

20 July 2026

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

Re: Comments on draft decision and conditions under section 70

Introduction and approach

Lodestone thanks the Panel for its careful consideration of the draft decision and conditions, which strike an appropriate balance. The section 70 comments from invited parties have offered some meaningful improvements, which Lodestone is happy to incorporate, if the Panel agrees.

This response addresses material matters raised by the invited parties and provides an updated set of tracked conditions which incorporate Lodestone's amendments that respond to the matters raised by the invited parties. A summary of Lodestone's amendments and the commenting party to which those amendments relate is included as Appendix D.

For ease of review, for matters raised by invited parties which are not addressed in this response and/or in the tracked conditions, Lodestone prefers the approach adopted by the Panel in its draft decision and conditions.

Ecological outcomes and no net loss

1. The Panel recognised that residual loss may remain but found the secured ecological framework sufficiently certain and durable (draft decision 222-224, 289-290, 302, 304, 309). In light of that conclusion, Lodestone supports the Panel's proposed positioning away from converting the conditions or individual management-plan objectives into an absolute, project-wide no-net-loss requirement, and towards the identification of more targeted ecological outcomes.

Technical Review Panel & Management Plans

2. Lodestone supports the functions of the TRP as set out in the draft conditions proposed by the Panel, with minor clarification proposed. Lodestone considers that MDC should retain certification and substantive decision-making as the consent authority, including in relation to the compensation recommended by the TRP.
3. Lodestone supports the draft conditions proposed by the Panel in relation to TRP membership, meetings and remuneration and does not consider that additional approval or publication requirements are necessary.



Compensation Area

4. The Compensation Area will be legally protected in perpetuity through a QEII-style covenant or similar mechanism, independently of the operational life of the Solar Farm. Following decommissioning, the land would remain subject to the enduring protection and stewardship obligations secured through that instrument (draft approval 305, 308).

Threatened plant buffers and monitoring

5. Lodestone supports the Panel's proposed 10 m buffer. The analysis provided in Appendix C demonstrates that this buffer is appropriate in mitigating any effects on Nationally Threatened plants. Lodestone can demonstrate the underlying analysis tool to the Panel if helpful.

Avifauna compensation

6. The Panel records DOC's view that the proposed compensation amount is appropriate and broadly commensurate with residual kakī collision risk. This will be directed towards measures reasonably expected to deliver tangible, population-level benefits for kakī (draft decision 259, 261). DOC have identified several projects where this funding could benefit outcomes including predator control, transmitter tracing work, wetland enhancement and instream invertebrate research to better understand food availability for birds.
7. This upfront avifauna compensation remains distinct from any separately defined adaptive-management response and Lodestone does not consider any further amendments are required.

Applied Ecological Research Programme

8. Lodestone supports the existing Applied Ecological Research Programme conditions as drafted by the Panel, which will support a funded, long-term programme that will improve understanding of solar-development effects in dryland environments, tests uncertain management actions, and inform future ecological management and review processes. (draft decision 212, 220, 303-304).
9. In particular, Lodestone believes the avifauna bird monitoring programme as part of the applied research funded will have significance globally.

Conclusion

Subject to the amendments shown in the accompanying tracked condition set (refer Appendix D), Lodestone supports the conditions proffered by the Panel. In Lodestone's view, they are appropriately balanced in securing the commitments relied on in the draft decision while maintaining a workable and proportionate framework for the construction and operation of the Project.

Yours faithfully,

Daniel Cunningham

GM, Development

Lodestone Energy Limited



Attached Separately

Appendix A - Updated Mackenzie District Council Condition Set

Appendix B - Updated Environment Canterbury Condition Set

Appendix C - Solar Shading Setback Analysis

Appendix D - Summary Changes to Conditions