "… plan(s) are certified by the relevant Consent Authorities.".
7.	The certification process shall be limited to confirming in writing that the management plan has been prepared in accordance with the relevant conditions(s) and will achieve the objectives of the management plan.	**CRC Consent Planning:** Too many management plans do not have specific objectives laid out in their conditions. To make Condition (7) workable, each management plan must have a clear list of objectives, e.g., the AMP objectives listed in Condition (60). **CRC Compliance:** "*limited to confirming in writing…*" is too limiting in terms of the response for certification. Would also remove "*…and will achieve the objectives of the management plan*", as this should be included in the conditions relevant for the management plan. Should be bundled with Conditions (6-8), with Condition (6) being the parent, and Conditions (7) and (8) being part (a) and (b) of Condition (6).

Condition Number	Applicant's Proposed Conditions	CRC Comments
8.	If the Council's response is that it is not able to certify the management plan, the Consent Holder must address any reasons or recommendations provided by the certifier and re-submit an amended management plan for certification.	**CRC Compliance:** As above.
Kaitiaki Forum		
9.	Within three months of the date of this consent being granted, the Consent Holder must invite hapū with mana whenua to establish and participate in a Kaitiaki Forum (the Forum) with respect to the Solar Farm, in accordance with the following requirements: a. The purpose of the Forum is to: i. Facilitate feedback to the Consent Holder on detailed design plans; ii. Facilitate feedback to the Consent Holder to inform the preparation of any of the management plans required by the conditions of this consent; iii. Facilitate feedback to the Consent Holder on the maintenance requirements associated with the completed infrastructure authorised by this consent; iv. Facilitate ongoing cultural and environment engagement on any other matters relating to the Solar Farm; v. Work collaboratively and constructively with the Consent	**CRC Compliance:** If this condition is only relevant for MDC to monitor, it could be moved into the MDC-only consents, rather than general conditions. Same goes for Condition (10) below. **CRC Policy Planning:** The intent of these proposed conditions **[**Conditions (9) & (10)**]**, no information has been supplied to indicate whether and to what extent Mana Whenua agree to the proposed approach.

Condition Number	Applicant's Proposed Conditions	CRC Comments
	Holder in relation to the Solar Farm; vi. Enable Forum members to inform individual hapū organisations, entities and/ or constituents in relation to the Solar Farm; and vii. Facilitate the appropriate tikanga and kawa (customary practices and protocols) being applied throughout the design, construction, and operation of the Solar Farm. b. The following core members shall be invited to include representatives on the Forum, including from the Consent Holder: i. Te Rūnanga o Arowhenua; ii. Te Rūnanga o Waihao; and iii. Te Rūnanga o Moeraki; c. The following secondary members may also be invited by Te Rūnanga o Arowhenua, Te Rūnanga o Waihao and / or Te Rūnanga o Moeraki to include representatives on the Forum: i. Canterbury Regional Council; ii. Mackenzie District Council; and iii. Department of Conservation (DoC).	

Condition Number	Applicant's Proposed Conditions	CRC Comments
	d. The Consent Holder must ensure that members of the Forum are provided opportunities and facilities to meet: i. Within six months of commencement of this resource consent or as otherwise agreed; ii. No-less frequently than every three months thereafter, unless all members of the Forum there is no need for a meeting; and iii. Until decommissioning of the Solar Farm has been completed, at which time the Forum may be disestablished. e. The Consent Holder shall prepare and maintain a Terms of Reference for the Forum, to be approved by Mackenzie Districtc Council prior to the first meeting. The Terms of Reference shall: i. Define the objectives, scope, and responsibilities of the Forum; ii. Set out the appointment, and replacement of representatives; iii. Specify the procedures for convening meetings, information sharing, and recording minutes; and iv. Provide for periodic review of the Terms of Reference, or as	

Condition Number	Applicant's Proposed Conditions	CRC Comments
	otherwise requested by Mackenzie District Council. f. The Consent Holder must meet the reasonable administrative costs of facility Forum meetings (e.g. meeting invitations, meeting venue, preparation and distribution of meeting minutes). g. The Consent Holder must take minutes at each Forum meeting and must provide those minutes to the Forum and Consenting Authorities within one week of each meeting being held (or other period otherwise agreed). h. The Forum may request and receive reports and presentation from third parties to meet any of the requirements in this condition. i. The Consent Holder must: i. Provide the Forum with up-to-date information about the design, construction, commissioning, operation and decommissioning of the Solar Farm; ii. Invite feedback from the Forum on drat management plans listed in Table 1 before each plan is submitted to the Consent Authorities for certification. The Consent Holder must record in the draft management plan any	

Condition Number	Applicant's Proposed Conditions	CRC Comments
	feedback provided by the Forum and any amendments made to the draft plan in response to that feedback; iii. Provide each draft management plan to the Forum at least 15 working days prior to the submission of the plan to the Consent Authorities, or such other period as agreed with the Forum to allow sufficient time for review and feedback; and iv. Provide certified management plans in Table 1 to the Forum upon request.	
10.	The Consent Holder must maintain a record of matters raised by the Forum and the Consent Holder's response to those matters (including reasons in circumstances where no action is taken).	As above.
Notification of Commencement of Works		
11.	At least 20 working days before the commencement of physical works on Site, the Consent Holder must notify in writing the Consent Authorities and members of the Kaitiaki Forum in Condition X the expected start date of commencement of this consent. ***Advice Note:*** *The Consent Holder is to contact the Consent Authorities through the following:*	**CRC Compliance:** Noting comments on "commencement" definitions above, would be clearer with "start date of works." (i.e., exercise of consent). If Kaitiaki Forum condition is removed from the General conditions, requirement to notify Kaitiaki Forum members should be included in that condition for MDC.

Condition Number	Applicant's Proposed Conditions	CRC Comments
	• *Mackenzie District Council (info@mackenzie.govt.nz)* • *Canterbury Regional Council (ecinfo@ecan.govt.nz)*	Additionally, construction consents generally require a pre-construction site meeting, among other pre-construction requirements, which are advised to be applied. For an example, see Conditions (4)-(6) of consent CRC252388[5].
State of Environment Monitoring Plan **Note:** The SEMP conditions (XX-XX) below are offered on an auger **[sic]** basis by the Consent Holder.		
CRC Consent Planning: While the applicant considers these conditions to be Augier, we note that potential long-term contamination of the site through gradual build-up of contaminants leached from solar panels and electrical infrastructure is an effect of concern for CRC, as is the potential for soil resource degradation from altered stormwater flows. As these effects relate to the discretionary activity of operational stormwater discharges, CRC would seek to impose conditions monitoring for soil contamination and health on such consents, and CRC does not consider that these conditions are "Augier" as CRC would have legal recourse to impose such conditions, though it is appreciated that the Applicant has taken CRC's advice and included these conditions.		
12.	A SEMP must be prepared and provided to the Consent Authorities for certification at least 30 working days before the commencement of physical works on Site. The purpose of the SEMP is to establish a framework for monitoring, managing, and reporting on environmental effects associated with the Solar Farm, to inform the Consent Authorities of environmental performance and compliance during construction and operation, including: a. Providing a baseline against which subsequent monitoring results submitted by the Consent	**CRC Compliance:** The review conditions are already included in the proposed conditions, so there is no need for (12)(b). Compliance requests an advice note to clarify that the SEMP and associated environmental testing is to monitor/address potential effects of soil contamination from the construction and operation of the solar farm over time as a potential effect of stormwater discharges (for Compliance Officer understanding).

[5] https://www.ecan.govt.nz/data/consent-search/consentdetails/CRC252388/CRC252388

Condition Number	Applicant's Proposed Conditions	CRC Comments
	Holder to the Consent Authorities can be assessed; and b. In the event subsequent monitoring results significantly exceed corresponding SEMP baseline data, the Consent Authorities shall initiate a review of conditions of this resource consent under Condition X.	Overall, Conditions 12-18 should be re-worded to more clearly outline the requirements of the SEMP, and that the monitoring conditions and contingency actions are part of the SEMP. **CRC Land Resources:** SEMP conditions are too general to provide clear direction for the applicant, or to enable meaningful certification. And, while the conditions introduce adaptive management framework, which is a positive step, it lacks specificity on evaluation and response. There is no defined basis for detecting meaningful change. The Operational Management Plan **[***Condition (102) – MDC conditions***]** does not reference the environmental monitoring processes.
13.	The SEMP must, at a minimum, detail monitoring locations, procedures to collect baseline (pre-works) as required by Condition X(a) and include ongoing monitoring data, ongoing monitoring requirements (frequency and contaminants), compliance with the maximum acceptable contaminant concentration thresholds and reporting frequencies for the following in relation to the Site: a. Health of freshwater on Site, including upstream and downstream of adjacent waterbodies to the Site; b. Groundwater up and downgradient of the Site; and c. Soil health and contamination.	**CRC Compliance:** Monitoring sites should be defined for freshwater, groundwater **[***See comment on condition (15) below re: groundwater***]**, and soils. E.g., specific co-ordinates for the freshwater monitoring sites should be established for consistent monitoring. This requirement could be included in the "objectives" of Management Plans, as required by Condition (7). Should read "baseline (pre-works) <u>sampling</u>". Wording should be consistent with monitoring conditions below "compliance with the trigger limits outlined in Condition (18(b)". This condition should be written as a list of SEMP requirements (e.g., ESCP conditions), and should include trigger limits for monitoring/reporting and align this wording with the monitoring conditions below (e.g., trigger limit, or guideline values, so long as

Condition Number	Applicant's Proposed Conditions	CRC Comments
		it is consistent). E.g., establish the WasteMINZ Table 3 guidelines as "the trigger values".
14.	Data obtained from the monitoring of the Site required by Condition X must be provided to the Consent Authorities on the basis specified in Condition X. The Consent Holder must notify the Consent Authorities immediately if trigger levels specified in the SEMP in Condition X are exceeded.	
Groundwater and Soil Monitoring **Note:** The groundwater and soil monitoring conditions (XX-XX) below are offered on an auger **[sic]** basis by the Consent Holder.		
CRC Consent Planning: While the applicant considers these conditions to be Augier, we note that potential long-term contamination of the site through gradual build-up of contaminants leached from solar panels and electrical infrastructure is an effect of concern for CRC, as is the potential for soil resource degradation from altered stormwater flows. As these effects relate to the discretionary activity of operational stormwater discharges, CRC would impose conditions monitoring for soil contamination and soil health on such consents, and CRC does not consider that these conditions are "Augier", given that CRC would have legal recourse to impose such conditions, though it is appreciated that the Applicant has taken CRC's advice and included these conditions.		
15.	The Consent Holder must undertake monitoring of groundwater and soil in accordance with the SEMP required by Condition X at the following consent milestones: a. Before the commencement of any earthworks on Site; b. Before the commencement of Solar Farm operations; c. Every fifth year after the commencement of operation of the Solar Farm; and d. At decommissioning of the Solar Farm.	**CRC Consents Planning:** Note that there is no requirement or specification of groundwater monitoring in the following conditions. CRC Groundwater science was not concerned that groundwater monitoring was required, so reference to monitoring groundwater could be removed. If groundwater monitoring is to remain in the conditions, requirements for groundwater monitoring (e.g., specific up/downgradient bores) should be included in conditions below as part of the SEMP.

Condition Number	Applicant's Proposed Conditions	CRC Comments
		CRC Land Resources: The current SEMP requirements for soil health monitoring are quite general. I recommend the conditions be more prescriptive about the sampling methodology to provide clearer direction for the applicant and make certification more straightforward. A suggested wording for the soil health component is: The SEMP must include a sampling methodology for soil health monitoring that specifies, at minimum: a. Sampling depths appropriate to the soil type. b. The number and spatial distribution of sampling locations, including stratification of sites beneath solar panels and within inter-row areas. c. The number of replicates at each location sufficient to characterise spatial variability. d. Timing of sampling relative to seasonal conditions, with consistency across monitoring rounds. Spring or autumn sampling is preferred to avoid extremes of soil moisture and temperature. e. Sample collection, handling, and laboratory analysis methods based on relevant national standards or guidelines. f. Technical approach for detecting change from baseline, including the magnitude of change considered meaningful.
16.	The monitoring undertaken in accordance with Condition X must include testing for soil health parameters including at least: a. Bulk density b. Aggregate stability	**CRC Land Resources**: Recommend removing bulk density from the required soil health parameters if the soils have high stone content. Collection of intact cores becomes increasingly difficult on stony soils, and while excavation-based methods can be used as an alternative, they are time-consuming and subject to high

Condition Number	Applicant's Proposed Conditions	CRC Comments
	c. pH d. Electrical conductivity	spatial variability. Given the site's stony alluvial soils, bulk density results are likely to be unreliable and difficult to compare across monitoring rounds. Total carbon and total nitrogen are more important indicators of soil health in the context of this site, and will provide meaningful data on changes over time. If there are concerns about compaction, near-saturated hydraulic conductivity testing may be a more practical alternative, though it's likely to have high spatial variability and be costly to measure reliably. The soil health parameters in Condition (16) must include: a. Organic carbon b. Total nitrogen c. Aggregate stability d. pH e. Electrical conductivity If site conditions make aggregate stability or bulk density impractical following the baseline assessment, an alternative indicator of structural condition should be substituted, with the justification documented in the SEMP
17.	The monitoring undertaken in accordance with Condition X must include testing for soil contaminants including at least: a. Silver – Ag b. Cadmium – Cd c. Copper – Cu d. Lead – Pb	

Condition Number	Applicant's Proposed Conditions	CRC Comments
	e. Antimony – Sb f. Zinc – Zn g. Per and Polyfluoroalkyl Substances Compounds - (PFAS)	
18.	Following completion of monitoring at each of the milestones identified in Condition X, the Consent Holder must prepare and submit a report on monitoring results to Consent Authorities within two months of monitoring being undertaken. The report must include the following: a. Soil Health: i. An assessment of the results of soil health testing; ii. If the soil health testing results indicate a decline in soil health compared to testing prior to the installation of the panels, the Consent Holder must provide details of mitigating actions to be undertaken to avoid a further decline in soil health. b. Soil Contamination: i. An assessment of the results of soil contamination testing, including if the results indicate any trend of increasing contamination compared to the testing prior to the installation of the panels or if any contaminant exceeds the	**CRC Compliance:** Timeframes for the provision of the SMMP (Condition (18)(b)(ii)) from the Consent Holder need to be specified. Or, if the timeframes of the general Management Plan conditions of 2-8 apply (including restriction on starting works before Management Plans have been certified), this needs to be specified, else the consent holder would have no time restrictions around these management plans. The SMMP should be a separate condition triggered by the testing of Condition (18). Condition (18)(c)(i) should enforce a time limit on mitigating actions, e.g. "as soon as practicable, but no later than 3 months after the Consent Holder received testing results alerting them to the exceedance.". Condition (18)(ii) into two parts, separating out the possibilities of an exceedance of values (ii), or where values are not exceeding but are increasing and may exceedance (iii), to make clear that there are different requirements for these scenarios.

Condition Number	Applicant's Proposed Conditions	CRC Comments
	WasteMINZ Class 4 Guidelines Table 3-C adopted values (or, where these Guidelines have been updated, the updated values); and ii. If the assessment indicate that soil contaminants exceed the Guideline values, or are increasing at a rate such that the Guideline values are likely to be exceeded, details of mitigation actions to be undertaken to ensure that any exceedance will be remediated, or that Guideline values will not be exceeded must be provided to the Consent Authorities within 20 working days. c. Implementation of mitigation measures: i. Mitigation measures required by Condition X(d) must be implemented as soon as practicable; and ii. Testing must be undertaken on a monthly basis until the trend for soil health is no longer in decline and until soil contaminants are no longer increasing and are either below the WasteMINZ Class 4 Guideline Table 3-C values, or at/below the pre-development levels recorded in the testing required by Condition 13(a) **[sic –**	

Condition Number	Applicant's Proposed Conditions	CRC Comments
	presumably now 15(a)] if they were higher than the Guideline values. d. Soil Mitigation Management Plan (SMMP): i. In the event that either the soil health or soil contamination triggers under Conditions X(a)(ii) or X(b)(ii) are met, the Consent Holder must prepare a Soil Mitigation Management Plan (SMMP) for approval and certification by the Consent Authorities. The purpose of the SMMP is to detail measures for how soil health and / or soil contamination on Site will be mitigated; and ii. The SMMP must detail the mitigation measures, monitoring regime, reporting requirements and timelines to ensure that soil health and / or soil contamination is managed in accordance with Condition X(c).	
19.	The Solar Farm must be constructed, operated, maintained and decommissioned in accordance with the information and plans submitted by the Consent Holder in support of application number XXX and officially received	**CRC Consent Planning:** Conditions referencing "information and plans submitted… in support of the application…" are not supported by CRC.

Condition Number	Applicant's Proposed Conditions	CRC Comments
	by Council on XXX. Plans and information that comprise this application are in Annexure A.	Where a specific plan/map, management plan, or constraint is outlined in the application information, that should be transferred in full to the conditions, or attached as a specific Appendix to the relevant consent to ensure that Compliance staff have immediate, clear access to all information required to determine compliance with the specific conditions. Additionally, there is no detail for decommissioning in the application documents, so this condition should refer to the DMP. Generally, where there is reference to application documents, the condition(s) should note that if there is a conflict between the information supporting the application and the condition(s), the condition(s) prevail over the other document.
Consent Lapse		
20.	Pursuant to section 125(1(c) of the Resource Management Act 1991 (RMA), this resource consent shall lapse 10 years from the date of its commencement unless it has been given effect to, surrendered or been cancelled at an earlier date.	**CRC Consent Planning:** Some consents have applied for only a 5-year duration, so a general 10-year lapse is incompatible with those consents.
Duration of Consents		
21.	Unless it has lapsed, been surrendered or been cancelled at an earlier date pursuant to the RMA, the duration of each consent is as follows:	

Canterbury Regional Council – Regional Consents
Solar Farm Consents

Activity	Rule Reference	Consent Ref.	Consent Duration
Earthworks in relation to the solar farm construction and the formation of access roads and hardstand areas	**Rule 5.176** – The use of land to excavate material that does not comply with one or more of the conditions of Rule 5.175.	XXX **[sic]**	5 Years
Construction phase stormwater discharge associated with the Applicant's Solar Farm Site	**Rule 5.94B** – The discharge of construction-phase stormwater, other than into or from a reticulated stormwater system, into a surface waterbody, or onto or into land in circumstances where a contaminant may enter groundwater or surface water, that does not meet one or more of the conditions of Rule 5.94A is a restricted discretionary activity.	XXX	5 Years
Operational stormwater in relation to rainwater off the solar panels	**Rule 5.97** – The discharge of stormwater, other than from a reticulated stormwater system, into a river, lake, wetland or artificial watercourse or onto or into land in circumstances where a contaminant may enter water that does not meet one or more of the conditions of Rule 5.93A.	XXX	35 Years
GIP Consents			
Construction phase stormwater discharge associated with Transpower's GIP	**Rule 5.94B** – The discharge of construction-phase stormwater, other than into or from a reticulated	XXX	5 Years

	stormwater system, into a surface waterbody, or onto or into land in circumstances where a contaminant may enter groundwater or surface water, that does not meet one or more of the conditions of Rule 5.94A is a restricted discretionary activity.		
Earthworks in relation to the GIP works (i.e. platform development)	**Rule 5.176** – The use of land to excavate material that does not comply with one or more of the conditions of Rule 5.175.	XXX	5 Years
Operational stormwater from the Transpower's [sic] GIP Operational stormwater from the Applicant's substation	**Rule 5.97** – The discharge of stormwater, other than from a reticulated stormwater system, into a river, lake, wetland or artificial watercourse or onto or into land in circumstances where a contaminant may enter water that does not meet one or more of the conditions of Rule 5.95 or Rule 5.96; and the discharge of stormwater or construction-phase stormwater into a reticulated stormwater system that does not meet the condition of Rule 5.93A; is a discretionary activity except that within the boundaries of Christchurch City it is a non-complying activity.	XXX	35 Years

Condition Number	Applicant's Proposed Conditions	CRC Comments
Monitoring Fees		
22.	Pursuant to section 36 of the RMA the Consent Holder must pay the actual and reasonable costs incurred by the Consent Authorities when monitoring the conditions of these resource consents.	**CRC Consents Planning:** This condition is no longer included in the standard CRC conditions.
Review		
23.	The Consent Authorities may, under sections 128 and 129 of the RMA, initiate a review of any or all conditions of this resource consent on the first, second and third anniversary of the commencement of the consent and every three years after that, for the duration of the resource consent. Any such review of conditions shall be for the purposes of: a. Responding to any adverse effect on the environment which may arise from the exercise of the consent and which it is most appropriate to deal with at a later stage; b. Ecology including, but not limited to, any effects detected by the avifauna monitoring required under Conditions XX; c. Dealing with any unanticipated adverse effects on the environment which may arise from the exercise of the consent, which it is appropriate to deal with at a later stage; and d. Ensuring that the conditions are effective and appropriate in managing the effects of the activities authorised by this consent.	**CRC Consent Planning:** Standard conditions enable yearly review for the duration of consent. While construction activities do have potential effects that could trigger review (i.e., yearly review for the first three years is appropriate), long-term effects (e.g., bird-strike, gradual contamination) may only become evidence later in the 35-year consent durations. As such, limiting the review window to three-yearly after the first three years of consent is not supported by CRC, and the standard ability to review consent conditions every year is recommended. Condition (23)(b) is superfluous as (a) already allows for review of any environmental effects. Further, (b) limits the consideration of ecology to avifauna, rather than all ecology effects. Remove (b).
Complaints Register		
24.	The Consent Holder must maintain a register of any complaints received regarding the activities authorised by these resource consents. As a minimum, the register must include:	

Condition Number	Applicant's Proposed Conditions	CRC Comments
	g. The name and contact details (if supplied) of the complainant; h. The nature and details of the complaint; i. The location, date and time of the complaint and the alleged event giving rise to the complaint; j. Weather conditions at the time of the complaint, where relevant to the complaint; k. Other activities in the area that may have contributed to the complaint; l. The outcome of the Consent Holder's investigation into the complaint; and m. A description of any measures taken by the Consent Holder to respond to the issue raised by the complainant.	
25.	The Consent Holder must notify the Consent Authorities of any complaint received that relates to the activities authorised by these resource consents as soon as reasonably practicable and no later than two working days after receiving the complaint.	**CRC Compliance:** Can align this with the 5-working days of (26) below.
26.	The Consent Holder must respond to any complainant as soon as reasonably practicable and, within 5 working days, advise the Consent Authorities and the complainant of the outcome of the Consent Holder's investigation and any measures taken, or proposed to be taken, to respond to the complaint.	
Decommissioning		
27.	The Consent Holder must provide written notice to the Consent Authorities and Kaitiaki Forum of the intended commencement of decommissioning of the Solar Farm at least six months before the commencement of Solar Farm decommissioning.	

Condition Number	Applicant's Proposed Conditions	CRC Comments
28.	At least three months before the commencement of Solar Farm decommissioning, the Consent Holder must submit a DMP to the Consent Authorities for certification that fulfils the requirements of Conditions X and X.	**CRC Consent Planning:** While Decommissioning Management Plan (DMP) is defined in the acronym table at the start of the set, DMP should be defined in first use within a condition. However, as noted below, the Applicant must also prepare a Dust Management Plan to demonstrate that dust discharges of the proposal will be permitted. The standard acronym for a Dust Management Plan is also DMP, so it could be beneficial to use a different acronym for the Decommissioning Management Plan to avoid confusion for Compliance (e.g., DeMP).
29.	The DMP must be prepared by a SQEP and meet the following objectives: a. Decommissioning of the solar panels and all associated infrastructure in a manner that complies with all legislative requirements; b. Clearing the site of all panels, buildings/structures and cabling; c. Reinstatement of the site to a state than enables it to continue to be used for land-based primary production; and d. Ensuring that the components and infrastructure are disposed of in a way that maximises re-use and recycling. For any parts that cannot be reused or recycled, ensuring that they are disposed of as e-waste in an environmentally responsible way in accordance with industry best practice.	
30.	The DMP must include but not be limited to:	**CRC Contaminated Land:** Solar panels should not be broken down or stored on mass in a degraded state during

Condition Number	Applicant's Proposed Conditions	CRC Comments
	a. Details on all infrastructure to be decommissioned, including details, method and location of reuse, recycling or disposal and the reasons why the options have been chosen; b. Details of specific infrastructure to remain on-site post-closure and reasons why it will remain on the Solar Farm site; c. Scheduling and timing for decommissioning; and d. Details for finished ground cover at completion of decommissioning and future intended land use.	decommissioning or panel replacement to avoid discharges of panel components and contaminants to the environment. This aspect should be included in the decommissioning plan, and I note that the proposed consent conditions do have a provision for plan certification from CRC, so this aspect can be addressed at that time.
31.	The Consent Holder must notify the Consent Authorities at least 10 working days before the completion of Solar Farm decommissioning to allow Council staff to carry out site inspections to determine compliance with the certified DMP.	

Condition Number	Applicant's Proposed Conditions	CRC Comments
MDC Consent Conditions		
CRC Note: Conditions (32)-(119) are specific to MDC consents. As such, only conditions where CRC Technical Staff have made specific comments are included from the MDC conditions below. Additionally, CRC was delegated to provide comment around ecological issues. In an error of process, CRC's technical comments were only provided to MDC on 18 February 2026 which CRC acknowledges is too late to include in MDC's s53 comments. As such, where CRC's Ecologist has commented directly on MDC conditions (e.g., Avifauna Management Plan, Lizard Management Plan etc.), those conditions are included below with CRC's ecology comments. Moving forwards, CRC an MDC will be able to consider all relevant ecology advice in working with the Applicant on revisions to the conditions sets.		

Condition Number	Applicant's Proposed Conditions	CRC Comments
Conditions (120)-(143) are specific to CRC consents and are included after the MDC conditions in full with comments below.		
Soil Contamination Reporting		
36.	In the event that the DSI required by Condition X finds contamination to exceed the applicable standards of the Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 (**NES-CS**), a Remedial Action Plan (**RAP**) must be prepared by a SQEP and in accordance with the current edition of the CLMG1 and the Ministry for the Environment's *Contaminated Land Management Guidelines No. 5: Site Investigation and Analysis of Soils (Revised 2021*) (**CLMG5**). The RAP must be provided to the Council for certification no more than 15 working days from the date of the submission of the DSI required in Condition X. ***Advice Note:*** *For the avoidance of doubt, the RAP is to be prepared in accordance with the relevant guidelines and requirements as set out by the Ministry for the Environment.*	**CRC Contaminated Land:** Need to require a Site Validation Report after the RAP has been implemented (if RAP required). **CRC Consent Planning:** The application specifically states that it does not seek NES-CS consent, but if this condition is triggered, the Consent Holder would need to apply for NES-CS consent to MDC before undertaking the required actions.
Landscaping		
43.	The Consent Holder must ensure that the ground underneath the solar panels is covered in established vegetation at all times to prevent sediments entering stormwater. Should the vegetation under the solar panels not thrive in the shade of the solar panels then the vegetation must be immediately replaced with shade tolerant species.	**CRC Land Resources:** The vegetation cover condition (Condition 43) requires cover to be maintained "at all times" and "immediately replaced", which is not achievable in practice given drought conditions, reseeding periods, and the nature of the environment. The condition could be reworded to require vegetation cover to be maintained "as far as practicable" or to specify a reasonable timeframe for re-establishment following disturbance or loss. Where vegetation establishment is not favourable, particularly

Condition Number	Applicant's Proposed Conditions	CRC Comments
		along the dripline, alternative measures to maintain infiltration of runoff from panels should be considered (e.g. gravel mulch, or temporary erosion protection). The condition for vegetation cover beneath panels currently sits in isolation. The blanket maintenance requirement is not connected to a monitoring or response process, for example in the Operational Management Plan.
44.	At least 30 working days before the commencement of landscaping, the Consent Holder must engage a SQEP ecologist to produce a PAWMP for the Solar Farm. The purpose of the PAWMP is to provide details on how pest animals and weeds will be managed on the site during the operation of the Solar Farm. The PAWP must be informed by the AMP, LzMp and RGMP required by Conditions XX-XX and as a minimum must: a. Identify measures for how pest management and weed control will be undertaken on the Site; b. Identify times of year to focus particular pest management and weed control strategies; c. Establish mechanisms to report annually on the results of pest and weed management to Mackenzie District Council Council.	**CRC Policy Planning:** The PAWMP needs to give effect to the Canterbury Regional Pest Management Plan.
Ecology		
Lizards		
56.	At least three months before the commencement of physical works on Site, the Consent Holder must provide for the certification of Mackenzie District Council a LzMP for the purposes of minimising any potential effects on indigenous skinks / geckos within the vegetation. Copies of any DoC permits (if required) must be	**CRC Land Ecology:** Conditions now align with previous recommendation for the LzMP to align to existing DOC guidelines.

Condition Number	Applicant's Proposed Conditions	CRC Comments
	attached to the plan. The LzMP must be prepared by a suitably qualified and experienced herpetologist and must be made in accordance with the DoC's 'Guidelines and model for producing management plans for New Zealand lizards' and be informed by the LMP required by Condition X. The LzMP must include (but not be limited to): a. Timing of the works; b. A description of the salvaging methodology; c. c. A description of relocation methodology, including transfer methods, relocation site(s) selection and habitat enhancement methods (such as deployment of logs and pest control).	
Avifauna		
57.	Any physical works on Site occurring during the bird breeding season (1 September to 31 March) must be undertaken in accordance with the recommendations set out in Section 12 of Assessment of Ecological Effects for the Proposed Solar Farm Between the Lower Reaches of the Tekapo and Twizel Rivers, Mackenzie District (dated May 2023, ref. 6621c). At a minimum, this must include the following: a. A Site inspection by a suitably qualified and experienced ecologist within 48 hours of works commencing to determine whether any indigenous birds are nesting on the Site on or in the vicinity of the construction area(s). b. If nesting birds, eggs or chicks are found, then works must not commence until after an exclusion zone has been established around the nesting birds, eggs or chicks within which construction must not commence until after nesting activities have ceased. Exclusion zones must be 100m, or smaller if considered appropriate by the suitably	**CRC Land Ecology:** Proposed conditions 57 to 67 provide provisions to assess bird strike occurrence through avifauna monitoring, and development of a Bird Collision Management Plan (BCMP) with associated mitigation options should collision thresholds be detected. These generally align with recommendations made by DOC technical staff shared with CRC for other solar farm developments. **CRC Consents Planning:** It is acknowledged that the Applicant has been in discussions with DOC around appropriate mitigations, and the mitigations/offsetting/compensation is still being decided, with the Applicant indicating that these would be finalised and proposed as conditions. Last discussed directly with Applicant 12/02/2026. CRC considers that any initial offset/compensation, as well as offset/compensation to address residual effects should

Condition Number	Applicant's Proposed Conditions	CRC Comments
	qualified and experienced ecologist, but under all circumstances must not be less than 25. c. c. If works are paused for eight successive days or more, then are resumed during the breading season, a new survey will be required.	mitigations prove ineffective, should be included in any final condition set.
58.	At least six months before the commencement of physical works on Site, the Consent Holder must engage a suitably qualified and experienced ornithologist / ecologist to prepare a Literature Review Report. This report must summarise the current state of knowledge on bird collision with ground-mounted, photovoltaic solar array. The purpose of the Literature Review Report is to: a. Provide an up-to-date evaluation of bird collision risk with equivalent technology projects both internationally and within New Zealand. b. Recommend appropriate timing, methods (including methods for carcass detection / persistence trials), frequency, and duration for bird collision monitoring that would enable effective detection and response to collision events in accordance with best practice. The Literature Review Report must generally inform the development of, and must be appended to, the AMP required under Condition X. ***Advice Note:*** *Carcass detection / persistence trails refer to methods developed to account for bird carcass detection and loss (via scavenging, decomposition) probability when estimating rates of bird mortality*.	

Condition Number	Applicant's Proposed Conditions	CRC Comments
59.	At least three months before the commencement of physical works on Site, the Consent Holder must provide for the certification of Mackenzie District Council an AMP. The AMP must be prepared by a suitably qualified and experienced ornithologist / ecologist with input from a biostatistician, in consultation with the DoC.	**CRC Consent Planning:** Currently, Condition (59) and (61) have "three months" and "60 working days" respectively, so that could be staggered to allow time for the DOC comments to be received before the draft goes to MDC. A further condition could be for the Consent Holder to comment on the DOC review, noting if/where DOC's comments have been adopted or not, and the reasoning for this. That all would allow MDC (or their delegated reviewer) to consider DOC's comments as part of the certification request, which gives more assurance that DOC's comments are a meaningful part of the process.
60.	The objectives of the AMP are to: a. Enable detection of bird collision with the solar arrays and ancillary infrastructure within the Site; b. Guide an appropriate management response in the event of collisions of indigenous bird species with the solar arrays and ancillary infrastructure within the Site, particularly those classified as nationally Threatened or At Risk to reduce the ongoing risk of exceeding the thresholds of unacceptable adverse effects in Table 2; c. Ensure any effects on indigenous birds arising from the operation of the Solar Farm do not exceed the thresholds of unacceptable adverse effect in Table 1.	**CRC Consent Planning:** "Table 1" in (c) presumably should also be "Table 2" presented below condition (63) in the conditions set.
61.	The draft AMP must be provided to DoC for comment at least 60 working days before the commencement of physical works on Site. Any review comments from DoC, including any responses to comments, must be appended to the AMP.	See comments above for (59).
62.	The AMP must incorporate best practice as determined through Condition X. [58 - Literature review condition]	

Condition Number	Applicant's Proposed Conditions	CRC Comments
63.	The AMP must include, but not be limited to, the following: 1. Monitoring Design: i. Frequency, duration (including a minimum of 36 months from commencement of installation of solar panels and ancillary infrastructure within the Site), timing, and site coverage of bird collision monitoring surveys that is adequate to ensure carcasses are detected. 2. Methodology: i. Statistically robust methods for bird collision surveys. ii. Methods for carcass detection and removal trials (to be informed by the Literature Review Report if addressed in the literature, otherwise that is of an adequate standard to ensure carcasses are detected). iii. Methods for record keeping and data analysis, including statistical methods to derive annual mortality estimates. 3. Mortality Thresholds and Management Responses: i. Thresholds in Table 2 for indigenous bird species that trigger a management response in accordance with Condition X.	
Table 2.	**Indigenous bird mortality thresholds.**	

<table>
<tr><th>Condition Number</th><th colspan="2">Applicant's Proposed Conditions</th><th>CRC Comments</th></tr>
<tr><td></td><td>National Threat Classification</td><td>Threshold to Trigger a Management Response</td><td></td></tr>
<tr><td></td><td>Threatened – Nationally Critical species</td><td>One carcass detected at any time during the monitoring period.</td><td></td></tr>
<tr><td></td><td>Threatened – Nationally Endangered species</td><td rowspan="2">One carcass detected at any time during the monitoring period.</td><td></td></tr>
<tr><td></td><td>Threatened – Nationally Increasing species</td><td></td></tr>
<tr><td></td><td>At Risk species</td><td>Three carcasses detected within any one survey; or five carcasses detected cumulatively in a consecutive 12-month period.</td><td></td></tr>
<tr><td></td><td>Not Threatened indigenous species</td><td>Five carcasses detected within any one survey; or 15 carcasses detected cumulatively in any consecutive 12-month period.</td><td></td></tr>
<tr><td>64.</td><td colspan="2">Twenty working days after the first, second and third year anniversaries of the monitoring required by Conditions XX-XX, a suitably qualified and experienced ecologist / ornithologist is to submit a report to Mackenzie District Council and DoC setting out the results of the monitoring.

Advice Note: The meaning of 'Threatened and At Risk' and national threat classifications for indigenous bird species are based on the most recent available assessment under the New Zealand Threat Classification System administered by DoC (Rolfe et al. 2022; available at https://nztcs.org.nz/).</td><td></td></tr>
<tr><td>65.</td><td colspan="2">Within 5 working days of exceeding a threshold in Table 2 (Condition X) at any time prior to the conclusion of the monitoring period, a</td><td></td></tr>
</table>

Condition Number	Applicant's Proposed Conditions	CRC Comments
	suitably qualified and experienced ecologist / ornithologist is to advise Mackenzie District Council setting out: a. The details of the mortality threshold breach; b. Notice of the preparation and recommendations on the content of an on-going Bird Collision Management Plan (BCMP) to ensure mortality of avifauna does not continue to exceed the thresholds in Table 2, Condition X.	
66.	If a BCMP is required, as a result of a Table 2 threshold being breached, this must be provided to DoC for comment no later than 20 work days from the notification of a mortality exceeded outline within Condition X. Following 20 working days, or receipt of comment from DoC (whichever is sooner), the BCMP must be finalised and provided to Mackenzie District Council for certification, no later than a further 20 working days following the conclusion of the comment period. The BCMP must include: a. Details of ongoing monitoring to be undertaken; and b. Details of collision prevention / deterrent measures that are to be developed in consultation with DoC and must be implemented at the Site which may include (as relevant to the nature of the impacts identified by the monitoring provided for under Conditions XX-XX) but are not limited to: i. Bird sensitive anti-reflective coatings and / or applications to the panels;' ii. Use of deterrent devices or visual warning devices / markings (flags, streamers, or visually distinctive markings on panels) to deter attempted landing on panels;	

Condition Number	Applicant's Proposed Conditions	CRC Comments
	iii. Limitations on angle or orientation of solar panels over defined spatial, temporal scales, or environmental conditions if collisions were able to be attributed to certain spatial temporal or environmental patterns; and iv. iv. Further monitoring at an appropriate time scale, to test the effectiveness of proposed mitigation responses.	
67.	The Consent Holder must comply with the certified Management Plan(s) or report(s) at all times including by undertaking bird collision monitoring, management and reporting in accordance with the methodologies within the certified AMP and BCMP (if development of such a plan is triggered).	
Robust Grasshopper		
68.	At least three months before the commencement of physical works on Site, the Consent Holder must provide for the certification of Mackenzie District Council a RGMP. The purpose of the RGMP is to describe the specific procedures to address potential adverse effects associated with the construction and operation of the project on the Robust Grasshopper. The RGMP must be prepared by a suitably qualified and experienced ecologist and be informed by the LMP required in Condition X. The RGMP must include (but not be limited to): a. Timing of works; and b. b. Relocation methods, including transfer methods and selection of appropriate relocation site(s).	**CRC Land Ecology:** The Application proposes funding the creation of an invertebrate sanctuary set up and maintained by DOC for the Robust Grasshopper (Application, Page 44). While a management plan for this species is provided for by proposed Condition (68) it does not explicitly refer to a sanctuary. Given robust grasshopper has not been confirmed as potentially affected by the proposal (?), presumably the Application's proposal would be an Augier condition.

Condition Number	Applicant's Proposed Conditions	CRC Comments
Ecological Enhancement Plan		
69.	At least three months before the commencement of physical works on Site, the Consent Holder must provide for certification of Mackenzie District Council an EEP. The purpose of the EEP is to describe how indigenous vegetation on the site will be managed during the term of the resource consent. The EEP must be prepared by a suitably qualified and experienced ecologist and be informed by the LMP required by Condition XX. The EEP must include (but not be limited to): - Measures for how invasive species will be managed on-site; - Measures outlining soil cultivation and weed control; and - Monitoring to assess the ongoing success of the ecological enhancement initiatives.	**CRC Land Ecology:** Conditions now align with previous recommendations including for the Ecological Enhancement Plan (EEP) to be reviewed by DOC.
70.	The draft EEP must be provided to DoC for comment at least 60 working days before the commencement of physical works on Site. Any review comments from DoC, including any response to comments, must be appended to the EEP.	**CRC Consent Planning:** Same comments as for (59) & (61) above.
Panels and Structures		
71.	All panels installed and used on Site must be coated in anti-reflective coating, contain no PFAS and have gridlines.	**CRC Groundwater:** Addresses comments that solar panel coating should not contain PFAS.
Archaeological sites or waahi [sic] tapu		

Condition Number	Applicant's Proposed Conditions	CRC Comments
72.	In the event of any archaeological site or waahi **[sic]** tapu being discovered or disturbed while undertaking works to give effect to the conditions of this consent, the works in the area of the discovery must cease immediately, and iwi and Mackenzie District Council must be notified within 48 hours. Works may recommence with the written approval of Mackenzie District Council. Such approval shall be given after the Consent Authorities have considered: a. Tāngata Whenua interests and values; b. The Consent Holder's interests; and c. Any archaeological or scientific evidence.	**CRC Consent Planning:** This condition misses crucial legal requirements around reporting archaeological sites. See CRC standard 'Discovery of Archaeological Material', Condition (9) on CRC252388[6].
Erosion and Sediment Control Plan		
79.	At least 30 working days before the commencement of physical works on Site, the Consent Holder must submit an ESCP for certification by Mackenzie District Council. The ESCP must be prepared by a SQEP who must provide certification that the erosion and sediment controls in the ESCP have been designed in accordance with the relevant best practice guidelines. As a minimum, the ESCP must include the following: a. The expected duration (timing and staging) of earthworks; b. Details of all erosion and sediment controls; c. Diagrams and / or plans of a scale suitable for on-site reference, showing the locations of any cut and fill operations (including earthworks for internal accessways); d. The commencement and completion dates for the implementation of the proposed erosion and sediment controls;	**CRC Compliance:** There is no specific requirement for soil protection during construction, when the greatest compaction risk occurs. The Erosion and Sediment Control Plan is focused on offsite sediment effects. **CRC Compliance:** The ESCP should require adherence to the CRC Erosion and Sediment Control Toolbox. (E.g., Condition (7)(b)(i) of CRC252392[7]).

[6] https://www.ecan.govt.nz/data/consent-search/consentdetails/CRC252388/crc252388
[7] https://www.ecan.govt.nz/data/consent-search/consentdetails/CRC252392/crc252392

Condition Number	Applicant's Proposed Conditions	CRC Comments
	e. Measures to minimise sediment being deposited on public roads; f. Measures to ensure sediment or dust discharge from the earthwork's activity does not create a nuisance on neighbouring properties; g. Measures to prevent spillage of fuel, oil and similar contaminants; h. Means of ensuring contractor compliance with the ESCP; and i. The name and telephone number of the person responsible for monitoring and maintaining all erosion and sediment control measures.	
Traffic Management Plan		
80.	No less than 30 working days before the commencement of physical works on Site, the Consent Holder must prepare and submit to Mackenzie District Council for certification a TMP. The purpose of the TMP is to provide measures to avoid, remedy or mitigate any potential or actual traffic effects associated with the construction or commissioning of the Solar Farm, including the following: a. No more than 30 heavy vehicle trips (in and out) per day; b. All deliveries (pick up and drop off) are to occur wholly within the site; c. Methods to ensure that the appropriate erosion and sediment control measures are in place to avoid, remedy, or mitigate the potential effects of sediment runoff associated with the construction or commissioning of the works; and d. Adjacent landowner and occupier liaison during the construction stage.	**CRC Policy Planning:** TMP has not yet been developed. The Panel have requested a traffic and transportation assessment. The assessment and management plan are necessary to determine the effects of traffic to and from the site and consistency with the Canterbury Regional Policy Statement. The assessment should include cumulative effects of the development of multiple solar arrays in the area.

Condition Number	Applicant's Proposed Conditions	CRC Comments
Night-time resting position		
112.	Once the Solar Farm is operational, the solar panels standard resting position at night-time must be vertical (be no less than 90 tilt from horizontal).	**CRC Land Ecology:** Condition (112) requires solar panels to be positioned vertically at night. While this has presumably been included as a mitigation to address the 'lake effect' there is the possibility that this action may create an equally concerning issue for collision – an upright structure. I recommend this is considered further by ornithologists / DOC avifauna experts. Rather than one angle being set as a default, the panels might better be at alternating angles and or informed by the time of year/month. i.e. individual panel set to different angles to break the polarised light visual cue from above and or positioning the panels at night in directions away from sources of polarised moonlight.

Condition Number	Applicant's Proposed Conditions	CRC Comments
PART D: SPECIFIC CONDITIONS – DISCHARGE PERMITS (CANTERBURY REGIONAL COUNCIL) DISXX IN RELATION TO: • **RULE 5.94B – CONSTRUCTION-PHASE STORMWATER DISCHARGES ASSOCIATED WITH THE CONSTRUCTION OF THE SOLAR FARM AND GIP SUBSTATION; AND** • **RULE 5.97 – OPERATIONAL STORMWATER IN RELATION TO THE OPERATION OF THE SOLAR FARM AND SUBSTATIONS**		
CRC Consents Planning: As discussed in the *Consent Scope and Conditions* section above, the construction-phase and operational phase consents need to be separated out to different consents. Additionally, if the Applicant's intent is to transfer consents managing the GIP site to Transpower, it would be beneficial to have separate operational consents covering the GIP site and solar farm site. For an example, see Meridian Energy Ltd's consent suite associated with CRC252388-396[8]. CRC has discussed this possibility with the applicant and provided the Meridian consents for reference.		
Consent Duration		

[8] https://www.ecan.govt.nz/data/consent-search/consentdetails/CRC252388/crc252388 (Note that there is no CRC252394)

Condition Number	Applicant's Proposed Conditions	CRC Comments
120.	Construction-phase stormwater discharges authorised under this consent shall expire 35 years from the date of commencement of the consent unless it has been surrendered or cancelled at an earlier date pursuant to the RMA.	**CRC Consent Planning:** The table of durations gives 5 years for the construction-phase stormwater consents, along with the earthworks consents. Presumably 35 years here is a typo, and it should be aligned with the 5 years as above. With a 5-year duration, there would be two separate s15 consents, the 5-year consent covering construction-phase discharges, and the 35-year consent covering operational stormwater discharges. For the separate 5-year construction-phase stormwater consent, a condition requiring that discharges only occur in accordance with the ESCP must be included (as included in the s9 earthworks consent for CRC below). Or, a reference to the ESCP included in the s9 consent to ensure that ESCP measures are in-place for the construction-phase works. See further conditions around ESCP on the s9 conditions below.
121.	Operational stormwater discharges authorised under this consent shall expire 35 years from date of commencement of the consent unless it has been surrendered or cancelled at an earlier date pursuant to the RMA.	As above for Condition (120).
Stormwater Management		
122.	At least 20 working days before the installation of the stormwater system on Site, the Consent Holder must submit to the Canterbury Regional Council, Attention: Regional Leader – Compliance Monitoring: a. Final detailed design plans for the stormwater system;	**CRC Consent Planning:** "Regional Leader – Compliance Monitoring" position no longer exists, should be "Compliance Manager". The only "stormwater system" to be installed would be at the GIP Substation and Solar Farm Substation sites. This should be

Condition Number	Applicant's Proposed Conditions	CRC Comments
	b. A certificate signed by a Chartered Professional Engineer (CPEng) with stormwater system design and construction experience confirming that the stormwater system has been designed in accordance with the conditions of this resource consent; and c. A statement signed by the CPEng confirming that they are competent to certify the engineering work.	specified with a specific condition outlining the stormwater systems. There are currently no specific design requirements in these conditions which a CPEng could certify under (122)(b). However, the application states that "*oil containment systems*" would be used for substation transformers to ensure that discharges are free of hydrocarbons (mineral oils stored within transformers). Conditions should be included requiring this mitigation for any areas where transformers are present (excluding the self-bunding Power Conditioning Units that would be spread throughout the site). Presence of transformers within the GIP Substation and/or Solar Farm Substation should be confirmed by the applicant for this condition.
123.	Any detailed design plans certified under Condition X, may be amended and recertified under the process outlined in Condition X.	**CRC Compliance:** There is no condition outlining a re-certification process. Conditions (122) could include a re-submission condition to clarify this.
124.	The stormwater system may be installed either: a. Following certification being received from the Canterbury Regional Council, Attention: Regional Leader – Compliance Monitoring, that it meets the requirements under this resource consent, or b. After 10 working days from submitting the design to Canterbury Regional Council for certification, and certification has not been received.	**CRC Consent Planning:** As above for "Regional Leader" should be "Compliance Manager".

Condition Number	Applicant's Proposed Conditions	CRC Comments
125.	Within 20 working days of the installation of the stormwater system, the consent holder must submit to the Canterbury Regional Council, Attention: Regional Leader – Compliance Monitoring: a. All as built design plans of the stormwater system installed; b. A certificate signed by a CPEng with stormwater system design and construction experience confirming that the installed stormwater system complies with the conditions of this resource consent; and c. A statement signed by the CPEng confirming that they are competent to certify the engineering work.	**CRC Consent Planning:** As above for "Regional Leader" should be "Compliance Manager". For (b), same comments as for (122)(b) above.
126.	The stormwater system must be maintained by: a. Inspecting the stormwater system at least once every two months; b. Removing any visible hydrocarbons, debris or litter within five working days of the inspection; c. Removing any accumulated sediment in the soakpit within five working days of the inspection; d. Removing any accumulated sediment in the soakpit when the sediment occupies more than one quarter of the depth below the invert of the outlet pipe; and e. Repairing any scour or erosion within five working days of the inspection.	
127.	Any material removed from the devices in accordance with Condition X must be disposed of at an appropriate location.	
128.	All practicable measures must be taken to avoid spills of fuel or any other hazardous substances within the site. In the event of a spill of fuel or any other hazardous substance:	

Condition Number	Applicant's Proposed Conditions	CRC Comments
	a. The spill must be cleaned up as soon as practicable, the stormwater system must be inspected and cleaned and measures must be taken to prevent a recurrence; b. The Canterbury Regional Council, Regional Leader – Monitoring and Compliance must be informed within 24 hours of a spill event exceeding five litres and the following information provided: i. The date, time, location and estimated volume of the spill; ii. The cause of the spill; iii. The type of hazardous substance(s) spilled; iv. Clean up procedures undertaken; v. Details of the steps taken to control and remediate the effects of the spill on the receiving environment; vi. An assessment of any potential effects of the spill; and vii. Measures to be undertaken to prevent a recurrence.	
129.	All best practicable options must be used to contain spills or leaks of any hazardous substance from being discharged via the stormwater system. These must include, but not be limited to the following: a. Using a tank filling procedure to minimise spills during any fuel delivery; b. Making spill kits available to contain or absorb any hazardous substances used or stored on the site; c. Maintaining signs to identify the location of the spill kits; and d. Maintaining written procedures in clearly visible locations that are to be undertaken to contain, remove and dispose of any spilled hazardous substance.	

Condition Number	Applicant's Proposed Conditions	CRC Comments
Hazardous Substances **Note:** The Hazardous Substances conditions (XX-XX) below are offered on an auger **[sic]** basis by the Consent Holder.		
130.	All hazardous substances must be identified, handled and stored in accordance with the requirements of the Hazardous Substances and New Organisms Act (1996).	
131.	All oil-filled transformers on Site must be located within impermeable bunded areas sized to contain the full oil volume, with allowance for rainfall with capacity to contain 110% of the total oil volume.	
PART E: SPECIFIC CONDITIONS – REGIONAL EARTHWORKS (CANTERBURY REGIONAL COUNCIL) LUCXX IN RELATION TO: **a. RULE 5.176 – EARTHWORKS IN RELATION TO THE SOLAR FARM CONSTRUCTION, INCLUDING FORMATION OF ACCESS ROADS AND HARDSTAND AREAS; AND** b. **RULE 5.176 – EARTHWORKS IN RELATION TO THE GIP SUBSTATION CONSTRUCTION.**		
CRC Consent Planning: The earthworks conditions are missing some standard mitigations including a Contamination Discovery Protocol and Archaeological Discovery Protocol, and pre-works meeting requirements. Examples of generally standard conditions (noting some site/application specific details) can be seen on CRC252388[9].		
Consent Duration		
132.	Earthworks activities authorised under this consent shall expire 5 years from the date of commencement of the consent unless it has been surrendered or cancelled at an earlier date pursuant to the RMA.	
Erosion and Sediment Control Plan		

[9] https://www.ecan.govt.nz/data/consent-search/consentdetails/CRC252388/CRC252388

Condition Number	Applicant's Proposed Conditions	CRC Comments
133.	At least 30 working days before the commencement of physical works on Site, the Consent Holder must submit an ESCP for certification by Canterbury Regional Council. The ESCP must be prepared by a SQEP who must provide certification that the erosion and sediment controls in the ESCP have been designed in accordance with the relevant best practice guidelines. As a minimum, the ESCP must include the following: a. The expected duration (timing and staging) of earthworks; b. Details of all erosion and sediment controls; c. Diagrams and / or plans of a scale suitable for on-site reference, showing the locations of any cut and fill operations (including earthworks for internal accessways); d. The commencement and completion dates for the implementation of the proposed erosion and sediment controls; e. Measures to minimise sediment being deposited on public roads; f. Measures to ensure sediment or dust discharge from the earthwork's activity does not create a nuisance on neighbouring properties; g. Measures to prevent spillage of fuel, oil and similar contaminants; h. Means of ensuring contractor compliance with the ESCP; and i. The name and telephone number of the person responsible for monitoring and maintaining all erosion and sediment control measures.	**CRC Compliance:** There is no specific requirement for soil protection during construction, when the greatest compaction risk occurs. The Erosion and Sediment Control Plan is focused on offsite sediment effects. **CRC Compliance:** The ESCP should require adherence to the CRC Erosion and Sediment Control Toolbox. (E.g., Condition (7)(b)(i) of consent CRC252392[10]).
Stabilisation		

[10] https://www.ecan.govt.nz/data/consent-search/consentdetails/CRC252392/crc252392

Condition Number	Applicant's Proposed Conditions	CRC Comments
134.	The Consent Holder must progressively stabilise all disturbed or un-stabilised areas in accordance with ESCP in Condition X. Upon completion of works authorised by this consent, the entire site shall be stabilised.	
Dust		
135.	Beyond the boundary of the Site there must be no dust caused by construction from the Site which, in the opinion of Canterbury Regional Council, is noxious, dangerous, offensive or objectionable.	**CRC Consent Planning:** The applicant has prepared a Dust Management Plan (DMP) which should be referenced here, acknowledging that preparation of a DMP makes dust discharges permitted under CARP Rule 7.32.
Construction Management Plan		
136.	At least 30 working days before the commencement of physical works on Site, the Consent Holder must prepare and submit to Canterbury Regional Council for certification a CMP. The purpose of the CMP is to avoid, remedy and / or mitigate adverse effects arising from construction. The CMP must include, but not be limited to: i. Confirmation of the construction works program, including staging of work, construction methodology; ii. Identification of working hours; iii. Identification of ecological / restoration areas; iv. Identification of key personnel and contact person(s); v. Methods and systems to inform and train all persons working on the site of potential environmental issues and how to avoid, remedy or mitigate any potential effects; vi. Procedures for ensuring that surrounding property owners and occupiers are given prior	

Condition Number	Applicant's Proposed Conditions	CRC Comments
	notice of the commencement of construction works and are informed about the expected duration of the works; vii. The location of notice boards that clearly identify the name, telephone number and address for service of the site manager; viii. Procedures for communicating with surrounding property-owners and occupiers during construction works, including engaging with property owners and occupiers to minimise disruption to farming activities and work-from-home activities, consulting prior to any high noise generating activities, and implementing procedures to ensure action is taken into any complaints received; and ix. Procedures for ensuring that materials are disposed of in a way that maximises re-use and recycling. For any parts that cannot be reused or recycled, ensuring that they are disposed of as e-waste in an environmentally responsible way in accordance with industry best practice.	
Construction Management Plan - Substation		
137.	A Substation CMP, or a series of CMPs, must be prepared and provided to Canterbury Regional Council for certification at least 2 working days before the commencement of any physical works for the initial construction of the Transpower GIP Substation, and must address the management of all construction works, including details of how the adverse effects of construction will be managed.	**CRC Compliance:** Should be 20 working days, not 2. Also, is this for the "Solar Farm Substation" or "GIP Substation", or both? Need to be separated out and clearly define which substation this is for.

Condition Number	Applicant's Proposed Conditions	CRC Comments
		Seemingly no need for separate substation CMP, should be included in overall CMP and if Transpower Substation Management Plan is separate, clearly define that.
Site Audits		
138.	During works authorised by this consent, and until the Site has been stabilised, the consent holder shall have the site and erosion and sediment control measures audited by a SQEP.	
139.	The audits must identify whether all erosion and sediment controls have been installed, operated and maintained in accordance with the ESCP in Condition X and identify any steps or measures required to ensure compliance is achieved, **[sic]**	**CRC Consents Planning:** Unclear if intention is to include further steps required after identifying measures to ensure compliance. Should include further requirement to implement steps/measures identified in audit.
140.	The audits required by Condition X must be undertaken: a. On a minimum of a weekly basis (unless a reduced frequency is approved in writing by Canterbury Regional Council); and b. As soon as practicable and within 24 hours after a rainfall event greater than 7mm in 1 hour, or 20mm in 24 hours.	
141.	Each audit must be recorded in writing and submitted to Canterbury Regional Council within 2 working days of completing the audit, unless an alternative timeframe is approved by Canterbury Regional Council.	
Monitoring Response		
142.	In the event that there is a failure or malfunction of any erosion and sediment control measure, or any other unauthorised discharge of contaminants, that has resulted in a discharge either directly or via land to a waterbody or local authority stormwater infrastructure;	**CRC Compliance:** A condition requiring that the unauthorised discharge be ceased immediately is strongly recommended.

Condition Number	Applicant's Proposed Conditions	CRC Comments
	the Consent Holder shall: a. Immediately notify Canterbury Regional Council of the incident; b. Immediately investigate the cause of the incident and implement changes required to prevent a reoccurrence; c. Take photographs of the discharge point, and upstream and downstream of the discharge point; d. Re-establish erosion and sediment control measures as soon as practicable in accordance with the ESCP; e. Within 5 working days of any of the issues in Condition XX(a) above occurring, provide a written report to Canterbury Regional Council including the following information: f. Date and time of the incident; i. Weather conditions prior to and during the incident; ii. Photographs required by iii iii. Investigations undertaken; iv. Cause of the incident; v. Response actions taken; vi. vii. Lessons learnt and actions taken to prevent a recurrence	
Decommissioning of Erosion and Sediment Controls		
143.	The Consent Holder must not remove or decommission any erosion or sediment control measure until the contributing catchment for the erosion or sediment control measure is completely stabilised.	

Condition Number	Applicant's Proposed Conditions	CRC Comments
	Written notice must be provided to Canterbury Regional Council prior to the removal or decommissioning of each erosion or sediment control measure. Written notice must include evidence of stabilisation and be signed by a SQEP confirming that the contributing catchment for the erosion or sediment control measure is stabilised.	