
MINUTE 1 OF THE EXPERT PANEL

Project overview conference

The Point Solar Farm [FTAA-2509-1100]

22 December 2025

- [1] The purpose of this Minute is to confirm the time and the details for an on-line briefing from the applicant.
- [2] The briefing will be held on 16 January 2026 at 11 am.
- [3] The purpose of the conference is to familiarise the Expert Panel with:
- (a) the content of the application for approvals;
 - (b) the content and structure of proposed conditions;¹
 - (c) the key points of evidence (technical reports, assessments and other information) provided in support of the application;
 - (d) proposed site visit details;
 - (e) relevant legal tests and legal issues in contention; and
 - (f) other relevant matters.
- [4] During the conference:
- (a) the Applicant has an opportunity to present a high-level overview of the application;
 - (b) the Expert Panel has an opportunity to ask any questions about the

¹ Including management plans, adaptive management protocols drafting style

application noting that by the time of the briefing panel members will have familiarised themselves with the documents.

[5] The Expert Panel requests that the applicant make available the appropriate experts they believe will assist in the Panel's understanding of the application in the briefing, recognising that this is a preliminary meeting of limited duration.

[6] To facilitate the overview of the application referred to in paragraph 4(a) above, it is suggested that the Applicant provides a short PowerPoint presentation to the EPA's Application Lead, Mujahid Musa, no later than 5 pm on Tuesday 13 January 2026 and then speak to it at the briefing on Friday 16 January 2026.

[7] The applicant may wish to provide a written update on the matters of particular interest in respect of which the Panel is seeking further assistance, which are set out below in question form. These matters may be addressed in the course of speaking to the PowerPoint presentation. Any such written material would need to be received by the Expert Panel by 5pm on Tuesday 13 January 2026.

[8] The matters of particular interest of the Panel are as follows:

Mana whenua issues

[9] What recent interaction has the Applicant had directly with any of the responsible hapū, Te Rūnanga o Arowhenua, Te Rūnanga o Waihao, and Te Rūnanga o Moeraki (kā rūnanga) in relation to this Application?

[10] What recent interaction has the Applicant had directly with the environmental companies working for the relevant hapū, i.e., Aoraki Environmental Consultancy Ltd and Aukaha Ltd?

[11] Has the Applicant confirmed with any of the above entities (in questions 9 &

10) that they agree with the Applicant's identification of where wahi tupuna sites are located within the land block of interest to the application?

[12] Has the Applicant confirmed with any of the above entities (in questions 9 & 10) if they agree with the Applicant's identification of where traditional nohonga sites exist in Te Manahuna (Mackenzie Basin)?

[13] Has the Applicant attempted to create a joined-up strategic and spatial plan to indicate where solar farms may be located as previously requested by kā rūnanga?

[14] Has the Applicant confirmed whether any of the above entities (in questions 9 & 10) agree with the Applicant's identification of critical taonga species that may be at risk in Te Manahuna (Mackenzie Basin)?

[15] Has the Applicant clarified to the above entities (in questions 9 & 10) why this particular site has been chosen as the location for the application?

[16] Has the report from Dee Issacs (8 April 2025) been utilised to further discussion with kā rūnanga in response to their outstanding concerns in relation to the application?

[17] Can the Applicant confirm in what way, if any, the project will directly affect Te Ao Mārama (Lake Benmore) via the Twizel and Pukaki/Tekapo Rivers that flow past the project area. Kā rūnanga have raised concerns regarding potential discharge of contaminants or stormwater to any adjacent waterbody. Will riparian values be maintained by providing setback?

RMA issues

[18] While subdivision consents are sought, there appears to be a lack of detail about what is proposed. Can the Applicant please confirm lease terms and

subdivision details, and how they will liaise with Mackenzie District Council (MDC) so that the Panel is provided with an agreed set of subdivision conditions and plans?

[19] What, if any, further discussions with the Department of Conservation (DoC) on Wildlife Act approvals and concessions or easements have occurred, and what is the outcome of those discussions?

[20] What volume of oil will be used in the proposed substation transformers and what oil or other hazardous substances are proposed to be stored on site if any?

[21] Please provide greater detail on volumes and areas of earthworks across the site, including roading, contouring and cabling.

[22] The application does not include an application for construction-phase stormwater – does Canterbury Regional Council (ECan) agree that an application is not required?

[23] At various points in the application documents, a water supply is required, such as for firefighting, dust suppression, and irrigation of plants. Where is this water sourced and does that require resource consents?

[24] What are the proposed construction hours and days?

[25] Please provide copies of all draft management plans.

[26] Operational stormwater discharge consent for the substation area – given this is a higher risk activity, where is the point of discharge, what treatment and mitigation is proposed, and what is the discharge standard?

[27] Has an assessment of transportation and traffic effects been undertaken, including engagement with MDC and New Zealand Transport Agency Waka Kotahi (NZTA)? If so, what are the outcomes of that?

[28] There is an adjacent solar farm fast-track application, and at least one other possible nearby. Have cumulative effects been considered? What, if any, conclusions have been drawn?

[29] The Panel anticipates invitees questioning the completeness and drafting of the conditions suggested in the application. Has the Applicant considered the engagement of a condition writing specialist? Further, what liaison with MDC, ECan and key stakeholders is being undertaken so that the Panel can be provided with an updated and complete set of draft conditions?

[30] On Thursday 18 December the Government announced a number of new and amended national direction instruments. At first sight, it appears to the Panel that it will be obliged to consider the amended and new instruments in making its decision. Can the Applicant:

- a. Identify which new and amended instruments are relevant.
- b. Explain what the applicant considers the significance of the relevant instruments are to the Panel's evaluation of the proposal.

Landscape issues

[31] Could the Applicant please confirm the status of the application, as it is stated that it is non-complying in Section 1.1 of Rough Milne Mitchell's (RMM) report? It is further assumed that the s.104D gateway tests are not relevant to this application under the Fast-track Act?

[32] For how long will plant replacement continue – 5 years or 'for the term of the consent' as indicated in proposed Condition 14?

[33] Are any conditions proposed to address the use of recessive colours or materials on buildings and structures within the solar farm and its switch yard (excluding the actual panels)?

[34] Landscape Mitigation Strip planting is proposed along the southern site boundary and part of the eastern boundary – but not along the western boundary facing towards an elevated Ohau Canal and McAughtries Road. Is there a reason the Landscape Mitigation planting wasn't extended along the western boundary facing towards these elevated public vantage points?

[35] In asking this question, it is acknowledged that the Landscape Mitigation Planting would have a limited effect on that part of the solar farm closer to Viewpoints 8 and 9 (both on McAughtries Road), but it might reduce the extent and scale of the 'tongue' of solar farm extending northwards, generally towards Twizel.

[36] Proposed Condition 14 addresses the broad nature of proposed planting within the Landscape Mitigation Strip, but does not specify the quantum of planting to be undertaken. Will a revised set of conditions provide some clarity about the minimum number of plants to be planted within the Landscape Mitigation Strip?

[37] None of the proposed conditions currently address planting within the Enhancement Zone, even though the Wildlands Report (Appendix G) indicates that a minimum of 500,000 plants are to be planted within it, employing the species indicated on p.41 of that report. Will this gap be addressed in a revised set of conditions?

[38] On p.5, it is stated that the solar farm would be "co-located with the extensive Hydro Power Scheme within the Mackenzie Basin, which contributes to its character" and on p.43 it is further stated that the "solar farm will introduce another renewable energy power source to the landscape". Are these statements meant to imply that The Point Solar Farm would give rise to effects that are limited and essentially incremental because of its proximity to the Waitaki HEPS? Alternatively, does this 'association' potentially raise the prospect of cumulative effects because of the subject site's proximity to the Ohau Canal and the Ohau B

and C Power Stations, i.e., as an extension to the existing 'energy generation landscape'?

[39] In relation to this matter, it is noted that reference is only made to cumulative effects with reference to the Mackenzie District Plan's Policy 3B2, but not to cumulative effects that might arise from co-location near other energy production facilities. Importantly, this 'umbrella' of energy generation utilities might also embrace the Haldon Solar Farm across the Pukaki River (near Viewpoint 16 on Haldon Road and the Haldon Solar Farm site). Could RMM comment on how such effects should be regarded and assessed?

[40] Appendix V identifies The Point site as being within an area of High Visual Vulnerability, which has a low capacity to absorb change. Are RMM aware of the criteria employed to determine that the site was within an area of High Visual Vulnerability?

Ecology

Field investigations information

[41] Please provide comment on the adequacy of ecological field investigations undertaken in terms of accurately quantifying and understanding the ecological characteristics and values on site.

Assessment of ecological effects

[42] Please provide further comment on:

- (a) The adequacy and appropriateness of the assessment of effects methodology and how conclusions on the level of effect were reached, with particular focus on:
 - (i) How effects can be understood when there is considerable

uncertainty around the presence, abundance and in some cases distribution of species across the site and immediate surrounds, e.g., for the nationally critical *Lepidium solandri*

- (ii) How effects on lizards can be understood when the assessment states the level of effect is 'TBC'.
- (b) The degree of transparency, rigour, and appropriateness applied to the assessment of effects, including but not limited to clarification of:
- (i) How effects on *individual* habitat types or species were assessed, which is not evident.
 - (ii) The level of effect, expressed using appropriate ecological effect descriptors rather than planning terms such as *more than minor*.
 - (iii) How the relationship between threat status and magnitude of effects was assessed in determining a level of effect.
 - (iv) How magnitude of effects on each habitat type and nationally Threatened or At Risk or otherwise notable species was assessed, for example in terms of:
 - (1) Spatial scale of the effect per se;
 - (2) Proportion of affected habitat relative to availability at various spatial scales;
 - (3) Duration and timescale of the effect;
 - (4) Time lag between effect and mitigation outcomes where applicable, in respect of key ecological factors;
 - (5) Level of confidence in understanding the expected magnitude of effect and the degree to which proposed avoidance, minimisation or remediation measures reduce the severity of effect;
 - (6) The degree of uncertainty and the degree of probability versus consequence for nationally threatened braided river birds, particularly for Kakī;
 - (7) How the assessment factored in the precautionary principle in relation to nationally Threatened species such

as Kakī;

- (8) Cumulative effects – particularly for highly mobile species such as Kakī.

Effects management

[43] Please provide further comment on the adequacy and appropriateness of the proposed effects management package, with particular focus on:

- (a) The level of uncertainty regarding the presence, abundance, and in some cases distribution, of species across the site and immediate surrounds;
- (b) The level of detail provided for proposed effects management measures, particularly for threatened plants, avifauna and lizards;
- (c) The degree of certainty that proposed effects management measures will counter-balance the level of effects and achieve stated outcomes;
- (d) Alignment with good practice offsetting/compensation principles;
- (e) The extent to which the application demonstrates best endeavours to ensure the protection and maintenance of habitat that meets criteria for ecological significance in accordance with the relevant policies and objectives in the Canterbury Regional Policy Statement.

Consent conditions

[44] Please provide further comment on the adequacy and appropriateness of the proposed consent conditions in providing confidence and certainty that effects management actions will adequately address effects.

Management plans

[45] Please provide comment on:

- (a) the adequacy of detail provided in the Ecological Enhancement Plan, particularly in relation to the timing and certainty around achieving stated outcomes including but not limited to:
- (i) The absence or near absence of any information on the existing mammalian pest assemblage and indigenous biodiversity values;
 - (ii) The likelihood of successful establishment of species proposed for planting for which successful establishment is likely to be challenging;
 - (iii) The absence of pest reduction targets and the likelihood of mice suppression at the scale proposed and to the level needed to facilitate the recovery of invertebrates and lizards;
 - (iv) The potential for net negative outcomes for lizards or invertebrates that may arise if mammalian pest control is not adequate;
 - (v) The duration of weed and mammalian pest control proposed and expectations on biodiversity outcomes once these actions cease;
 - (vi) The potential for exotic grasses and herbs to outcompete nationally threatened or at-risk flora that are likely to be present once mammalian browsers are suppressed and why this hasn't been considered in the assessment of effects;
 - (vii) The type, level of effort and duration of proposed biodiversity outcome monitoring to verify stated outcomes are achieved and/or inform adaptive management/contingency actions where required;
 - (viii) Consideration of the balance between the scale and intensity of the proposed ecological enhancement package and implications for achieving stated outcomes.
- (b) the rationale for not including other ecological management plans necessary to understand the degree to which effects on ecological

values are adequately and appropriately addressed, e.g., an avifauna plan, lizard management plan, and invertebrate management plan.

Additional ecology work

[46] Please provide commentary on any further ecological work that has or is proposed to be undertaken, that was not included in the substantive application.

[47] MDC's comments on the substantive application (Appendix V) raise an issue concerning the potential for clearance of ecologically significant indigenous vegetation, including threatened and at-risk species. This can be found at page 4 of the comments in the discussion of Plan Change 18. Can the Applicant:

- a. Confirm whether consent is being sought to clear indigenous vegetation; and
- b. If so, identify the location and species affected; and
- c. identify where the significance of the proposed indigenous vegetation clearance has been assessed in the AEE.
- d. If the answer to (a) is that consent is not being sought to clear indigenous vegetation, how is that to be avoided or otherwise handled?



Raynor Asher KC

The Point Solar Farm Expert Panel Chair