

MAY IT PLEASE THE PANEL CONVENER

1. This memorandum is provided on behalf of Canterbury Regional Council (CRC) in response to Minute 2 of the Panel Convener, dated 5 November 2025 (Minute), regarding the Lodestone Energy Limited (Lodestone / the Applicant) application for approvals for the Haldon Solar Project.

Direction to CRC - Conditions

2. Paragraph [20](b) of the Minute requests CRC to confirm whether it has responded to the draft conditions of consents.
3. As part of CRC's comments to the EPA concerning the completeness of Lodestone's Substantive Application (the s46 Comments), CRC scientists and consent planners provided comment on the proposed conditions of consent. Lodestone was provided with CRC's s46 comments on 17 October 2025.
4. CRC discussed with Lodestone on 30 October 2025 that the additional ecological surveys required may necessitate additional conditions to address potential effects on terrestrial ecology.
5. No further comments on conditions have been made by CRC.
6. A summary of CRC's science expert reviews from the s46 comments, along with comments on any progress made thus far, is provided below:

CRC Science Department	Comments on Conditions	Progress Since s46 Comments
Land Ecology	<p>Further compensation or offsets are required to address effects, some of which are unavoidable:</p> <ul style="list-style-type: none">• Loss of potential bird feeding/breeding habitat.• Cumulative effects on terrestrial biodiversity loss.• Changes to site will favour exotic vegetation, reducing the abundance of native dryland vegetation and potentially associated fauna.	<p>Lodestone undertaking further ecological assessments and understood to be reaching out to the Department of Conservation on mitigations / offsetting / compensation for potential avifauna concerns.</p>

Contaminated Land	<p>Proposed monitoring conditions are appropriate.</p> <p>Conditions should be included requiring:</p> <ul style="list-style-type: none"> • Preliminary Site Investigation (PSI) • Ensuring imported materials meet clean fill definition • Trigger limits for monitored conditions should be further specified 	<p>As discussed at the Panel Convener meeting, Lodestone has undertaken the PSI which is understood to be finalised imminently.</p>
Land Resources	<p>Overall, consider the conditions to be appropriate.</p> <p>ECan Conditions 22-29 are very thorough but could be improved by further specifying [sampling] sections and sample number requirements.</p> <p>No mitigating contingency plans included in conditions if monitoring parameters are breached. Should require plan drafted before grant.</p> <p>Consider additional 6-month condition monitoring ground vegetation required.</p>	<p>No further discussion since s46 comments. Expect further discussions during process.</p>
Groundwater	<p>Conditions address main concerns.</p>	<p>Nothing further required.</p>
Planning	<p>Other solar proposals in the area have proposed ecological restoration.</p> <p>Including such restoration for the project would give better consistency with Canterbury Regional Policy Statement (RPS) Chapter 9 objectives and policies.</p>	<p>No further discussion since s46 comments. Expect further discussions during process.</p>

Natural Hazards	Modelling and 450-year/100-year flood event assessment seems appropriate.	Nothing further required.
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7. CRC intends to continue to work with Lodestone on developing appropriate conditions and acknowledges that finalising a condition set will not be possible until the additional ecological surveys have been undertaken. CRC understands that these reports are likely to be available in January.

Direction to CRC – Technical Review Capacity

8. Paragraph [20](c) of the Minute directs all participants to confirm their capacity to respond to further technical reports filed by Lodestone within the 20-working day period when comments are sought.
9. On the ability for CRC to review those additional ecological surveys/reports, CRC wishes to acknowledge that the availability of CRC’s ecologist familiar with the application was incorrectly stated at the Panel Convener Meeting of 3 November 2025. CRC’s ecologist is on leave from 2 December 2025 until 20 January 2026.
10. As such, if Lodestone’s additional ecological reports are available before 20 January 2026, CRC will seek to either find a replacement internal expert or engage an external expert to provide comment.
11. CRC are yet to receive the study methodology from Lodestone but will continue engaging on this matter.

Dated: 7 November 2025



Robyn Fitchett
General Counsel for Canterbury Regional Council