

**BEFORE THE PANEL
HALDON SOLAR**

IN THE MATTER of the Fast-track Approvals Act 2024 (FTAA)

AND

IN THE MATTER of an application for resource consent approvals
under the FTAA for the Haldon Solar Project

**ENVIRONMENTAL DEFENCE SOCIETY INCORPORATED COMMENTS ON DRAFT
CONDITIONS OF CONSENT**

13 July 2026

Environmental Defence Society Inc
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May it please the Panel:

1. We refer to Minute 19 and the Panel's invitation to comment on draft conditions of consent, as attached to the Panel's draft decision to approve the Haldon Solar Project.
2. EDS has engaged Dr Susan Walker to review the draft conditions and provide comment and revisions as necessary. Ms Walker's commentary is set out in her statement of evidence, dated 13 July 2026, filed with this memorandum.
3. Attachment 1 of Ms Walker's evidence is a table with her comments on the draft conditions. Attachment 2 of Ms Walker's evidence is a tracked version of the draft conditions (amendments tracked in red). EDS requests that the Panel adopt the amendments set out in Attachment 2, for the reasons provided in Attachment 1.
4. We note the extensive changes required. This has largely arisen because many of the conditions (and ideas) were proposed after evidence exchange, so this is the first time that EDS has had an opportunity to comment on them.
5. In addition to Ms Walker's comments, EDS is also concerned about the legal enforceability of conditions that require unquantified compensation 10 years hence. EDS does not consider that the impacts of the Project can be properly assessed when conditions include future compensatory options. The corollary is that EDS also does not consider that the benefits of the Project can be quantified when it is not yet known how big the project footprint will be because avoidance areas have not yet been finalised.
6. EDS provides these comments without prejudice to its position that consent should be declined for the reasons previously provided in its comments dated 2 February 2026, its further comments dated 29 April 2026, and Ms Walker's evidence dated 29 April 2026.