

File ref: FTAA-2508-1097

12 March 2026

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Tēnā koe

Request for information from Lodestone Energy Limited in relation to the Haldon Solar application under the Fast-track Approvals Act 2024

The Haldon Solar Expert Panel (the Panel) has directed the Environmental Protection Authority (EPA) to request further information from you under section 67 of the Fast-track Approvals Act 2024 (the Act), relating to the Haldon Solar application.

The Panel recognises that the application is currently suspended, but recognises the efficiency of getting this request to the applicant as soon as possible, and the applicant's invitation to the Panel in the request for suspension to "issue any procedural directions it considers appropriate" during the suspension.

At the direction of the Panel, the EPA is seeking further information from Lodestone Energy Limited regarding **the following**:

1) Landscape

The Panel has reviewed the landscape information¹ provided in response to the Panel's Request for Further Information (RFI) of 16 February 2026. While the response addresses the core of the Panel's questions, the Panel has residual concerns about the effectiveness of the landscape mitigations proposed in the response. Therefore, the Panel seeks further, refined, information, as follows:

- (a) Confirmation that the applicant has control over the land in question for the purposes of potential future mitigation, and it is therefore included within the application area, or that the

¹ Memorandum dated 26 February 2026

applicant will advance conditions, on an *Augier* basis, that proposes this potential future mitigation.

- (b) Reconsideration of whether the native planting proposed will be effective at replacing the screening function of the willows, given the substantially smaller size of the native plant species proposed when compared to the existing willows. While the concept of native revegetation and rehabilitation within the Mackenzie Basin is supported, and the location of the planting is appropriate, the Panel asks whether reliance on native species alone is appropriate to achieve a replacement of the existing exotic screening planting. If a similar screening function will not be achieved, then please amend the design to incorporate some exotic species to assist with the screening function.
- (c) The drawing of the Conservation Area shown on the last page of the Memorandum shows ‘green boxes’ of planting loosely scattered across the Conservation Area in a dispersed manner. The Panel understands that there is primary reliance on spatial separation to buffer the proposed solar farm from Haldon Arm Road. The Panel considers that there may be additional benefits to the ecology of the area, and enhancements to the perception of the road’s separation from the solar farm, by the placement of ‘grey shrubland’ and other planting near the road corridor. Please provide an option that includes this for the Panel to consider.

2) Avifauna

In response to comments from s 53 parties, the Applicant provided:

- a report titled “Statistical advice for a solar power installation at Haldon Station, Canterbury” from Proteus,
- information on design elements, risk, monitoring and responses in the “Addendum 3 - Ecology and Biodiversity” from Lodestone Energy Limited,
- a draft condition on avifauna monitoring, and responses.

As identified in Minute 4 of 16 February 2026, the Panel appointed an avifauna expert as a technical advisor to the Panel. That expert has reviewed the application, including the information listed above, has visited the site and surrounding area, and has prepared a preliminary report that has been provided to the applicant. That preliminary report includes a range of questions, which are repeated below, with some minor modifications. The applicant is referred to that report for further context on the questions below.

The request for information from an expert ecology witness is:

- (a) A revised avifauna effects assessment in accordance with the Ecological Impact Assessment Guidelines, or similar.
- (b) A fulsome draft Avifauna Management Plan (building on the foundation provided by the Proteus report), which quantifies, as far as reasonably possible, the performance standards and outcomes, in terms of adaptive management approaches, required to give effect to solar farm design changes and compensatory packages to ensure adverse effects on birds have been addressed so that the stated “no net loss”² is assured.

Specifically, the avifauna effects assessment should include responses to the following specific questions, which may then influence the draft Avifauna Management Plan:

² Addendum 3 - Ecology and Biodiversity, Page 11

- (1) A species-specific collision-risk assessment for all Threatened and At-Risk species using or traversing the site, including:
 - (a) Flight frequency analysis based on available GPS tracking datasets and field observations
 - (b) Flight height distributions and panel interaction zones
 - (c) Seasonal and diurnal variation in collision exposure
 - (d) Species-specific vulnerability factors (body size, flight behaviour, habitat requirements, polarised light sensitivity)
 - (e) Collision probability estimates for:
 - Kakī/black stilt
 - Black-fronted tern
 - Australasian bittern
 - Australasian crested grebe
 - Other waterbird species using the area
 - (f) Known breeding, roosting, and foraging locations within 5 km
- (2) Panel Technology and Design Risk Analysis - provide technical assessment of the proposed solar array configuration including:
 - (a) Polarization and UV reflectance signatures of proposed panels
 - (b) Evidence for efficacy of anti-reflective coatings in reducing bird attraction
 - (c) Comparative collision risk: 60-degree vs vertical night positioning
 - (d) Panel spacing effectiveness (3.6 m gaps) in reducing the hypothetical "lake effect"
 - (e) An updated literature review of proven panel technologies that demonstrably reduce bird mortality
- (3) Infrastructure Collision and Electrocution Assessment - provide an assessment of bird collision and electrocution risks from non-panel infrastructure:
 - (a) Perimeter fencing collision risk analysis
 - (b) Substation and inverter collision/electrocution potential
 - (c) Internal road and track collision risk
 - (d) Lighting impacts (construction and operational)
 - (e) Building strike risk assessment
 - (f) Mitigation design for all infrastructure types
- (4) Population-Level Impact Thresholds & Adaptive Management Options - provide a population viability analysis determining:
 - (a) Maximum sustainable annual mortality rates for regional kakī population
 - (b) Population consequences of 1-2 adult kakī deaths per year
 - (c) Regional population estimates and trends for black-fronted tern, bittern, crested grebe
 - (d) Mortality thresholds that would trigger population declines for each Threatened and At-Risk species

- (e) Conservation context: relationship to existing conservation investments in the basin
- (f) Adaptive management triggers and response mechanisms with defined timelines

Supply of Information

In accordance with section 67(2) of the Act Lodestone Energy Limited must:

- a) Provide electronic copies of the information or report requested; or
- b) Advise the EPA, with reasons that you decline to provide the information or report requested.

Accordingly, please provide the requested information to the EPA by **5pm Thursday 9 April 2026**. If the information is not received by this date, the Panel will proceed on the basis that the request for further information has been declined.

Please note, the information will be provided to the Panel, and every person who provided comments on the application. The information will also be made available on the Fast-track website.

If you have any questions, please contact Application Lead, [REDACTED], by email at info@fasttrack.govt.nz

Nāku noa, nā

[REDACTED]
Application Lead, Fast-track Applications