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16th February 2026

LIZARD HABITAT ASSESSMENT FOR THE POINT SOLAR FARM

Dear Murray,

Thank you for the opportunity to provide specialist input on lizard habitat values associated with the proposed 'The Point Solar Farm'. This letter summarises the findings of the recent walk-through habitat assessment and presents my assessment of the likely adverse ecological effects of construction and operation on indigenous lizard populations. It also outlines the recommended mitigation and effects-management measures consistent with current best-practice guidance and Wildlife Act requirements.

Although this is not an Environment Court proceeding, I confirm that I have read the Code of Conduct for expert witnesses contained in the Environment Court of New Zealand Practice Note 2023 and that I have complied with it when preparing my assessment.

1. Overview

Far North Solar Farm Ltd have lodged a substantive fast-track application to construct and operate The Point Solar Farm ('the Site'). The proposal encompasses approximately 670 ha on the northern margin of Lake Benmore, between the Pūkaki River and the Ōhau C hydro canal. To inform the assessment of potential effects on indigenous lizard fauna, the Applicant completed an initial walk-through survey on 13 December 2022, which recorded two lizard species on the periphery of the Site.¹

¹ Appendix G of Substantive Application titled: Assessment of Ecological Effects for the proposed solar farm between the lower reaches of the Tekapo and Twizel Rivers, Mackenzie District. R6621C. 63 pages.



A subsequent habitat-focused survey was undertaken on 20 January 2026 to further characterise the distribution and quality of lizard habitats across the development footprint.² However, no formal lizard survey has been carried out to date which is concerning given the high-quality lizard habitats present over the eastern areas of the Site.³

2. Lizards of Outwash Plains

The Applicant's desktop assessment correctly identifies the suite of lizard species potentially associated with the outwash plains and adjacent terrace risers of the Mackenzie Basin.⁴ The stable, lichen-encrusted cobble fields within the Site (see Figure 1) constitute suitable habitat for several Threatened – Nationally Vulnerable skink species, including Mackenzie skink, scree skink, and Lake's skink.⁵

3. Lizard Assessment, February 6th, 2026

A targeted walk-through lizard assessment was undertaken on 6 February 2026. The assessment sought to evaluate the presence and distribution of indigenous lizard fauna within areas of the Site identified in the Applicants ecology reports as supporting potential high-quality habitat. Survey conditions were fine and hot, with sheltered air temperatures reaching approximately 25 °C. These conditions materially reduced detectability, as lizards were largely inactive and remained within deeper substrate layers. A total of 4.25 hours of systematic visual encounter (VES) and manual habitat searching was completed under Wildlife Act Authority 62386-FAU.

Despite suboptimal detectability, three indigenous lizard species were confirmed within the development footprint, with all

² Applicants Response to RFI provided 9 Feb 2026: Appendix 13. Vegetation and Habitat Survey of The Point Solar Farm, January 2026. R6621h(V).

³ It is not clear to me if a lizard survey will be carried out and provided before Feb 25th, 2026, as indicated in the RFI response letter.

⁴ Table 3, Section 7 of Appendix G of Substantive Application.

⁵ Hitchmough *et al.* 2026. Conservation status of reptiles in Aotearoa New Zealand 2025. New Zealand Threat Classification Series 50. Department of Conservation, Wellington. 32 p.



detections located along habitat margins rather than within heavily modified interior areas. The full survey path is provided in Appendix 1, and all GPS-referenced detections are presented in Appendix 2. Lizards detected were southern grass skink and Southern Alps gecko (both At Risk- Declining), and McCann's skink (Not Threatened; Figure 1).

Survey results demonstrate that walk-through assessment alone is insufficient to determine the potential presence of rarer, large-bodied skink species. Detection of these species requires intensive survey techniques—specifically structured live-trapping using Gee's minnow traps and pitfall arrays. Although the Applicant acknowledged the need for comprehensive survey effort to inform lizard-specific effects management,⁶ this additional work was not undertaken, resulting in a significant information gap regarding species presence, habitat utilisation, and potential effects.

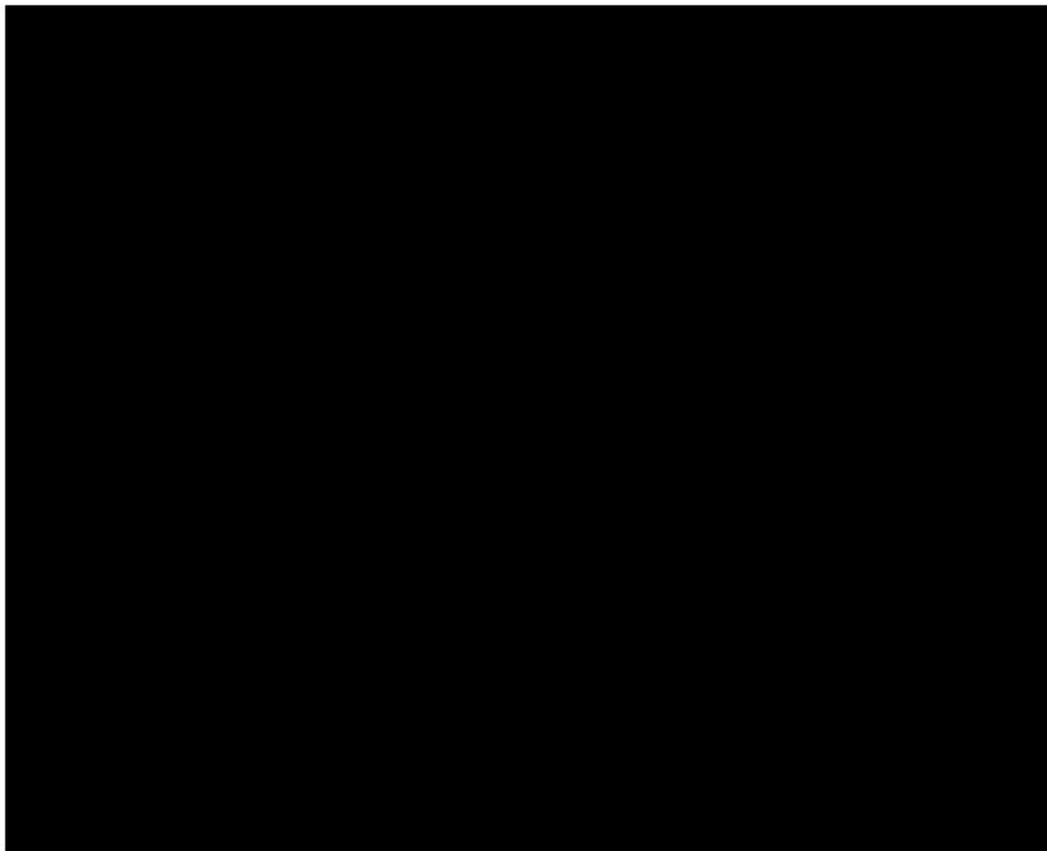


Figure 1:

⁶ Section 12.4 of Appendix G of Substantive Application but not acknowledged in Appendix 13 of the RFI response dated 9 Feb 2026.



The eastern cobbled gullies named northern and southern gully in Figure 1, represent the most plausible habitat for the large-bodied skinks and seem to form the basis of the Applicant's proposed compensation package. However, in the absence of targeted survey effort, the ecological value of these habitats cannot be verified, and the adequacy of the proposed compensation cannot be determined with confidence.

No large-bodied skink scat was detected in either gully. While the absence of such sign is typical of sites without large-bodied skinks, it does not conclusively rule out their presence.

Incidental observations recorded during the survey also identified a mouse within the northern gully and the presence of possum scat. The northern gully also supported higher shrub cover than the southern gully, including both indigenous species and exotic wilding conifers. In contrast, the southern gully exhibited greater lizard sign despite appearing more degraded, with reduced indigenous shrub cover and a higher density of invasive rosehip. Paper wasps were also recorded in this gully and cattle fecal material was prevalent.

Miscellaneous Incidental Observations

The entire Site is enclosed by a rabbit-proof fence, although internal modification was evident. Extensive areas of rock had been scraped or removed and stockpiled, including recently formed piles. One of these rock piles contained an active rat colony and none showed evidence of lizard use (see Appendix 4).

4. Significance of Lizard Values

In the absence of a formal lizard survey capable of detecting rare or cryptic skink species within the Solar Farm footprint, determining the significance of lizard values across the Site remains technically constrained. The security fence will form the outermost disturbance boundary; therefore, any comprehensive survey must explicitly assess habitat margins, where adverse effects are most likely to occur.



Notwithstanding this information gap, and assuming no additional lizard species are present onsite, the confirmation of three indigenous lizard species—including two classified as At Risk – Declining and Southern Alps gecko, which is present across only two regions—meets the significance thresholds under the NPS-IB and the Canterbury Regional Policy Statement. Consequently, these habitats must be protected through strict application of the mitigation hierarchy.

5. Likely Potential Effects & Their Significance

Adverse Effects

Development of the solar farm will likely result in the permanent loss of all remaining lizard habitat within the Site and the removal of any residual habitat along its periphery. All lizards occupying these areas will be lost as a direct consequence of habitat destruction.⁷

Additional effects that could be generated by the proposal include shading by solar units, restoration and screening plantings; and potential changes to microclimate conditions/predator loading over restoration areas.

Significance of Lizard Effects

Lizard habitat is apparently primarily confined to the Site's periphery and the northern and southern gullies, where high-quality cobble fields persist and were never proposed for development. If all remaining habitat within the Site is permanently removed, populations of McCann's skink, Southern Alps gecko, and southern grass skink are unlikely to be significantly affected at the national scale. Southern grass skinks were readily detected during the 6 February 2026 assessment, and both southern grass skink and Southern Alps gecko are likely to experience locally significant adverse effects. However, the current dataset is insufficient to robustly determine the magnitude of these local-scale effects. For McCann's skink, populations of this 'Not Threatened' species are unlikely to experience a locally significant impact.

⁷ Potential effects on lizard habitats are provided in Section 11.4 Appendix G of Substantive Application.



6. Proposed Management of Adverse Effects

Effects management for lizards was outlined in the Substantive Application without the benefit of a formal, detection-appropriate lizard survey and is therefore incomplete and inconsistent with best-practice survey standards for cryptic or rare skinks (e.g., structured live-trapping and pitfall arrays). The Applicant acknowledged the need for comprehensive, targeted survey to inform a Lizard Management Plan (LMP), but this work was not undertaken, leaving a material information gap in species presence, habitat utilisation, and effect pathways.

Given the shortfalls in information, no avoidance, remediation, mitigation actions have been proposed. What has been proposed, however tentative, falls within the dominion of compensation in my view, as described over the next Section.

Offered Compensation⁸

The proposed ~14 ha predator-proof fenced compensation area, shown in Appendix 1, that takes in the northern and southern gully and surrounding land, is not technically feasible at this site and does not currently demonstrate compliance with recognised compensation principles.⁹ Accordingly, it cannot be relied upon to balance actual and potential lizard-related effects.

A. Feasibility risks (engineering, geomorphic, and boundary constraints)

- Active terrace/gully dynamics: The core habitats (northern and southern gullies) are actively forming/eroding, with new gullies observed and roadway undercutting noted during the site visit. A static fence line across unstable, incising landforms presents high structural failure risk (washouts, undermining, bypass).
- Partial enclosure and boundary exposure: The northern gully extends outside the Site, making full encapsulation impossible

⁸ Applicants Response to RFI provided 9 Feb 2026: Appendices 10 & 11.

⁹ Appendix 4 Biodiversity Compensation Principles of the NPS-IB



and creating an inherent biosecurity weak point for predator ingress/egress.

B. Ecological performance risks (habitat condition and restoration uncertainty)

- Severe substrate disturbance: Outside the gullies, the wider 14 ha block is heavily degraded—rock stripped/stockpiled, probable direct drilling, and loss of dryland habitat structure—which lowers the probability of achieving functional lizard habitat within ecologically meaningful timeframes.
- No restoration methodology or precedent: The proposal references “habitat restoration” but provides no methods, success criteria, or examples of successful rehabilitation in comparable dryland systems; therefore, restoration success is unproven and high risk.

C. Governance and operational failure pathways

- Absence of governance and management detail: The proposal omits governance arrangements, long-term management, and assurance mechanisms for fence integrity, predator control, and adaptive responses. These omissions create clear failure pathways (e.g., unmanaged breaches, predator reinvasion, weed and mice re-establishment) that would erode biodiversity gains over time.

D. Non-compliance with compensation principles and mitigation hierarchy

- Compensation proposed without prior mitigation/avoidance: Advancing compensation ahead of detection-appropriate surveys and mitigation planning is inconsistent with the mitigation hierarchy, and premature given unresolved information gaps about species presence and habitat utilisation.
- Does not demonstrate alignment with recognised compensation principles: In its current form, the package fails to evidence feasibility, durability, measurability, and



governance—key attributes required to meet Appendix 4 compensation principles under the NPS-IB—and therefore cannot be considered technically adequate.

If the Applicant proceeds with this compensation offering, the following actions and information are required to achieve technical adequacy prior to approval:

- Detection-appropriate lizard surveys (systematic live-trapping, pitfall arrays, VES, refuge checks) across all disturbance and buffer areas, to inform effects pathways.
- Fence feasibility and risk analysis (geotechnical/geomorphic assessment, whole-of-life design, fail-safe features, contingency routing for active gullies, and proof that all core habitats can be fully enclosed).
- Restoration methodology tailored to dryland cobble systems (substrate reinstatement specifications, microhabitat/refuge density targets, weed/pest suppression, predator control regime), with time-bound success criteria and precedent evidence.
- Governance and management plan (roles, funding, monitoring, adaptive triggers, and maintenance protocols) that closes the identified failure pathways and ensures durable, measurable gains over the life of the project.

7. Conclusion:

Without the above corrections, the compensation proposal presents high feasibility and performance risk, contains multiple failure pathways, and does not comply with compensation principles or the mitigation hierarchy. It should not be relied upon to balance adverse lizard effects at this stage.

8. Wildlife Act Permitting

Physical works affecting habitat for indigenous skinks require a Wildlife Act Authority from the Department of Conservation and must be supported by a Lizard Management Plan (LMP) prepared in accordance with best-practice standards. The Applicant is seeking



to condition the preparation of an LMP without first completing a detection-appropriate lizard survey. This approach is not supported.

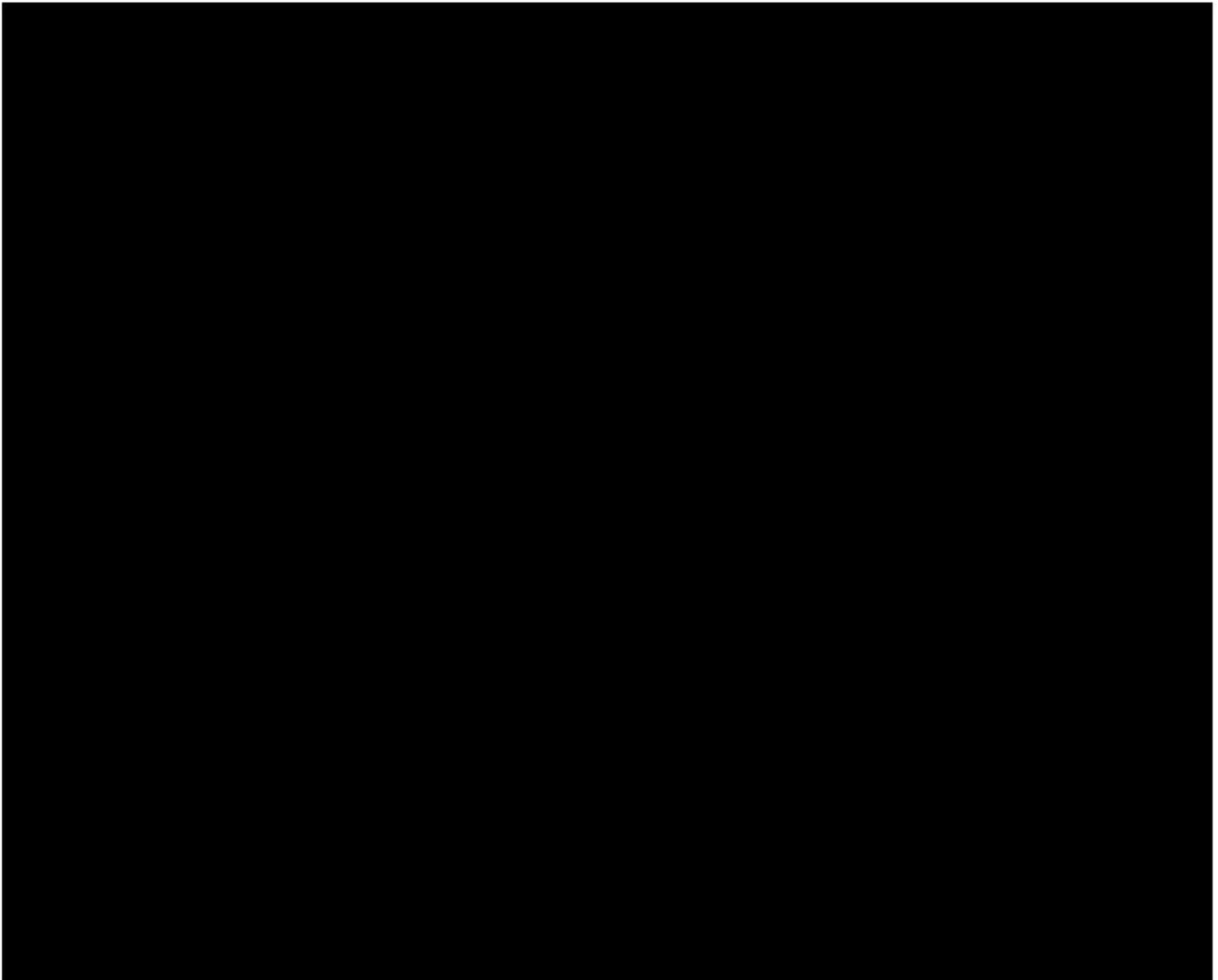
A comprehensive lizard survey must be completed prior to any Fast-Track approval to ensure that species presence, habitat values, and associated effects are robustly understood and that any LMP developed is technically defensible and fit for purpose. This is my opinion irrespective of whether the Wildlife Act permitting occurs within the Fast Track process, or through the 'usual' permitting process.



Dr Mandy Tocher, LizardExpertNZ



Appendix 1: Search path February 6th, 2026, recorded from a hand-held Garmin GPS (teal blue line).



Appendix 2: Geo-referenced lizard detections from the February 6th, 2026, walk-through survey recorded from a hand-held Garmin GPS.



Appendix 3: Lizard fecal sign (scat) recorded February 6th, 2026, on a hand-held Garmin GPS.



Appendix 4: Site photographs from the February 6th site visit

