

# Memorandum on Completeness and Scope

---

**File** FTAA-2508-1097

**Application** Haldon Solar

**To** Elliott Dennett /Ben Bond, Team Leader LOA

**From** [REDACTED]

**Date** 19 September 2025

**Subject** Assessment whether the application complies with section 46(2) of the Fast-track Approvals Act 2024

---

## Purpose

1. The purpose of this memo is to assist you in making your decision on whether the Haldon Solar application, received by the Fast-track Team on 1 September 2025. lodged by Lodestone Energy Limited complies with the requirements of section 46(2) of the Fast-track Approvals Act 2024 (**the Act**).

## Decision-maker

2. You have delegated authority to make the decision under section 46 of the Act under the instrument of delegation dated 5 February 2025.

## Conflict of interest

3. I confirm that I do not have any conflict of interest in this matter that would prevent me making this assessment.

## The application

4. For projects listed in Schedule 2 of the Act and referred projects, authorised persons may lodge a substantive application for approvals available under the Act.
5. The Haldon Solar application is a listed project.

6. The EPA received the substantive application for Haldon Solar on 1 September 2025 by Mark Henry of Mitchell Daysh, agent for Lodestone Energy Limited. The EPA must, in consultation with the relevant administering agencies and relevant consent authorities, decide whether this substantive application complies with section 46 of the Act by 22 September 2025.
7. As set out in more detail below, the EPA must decide whether the application is complete and either:
  - provide the application to the Panel Convener for consideration and decision by the expert consenting panel (if complete and within scope); or
  - return it to the person who lodged it (if incomplete and not within scope).

## **Project and scope**

8. The project description in Schedule 2 of the Act is “construct and operate a solar farm across approximately 320 hectares, and connect and supply electricity to the national grid. The approximate geographical location is “320 hectares adjacent to Lake Benmore, south of Haldon Arm Road, 14 kilometres southeast of Twizel, Waitaki District.
9. The application seeks to enable the construction, operation, maintenance and decommissioning of a solar farm and battery energy storage system (“BESS”) on land at Haldon Station in the Mackenzie District. Electricity generated will be connected to the National Grid, via the 220 kV Benmore to Islington (“BEN-ISL-A”) transmission line which passes through the site in a northwest – southeast alignment.
10. The Project includes the following key elements:
  - Installation of approximately 360,000 solar PV modules, orientated on a north-south axis and mounted on single-axis tracking tables supported by piles driven into the ground. The configured PV modules will be approximately 2.6 m above ground level when at maximum rotation of 60 degrees;
  - Installation of approximately 48 power stations (containing inverters, BESS, DC/DC power converter (“PCS”)), transformers and associated switchgear) in an outdoor “skid” configuration, with two 20 ft shipping container-like footprints at each power station;
  - Construction of a single 33 kV / 220 kV substation to facilitate connection to the National Grid transmission line which traverses the site, with a localised upgrade to the National Grid line to establish the connection;
  - Installation of “Balance of Plant” items including underground electrical and communications cabling, combiner boxes, telecommunications equipment and weather stations;
  - Construction of internal access tracks throughout the project area to provide access to the solar PV modules and other infrastructure for maintenance purposes. These will be approximately 4 m wide, with a compacted metal surface;

- Earthworks of up to 132,000 bank cubic metres (which includes approximately 21,500 cubic metres of imported fill)
  - Construction of approximately 7 km of perimeter deer fence at a height of approximately 2.0 m, including a rabbit fence along the lower portion.
11. The notable difference between the description in Schedule 2 and the project description in the substantive application is the inclusion of decommissioning of a solar farm and battery energy storage system (“BESS”). The applicant states the operation is intended to be for an initial period of 35 years. The operation will be reviewed at 25 years with a view to potential extension. The overall intention is to operate the installation for as long as it is required, with maintenance and replacement of equipment according to standard operational schedules. However, eventual decommissioning may be necessary and therefore, forms part of the project scope.
12. The project is for 35 years and maintenance is essential throughout that period. The disposal of obsolete equipment if it cannot be replaced is a decommissioning operation which I consider is an integral part of the project life cycle. I therefore consider the decommissioning to support and be subsidiary to, the project referred to in Schedule 2.

## **Fast-track consenting application process**

### **Legislative context**

13. The EPA must decide whether the substantive application complies with section 46(2) of the Act. A substantive application complies with section 46(2) of the Act, if the application:
- complies with sections 42, 43 and 44;
  - relates solely to a listed project or a referred project;
  - the EPA considers that, on the face of the application, the project does not appear to involve an ineligible activity; and
  - any fee, charge, or levy payable under the Fast-track Approvals (Cost Recovery) Regulations 2025 (the Regulations) in respect of the application is paid.

### **Section 42 Requirements**

14. Section 42 of the Act states that an authorised person may lodge a substantive application for one project or substantive applications for each stage of a project. Section 42(4) lists the approvals that may be sought under the Act.

### **Section 43 Requirements**

15. Section 43 of the Act sets out the requirements for a substantive application. A substantive application must be lodged in the form and manner approved by the EPA and must include

the information listed in this section. Assessment of section 43 requirements is included at Appendix 1.

### **Section 44 Requirements**

16. Section 44 of the Act requires that the information provided by the applicant under section 43 must be specified in sufficient detail to satisfy the purpose for which it is required. Assessment of section 44 sufficiency is included at Appendix 1.
17. In assessing the sufficiency of information provided by the applicant, we rely on the information provided to us through consultation with each relevant administering agency and consent authority, as summarised in Appendix 2.
18. As set out in more detail in Appendix 2, of the three agencies consulted, Canterbury Regional Council (CRC) has advised that the information required by section 44 is provided (in their view) in **insufficient** to detail to satisfy the purpose for which it is required.
19. The main considerations for their determination are summarised below:
  1. Insufficient consultation with relevant iwi authorities.
  2. Contaminated Land assessments (PSI) not undertaken on site.
  3. Ecological Assessments lack detail of potential ecological values at site.
20. After reviewing the feedback from CRC, I am of the view that there is sufficient information and I address these main concerns below in Appendix 1 under clauses 5 (1) (h), (5(4)(a) 13(4)(h) and 13(4)(k).

### **Ineligibility**

21. The EPA needs to decide whether it considers that, on the face of the application, the project does not appear to involve an ineligible activity, as defined in section 5 of the Act. As the EPA has to consider this on the face of the application, the EPA is only able to consider information contained in the application materials.
22. The list of ineligible projects includes activities:
  - on land returned under a Treaty settlement, on identified Māori Land, on Māori customary land, on land set apart as Māori reservation, or in a customary marine title or protected customary rights area without written permission from the rights holder;
  - on Māori customary land, or land set apart as Māori reservation under Part 17 of Te Ture Whenua Māori Act 1993;
  - in a customary marine or protected customary rights area without written agreement from the rights holder/group;
  - within an aquaculture settlement area without the required authorisation;
  - activities that would be prevented under section 165J, 165M, 165Q, 165ZC, or 165ZDB of the RMA (which deal with occupation of space in the common marine and coastal area); or

- that require permissions on national reserves held under the Reserves Act 1977 ; or
- on land listed under clauses 1 to 11 or 14 of Schedule 4 of the Crown Minerals Act 1991 (and clauses 12 and 13 for mining activities).

### **Fees and levies**

23. The EPA has received all fees, charges and levies payable by the applicant under the Regulations for the substantive application as follows:

- Application fee in the sum of \$250,000 plus GST;
- Levy in the sum of \$140,000 plus GST; and

### **Consultation**

24. We have consulted with and considered consultation responses from the following relevant administering agencies and relevant consent authorities:

- with Mackenzie District Council (MDC), Canterbury Regional Council (ECAN) and the Ministry for the Environment for an approval described in section 42(4)(a) (resource consent).

25. A summary of the consultation is included at Appendix 2.

### **Assessment of compliance for each section of each application form**

26. We have assessed the application materials against the relevant checklists in the prescribed application form. Each assessment is contained within the appropriate approval checklist. These are included in Appendix 1 for ease of reference.

27. My view is that the application does comply with section 46 and the EPA may now notify the applicant of its decision.

28. The EPA must now decide whether the substantive application has a competing application under section 47(3) (under delegation from the Minister for Infrastructure under section 47(10)) within 10 working days from the date of the completeness decision.

29. Once the EPA has made the decision under section 47(3), the EPA can provide the application to the panel convener to commence consideration and decision of the application by the panel.

## **Appendix 1: Assessment of section 44 sufficiency**

This application seeks the following approval(s) under the Act:

- A resource consent, change to or cancellation of a resource consent: **checklist A**
- Information requirements for all applications **checklist J**.

**CHECKLIST A – Resource consent, change to or cancellation of a resource consent**

Clause, Schedule 5	Information required for an approval described in section 42(4)(a) (resource consent) and/or section 42(4)(b) (change or cancellation of resource consent), Clauses 5-8 of Schedule 5	Application Reference	EPA office use only <b>Where applicant has referred Substantive Application I refer to AEE</b>
5(1)(a)	A description of the proposed activity	Substantive Application  Section 3 (pp 14-41)  Section 4 (pp 42-59).	Addressed  Section 4 Project Description (page 42 – 59 AEE)
5(1)(b)	A description and map of the site at which the activity is to occur, including whether the site is within or adjacent to—  (i) a statutory area (as defined in the relevant Treaty settlement Act); or  (ii) ngā rohe moana o ngā hapū o Ngāti Porou (as defined in section 11 of the Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019); or  (iii) a protected customary rights area under the Marine and Coastal Area (Takutai Moana) Act	Substantive Application  Section 3 (pp 14-41)  Section 4 (pp 42-59).	Addressed  Section 3 Site Description (page 14-41)  Figure 2 Approximate location of the Haldon Solar Project (page 15 AEE)  (i) Section 3.10.1 Treaty Settlements. Page 30 AEE  <i>“The relevant treaty settlement is the Ngāi Tahu Claims Settlement Act 1998, which recognises Ngāi Tahu’s traditional kaitiaki role in managing and safeguarding resources, and includes a statutory acknowledgement covering Te Ao Mārama / Lake Benmore. The statutory</i>

	2011		<p><i>acknowledgement requires that consent authorities forward summaries of resource consent applications in or adjacent the area20. The statutory area of Te Ao Mārama / Lake Benmore is shown in Figures 19 and 20.”</i></p> <p>ii) N/A</p> <p>iii) N/A</p>
5(1)(c)	<p>Confirmation that the consent application complies with section 46(2)(a), (b), and (d); being:</p> <ul style="list-style-type: none"> <li>• section 42; and</li> <li>• sections 43 and 44; and</li> <li>• relates solely to a listed project or a referred project; and</li> <li>• any fee, charge, or levy payable under regulations in respect of the application is paid.</li> </ul> <p><i>Guidance note: Section 46 provides for the EPA to decide whether the substantive application is complete and within scope. The EPA will need to be satisfied that the application complies with these requirements. These matters are addressed throughout the substantive application form and relevant checklist.</i></p>		<p>Addressed</p> <p>Confirmation provided on page 19 of the application form. Also AEE page ix.</p> <p><b>Section 42 &amp; 43 requirements:</b></p> <ul style="list-style-type: none"> <li>○ The project has been lodged by the authorized person.</li> <li>○ Lodged in the form and manner approved by the EPA.</li> <li>○ How the project is consistent with the purpose of the FTAA is addressed in: <ul style="list-style-type: none"> <li>- Section 2.5 on page 11 of AEE</li> </ul> </li> </ul>

			<ul style="list-style-type: none"> <li>- section 2.6 on page 11-12 of AEE.</li> <li>- Also Section 6.3 National and Regional benefits (page75-79 AEE).</li> <li>o The project is proposed to occur in stages. Indicative staging and timeline described in section 4.6 (page 59 AEE).</li> <li>o The applicant has stated that the project does not involve any ineligible activities in Section 2.7 (page 12 - 13 AEE)</li> <li>o Has only been lodged by one approved person. See Part 1 page 5 of the Application Form.</li> <li>o The application fee and levy have been paid in full.</li> <li>o An assessment against the requirements of Section 43(2) is provided in Checklist J below.</li> <li>o Assessments against the applicable requirements of Section 43(3) are provided in the relevant checklists below.</li> </ul> <p>In terms of scope, the application relates solely to the listed project outlined in Schedule 2 of the Act, as discussed above.</p>
--	--	--	---

<p>5(1)(d) and 5(6)</p>	<p>The full name and address of—</p> <ul style="list-style-type: none"> <li>(i) each owner of the site and of land adjacent to the site; and</li> <li>(ii) each occupier of the site and of land adjacent to the site whom the applicant is unable to identify after reasonable inquiry;</li> </ul> <p>If the applicant is not able to supply the name and address of the owner and each occupier of the site and of land adjacent to the site because the land is Māori land in multiple ownership, the applicant must include a statement to that effect (clause 5(6)).</p>	<p>Substantive Application Section 3.4 (pp 15-20)</p>	<p>Addressed Section 3.3 Land Ownership page 15 AEE Appendix 1 Section 3.4 Adjacent owners page 15 – 20 AEE <a href="#">Map of project area and adjacent owners and occupiers</a></p>
<p>s5(1)(e)</p>	<p>A description of <u>any other activities</u> that are part of the proposal to which the consent application relates</p>	<p>Substantive Application Section 4 (pp 42-59)</p>	<p>Addressed Section 4 Project Description (page 42-59 AEE) covers the activities that are <u>been sought</u> in this application. Appendix 9 provides a high-level description of the proposed electrical infrastructure including the Solar Far, 220 kV switchyard and transmission line connection. This is considered part of the project description. No other activities have been identified that are part of the proposal to which the consent application applies.</p>

5(1)(f)	A description of any other resource consents, notices of requirement for designations, or alterations to designations required for the project to which the consent application relates	N/A	None have been identified.
5(1)(g)	An assessment of the activity against sections 5, 6 and 7 of the Resource Management Act 1991	Substantive Application Section 9.2 (pp 108-110)	<p>Addressed</p> <p>Section 9.2 Purpose and Principles of the Resource Management Act (page 108-110 AEE).</p> <p>Page 108 AEE</p> <p><i>The purpose of the RMA is to promote the sustainable management of natural and physical resources. As set out in Sections 1, 4 and 6 of this report, the Haldon Solar Project will provide a significant source of renewable electricity. The Project is located within a high generation potential solar resource area and seeks to utilise this source to generate renewable electricity, thereby contributing to the attainment of New Zealand's decarbonisation goals.</i></p> <p>Section 5 RMA (page 109 AEE) states:</p> <p><i>In accordance with section 5(2)(c) of the RMA, this application provides details as to how the actual and potential effects of the Project on the environment are avoided, remedied, or mitigated.</i></p> <p><i>Sections 6 and 7 of this application provide details on effects and the measures proposed by Lodestone Energy to avoid, remedy or mitigate the</i></p>

			<p><i>actual and potential effects of the project on the environment in accordance with section 5 of the RMA.</i></p> <p>Key matters in sections 6 &amp; 7 are noted in page 109-110 of the AEE</p>
<p>5(1)(h) (and also Clauses 5(2) and 5(3))</p>	<p>An assessment of the activity against any relevant provisions in any of the following documents:</p> <ul style="list-style-type: none"> <li>• a national environmental standard:</li> <li>• other regulations made under the Resource Management Act 1991:</li> <li>• a national policy statement:</li> <li>• a New Zealand coastal policy statement:</li> <li>• a regional policy statement or proposed regional policy statement:</li> <li>• a plan or proposed plan:</li> <li>• a planning document recognised by a relevant iwi authority and lodged with a local authority.</li> </ul> <p>This assessment must include an assessment of the activity against the requirements set out in clause 5(3) of Schedule 5 being:</p> <ul style="list-style-type: none"> <li>• any relevant objectives, policies or rules in the documents listed; and</li> <li>• any requirement, condition, or permission in any rules in any of those documents; and</li> <li>• any other requirements in any of those documents</li> </ul>	<p>Substantive Application</p> <p>Section 9.4 (pp 111-112)</p> <p>Section 9.5 (pp 112-116)</p>	<p>Addressed</p> <ul style="list-style-type: none"> <li>• National Environmental Standards - section 9.4 (page 111-112 AEE)</li> <li>• National Policy Statements – section 9.5 (page 112 – 116)</li> <li>• Canterbury Regional Policy Statement - section 9.6 (page 117 – 126 AEE)</li> <li>• Canterbury Land and Water Regional Plan – section 9.7 (page 126 – 128)</li> <li>• Canterbury Air Regional Plan – section 9.8 (page 128 – 129 AEE)</li> <li>• Mackenzie District Plan – section 9.9 (page 128 – 150 AEE)</li> <li>• Iwi Management Plans - section 9.10 (page 150 – 151 AEE)</li> </ul> <p><i>CRC consultation feedback advise that:AECL highlighted that the assessments against the Kati Huirapa and Waitaki Iwi Management Plans are short and do not identify all relevant provisions.</i></p>

		<p><i>The assessment against the relevant Kati Huirapa Iwi Management Plan does not identify all of the objectives and policies that are relevant and the assessment against the Waitaki Iwi Management Plan (which is huge) is 3 lines. There is also no assessment against the Ngai Tahu Resource Management Strategy for the Canterbury Region.</i></p> <p>The application stated in relation to the Waitaki Iwi Management Plan (Section 9.10.1.2 page 151 AEE) that:</p> <p>The applicant states that the Waitaki Iwi Management Plan 2019 plan does not directly address renewable electricity, but includes the following strategic objectives (which are then listed). It then goes on to state that the proposal will provide opportunities for mana whenua to be actively involved throughout the project lifecycle.</p> <p>The Applicant discusses the Kati Huirapa IMP (Section 9.10.1.1 page 150 AEE) and quotes the part of the plan it considers relevant to the application. It then goes on to state its proposed approach to engagement. .</p> <p>The application identifies the Ngai Tahu Resource</p>
--	--	---

			<p>Management Strategy (Section 9.10.1.3 page 151 AEE) and identifies what the applicant considers to be a request for appropriate engagement of Ngai Tahu in resource management matters.</p> <p>The applicant has therefore identified provisions in the relevant planning document that the applicant considers relevant and has provided an assessment in this context.</p> <p><i>CRC have also identified, in relation to the CRPS that there is no assessment provided in terms of potential HAIL across the wider application site. This feedback has been provided in regards to chapter 17 of the CRPS.</i></p> <p>I consider that the applicant has identified chapter 17 of the CRPS (Section 9.6.12 page 125 AEE) as a relevant provision and provided an assessment against this.</p>
5(1)(i)	<p>Information about any Treaty settlements that apply in the area covered by the consent application, including—</p> <p>(i) identification of the relevant provisions in those Treaty settlements; and</p>	<p>Substantive Application</p> <p>Section 3.10.1 (pp 30-32)</p>	<p>Addressed</p> <p>Section 3.10.1 Treaty Settlements (page 30 – 32 AEE)</p>

	(ii) a summary of any redress provided by those settlements that affects natural and physical resources relevant to the project or project area		
5(1)(j)	A list of any relevant customary marine title groups, protected customary rights groups, ngā hapū o Ngāti Porou (where an application is within, adjacent to or directly affecting ngā rohe moana o ngā hapū o Ngāti Porou), or applicants under the Marine and Coastal Area (Takutai Moana) Act 2011;	N/A	N/A
5(1)(k)	The conditions that the applicant proposes for the resource consent.	Substantive Application Section 7 (pp 95-99) Appendix 2	Addressed Section 7 Management and monitoring of actual and potential effects (page 95 – 99 AEE) Appendix 2 Proposed conditions of consent and draft management plans
5(1)(l)	if a notice under section 30(3)(b) or (5) has been received,—  (i) a copy of that notice showing that it was received within the time frame specified in section 30(6)(b); and  (ii) if a notice has been received under section 30(5), any more up-to-date information that the applicant is aware of about the existing	Appendix 12	Addressed Appendix 12 (15 April 2025) MDC Haldon Solar project - section 30(3)(b) response Appendix 12 17 July 2025 CRC RMA251941 – Section 30(3)(b) confirmation letter

	resource consent referred to in the notice.		
5(4)(a)	<p>An assessment of the activity's effects on the environment that includes the information required by clause 6.</p> <p><i>Guidance note: See rows below for requirements in clause 6.</i></p>	<p>Substantive Application</p> <p>Section 6 (pp 73-94)</p>	<p>Addressed</p> <p>Section 6 Assessment of Environmental Effects (page 73 – 94 AEE)</p> <p>Appendix 6 Landscape Assessment</p> <p>Appendix 7 Ecological Assessment</p> <p>CRC have advised:</p> <p>ecological assessments lack detail of potential ecological values at site.</p> <p>CRC are of the view that the Ecological assessment is lacking in some details. E.G. no survey of lizard or invertebrates.</p> <p>Land Ecology Assessment (page 10 of the CRC feedback ) in relation to s 43</p> <p>a) <i>The Ecological Assessment provided with the application does not include a survey for lizards or invertebrates. Given the ecologically significant habitats at the site and area, these surveys should be provided to properly inform potential mitigations.</i></p> <p>b) <i>Canterbury Regional Council Land Ecology has expressed concerns around</i></p>

			<p><i>the methodology used to identify ecological values at the site and the conclusions drawn around the level of potential effects, which are considered to be low-moderate.</i></p> <p>In response to a) I note in the Appendix 7 page 35 of the Application that a survey was undertaken for lizards.</p> <p><i>“Herpetofauna No lizards, geckos or skinks were observed, caught in pitfall traps, or their tracks recorded on sand strips. Weather conditions were favorable for basking and activity during the survey period. This absence indicates their absence or an extremely low population density. If present the species most likely to occur are the common skink (Oligosoma polychroma) or McCann’s skink (Oligosoma maccanni). Both are common and widespread in other parts of the Pukaki Ecological District and Makenzie basin.”</i></p> <p>In response to b) I am satisfied the information has been provided and accept that there may be differences in how ecological values have been identified.</p>
--	--	--	--

5(4)(b)	<p>An assessment of the activity's effects on the environment that covers the matters specified in clause 7.</p> <p><i>Guidance note: See rows below for requirements in clause 7.</i></p>	<p>Substantive Application</p> <p>Section 6 (pp 73-94)</p>	<p>Addressed</p> <p>See below Clause 7 matters as outlined in page 16 -18 of this memo.</p>
6	<p>(1) The assessment of an activity's effects on the environment must include the following information:</p> <p>(a) an assessment of the actual or potential effects on the environment:</p> <p>(b) if the activity includes the use of hazardous installations, an assessment of any risks to the environment that are likely to arise from such use:</p> <p>(c) if the activity includes the discharge of any contaminant, a description of—</p> <p>(i) the nature of the discharge and the sensitivity of the receiving environment to adverse effects; and</p> <p>(ii) any possible alternative methods of discharge, including discharge into any other receiving environment:</p> <p>(d) a description of the mitigation measures</p>	<p>Substantive Application</p> <p>Assessment of Effects</p> <p>Section 6 (pp 73-94)</p> <p>Hazardous Substances</p> <p>Section 6.9 (p 89)</p> <p>Sensitivity of receiving environment</p> <p>Section 3.8 (pp 27-29)</p> <p>Section 3.9 (pp 29-30)</p>	<p>Addressed</p> <p>(a) assessment of actual or potential effects – Section 6 (page 73-94 AEE)</p> <p>See comment above in clause 5(4)(a)</p> <p>(b) AEE refers to Section 6.9 (page 89 AEE) in response to cl 6(1)(b). Section 6.9 does not mention hazardous installations but acknowledges hazardous substances will be on site and managed according to HSN0 Act 1996 and HSW (Hazardous Substances) Regulations 2017.</p> <p>(c) assessment of discharges</p> <p>(i) Section 3.8 -Surface water (page 27 – 29 AEE) Section 3.9 – Groundwater (page 29 – 30 AEE)</p> <p>(ii) Section 4.4 Construction activity to manage discharges: Earthworks, Stormwater - (page 56-58 AEE)</p> <p>(d) description of mitigation measures</p> <p>Section 7 management and monitoring of actual</p>

<p>(including safeguards and contingency plans where relevant) to be undertaken to help prevent or reduce the actual or potential effect of the activity:</p> <p>(e) identification of persons who may be affected by the activity and any response to the views of any persons consulted, including the views of iwi or hapū that have been consulted in relation to the proposal:</p> <p>(f) if iwi or hapū elect not to respond when consulted on the proposal, any reasons that they have specified for that decision:</p> <p>(g) if the scale and significance of the activity's effects are such that monitoring is required, a description of how the effects will be monitored and by whom, if the activity is approved:</p> <p>(h) an assessment of any effects of the activity on the exercise of a protected customary right.</p> <p><i>Guidance note: Clause 6(2) provides that a consent application need not include any additional information specified in a relevant policy statement or plan that would be required in an assessment of environmental effects under clause 6(2) or 7(2) of Schedule 4 of the Resource Management Act.</i></p>	<p>Mitigation measures</p> <p>Section 7 (pp 95-99)</p> <p>Persons affected and consultation</p> <p>Section 8 (pp 100-107)</p> <p>Appendix 2</p> <p>Monitoring</p> <p>Section 7 (pp 95-99)</p> <p>Appendix 2</p>	<p>and potential environmental effects (page 95-99). Also Appendix 2 Proposed conditions and draft management plans.</p> <p>(e) identification of persons who may be affected by the activity and any response to the views of any persons consulted, including iwi.</p> <p>Section 8 Affect parties and consultation (page 100-108)</p> <p>(f) if iwi or hapū elect not to respond when consulted on the proposal. N/A.</p> <p>Consultation with Ngai Tahu and rūnanga are covered in various Appendix 12 documents where meetings and updates are recorded.</p> <p>(g) if the scale and significance of the activity's effects are such that monitoring is required.</p> <p>Section 7 Management and monitoring of actual and potential environmental effects (page 95- 99 AEE). Also Appendix 2 Proposed conditions and draft management plans</p> <p>(h) an assessment of any effects of the activity on the exercise of a protected customary right.</p> <p>N/A</p>
---	---	--

7	<p>The assessment of an activity's effects on the environment must cover the following matters:</p> <p>(a) any effect on the people in the neighbourhood and, if relevant, the wider community, including any social, economic, or cultural effects:</p> <p>(b) any physical effect on the locality, including landscape and visual effects:</p> <p>(c) any effect on ecosystems, including effects on plants or animals and physical disturbance of habitats in the vicinity:</p> <p>(d) any effect on natural and physical resources that have aesthetic, recreational, scientific, historical, spiritual, or cultural value, or other special value, for present or future generations:</p> <p>(e) any discharge of contaminants into the environment and options for the treatment and disposal of contaminants:</p> <p>(f) any unreasonable emission of noise:</p> <p>(g) any risk to the neighbourhood, the wider community, or the environment through natural hazards or hazardous installations.</p>	<p>Substantive Application</p> <p>Cultural Effects Section 6.2 (pp 74-75)</p> <p>Economic Effects Section 6.3 (pp 75-79)</p> <p>Ecological Effects Section 6.5 (pp 84-86)</p> <p>Effects on Natural Values, Heritage Section 6.4 (pp 79-84) Section 6.13 (pp 94)</p> <p>Discharge Effects</p>	<p>Addressed</p> <p>(a) Any effect on the people in the neighbourhood and; including any social, economic, or cultural effects.</p> <p>Section 6.2 Cultural Effects (page 74 – 75 AEE)</p> <p>Section 6.3.1 Economic Effects (page 75 -76 AEE)</p> <p>Section 6.4 landscape, Natural Character and Visual Amenity (page 78-84 AEE). Also Appendix 6 Landscape Assessment.</p> <p>Section 6.10 Transport Effects (page 89- 92 AEE) Also Appendix 8 Transport Assessment</p> <p>Also Appendix 2 Draft Traffic management plan.</p> <p>Section 6.13 Historic Heritage and Archaeological Heritage (page 94 AEE)</p> <p>Mackenzie District Council notes:</p> <p><i>The only element perhaps not adequately covered in terms of these requirements would be the potential social impacts on the townships within the Mackenzie District resulting from the potential lack of adequate workers accommodation; and any subsequent distributional and social changes arising from the disruption to the residential rental market</i></p>
---	---	---	--

		<p>Section 6.7 (pp 87)</p> <p>Noise Effects</p> <p>Section 6.12 (pp 93-94)</p> <p>Natural Hazards</p> <p>Section 6.6 (pp 86-87)</p>	<p><i>caused by the increased demand for housing over the construction period.</i></p> <p>(b) Physical effect on the locality, including landscape and visual effects.</p> <p>Section 6.4 Landscape, natural character, and visual amenity (page 79 – 84 AEE). Also Appendix 6 Landscape assessment</p> <p>(c) any effect on ecosystems</p> <p>Section 6.5 Ecology (page 84 – 86 AEE). Also Appendix 7 Ecological assessment</p> <p>(d) any effect on natural and physical resources</p> <p>Section 6.13 Historic heritage and archaeological effects (page 94 AEE)</p> <p>Section 6.4.3 Natural character effects (page 83 – 84 AEE).</p> <p>Section 6.4.4 Glint and Glare (page 84 AEE)</p> <p>As mentioned above: Section 10 Transport Effects, Section 12 Noise Effects</p> <p>(e) any discharge of contaminants into the environment</p> <p>Section 6.7 Stormwater (page 87 AEE)</p> <p>Also Appendix 2 Draft Erosion and Sediment Control Plan.</p> <p>(f) any unreasonable emission of noise</p>
--	--	---	---

			<p>Section 6.12 Noise (page 93 – 94 AEE). Also Appendix 11 Noise Assessment.</p> <p>(g) any risk to the neighbourhood, the wider community, or the environment through natural hazards or hazardous installations.</p> <p>Section 6.6 Natural Hazards (page 86 – 87 AEE). Also Appendix 4 Geotechnical assessment.</p> <p>Section 6.8 Flood risk (page 88- 89 AEE). Also Appendix 5 Flood Risk Assessment.</p> <p>No hazardous installations identified but hazardous substances will be on site. See cl 6(1)(b) above.</p>
5(5)(a)	If a permitted activity is part of the proposal to which the consent application relates, a description that demonstrates that the activity complies with the requirements, conditions, and permissions for the permitted activity (so that a resource consent is not required for that activity under section 87A(1) of the Resource Management Act 1991)	Substantive Application Section 5.3.4 (p 72) Appendix 13	<p>Addressed</p> <p>Section 5.3.4 Permitted Activities (page 72 AEE)</p> <p>Appendix 13 Permitted Activity Assessment</p> <p>Mackenzie District Plan and Canterbury Air Regional Plan activities are assessed.</p> <p>Appendix 1 (of Appendix 13) lists the Hazardous Substance Limits Applicable in the Rural Zone (Rule 9.1.1.b)</p>

5(5)(b)	If the activity is to occur in an area that is within the scope of a planning document prepared by a customary marine title group under section 85 of the Marine and Coastal Area (Takutai Moana) Act 2011 or the environmental covenant prepared by ngā hapū o Ngāti Porou under section 19 of the Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019, an assessment of the activity against any resource management matters set out in that document	N/A	N/A
5(5)(c)	If the activity is to occur in an area that is taiāpure-local fishery, a mātaītai reserve, or an area that is subject to bylaws made under Part 9 of the Fisheries Act 1996, an assessment of the effects of the activity on the use or management of the area.	N/A	N/A

**CHECKLIST J – Listed project information requirements**

Section, Fast-track Approvals Act	Information required for a substantive application under section 43(2) and section 13(4)	Application Reference	EPA office use only
13(4)(a)	a description of the project and the activities it involves	Substantive Application Section 1 (pg x-y) Section 4 (pg x-y)	Addressed Section 1.1 Overview of the Proposal (page 2-3 AEE) Section 4 Project Description (page 42 – 59 AEE)
13(4)(c)	information to demonstrate that the project does not involve any ineligible activities (other than activities that may be the subject of a determination under section 23 or 24)	Substantive Application Section 2.7 (pp 12-13)	Addressed Section 2.7 (page 12-13 AEE) Also marked as no ineligible activities in Subpart 1 of the application form (page 6)
13(4)(d)	a description or map of the whole project area that identifies its boundaries in sufficient detail to enable consideration of the referral application	Substantive Application Section 3.2 (pp 14-15) Figure 2 (p 15)	Addressed Section 3.2 Site description (page 14 -15 AEE ) Figure 2 Approximate location of the Haldon Solar Project (outlined in red). Page 15 AEE

13(4)(e)	the anticipated commencement and completion dates for construction activities (where relevant)	Substantive Application Section 4.6 (p 59)	Addressed Section 4.6 Indicative project staging and timeline (page 59 AEE) No commencement dates for the construction and development of the solar farm which is anticipated to take 14 -18 months.
13(4)(f)(i)	a statement of whether the project is planned to proceed in stages and, if so an outline of the nature and timing of the stages	N/A	Addressed  Section 4.1 (page 43 AEE)  <i>“Construction is expected to take between 14-18 months. Operation is intended to be for an initial period of 35 years. The operation will be reviewed at 25 years with a view to potential extension. The overall intention is to operate the installation for as long as it is required, with maintenance and replacement of equipment according to standard operational schedules. However, eventual decommissioning may be necessary and therefore, forms part of the project scope.”</i>
13(4)(h)	a description of the anticipated and known adverse effects of the project on the environment	Substantive Application Section 6 (pp 73-94)	Addressed Section 6 Assessment of environmental effects (page 73 – 94 AEE) Appendix 7 Ecological assessment. Feedback from CRC page 4 CRC are of the view that the Ecological assessment

			<p>is lacking in some details. E.G. no survey of lizard or invertebrates.</p> <p>Land Ecology Assessment (page 10 of the CRC feedback ) in relation to s 43</p> <ul style="list-style-type: none"> <li>a) <i>The Ecological Assessment provided with the application does not include a survey for lizards or invertebrates. Given the ecologically significant habitats at the site and area, these surveys should be provided to properly inform potential mitigations.</i></li> <li>b) <i>Canterbury Regional Council Land Ecology has expressed concerns around the methodology used to identify ecological values at the site and the conclusions drawn around the level of potential effects, which are considered to be low-moderate.</i></li> </ul> <p>In response to a) I note in the Appendix 7 page 35 of the Application that a survey was undertaken for lizards.</p> <p><i><b>“Herpetofauna.</b> No lizards, geckos or skinks were observed, caught in pitfall traps, or their tracks recorded on sand strips. Weather conditions were favorable for basking and activity during the survey period. This absence indicates their absence or an extremely low population density. If present the species most likely to occur are the common skink (<i>Oligosoma polychroma</i>) or McCann’s skink (<i>Oligosoma maccanni</i>). Both are</i></p>
--	--	--	---

			<p><i>common and widespread in other parts of the Pukaki Ecological District and Makenzie basin.”</i></p> <p>In response to b) I am satisfied the information has been provided and accept that there may be differences in how ecological values have been identified.</p>
13(4)(i)	a statement of any activities involved in the project that are prohibited activities under the Resource Management Act 1991	N/A	<p>Addressed</p> <p>Statement provided in section 1.4 (page 5 AEE)</p> <p><i>“For completeness, it is noted that there are no activities proposed that are prohibited under the Resource Management Act 1991 (“RMA”)”</i></p>
13(4)(j)	<p>a list of the persons and groups the applicant considers are likely to be affected by the project, including—</p> <ul style="list-style-type: none"> <li>(i) relevant local authorities:</li> <li>(ii) iwi authorities and groups that represent hapū that are parties to relevant Mana Whakahono ā Rohe or joint management agreements:</li> <li>(iii) other relevant iwi authorities:</li> <li>(iv) relevant Treaty settlement entities:</li> <li>(v) relevant protected customary rights groups and customary marine title groups:</li> </ul>	<p>Substantive Application</p> <p>Section 8 (pp 100-107)</p>	<p>Addressed</p> <p>Section 8 Affected parties and consultation (page 100-107 AEE)</p> <p>Noting that the following groups are N/A</p> <ul style="list-style-type: none"> <li>v) protected customary rights</li> <li>vi) ngā rohe moana o ngā hapū o Ngāti Porou</li> <li>vii) relevant applicant groups under the Marine and Coastal Area (Takutai Moana) Act 2011</li> <li>viii) persons with a registered interest in land that may need to be acquired under the Public Works Act 1981</li> </ul>

	<p>(vi) ngā hapū o Ngāti Porou, if the project area is within or adjacent to, or the project would directly affect, ngā rohe moana o ngā hapū o Ngāti Porou:</p> <p>(vii) relevant applicant groups under the Marine and Coastal Area (Takutai Moana) Act 2011:</p> <p>(viii) persons with a registered interest in land that may need to be acquired under the Public Works Act 1981:</p>		
13(4)(k)	<p>a summary of—</p> <p>(i) the consultation undertaken for the purposes of section 29 and any other consultation undertaken on the project with the persons and groups referred to in paragraph (j); and</p> <p>(ii) how the consultation has informed the project:</p>	<p>Substantive Application</p> <p>Section 8 (pp 100-107)</p> <p>Appendix 12</p>	<p>Addressed</p> <p>Section 8.8 Affected parties and consultation (page 100-107 AEE)</p> <p>A record of the consultation is provided in numerous documents under Appendix 12 that includes: mana whenua, Ngai Tahu, Aukaha, Arowhenua, ECAN, MDC, FENZ, Transpower, NZTA</p> <p>I accept section 8.8 and the Appendix 12 documents provide a summary of the consultation undertaken.</p> <p>How the consultation has informed the project is provided in:</p> <ul style="list-style-type: none"> <li>• the AECL response of 17 May 2025 providing feedback on the Landscape Assessment.</li> <li>• The Transpower response 20 May 2025 providing</li> </ul>

			<p>feedback on construction management, grid connections and conditions</p> <ul style="list-style-type: none"> <li>• Canterbury Regional Council 21 August 2025 providing feedback on conditions.</li> <li>• FENZ 7 August 2025 providing feedback on fire risk.</li> <li>• NZTA 9 June 2025 consultation on conditions.</li> </ul> <p>CRC expressed concerns that information has not been in sufficient detail in relation to consultation with relevant iwi authorities (outlined in page 10 of the CRC feedback; and Appendix 8 page 90 – 94 as feedback sought from AECL and updated on 11/09/2025).</p> <p>However, I am of the view that Section 8.4 and Appendix 12 contains a summary of consultation with the requisite groups, and how the consultation informed the project.</p>
. 13(4)(l)	a list of any Treaty settlements that apply to the project area, and a summary of the relevant principles and provisions in those settlements	Substantive Application Section 3.10.1 (pp 30-32)	Addressed Section 3.10.1 Treaty Settlements (page 30 - 32 AEE)
13(4)(m)	a description of any processes already undertaken under the Public Works Act 1981 in relation to the	N/A	N/A

	project		
13(4)(n)	a statement of any relevant principles or provisions in the Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019	N/A	N/A
13(4)(o)	information identifying the parcels of Māori land, marae, and identified wāhi tapu within the project area	N/A	N/A
13(4)(p)	a statement of whether the applicant is seeking a determination under section 23 and, if so, an assessment of the effects of the activity on the relevant land and on the rights and interests of Māori in that land	N/A	N/A Not a referral application
13(4)(q)	a statement of whether the applicant is seeking a determination under section 24(2) and, if so, a description of— <ul style="list-style-type: none"> <li>(i) the scale and adverse effects of the existing electricity infrastructure; and</li> <li>(ii) how, if at all, that scale or those adverse effects are anticipated or known to change as a result of the maintenance, upgrading, or continued operation of the infrastructure</li> </ul>	N/A	N/A Statement in Part A on page III of AEE: <i>“No Schedule 4 land is affected by the proposal”</i>

13(4)(r)	<p>a statement of whether the applicant is seeking a determination under section 24(4) and, if so,—</p> <ul style="list-style-type: none"> <li>(i) a description of every alternative site considered by the applicant (or, if the referral application is lodged by more than 1 person, any of those persons) for the construction and operation of the new electricity lines (the activity); and</li> <li>(ii) for each alternative site considered,— <ul style="list-style-type: none"> <li>(A) a statement of the anticipated and known financial cost of undertaking the activity; and</li> <li>(B) a description of the anticipated and known adverse effects of undertaking the activity; and</li> <li>(C) a description of the anticipated and known financial cost and practicality of available measures to avoid, remedy, mitigate, offset, or compensate for the anticipated and known adverse effects of the activity; and</li> <li>(D) a description of any issues (including financial cost) that would make it impractical to undertake the activity on</li> </ul> </li> </ul>	N/A	<p>N/A</p> <p>Statement in Part A page III of AEE</p> <p><i>“New electricity lines associated with the project are permitted”</i></p>
----------	--	-----	---

	<p>the site; and</p> <p>(E) an assessment of whether it would be reasonable and practical to undertake the activity on the site, taking into account the matters referred to in subparagraphs (A) to (D) and any other relevant matters</p>		
13(4)(s)	a description of the applicant's legal interest (if any), or if the application is lodged by more than 1 person, the legal interest of any of those persons) (if any), in the land on which the project will occur, including a statement of how that affects the applicant's ability to undertake the work	<p>Substantive Application</p> <p>Section 3.3 (p 15)</p>	<p>Addressed</p> <p>Section 3.3 Land ownership (page 15 AEE)</p> <p>Appendix 1 Record of title</p>
13(4)(t)	an outline of the types of consents, certificates, designations, concessions, and other legal authorisations (other than contractual authorisations or the proposed approvals) that the applicant considers are needed to authorise the project, including any that the applicant considers may be needed by someone other than the applicant	<p>Substantive Application</p> <p>Section 1.4 (pp 5-8)</p> <p>Section 5 (pp 60-72)</p>	<p>Addressed</p> <p>Section 1.4 Approvals required (page 5 -8 AEE)</p> <p>Section 5 Approvals required under the FTAA (page 60 – 72 AEE)</p>
13(4)(u)	<p>whether any activities that are involved in the project, or are substantially the same as those involved in the project, have been the subject of an application or a decision under a specified Act and,—</p> <p>(i) if an application has been made, details of</p>	N/A	N/A

	the application:  (ii) if a decision has been made, the outcome of the decision and the reasons for it:		
13(4)(v)	a description of whether and how the project would be affected by climate change and natural hazards	Substantive Application  Section 6.6 (pp 86-86)	Addressed  Section 6.6 Natural hazards (page 86 – 87) focuses on geotechnical hazards and supported by Appendix 4 which covers geology /seismic conditions as well as earthquake related hazards.  Section 6.8 Flood risk with reference to climate change (page 88 – 89 AEE). Support by Appendix 5A, 5B and 5C.
13(4)(w)	if the application is lodged by more than 1 person, a statement of the proposed approval to be held by each of those persons	N/A	N/A
13(4)(x)	a summary of compliance or enforcement actions (if any), and the outcome of those actions, taken against the applicant (or if the application is lodged by more than 1 person, any of those persons) under a specified Act	N/A	N/A  There is no mention in the AEE of any compliance or enforcement actions against the applicant.
13(4)(y)	Please provide the information specified below for the relevant approval(s) sought. This is the information specified in the relevant schedule.		
13(4)(y)(i), clause 2 of	Resource consent or designation  (a) an assessment of the project against—	Substantive Application  National Policy	Addressed  i) any relevant national policy statement  Section 9.5 assessed on page 112 116 AEE

Schedule 5	<ul style="list-style-type: none"> <li>(i) any relevant national policy statement; and</li> <li>(ii) any relevant national environmental standards; and</li> <li>(iii) if relevant, the New Zealand Coastal Policy Statement; and</li> </ul>	<p>Statements</p> <p>Section 9.5 (pp 112-116)</p> <p>National Environmental Standards</p> <p>Section 9.4 (pp 111-112)</p>	<p>NPS Renewable Electricity Generation 2011</p> <p>NPS Electricity Transmission 2008</p> <p>NPS Freshwater Management 2020</p> <ul style="list-style-type: none"> <li>ii) any relevant national environmental standards; and</li> </ul> <p>Section 9.4 National Environmental Standards (page 111-112 AEE)</p> <p>NES Electricity Transmission Activities, further discussed under section 5.3.1 (page 65-66 AEE)</p> <ul style="list-style-type: none"> <li>iii) N/A</li> </ul>
	<ul style="list-style-type: none"> <li>(iv) in relation to any proposed approval that is a resource consent, whether, to the best of the applicant’s knowledge, there are any existing resource consents of the kind referred to in section 30(3)(a).</li> </ul> <p><i>Guidance note: If the application is to be lodged by more than 1 person, the reference to the applicant in subclause (1)(b) is to the person who will be identified in the application as the proposed holder of the resource consent.</i></p>	<p>N/A</p> <p>Appendix 12</p>	<p>Addressed</p> <p>Documentation regarding existing resource consents is covered in correspondence with the local authorities regarding s 30(3) FTAA</p> <p>Appendix 12 15 April 2025 MDC Section 30(3)(b) response</p> <p>Appendix 12 17 July 2025 CRC RMA251941 Section 30(3)(b) response.</p>
<p>13(4)(y)(ii), clause 3 of Schedule 5</p>	<p><b>Change or cancellation of resource consent condition</b></p> <p>The information to be provided under section 13(4)(y)(ii) is information about whether and how the change or cancellation of the condition is material to the implementation or delivery of the</p>	<p>N/A</p>	<p>N/A</p>

	project.		
13(4)(y)(iii), clause 4 of Schedule 5	<p><b>Certificate of compliance</b></p> <p>The information required to be provided under section 13(4)(y)(iii) is information that shows the activity that the certificate of compliance is intended to cover can be done lawfully in the particular location without a resource consent. Include information that shows that</p> <p>the activity that the certificate of compliance is intended to cover can be done lawfully in the particular location without a resource consent.</p>	N/A	N/A
13(4)(y)(iv), clause 2 of Schedule 6	<p><b>Concession</b></p> <p>(1) The information in subclause (2) is required to be provided under section 13(4)(y)(iv) if a proposed concession includes a lease and—</p> <p>(a) the lease would be for a term (including any renewals) that will or is likely to be more than 50 years; and</p> <p>(b) the granting of the lease would trigger a right of first refusal or a right of offer or return.</p> <p>(i) Confirmation that the applicant has written agreement from the holder of the</p>	N/A	N/A

	<p>right of first refusal or right of offer or return to waive that right for the purposes of the proposed lease.</p> <p><i>Guidance note: If the application is to be lodged by more than 1 person, the reference to the applicant in subclause</i></p> <p><i>(2) is to the person who is to be identified in the application as the proposed holder of the concession (clause 2(3) of Schedule 6).</i></p>		
<p>13(4)(y)(v), clause 23 of Schedule 6</p>	<p><b>Land exchange</b></p> <p>(ii) The information required to be provided under section 13(4)(y)(b) is (a) - (e) below:</p> <p><i>Guidance note: If the substantive application is to be lodged by more than 1 person, the reference to the applicant in subclause (2)(d) is to the person who is to be identified in the application as the person proposed to exchange land (clause 23(2) of Schedule 6).</i></p> <p>a) a description of both land areas proposed for exchange (for example, maps showing areas and location, addresses, and legal descriptions where possible:</p>	N/A	N/A
	<p>b) the financial value of the land proposed to be acquired by the Crown:</p>		

	c) a brief description of the conservation values of both pieces of land, including an explanation of why the exchange would benefit the conservation estate:		
	d) if the land exchange would trigger a right of first refusal or a right of offer or return, confirmation that the applicant has written agreement from the holder of the right of first refusal or right of offer or return that the holder has agreed to waive that right for the purpose of the land exchange:		
	e) confirmation by the applicant that no part of any land to be exchanged by the Crown is –  (iii) land listed in Schedule 4; or  (iv) a reserve declared to be a national reserve under section 13 of the Reserves Act 1977		
13(4)(y)(vi), clause 2 of Schedule 9	<b>Standard or complex freshwater fisheries activity approval</b>  (1) The information required to be provided under section 13(4)(y)(vi) is the following:  (a) whether an in-stream structure is proposed (including formal notification of any dam or diversion structure) and the extent to which this may impede fish passage; and  (b) whether any fish salvage activities or other complex freshwater fisheries activities are	N/A	N/A

	proposed.		
13(4)(y)(vii), clause 2 of Schedule 10	<p><b>Marine consent</b></p> <p>The information required to be provided under section 13(4)(y)(vii) is–</p> <p>(a) information about whether the Minister of Conservation is an affected person:</p>	N/A	N/A
	<p>(b) additional information about whether the applicant has already made an application for a consent under the EEZ Act in relation to the project, and, if so,—</p> <p>I. details of any application made; and</p> <p>II. the decisions made on that application; and</p> <p>III. information about the matters that the Minister may consider under section 22(6):</p>		
	<p>(c) additional information (in a summary form) about compliance or enforcement action taken against the applicant by the EPA under the EEZ Act.</p> <p><b>Guidance note: If the application is to be lodged by more than 1 person, the reference to the applicant in subclause (1)(b) is to the person who is to be identified in the application as the</b></p>		

	<b><i>proposed holder of the marine consent (clause 2(2) of Schedule 10).</i></b>		
13(4)(y)(viii), clause 2 of Schedule 11	<p><b>Access arrangement</b></p> <p>(i) Confirmation that the applicant has complied with section 12(2) (for the purposes of section 13(4)(y)(viii)).</p> <p><i>Guidance note: If the referral application is to be lodged by more than 1 person, the reference to the applicant in subclause (1) is to the person who is to be identified in the application as the proposed holder of the access arrangement (clause 2(2) of Schedule 11).</i></p>	N/A	N/A
13(4)(y)(ix), clause 15 of Schedule 11	<p><b>Mining permit</b></p> <p>(1) For the purposes of section 13(4)(y)(ix), the information is—</p> <p>(a) a copy of the relevant exploration permit or existing privilege to be exchanged for a mining permit that entitles the holder to mine a Crown owned mineral:</p> <p>(b) the name and contact details of the proposed permit participants and the proposed permit operator:</p> <p>(c) a proposed work programme for the proposed permit, which may comprise committed work, committed or</p>	N/A	N/A

	<p>contingent work, or both:</p> <p>(d) evidence of the technical or financial capability of the proposed permit holder to comply with and give proper effect to the work programme:</p> <p>(e) information about the proposed permit holder's history of compliance with mining or similar permits and their conditions:</p> <p>(f) the proposed date on which the substantive application is intended to be lodged:</p> <p>(g) if the authorised person proposes to provide information under section 37, the date on which the person intends to provide that information:</p> <p>(h) The proposed duration of the permit:</p> <p>(i) if the proposed approvals include a mining permit for petroleum,—</p> <p style="padding-left: 20px;">(i) a map of the area over which the mining permit application is intended to be made, the area in which the surrender of an exploration permit or existing privileges is proposed (which must be same area as the area over which the mining permit application is intended to be made), and the extent of the resource to which the development plan relates:</p> <p style="padding-left: 20px;">(ii) the resources and reserves relating to the</p>		
--	--	--	--

	<p>project, estimated in accordance with the Petroleum Resources Management System:</p> <ul style="list-style-type: none"> <li>(iii) a high-level overview of the following: <ul style="list-style-type: none"> <li>(A) the proposed field development plan:</li> <li>(B) the proposed date for the commencement of petroleum production:</li> <li>(C) the economic model for the project:</li> <li>(D) the proposed duration of the proposed mining permit:</li> <li>(E) decommissioning plans:</li> </ul> </li> <li>(j) if the proposed approvals include a mining permit for minerals other than petroleum,— <ul style="list-style-type: none"> <li>(i) a map of the area over which the mining permit application is intended to be made, the area in which the surrender of an exploration permit or existing privileges is proposed (which must be same area as the area over which the mining permit application is intended to be made), and the extent of the resource and reserves to which the development plan relates:</li> <li>(ii) for minerals other than gold or silver, a report or statement confirming the</li> </ul> </li> </ul>		
--	---	--	--

	<p>ownership of the minerals targeted:</p> <p>(iii) whether the application will be for a Tier 1 or Tier 2 permit:</p> <p>(iv) an estimate of the mineral resources and reserves relating to the project, including a summary on acquisition of the data and the data underpinning the estimate (such as information on sample locations, grade, and geology):</p> <p>(v) an indicative mine plan:</p> <p>(vi) a high-level overview of the following:</p> <p>(A) the proposed mining method:</p> <p>(B) the proposed date for the commencement of mining and estimated annual production:</p> <p>(C) the economic model for the project:</p> <p>(D) the status of or anticipated timing for completing any prefeasibility or feasibility studies:</p> <p>(E) the proposed methods for processing mined material and handling and treating waste:</p>		
--	---	--	--

	<p>(F) anticipated plans for mine closure and rehabilitation.</p> <p>(2) For the purpose of subclause (1)(j)(iv), for a Tier 1 permit application the resources and reserves relating to the project are to be estimated in accordance with a recognised reporting code such as JORC or NI 43-101</p>		
--	---	--	--

## Appendix 2: Consultation Summary

The following agencies were consulted with to inform the assessment of the application for completeness. Each agency was requested to confirm whether the application documentation provided by the EPA regarding the proposal as provided by the applicant meets the requirements of sections 42 and 43 of the Act and is provided in sufficient detail to satisfy the purpose of the Act in accordance with section 44 of the Act.

1. **Consultation with Mackenzie District Council and Canterbury Regional Council** as the relevant consent authority and the **Ministry for the Environment** as the administering agency for the following approvals under the Resource Management Act 1991:

- Resource consent (section 42(4)(a) of the Act)

Mackenzie District Council
<p><b>Haldon Solar – response from Mackenzie DC Via the Portal on 9/09/2025</b></p> <p>The application is for an activity that accords with section 42(4) of the Fast Track Approvals Act 2024 (FTAA) in that it could otherwise have been applied for as a resource consent under the Resource Management Act 1991 (RMA).</p> <p>In terms of section 42(5), it is noted that:</p> <ul style="list-style-type: none"><li>a) The activity for which approval is sought is not a prohibited activity under the RMA; and</li><li>b) No existing resource consent/s apply to the proposed activity.</li></ul> <p>In terms of section 43(1) and (3) of the FTAA, the application includes the information set out in clauses 5 to 9 of Schedule 5. Section 44 sets out that the "information required by section 43 must be specified in sufficient detail to satisfy the purpose for which it is required".</p> <p>Schedule 5, Clause 7(a) refers to "any effect on the people in the neighbourhood and, if relevant, the wider community, including any social, economic, or cultural effects:"</p> <p>The only element perhaps not adequately covered in terms of these requirements would be the potential social impacts on the townships within the Mackenzie District resulting from the potential lack of adequate workers accommodation; and any subsequent distributional and social changes arising from the disruption to the residential rental market caused by the increased demand for housing over the construction period.</p>

**Haldon Solar – response from ECAN Via the Portal on 16/09/2025**

Thank you for your letter, dated 2 September 2025, regarding the Haldon Solar application from Lodestone Energy Limited (Lodestone / the Applicant).

Please find below the response from the Canterbury Regional Council on considerations of the completeness of the Applicant's Substantive Application under the Fast-track Approvals Act 2024 (the Act / FTAA).

**Consideration under s30 of the Act.**

Section 8.2 of the Substantive Application notes that Canterbury Regional Council supplied a s30 response on 14 April 2025.

Canterbury Regional Council sent an updated s30 letter to the Applicant on 17 July 2025, which is provided as Appendix 1 to this letter. Canterbury Regional Council can confirm that, as of 15 September 2025, the information within the 17 July 2025 s30 letter is still current, and that there are no existing resource consents of the kind described in s30.

**The substantive application includes applications for the following approvals under the Resource Management Act 1991 (RMA) that Canterbury Regional Council is the relevant consent authority for: a resource consent that would otherwise be applied for under the RMA (section 42(4)(a) of the FTAA).**

Based on the information provided in the Substantive Application (and its appendices), Canterbury Regional Council considers that the Canterbury Land and Water Regional Plan (LWRP) would apply.

The Waitaki Catchment Water Allocation Regional Plan (WCWA) also applies to the site of the proposal, though there are no rules or consent requirements relevant for the activities identified by the Applicant in the Substantive Application.

Consents under the RMA that would be administered by Canterbury Regional Council:

a. Section 9 Land Use Consent

- a. To undertake earthworks over an aquifer – LWRP Rule 5.176
- b. Requested duration: 10 years

b. Section 15 Discharge Permit

- a. To discharge construction-phase stormwater to land – LWRP Rule 5.94B

b. Requested duration: 10 years

c. Section 15 Discharge Permit

a. To discharge operational stormwater to land – LWRP Rule 5.97

b. Requested duration: 35 years

Canterbury Regional Council considers that, based on our understanding of the proposal, the relevant planning documents identified by the Applicant in the Assessment of Environmental Effects (AEE) are correct, and that the Applicant has assessed their proposal against the relevant Plans with regards to regional consenting.

It is noted that the Applicant's proposed conditions for their Mackenzie District Council consents includes "*provision... of an onsite firefighting water supply*".

As noted above, the proposal includes the provision of water for firefighting use (Proposed Conditions for Mackenzie District Council – Condition 35), though no details on the source of that water are provided. The Applicant's consultant provided further comment noting that the risk of fire at the site is low, and that Fire and Emergency New Zealand could be self-sufficient or rely on RMA s14(3)(e) to access water sources, including Lake Benmore, for firefighting (See Appendix 10 attached to this letter).

Alternatively, the Applicant could apply for resource consent to take water under the WCWA. Such an application would not trigger FTAA s30, as multiple water takes may occur on a property concurrently, and any application by the Applicant would not be subject to RMA s124C.

So, while the applicant has not applied to take water for potential firefighting use, the applicant should clarify the proposed source of water. This is not considered to be a major issue that would be a barrier to accepting the Substantive Application.

**Whether that substantive application made available to Canterbury Regional Council, meets the requirements of sections 42 and 43 of the Act and is provided in sufficient detail to satisfy the purpose for which it is required in accordance with section 44 of the Act.**

Overall, Canterbury Regional Council considers the application **does not** meet the requirements of ss 42-43 of the Act. The main considerations for this determination are summarised below:

1. Insufficient consultation with relevant iwi authorities.
2. Contaminated Land assessments (PSI) not undertaken on site.
3. Ecological Assessments lack detail of potential ecological values at site.

The reasoning for this determination is outlined below, with comments from Canterbury Regional Council technical advisors summarised in Table 1 below.

Table 1 of the CRC assessment is provided in page 4-9, appendix to this document.

### **Section 42 – Authorised person may lodge substantive application for approvals**

Canterbury Regional Council considers that the Applicant has identified and applied for all relevant RMA consents under Canterbury Regional Council's plans, as outlined above.

### **Section 43 – Requirements for substantive application**

Parts of this section where Canterbury Regional Council considers that key information is lacking or could be clarified are highlighted below:

#### **1. Cultural Assessments**

- a. The application includes assessment against the Iwi Management Plan of Kati Huirapa, as well as the Waitaki Iwi Management Plan 2019.
- b. AECL highlighted that the assessments against the Kati Huirapa and Waitaki Iwi Management Plans are short and do not identify all relevant provisions.
- c. Planning recommended provision of a Cultural Impact Assessment.
- d. Consultation with relevant iwi authorities could have addressed the cultural matters, but this has not been undertaken in sufficient detail by the Applicant.

#### **2. Contaminated Land information**

- a. An historic landfill is identified in proximity to the site's north-western boundary.
- b. Canterbury Regional Council Contaminated Land staff consider that a Preliminary Site Investigation should be undertaken to clarify not only the extent of the existing landfill, but also across the site as a whole to identify any potentially contaminated material that may exist at the site. For a development of this size, a PSI is expected.

#### **3. Land Ecology Assessment**

- a. The Ecological Assessment provided with the application does not include a survey for lizards or invertebrates. Given the ecologically significant habitats at the site and area, these surveys should be provided to properly inform potential mitigations.
- b. Canterbury Regional Council Land Ecology has expressed concerns around the methodology used to identify ecological values at the site and the conclusions drawn around the level of potential effects, which are considered to be low-moderate.

## **Section 11 - Consultation requirements**

Canterbury Regional Council considers that the Applicant **has not** undertaken adequate consultation per FTAA s11.

### **1. Consultation with Canterbury Regional Council**

Canterbury Regional Council considers that the Applicant **has** undertaken adequate consultation with Canterbury Regional Council.

The Applicant undertook consultation with Canterbury Regional Council on several occasions between 6 November 2024 and the date of lodgement. This included providing draft technical assessments, the s30 letter noted above, and a pre-application meeting on 24 July 2025. Canterbury Regional Council provided advice after that meeting around appropriate conditions and assessments to include in the application. The minutes for that meeting are attached as Appendix 9 of this letter.

It is noted that Canterbury Regional Council offered to review the draft Substantive Application document prior to lodgement on several occasions, though the Applicant did not take up this offer.

The Applicant's consultant also provided a memorandum of further comments in response to concerns raised by Canterbury Regional Council around this 'Completeness Check' on 15 September 2025. That memorandum is attached as Appendix 10 of this letter.

### **2. Consultation with relevant iwi authorities, hapū, treaty settlement entities**

Canterbury Regional Council considers that the applicant **has not** undertaken adequate consultation with relevant iwi authorities.

#### **1. Te Rūnanga o Arowhenua and Aoraki Environmental Consultancy Ltd**

- a. Canterbury Regional Council has received advice from Aoraki Environmental Consultancy Ltd (AECL), who provide cultural advice on behalf of Te Rūnanga o Arowhenua (Arowhenua).
- b. The record of consultation provided by AECL indicates varying degrees of consultation between December 2023 and the lodgement of the Substantive Application. This includes two occasions where AECL representatives visited the site (though it is unclear if the applicant met with AECL representatives), as well as provision of a draft Landscape Report to AECL. Apart from this, the consultation record seems to indicate that the applicant's consultation consists mostly of updates to AECL and other iwi entities (Ngāi Tahu, Aukaha).

c. Notwithstanding, AECL considers that the consultation undertaken is **insufficient** to meet the requirements of Section 11.

d. AECL notes that they were not aware of the Applicant's proposed Kaitiaki Working Group.

e. The full advice from AECL can be viewed as Appendix 8 to this letter.

## 2. Te Rūnanga o Waihao and Te Rūnanga o Moeraki and Aukaha Limited

a. Aukaha Limited (Aukaha) provide Canterbury Regional Council with cultural advice on behalf of Te Rūnanga o Waihao (Waiaho) and Te Rūnanga o Moeraki (Moeraki).

b. Aukaha has advised Canterbury Regional Council that they had insufficient time to review the application material and comment on the completeness of the application.

c. The Applicant's record of 'Aukaha Consultation' (Appendix 12 of the application documents) consists of a single email with Greg Carson from June 2024.

d. Overall, it is not evident that the Applicant has undertaken sufficient consultation with Aukaha, Waihao, or Moeraki.

The consultant's additional memorandum of 15 September 2025 (attached as Appendix 10 of this letter) acknowledges these concerns. The consultant outlined the Kaitiaki Working Group proposed as a condition of consent, as well as a willingness from the applicant to continue addressing cultural concerns.

Notwithstanding, Canterbury Regional Council **does not** consider the Applicant's consultation with the relevant iwi authorities was undertaken in sufficient detail to satisfy the requirement of s44 FTAA.

### **Summary and Key Concerns**

From Canterbury Regional Council's perspective, the information provided as part of the application is considered **incomplete**.

Canterbury Regional Council considers the application should not be accepted because:

1. Insufficient consultation has been undertaken with the relevant iwi authorities.
2. Further information around contaminated land, in the form of a Preliminary Site Investigation (PSI), is considered appropriate to inform necessary mitigations.

3. Further ecological assessment, including survey for lizard and invertebrates, as well as clarification of methodology to identify ecological values of the site is considered appropriate to inform potential effects of the development and suitable mitigations.

We trust that this information assists you determining the completeness of the application regarding the Haldon Solar Project from Lodestone Energy Ltd, under section 46(1) of the Act.

Please advise if you need any further clarification on any matters raised in this letter. We look forward to working with you further on this application if it is considered to meet section 46(1) of the Act.

Yours Sincerely,

**Dr. Tim Davie**

Acting Operations Director

List of Appendices: CRC Feedback document

- Appendix 1 – s30 letter 17/7/25
- Appendix 2 – Land Ecology Technical Advice
- Appendix 3 – Contaminated Land Technical Advice
- Appendix 4 – Land Resource Science Technical Advice
- Appendix 5 – Groundwater Technical Advice
- Appendix 6 – Planning Technical Advice
- Appendix 7 – Natural Hazards Technical Advice
- Appendix 8 – Aoraki Environmental Consultancy Ltd Advice
- Appendix 9 – Canterbury Regional Council Pre-Application
- Appendix 10 – Consultant Memorandum of Further Information

**Ministry for the Environment**

**S 46 letter from MfE dated 8/09/2025**

**Consultation regarding the updated substantive application under the Fast-track Approvals Act (2024) (the Act) – Haldon Solar Farm**

Thank you for your letter dated 2 September 2025 regarding Lodestone Energy Limited’s updated substantive applications under the Act. MfE as relevant administering agency does not have any comment on whether the documentation meets the requirements of sections 42 and 43 of the Act or whether it is in sufficient detail to satisfy the purpose for which it is required.

We appreciate MfE being consulted and note that the responsibility for making these determinations sits with the EPA. MfE will provide comment on whether future applications meet the requirements of these sections where it holds relevant information to contribute to that determination.

Macaela Flanagan

**General Manager – System Enablement and Oversight**

**Ministry for the Environment | Manatū Mō Te Taiao**