



Attachment 25

FNSF Response to Department of Conservation (DOC) comments

26 February 2026

Far North Solar Farm Limited (FNSF) thanks the Department of Conservation (DOC) for its Section 53 comments dated 19 February 2026 and for the constructive pre-application engagement in 2023 and since the fast-track listing. We acknowledge DOC's statutory role and its support in principle for renewable energy generation where adverse effects on conservation values, including indigenous biodiversity, are appropriately managed.

The additional February 2026 ecological surveys (Wildlands Contract Reports 6621h-vi (vegetation/habitat), 6621h-i (avifauna), 6621h-v (lizards), 6621h-ii (invertebrates), 6621h-iv (pest mammals)) and draft management plans directly address the information gaps and technical ecological matters raised by DOC (including flora/ecosystems, avifauna risks, and lizards). These are covered in detail in the Wildlands reports and the associated evidence submitted to the Panel.

This response is therefore limited to the statutory framework matters raised in DOC's high-level commentary (para 2.1) and references throughout the submission. These points are also addressed further in section 19 of Laila Alkamil's statement of evidence (Statement of Evidence - Laila Alkamil - The Point_250226)

Statutory Framework and Policy Context

DOC notes that its comments provide only high-level commentary on consistency with the wider statutory framework and emphasises the need for appropriate management of effects on indigenous biodiversity, particularly where Threatened and At Risk species and cumulative effects are involved.

FNSF agrees that the proposal must be assessed against the Resource Management Act 1991 (RMA) (including sections 5, 6, 7 and 104), the National Policy Statement for Renewable Electricity Generation 2011 (NPS-REG, as amended December 2025), the National Policy Statement for Indigenous Biodiversity 2023 (NPS-IB), the Canterbury Regional Policy Statement (CRPS), the Canterbury Land and Water Regional Plan (CLWRP), the Mackenzie District Plan (MDP, including proposed Plan Change 18), and relevant Conservation Act 1987 considerations for the marginal strip concession.

Consistency with NPS-REG (Policies B and F)

The Point Solar Farm is a clear example of the type of development the NPS-REG seeks to enable. **Policy B** requires recognition and provision for cumulative increases in renewable electricity generation (REG) capacity. The project delivers 450 MWp ($\approx 6\%$ of daytime national demand) in a location with record irradiance, immediate adjacency to the existing 220 kV BENMORE-ISLINGTON line (very low transmission losses $<1-2\%$ to the HVDC

link), and co-location with Benmore hydro storage. This enables operators to store water during daylight hours for evening/winter peaks and dry-year resilience — a nationally significant grid benefit explicitly supported by the NPS-REG.

Policy F(1) directs decision-makers to “enable REG assets and activities in all locations and environments”. Where s 6 RMA matters are engaged (para F(2)), the policy is to be read alongside other relevant national direction. The February 2026 surveys and management plans demonstrate that higher-value habitats are avoided and enhanced, residual effects are minor and localised, and net ecological gain is delivered on-site with Basin-scale compensation for avifauna. The functional and operational need (large flat already modified parcel, existing grid connection, hydro synergy) is clearly established. The proposal therefore gives full effect to Policies B and F.

RMA s 6 matters (indigenous biodiversity, outstanding landscapes, natural character)

Section 6(c) (significant indigenous vegetation and significant habitats of indigenous fauna) is satisfied. The February 2026 surveys confirm low indigenous vegetation values inside the operational solar farm footprint on this highly modified cultivated terrace (exotic pasture dominant, noting that only resurrection lichen (At Risk – Declining) was detected in 10 plots and onion orchid (Not Threatened) in two plots, and no Threatened or At Risk vascular plants). Higher-value stonefield drylands, gullies, and river margins are avoided or included in the 81-hectare ecological enhancement area. The Vegetation Management Plan, Lizard Management Plan, Terrestrial Invertebrate Management Plan, and Pest Mammal Management Plan deliver net gain through avoidance, the construction of a 14-hectare invertebrate reserve, lizard /habitat enhancement to improve connectivity and site-wide long-term pest control.

Section 6(a) (preservation of natural character) and **s 6(b)** (protection of outstanding natural landscapes) are addressed through the modified nature of the terrace (decades of cultivation), avoidance of unmodified outwash features, low-profile panels (max 2.95 m), recessive colours, perimeter planting reaching ~3 m within five years, and the 81-hectare ecological enhancement zone. Cumulative landscape effects with Haldon Solar and Waitaki HEPS remain acceptable at the wider basin scale (Rough Milne Mitchell RFI Response 2, 23 February 2026). The proposal does not result in inappropriate development within the ONL.

NPS-IB, CRPS and CLWRP

The proposal is consistent with NPS-IB Policies 1–3 (avoid adverse effects on indigenous biodiversity where practicable; otherwise remedy, mitigate, offset or compensate). Higher-value areas are avoided; net gain is delivered on-site; residual avifauna risk is compensated at basin scale via the ACS. CRPS Chapter 9 (biodiversity) and Chapter 12 (ONL) are satisfied for the same reasons. CLWRP stormwater and farm land-use requirements are met through certified Erosion and Sediment Control Plans and grazing will be light and managed under the Vegetation Management Plan.



Conservation Act 1987 (marginal strip concession)

The separate concession application for easements over the Bendrose Stream Marginal Strip is addressed in DOC's s 51 report and is not opposed.

In summary, the updated evidence demonstrates that adverse effects can be appropriately managed in accordance with the statutory framework. The national benefits under the NPS-REG and the purpose of the FTAA are considered to outweigh the anticipated localised adverse effects, which are proposed to be appropriately avoided, mitigated, remedied, or compensated. FNSF respectfully requests that the Panel grant the approvals sought, subject to finalised conditions and management plans that secure the agreed management and compensation mechanisms. We remain available for any further caucusing or refinement.