

Far North Solar Farm Limited
65 Main Road, Kumeū, Auckland 0810
New Zealand



March 6, 2026

Hon Raynor Asher KC

The Point Solar Farm Expert Panel Chair
c/o Environmental Protection Authority
Level 10, 215 Lambton Quay
Wellington 6011

Re: The Point Solar Farm [FTAA-2509-1100] - Response to S53 Submissions on Ecological Management Plans

Dear Hon. Raynor Asher KC,

Far North Solar Farm Limited (FNSF) appreciates the opportunity to respond to the submissions received under Section 53 of the Fast-track Approvals Act 2023 relating to the proposed Point Solar Farm at Twizel, Canterbury.

We have carefully reviewed the submissions from:

- The Department of Conservation (DOC),
- Canterbury Regional Council (CRC),
- Royal Forest & Bird Protection Society of New Zealand Incorporated (Forest & Bird),
- Environmental Defence Society (EDS),
- Te Rūnanga o Ngāi Tahu, and
- Aukaha on behalf of Te Rūnanga o Waihao and Te Rūnanga o Moeraki

These submissions primarily focused on ecological uncertainties, the robustness of monitoring, protection of Threatened and At Risk species, and the adequacy of adaptive management frameworks.

In response, FNSF commissioned Wildland Consultants to revise the suite of ecological management plans based on this feedback.

The revisions are detailed in the attached memo, "The Point Solar Farm: Response to S53 Comments on Draft Management Plans" (Wildland Consultants Report No. 6621h-vii, March 2026). This memo outlines how the key concerns have been addressed through strengthened monitoring designs, precautionary measures, clearer trigger thresholds, adaptive responses, and improved integration across plans.

The revised management plans themselves are also attached (dated March 2026, with tracked changes for transparency):

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



Below, we summarise the key S53 comments and how they have been addressed in the revised plans, drawing directly from the Wildlands memo. These updates ensure the project achieves a net gain for biodiversity while minimising effects on high-value adjacent habitats, such as the Lake Ruataniwha Conservation Area, Ohau River, and surrounding waterways. Where appropriate, consent conditions will be updated to align with these revisions.

1. Avifauna Management Plan (AMP)

Submissions from DOC, CRC, and Forest & Bird highlighted concerns about collision (bird-strike) risks, monitoring adequacy, and the need for explicit adaptive management. Forest & Bird specifically noted the site's proximity to significant avifauna habitats and the potential for river-breeding birds (e.g. black-fronted tern, banded dotterel) to mistake panels for water bodies.

The revised AMP addresses these by:

- Requiring a statistically robust Avifauna Carcass Monitoring Programme (ACMP) designed by a qualified ecologist and biostatistician, incorporating observer efficiency trials, carcass persistence trials, and correction factors for accurate mortality estimates.
- Implementing risk-stratified sampling, prioritising high-risk areas like site perimeters near waterways and infrastructure. Monitoring extends throughout the solar farm's operational life to detect rare events.
- Introducing clear trigger thresholds (e.g. detection of collisions involving Threatened or At Risk species triggers immediate notification, expert review, and adaptive responses such as panel modifications or deterrents).
- Explicitly mitigating ancillary infrastructure risks through visibility enhancements on fencing and lines, and minimised lighting.

These changes ensure proactive management of bird-strike risks, with baseline and ongoing monitoring to capture seasonal variations and enable adaptive adjustments, if required.

2. Lizard Management Plan (LzMP)

DOC, CRC, and Forest & Bird raised issues around lizard salvage containment, pest control sequencing, baseline monitoring, post-release monitoring duration, and integration with other plans. Forest & Bird questioned percentage-based targets for low baseline populations, while CRC emphasised avoiding impacts on other values during habitat enhancement.

The updated LzMP incorporates:

- Baseline quantitative surveys before salvage to establish population trends.
- Sequencing pest mammal control prior to salvage, reducing predator pressure in enhancement areas.
- Extended post-translocation monitoring for at least five years, with habitat enhancements like rock refugia and corridors.
- Ecological pre-checks before enhancement works to protect threatened plants or invertebrates.



- A refined monitoring framework focusing on trends and habitat utilisation rather than strict percentage increases.
- Detail on the habitat enhancement measures, including rock refugia and habitat corridors designed to increase available habitat for lizards.
- Stronger links to the PMMP for integrated pest control supporting lizard outcomes.
- Detail on the avoidance of high value invertebrate habitats and plant species.

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

3. Terrestrial Invertebrate Management Plan (TIMP)

Concerns from DOC, CRC, Forest & Bird, and EDS included survey limitations, habitat loss (e.g. from panel shading), predator pressure, and monitoring certainty, particularly for At Risk species like grasshoppers and wētā.

The revised TIMP responds with:

- Additional quantitative baseline transects and habitat mapping for notable species, plus an Incidental Discovery Protocol (with Wildlife Act compliance for species like robust grasshopper).
- Establishment of a 13.8-hectare predator-proof "Point Grasshopper Reserve" in retained high-quality habitat, focusing on the eastern paddock.
- Annual monitoring for three years, then three-yearly for twelve more, using consistent transects.
- Adaptive triggers for sustained declines, including contingency research funding.
- Integration with the PMMP for broader predator suppression.
- Comments on the effects of possible shading.

These measures address uncertainty and aim for no net loss, with potential net gains through the reserve.

4. Vegetation Management Plan (VMP)

CRC, Forest & Bird, and EDS commented on threatened plant protection (e.g., Maniototo peppergrass), edge effects from infrastructure, and weed invasion risks post-land-use change.

The updated VMP includes:

- An expanded programme for Maniototo peppergrass, with baseline surveys, habitat mapping, seed collection, propagation, annual planting, and species-specific monitoring.
- Permanent transects for quantitative monitoring of edge effects (e.g., microclimate changes), conducted pre-construction and every three years for fifteen years.



- Strengthened weed surveillance and biosecurity, targeting species like broom and wilding conifers.
- Quantitative reporting for an experimental disturbance treatment site to gather data on dryland vegetation and invertebrates.
- Adaptive responses if declines or edge effects are detected.

This ensures protection of peripheral indigenous habitats and detection of indirect effects. We note that many of the issues regarding edge effects due to watering are covered on page 11 of the document “RMM Fast-track RFI Response 2 - Landscape”, 13 February 2026, which specifically covers this.

We reiterate there is no widespread vegetation clearance planned, leaving existing vegetation in place to be enhanced by weeding and other measures as described in the VMP.

5. Pest Mammal Management Plan (PMMP)

Submissions, including from CRC, focused on predator control intensity in the invertebrate reserve. Forest & Bird supported the overall approach but sought enhancements.

The revised PMMP features:

- Reduced bait-station spacing to a 10-metre grid within 30 metres of the reserve fence and 25-metre grid throughout the rest (c.600 stations total), balancing effectiveness and feasibility over CRC's suggested full 10-metre grid.
- Site-wide control for rodents, mustelids, cats, and other pests, benefiting avifauna, lizards, and invertebrates.

This strengthens integration across plans and will reduce predation pressure.

Overall Conclusion

The revised management plans directly address the ecological concerns raised in the S53 submissions, providing a precautionary, evidence-based framework with robust monitoring, clear triggers, and adaptive mechanisms. Key improvements include longer monitoring periods, enhanced species protections, and better plan integration, ensuring minimal effects on Threatened and At Risk species while supporting renewable energy development.

FNSF is committed to implementing these plans and welcomes any further Panel direction. We are available for discussion or to provide additional information.

Best regards,

A handwritten signature in black ink, appearing to read 'Richard Homewood', written over a horizontal line.

Richard Homewood
Director
Far North Solar Farm Limited



Attachments:

- Wildlands The Point Solar Farm response - Management plans
- 6621h-i The Point Avifauna Management Plan Draft 6-3-26_clean
- 6621h-i The Point Avifauna Management Plan Draft 6-3-26_tracked
- 6621h-ii The Point Invertebrate Management Plan DRAFT_6 03 2026_clean
- 6621h-ii The Point Invertebrate Management Plan DRAFT_6 03 2026_tracked
- 6621h-iii The Point Solar Farm Vegetation Management Plan DRAFT 06-03-26_clean
- 6621h-iii The Point Solar Farm Vegetation Management Plan DRAFT 06-03-26_tracked
- 6621h-iv Pest Mammal Management Plan_6 03 2026 DRAFT_clean
- 6621h-iv Pest Mammal Management Plan_6 03 2026 DRAFT_tracked
- 6621h-vi The Point Solar Farm Vegetation and Habitat Surveys Feb 2026 (updated)_clean
- 6621h-vi The Point Solar Farm Vegetation and Habitat Surveys Feb 2026 (updated)_tracked
- 6621i The Point Solar Farm Lizard Management Plan DRAFT 6-3-26_clean
- 6621i The Point Solar Farm Lizard Management Plan DRAFT 6-3-26_tracked