

19 February 2026

Environmental Protection Authority  
Te Mana Rauhi Taiao  
Private Bag 63002  
Wellington 6140

**Re: s53 comments on FTAA-2508-1100**

## **Lodestone Energy Limited - Section 53 Comments**

### **1. Introduction**

Lodestone Energy Limited provides the following comments in response to the cumulative landscape assessment accompanying The Point solar farm application.

These comments rely on the independent review memorandum prepared by Boffa Miskell Limited dated 19 February 2026 and are confined to ensuring that cumulative effects involving the Haldon Solar Farm are assessed consistently and logically.

Lodestone does not oppose The Point project.

Lodestone is driven to be a first mover across New Zealand for many reasons, including the awareness we have for the effect of multiple projects in a given area. We see a future where there is a solar farm in every community, however, like any form of development, the solar industry should always consider the cumulative impact our developments have on local landscape, culture, the electricity market and ecology.

### **2. Summary of Cumulative Assessment Considerations**

The Boffa Miskell review identifies the following matters for the Panel's consideration:

**(a) Treatment of Visibility Evidence** - The cumulative assessment relies on simplified visibility summaries that may not fully reflect the detailed findings of the underlying landscape assessments, particularly regarding distance, topographic screening, and perceptibility.

**Relevance:** Accurate cumulative ratings depend on consistent and nuanced application of the source visibility evidence.

**(b) Sequential and Simultaneous Views** - Descriptions of sequential views in the southern Basin appear inconsistently applied, including circumstances where simultaneous visibility may occur or where intervening landform materially limits views.

**Relevance:** Consistent treatment of sequential versus simultaneous visibility is essential to robust cumulative conclusions.

**(c) Role of Mitigation Planting** - Proposed mitigation planting is referenced as providing screening in some sections, but not consistently factored into sequential or simultaneous view analysis. Planting also has its own landscape implications in the Mackenzie Basin context.

**Relevance:** Cumulative assessment should transparently address both the character implications of planting and its time-dependent effectiveness.

**(d) Internal Consistency of Basin-Wide Conclusions** – Where Basin-wide cumulative effects are attributed primarily to the spatial spread of development, the conclusion that removal of Haldon would materially reduce Basin-wide effects appears logically uncertain.

**Relevance:** Conclusions regarding the contribution of individual projects should align with the stated drivers of cumulative effect.

## 6. Conclusion

Lodestone respectfully submits that cumulative landscape effects should be assessed:

- Using consistent visibility methodology;
- With clear distinction between sequential and simultaneous effects;
- With transparent treatment of mitigation planting; and
- With conclusions that logically follow from the assessment reasoning.

These comments are provided to assist the Panel in ensuring a coherent and internally consistent cumulative assessment across both applications.

Regards,



**Daniel Cunningham**

**GM, Development - Lodestone Energy Limited**