# Pre-Application Advice for Lodestone Energy Ltd – RMA251941

**Disclaimer:** This technical advice note does not constitute legal advice and should not be relied upon as such. Please note this preliminary advice has been given prior to any official guidance from the Ministry for the Environment relating to Canterbury Regional Council's role under the Fast-Track Approvals Act 2024.

**Meeting Date:** 

24 July 2025 - 3-4pm

## **Executive Summary**

Lodestone Energy Ltd (Lodestone) (the applicant) have sought a meeting with Canterbury Regional Council (regional council) to discuss to potential option of using the Fast-Track Approval Act (FTAA) for Haldon Solar Project. The project **is** listed in Schedule 2 of the FTAA.

## **Regional Council Staff**

- Nardia Feehan Principal Consents Planner
- David Sluter Senior Consents Planner: Project Management Officer
- Anna Stewart Significant Consents Team Leader
- Reuben Herz-Edinger Consents Planner

#### Lodestone

- Ethan Glover Mitchell Daysh consultant
- Brad Henderson Applicant

#### Introduction

# **Fast-Track Approvals Act Consenting:**

Under the FTAA, the applicant is required under section 11(1)(a) to consult with relevant local authorities. Lodestone will need to provide evidence of this consultation as part of their application.

This pre-application meeting forms part of this consultation and discusses the process going forward for any potential applications by Lodestone under the FTAA.

## **Haldon Solar Project:**

The applicant requested a pre-app meeting to discuss the proposed Fast-track application. Specifically, the applicant sought advice relating to the proposed development of an approximately 280ha utility-scale solar farm at the Haldon Station site, just east of Lake Benmore, for the following consents:



#### **Section 9 Land Use Consent**

-Earthworks for development of site. Precautionary as excavations may be within 1m of groundwater, potentially requiring consent under the Canterbury Land and Water Regional Plan (LWRP) Rule 5.176.

## **Section 15 Discharge Permits**

- -Construction-phase stormwater discharge for >2ha of disturbed ground during construction. Include new roading throughout site, trenching for cables, and excavations for new substation infrastructure. LWRP Rule 5.94B
- -Operational stormwater discharge for both general solar farm area, as well as potentially separate consent for the substation area which could be transferred to Transpower. LWRP Rule 5.97.

## Minutes - Notes - Advice

#### Overview from Brad

- Lodestone independent solar developer.
- Three current operation solar farms in North Island, fourth nearly operational, fifth nearing commissioning. Roughly 1/10<sup>th</sup> size of Haldon Station. Most around 30MW / 40ha.
- Haldon Station Larger scale than previous farms. First with direct connection to national grid, with substation to connect into Transpower network running through site. Substation constructed by Lodestone and vested with Transpower.
- o Completed almost all documents, still finalising Ecological Assessment, which may inform additional reports, but hoping for this to be finalised end of this week (25/7).

#### Comments from Reuben

- Highlighted conditions around long-term soil sampling recommendations for metals/PFAS and concerns from Contaminated Land team around that.
- Brad supported 10-yearly type of testing, and it was noted that existing Lodestone solar consent also has this requirement.

#### Substation

 Ethan considered that they could just have one full site operational stormwater consent and do a partial transfer to Transpower, though CRC consider it easier to transfer to Transpower if there is a separate operational consent for the substation. Ethan said they would consider the differences that may be needed there.

## • Substantive Lodgement/Process

- Nardia outlined how other applications have gone through the process and that once
  it gets to a panel stage it needs to have all issues figured out and agreed upon
  between the parties to ensure that it goes smoothly through panel stage.
- Completeness check regional council have five workings days to comment on application to EPA, so we want to see detailed plans / mitigations / conditions / assessments to ensure that all concerns are addressed.



 Detailed Site Investigation (DSI) – 'Landfill' area seems to be moot point as its outside the site boundary, so DSI not required.

#### Conditions

- Need to have conditions set for completeness check.
- Conditions currently reflect Resource Management Act consents (per Ethan), so this should address our concerns.
- Acknowledge that most effects fairly well understood and standard conditions should manage effects. Just again note the further development of the long-term monitoring conditions such as including specific metal contaminants and limits, but generally expect that a fairly standard condition set should address the concerns.

## Management Plans

- Lodestone: Can we leave these plans to be finalised in conjunction with consent authority/panel.
- Brad proposed having some management plans perhaps 60% drafted but noting that site designs may be subject to change. Although they may need to change this seems to be a reasonable approach to the regional council.
- Regional council agreed that for this project, general plans (e.g., Erosion Sediment Control Plan) usually acceptable but some details, e.g., for substation construction management, would be ideal.

## Cumulative and Cultural effects

- Regional council noted that cumulated landscape effects can be of concern for territorial authority, rūnanga, and panel so must be addressed.
- Lodestone has been in contact with Arowhenua, to be engaged throughout the process.

## Moving forward

- Anna outlined that the regional council would provide feedback at each opportunity we have to comment under the FTAA process.
- Outlined some of the process around panel selection and how regional council and Mackenzie District Council will have to nominate a joint representative.
- If there are things outstanding, the panel convener may seek to resolve issues before
  the panel has been set, so important to have all issues ironed out before the panel
  stage to ensure that it can move smoothly through the process.
- David highlighted that other legal issues (landowner approval, parties affected by non-environmental effects, e.g., Transpower) will be assessed and that it's good to have all that prepared.
- Brad Hoping to lodge by the end of next month, but very tentative pending finalisation of technical reviews, especially ecology report and how that may influence other assessments. Have had a legal peer review and some outstanding issues to address before lodging.

## Follow up

 The existing conditions for solar farms create a framework but regional council can review and update the existing conditions based on latest developments. Reuben can follow up on changes to conditions and what we would be wanting there.



 Next meeting with any follow-ups from regional council's review on conditions, reports etc. Brad – Could book this week of 11<sup>th</sup> or 18<sup>th</sup> of August. A few people on leave before then.

## **Additional Information**

**Charging:** As discussed in the meeting, all pre-lodgement advice from the regional council will be treated as regular pre-application advice, with time charged to advice number RMA251941 and an invoice provided once lodgement is confirmed and the pre-application file closes.

**Communication (going forward):** Key regional council contact to be David and Ethan/Brad as required.

**Timelines for pre/ referral and substantive notification:** Lodestone indicated they hoped to lodge by the end of August, though this may be extended pending review/finalisation of technical documents.

## Next Steps:

**ACTION** – Reuben to provide more details around regional council's recommended long-term sampling conditions.

**ACTION** – Lodestone to submit proposed conditions for regional council to review.

**ACTION** – David to book in follow-up meeting for mid-late August.

## Signed by

Reuben Herz-Edinger Consents Planner

David Sluter

Senior Consents Planner - Project Management Officer