The Point Solar Farm Fast Track project –

Comments on post-RFI updated information pertaining to terrestrial flora and ecosystems components of proposal.

Richard Ewans – Senior Technical Advisor Ecology, Flora & Ecosystems Team, Department of Conservation.

16 June 2026.

Introduction and background

These comments are provided in response to additional information provided by applicant between March and June 2026 in response to numerous RFIs. The documents I have reviewed for these comments are:.

- Rough Milne Mitchell Landscape Architect (RMM) Fast-track – Response to DoC – Landscape, Proposed Solar Farm, The Point, Mackenzie Basin, 11 March 2026 (RMM Report).
- Far North Solar Farm Limited Response to Request for Information 5 – The Point Solar Farm Application under the Fast-track Approvals Act 2024 (File ref: FTAA-2509-1100), 29 May 2026 (FNSF RFI 5 Response).
- Draft Vegetation Management Plan for The Point Solar Farm, Wildland Consultants Ltd, March 2026, Report No. 6621h-iii (Wildlands Vegetation Management Plan).
- Draft Terrestrial Invertebrate Management Plan for The Point Solar Farm at Twizel, Canterbury. Wildland Consultants Ltd, March 2026, Report No. 6621h-ii (TIMP).
- Draft Lizard Management Plan for The Point Solar Farm at Twizel, Canterbury. Wildland Consultants Ltd, March 2026, Report No. 6621h-v (LMP).
- Mackenzie District Council – Land Use Conditions The Point Solar Farm.

In addition to the following documents reviewed for previous comments dated 11 February 2026 and 3 March 2026.

- Vegetation and Habitat Surveys of The Point Solar Farm, January-February 2026, Wildland Consultants Ltd, February 2026, Report No. 6621h-vi (Wildlands Additional Vegetation Report).
- Assessment of ecological effects for the proposed solar farm between the lower reaches of the Tekapo and Twizel Rivers, Mackenzie District. Wildland Consultants Ltd, May 2023, Report No. 6621c.
- RMM Fast-track RFI Response 2 – Landscape, Proposed Solar Farm, The Point, Mackenzie Basin, 23 February 2026.
- RMM Fast-track RFI Response 1 – Landscape, Proposed Solar Farm, The Point, Mackenzie Basin, 9 February 2026.
- Ecological Enhancement Plan for The Point Solar Farm, Twizel. May 2025, Wildland Consultants Ltd, February 2026, Report No. 6621g.
- Earlier versions of the LMP and TIMP.

The comments follow the format of the author's initial comments dated 11 February 2026 and a response to further information provided by the applicant after s53 reports were due dated 3 March 2026. Both are provided here (Appendix 1 & 2) to assist with continuity.

My experience is as set out in my statement to the panel dated 20 March 2026 (Appendix 3). In preparing these comments I continue to comply with the Code of Conduct for expert witnesses as also outlined in that statement.

Existing vegetation

I reiterate that I broadly support the proposed Threatened plant monitoring and management (Section 3.2), Adaptive seasonal grazing (Section 3.3) and Weed management (Section 4) in the Wildlands 2026 Draft Vegetation Management Plan (VMP).

In my comments dated 3 March 2026 I recommended that Russell lupin should be included as a compulsory[1] search and control weed target but have not seen that adopted in any subsequent documentation and it remains a recommendation.

Project proximity to Threatened and At Risk species

I reiterate that 1 Threatened and 10 At Risk plants are known to occur **in close proximity** of the site boundary and proposed landscape screening planting:

- *Lepidium solandri* (Threatened - Nationally Critical)
- *Carmichaelia monroi*, *Carmichaelia petriei, Raoulia australis*, *Raoulia monroi*, *Raoulia parkii*, *Convolvulus verecundus* f *verecundus*, *Muehlenbeckia ephedroides*, *Poa maniototo*, *Carex resectans*, and a lichen *Xanthoparmelia semiviridis,* (all At Risk – Declining).

It is not known where the other populations of 10 At Risk plant species are located because that information was unhelpfully redacted from the Wildlands Additional Vegetation Report.[2] It is likely further populations and occurrences of Threatened and At Risk plant species are present but unaccounted for on the terraces edges adjacent to landscape screening plantings because survey work has not been systematic outside of the site boundary.[3]

As discussed in previous comments dated 11 February 2026 the population of *Lepidium solandri* is nationally important and this species (and many other low growing native species) are vulnerable to edge effects caused by the close proximity and/or irrigation of landscape screening plantings. I recommended a buffer/setback of 50 m between irrigated landscape screening plantings and the property boundary fence, and specific irrigation conditions to reduce risk.

The 11 March 2026 RMM Report offers a dripline irrigation system rather than manual watering (spraying). I agree this is preferable to manual watering and its adoption with minimal

[1] Section 4.4.1 Wildlands Vegetation Management Plan only recommends Russell lupin is considered for control despite noting it earlier as a significant threat in dryland habitats.
[2] Figure 2.
[3] Section 4.2.1 Wildlands Additional Vegetation report.

application rates at times of seasonal dryness could be supported 50 m or more away from the property boundary fence.

However, the preference is to reduce edge effect risk by not irrigating at all, and maximising plant survival by ensuring appropriate species and locally eco-sourced[4] plants are used that are properly hardened off to local conditions, soaking plants before planting and using of water crystals. As noted previously, the plant species recommended by DOC for landscape screening planting grow naturally in the area without irrigation.

I note that there has been no change to the buffer/setbacks between landscape screening plantings and the property boundary fence, which are reportedly between 13.5 m and 35 m[5] (or 56.4 m[6]), although no comprehensive maps of these distances have been provided. Of particular concern is the south-eastern boundaries where the majority of *Lepidium solandri* (Threatened - Nationally Critical) appears to be located, and the buffer/setbacks are depicted as particularly narrow, and probably average 25 m and as close as 13.5 m over a 200 m to 300 m stretch.

The current planned proximity of irrigated landscape screening plantings remains unacceptably close to populations of Threatened and At Risk plant species, a situation that appears to be easily avoided with changes to site design.

I note that for this project an expert Mackenzie Basin researcher recommends a setback of at least 100 m from the terrace edge,[7] based on edge effects research from the Mackenzie Basin on similar surfaces.[8] Other (less directly applicable but still relevant) research from the Canterbury Plains suggests edge effects and spillover from immediately adjacent intensive agriculture require a 50-60 m buffer out from the boundary of indigenous vegetation being protected.[9]

My recommendations for a 50 m buffer/setback between the closest edge of landscape screening plantings and the boundary fence (and no irrigation) is to reduce the risk of edge effects on all Threatened and At Risk plants east and south of the boundary fence and is based on available research. This contrasts with one-off anecdotal observations alluded to in the 11 March 2026 RMM Report which refer to observed dryland plant communities just beyond the spray zone to the west of a pivot irrigator (in the opposite direction to the prevailing wind) and *Lepidium solandri* growing meters away from cultivated pasture (which is not irrigated).

The importance of requiring an evidence-based buffer/setback is highlighted when considering what the options would be if monitoring demonstrated that edge effects were negatively affecting Threatened and At Risk plants outside the property boundary. To remove and reverse the edge effects in this case would likely require ongoing intensive hand weeding outside the

---

[4] See authors comments 11 February 2026 for eco-sourcing meaning.
[5] Para 3.2(d), Far North Solar Farm Limited Response to Request for Information 5 – The Point Solar Farm Application under the Fast-track Approvals Act 2024 (File ref: FTAA-2509-1100), 29 May 2026.
[6] Figure 1. RMM Fast-track RFI Response 2 – Landscape, Proposed Solar Farm, The Point, Mackenzie Basin, 23 February 2026.
[7] Para 46.a, Evidence of Dr Susan Walker, FTAA-2508-1100, 19 February 2026.
[8] Walker S. 2020. Measured edge effects on indigenous grassland and shrubland vegetation on low-relief topography in Canterbury. Manaaki Whenua – Landcare Research Contract Report LC3866, prepared for Environment Canterbury.
[9] Brownstein G, Monks A. 2024. Adjacent land-use intensification facilitates plant invasions into indigenous shrubland fragments. New Zealand Journal of Ecology, Vol. 48, No. 1, 2024.

site boundary, intensive spraying and cultivation to remove exotic vegetation within the site boundary, and removal of the landscape screening plantings altogether. A 50 m buffer does not entirely eliminate this risk, and actions for the removal and reversal of edge effects should be provided for in consent conditions.

Detailed monitoring for edge effects and their impacts on adjacent Threatened and At Risk plant populations must be specified in conditions of consent, including baseline survey and monitoring. I do not consider the edge effect monitoring proposed in the March 2026 Wildlands Vegetation Management Plan to be adequate to detect impacts on adjacent Threatened and At Risk plant populations,[10] and I recommend the monitoring is designed and carried out independently using a public science provider with expertise in robust sampling design and statistical modelling for repeated measures monitoring of plant communities and threatened plant populations.

Ecological restoration plantings

There has been no changes to the issues identified below for ecological restoration plantings that are proposed for indigenous fauna habitat enhancement in the Wildlands 2026 Draft Lizard Management Plan (LMP) and Draft Terrestrial Invertebrate Management Plan (TIMP).

In LMP Table 6 *Carmichaelia australis* needs to be changed to *Carmichaelia petriei*.

In LMP Sections 5.4.1 and 5.4.3 it must be made clear that confirmed species to be planted should only be from those listed in Appendix 2 and Appendix 3 of the author's initial comments dated 11 February 2026. This should be prescribed in consent conditions. These are species lists compiled from known recent sources for outwash terraces and shrublands near to the project site.

In TIMP Tables 3-5, *Ozothamnus vauvilliersii* should be changed to *Ozothamnus leptopyhllus*. This would maintain consistency with the landscape screening plant list. There is also some conjecture about the validity of *Ozothamnus vauvilliersii* as a species. This highlights the need for local eco-sourcing.

In TIMP Tables 3-5, there are several species listed that are inconsistent with previous DOC advice to the applicant in mid-2024 to design plantings that are compositionally similar to nearby short tussock grassland and native shrubland areas, which included species lists compiled from known recent sources for outwash terraces and shrublands near to the project site. Species to be planted should only be from those listed in Appendix 2 and Appendix 3 of the author's initial comments dated 11 February 2026. This should be prescribed in consent conditions.

[10] For the reasons discussed in Paras 18 & 19 in Susan Walker's Second Supplementary Statement of Evidence for terrestrial ecology dated 12 June 2026.

Landscape screening plantings

The updated 23 February 2026 landscape mitigation plant palette was consistent with advice provided to the applicant in mid-2024 to design plantings that are visually and compositionally similar to nearby shrubland areas and remains unchanged in the 11 March 2026 RMM Report.

However the proposed consent conditions in RMM RFI Response 2 allowed for substitution with unspecified plant species (proposed Condition 11) a position retained in the 11 March 2026 RMM Report. Simply allowing any native species to be planted is not an acceptable ecological position in this context for reasons outlined in my advice dated 11 February 2026, even if it is a permitted activity. In addition, the widespread planting of tall trees (which this would allow) would require a larger buffer/setback (than 50 m) from the boundary fence due to larger shading effects contributing to edge effects.

This concern applies to all potential solar farms proposing to establish landscape screening in the Mackenzie Basin, which could result in tens of thousands of out of place tall trees (a hedge row effect) and substantial native weed issues if ecologically appropriate conditions are not applied (i.e., cumulative effects).

Therefore it is reiterated that appropriate native plant species for landscape screening planting should be limited via consent conditions to only those in Appendix 3 of the author's initial comments dated 11 February 2026. If this means a longer timeframe to achieve screening that is far preferable to indiscriminate planting of inappropriate species that the current loosely worded proposed condition allows for. Should the panel wish to allow for more flexibility, it must at minimum be restricted by conditions to plant species native to, and currently naturally extant in, the local Ecological District (Pukaki).

Conclusions and recommendations

Little progress has been made towards addressing ecological issues relating to indigenous vegetation since my last comments dated 3 March 2026. It is recommended that:

1. Landscape screening plantings are located a minimum of 50 m away from the property boundary fence at all locations and not irrigated.
2. If the panel choose to allow irrigation, irrigation is via a dripline system, used minimally e.g., a maximum of once per month for no longer than 6 hours at a time, between November and April for a maximum of 3 years starting when planted.
3. Plantings for landscape screening are restricted via consent conditions to those listed in Appendix 3 of the author's initial comments dated 11 February 2026.
4. Plantings for lizard and terrestrial invertebrate habitat enhancement are restricted via consent conditions to those listed in Appendix 2 and Appendix 3 of the author's initial comments dated 11 February 2026 and are not irrigated.
5. Scientifically robust monitoring of potential edge effects on the vegetation community and Threatened and At Risk plants on the terrace adjacent to the property where landscape screening planting is proposed is specified in consent conditions and undertaken using an independent public science provider with expertise in robust sampling design and statistical modelling for repeated measures monitoring of plant communities and threatened plant populations.
6. Russell lupin is included as a compulsory weed search and control target.

Appendix 1.

The Point Solar Farm Fast Track project – Comments on updated information pertaining to terrestrial flora and ecosystems components of proposal.

Richard Ewans – Senior Technical Advisor Ecology, Flora & Ecosystems Team, Department of Conservation.

5 March 2026.

Introduction and background

These comments are provided in response to additional information provided by applicant in late February 2026[11], after statutory timeframes for DOCs s.53 comments to the Fast Track panel had passed. The comments follow the format of the author's initial comments dated 11 February 2026.

Existing vegetation

Additional survey of vegetation and habitats was carried out over 118 person hours in mid-February, including 40 person hours searching areas of likely higher value for indigenous plants around the margins of the site and in two small gullies. This level of effort is more appropriate and confirmed the vegetation within the development footprint to be dominated by exotic pasture and herbfield.

The At Risk -Declining resurrection lichen (*Xanthoparmelia semiviridis*) was the only indigenous flora taxa recorded in the **development footprint**.

Outside the development footprint but on the **property** four additional indigenous species were found including important records for *Lepidium solandri* (Threatened - Nationally Critical) in the southern gully.

Note that I concur with the most recent Wildlands reports that two native brooms previously recorded as *Carmichaelia australis* and *Carmichaelia monroi* were likely misidentified in the original Wildlands report and are in fact *Carmichaelia petriei* and *Carmichaelia vexillata* respectively.

---

[11] Wildland Consultants. 2026. Vegetation and habitat survey of The Point solar farm, January 2026. Contract Report 6621h(v). Prepared for Far North Solar Farms. 9pp.;
Wildland Consultants. 2026. Draft Vegetation Management Plan for The Point Solar Farm. Wildland Consultants Contract Report No. 6621h-iii. Prepared for Far North Solar Farms Ltd. 23pp.;
Wildland Consultants. 2026. Draft Lizard Management Plan for The Point Solar Farm. Wildland Consultants Contract Report No. 6621h-v. Prepared for Far North Solar Farms Ltd. 44pp.;
Wildland Consultants. (2026). Draft Terrestrial Invertebrate Management Plan for the Point Solar Farm at Twizel, Canterbury. Wildland Consultants Contract Report No. 6621h-ii. Prepared for Far North Solar Farms Ltd. 31pp.;
Rough Milne Mitchell Landscape Architects. 2026. Fast-track RFI Response 2 – Landscape, Appendix 1: Proposed Landscape Mitigation Plan. 23 February 2026.; and
Rough Milne Mitchell Landscape Architects. 2026. Fast-track RFI Response 2 – Landscape Proposed Solar Farm. The Point, Mackenzie Basin. 23 February 2026.

I broadly support the proposed Threatened plant monitoring and management (Section 3.2), Adaptive seasonal grazing (Section 3.3) and Weed management (Section 4) in the Wildlands 2026 Draft Vegetation Management Plan (VMP) but note that Russell lupin should be included as a compulsory search and control weed target.

Project proximity to Threatened and At Risk species

The additional survey work outside the site boundary found eight additional indigenous plant species, however these areas were not systematically searched.

1 Threatened and 10 At Risk plants are known to occur **in close proximity** of the site boundary and proposed landscape screening planting:

- *Lepidium solandri* (Threatened - Nationally Critical)
- *Carmichaelia monroi*, *Carmichaelia petriei, Raoulia australis*, *Raoulia monroi*, *Raoulia parkii*, *Convolvulus verecundus* f *verecundus*, *Muehlenbeckia ephedroides*, *Poa maniototo*, *Carex resectans*, and a lichen *Xanthoparmelia semiviridis,*(all At Risk – Declining).

As discussed in previous comments dated 11 February 2026 the population of *Lepidium solandri* is nationally important and these species (and other native species) are vulnerable to edge effects caused by irrigation of landscape screening plantings.

The Rough Milne Mitchell Landscape Architect (RMM) RFI Response 2 discusses cross boundary effects and shows the landscape mitigation planting is at least 20 m from the boundary line and therefore at least 40 m from "that At-risk plant species", presumably referring to the Threatened - Nationally Critical plant species *Lepidium solandri*. The response also describes an irrigation regime using top down boom spraying. This does not adequately address the 10 At-Risk species in close proximity to the site which may be closer to the boundary.

The irrigation regime described is less risky than originally speculated but a larger buffer is still required to minimise risk of cross boundary effects i.e., 50 m from property boundary, this should be prescribed in consent conditions. If that cannot be achieved irrigation should not be used, and plant survival should be maximised by ensuring appropriate species and locally eco-sourced[12] plants are used that are properly hardened off to local conditions. Soaking plants before planting and use of water crystals should assist with survival. The plant species recommended by DOC for landscape screening planting grow naturally in the area without irrigation.

If a 50 m buffer from property boundary can be achieved and irrigation is used, the regime described is acceptable but needs to be more prescribed in the conditions. The RMM RFI Response 2 conditions lack specificity over when irrigation should not be used and should prescribe limits as to how much irrigation can be used.

For example, irrigation should only occur on still days or days with a southerly or easterly wind direction up to 20 km/hr; should use heavy droplets not fine mist spray; and be used a maximum of once per month between November and April for maximum of 3 years.

[12] See authors comments 11 February 2026 for eco-sourcing meaning.

Detailed monitoring of adjacent Threatened and At Risk plant populations must be included in conditions of consent, including baseline monitoring. Monitoring described in Section 8 of the 2026 Wildlands Draft Vegetation Management Plan (VMP) does not include monitoring needed to monitor potential cross boundary effects on adjacent biodiversity values and is not adequate for the nationally important population of *Lepidium solandri* on and adjacent to the site.

Ecological restoration plantings

Ecological restoration plantings are proposed for indigenous fauna habitat enhancement in the Wildlands 2026 Draft Lizard Management Plan (LMP) and Draft Terrestrial Invertebrate Management Plan (TIMP).

In LMP Table 6 *Carmichaelia australis* needs to be changed to *Carmichaelia petriei*.

In LMP Sections 5.4.1 and 5.4.3 it must be made clear that confirmed species to be planted should only be from those listed in Appendix 2 and Appendix 3 of the author's initial comments dated 11 February 2026. This should be prescribed in consent conditions. These are species lists compiled from known recent sources for outwash terraces and shrublands near to the project site.

In TIMP Tables 3-5, *Ozothamnus vauvilliersii* should be changed to *Ozothamnus leptopyhllus*. This would maintain consistency with the landscape screening plant list. There is also some conjecture about the validity of *Ozothamnus vauvilliersii* as a species. This highlights the need for local eco-sourcing.

In TIMP Tables 3-5, there are several species listed that are inconsistent with previous DOC advice to the applicant in mid-2024 to design plantings that are compositionally similar to nearby short tussock grassland and native shrubland areas, which included species lists compiled from known recent sources for outwash terraces and shrublands near to the project site. Species to be planted should only be from those listed in Appendix 2 and Appendix 3 of the author's initial comments dated 11 February 2026. This should be prescribed in consent conditions.

Landscape screening plantings

The updated 23 February 2026 landscape mitigation plant palette is now consistent with advice provided to the applicant in mid-2024 to design plantings that are visually and compositionally similar to nearby shrubland areas.

However the proposed consent conditions in RMM RFI Response 2 allow for substitution with unspecified plant species (proposed Condition 11) which is unacceptable. Appropriate native plant species for landscape screening planting should be limited via consent conditions to only those in Appendix 3 of the author's initial comments dated 11 February 2026.

It is noted that *Aristotelia fruticose* should read *Aristotelia fruticosa* (a common MS Word autocorrect issue), and that *Carmichaelia kirkii* is a scrambling broom that is unlikely to reach 4 m in height unless supported by other shrubs.

Conclusions and recommendations

Table 1. Comment on updated information in relation to previous recommendations.

Recommendation 11 February 2026	Comment on additional information
1. Survey for Threatened and At Risk plant species is undertaken on terrace areas adjacent to proposed landscape screening planting and ecological restoration planting areas.	Partially completed, areas outside site boundary not systematically searched.
2. Baseline survey/monitoring of *Lepidium solandri* populations adjacent to the site is undertaken and repeated annually for the life of the project.	Suggested in Section 3 of Wildlands 2026 VMP but not adequately described in Section 8. Needs to include newly discovered population on property.
3. Baseline monitoring of the terrace plant communities to understand edge effects is undertaken and repeated bi-annually for the life of the project.	Not addressed.
4. Ecological restoration plantings are restricted to the list in Appendix 2 and are not irrigated.	Partially addressed.
5. Landscape screening plantings are restricted to the list in Appendix 3, are not irrigated, and are placed a minimum of 50m from the property boundary fence inside the property.	Partially addressed.

Progress has been made towards addressing ecological issues relating to indigenous vegetation but outstanding issues remain relating to planting of indigenous species for landscape screening, and for lizard and terrestrial invertebrate habitat enhancement.

It is recommended that:

7. Plantings for landscape screening are restricted via consent conditions to those listed in Appendix 3 of the author's initial comments dated 11 February 2026.
8. Plantings for landscape screening are not irrigated if within 50 m of the property boundary fence.
9. Plantings for landscape screening greater than 50 m from the property boundary fence are only irrigated on still days or days with a southerly or easterly wind direction up to 20 km/hr; should use heavy droplets not fine mist spray; and be used a maximum of once per month between November and April for a maximum of 3 years starting when planted; using a top down boom facing away from the property boundary.
10. Plantings for lizard and terrestrial invertebrate habitat enhancement are restricted via consent conditions to those listed in Appendix 2 and Appendix 3 of the author's initial comments dated 11 February 2026 and are not irrigated.
11. Scientifically robust monitoring of potential edge effects on the vegetation community on the terrace adjacent to the property where landscape screening planting.
12. Russell lupin is included as a weed search and control target.

Appendix 2.

The Point Solar Farm Fast Track project – Comments on terrestrial flora and ecosystems components of proposal.

Richard Ewans – Senior Technical Advisor Ecology, Flora & Ecosystems Team, Department of Conservation.

11 February 2026.

Introduction and background

Prior to the Fast Track legislation The Point Solar Farm project was slated for an RMA consenting pathway and the Department of Conservation (DOC) was engaged in constructive pre-application discussions with the applicant in the second half of 2023.

The author was involved in those discussions pertaining to flora and ecosystems, attended a short overview site visit with applicant representatives on 6 October 2023, and provided advice to the applicant on appropriate ecological restoration and landscape screening planting species.

The site is a Naturally Uncommon Ecosystem (Inland Outwash Gravels)[13], which is classified as Critically Endangered[14]. Therefore any indigenous vegetation is ecologically significant under NPS-IB[15] and Canterbury RPS[16] significance criteria.

Initially, in both RMA and Fast Track contexts, the project proposed large-scale ecological restoration plantings (c. 82 hectares), a position held until very recently. The latest proposal has substantially reduced the scale of restoration plantings, and details are to be provided by 23 February 2026, post-DOCs comments on the application being due to the Fast Track panel. In addition, further ecological survey work is being undertaken, the results of which will not be available to DOC prior to comments being due.

Therefore, these comments are broad and subject to change based on the results of further ecological survey work and redesign of the ecological restoration plantings.

Existing vegetation

Current vegetation is described in the May 2023 Wildlands ecological assessment (EA) based on a single day's field work by one person and subsequently verified by a Wildlands site visit on 20 January 2026. This level of survey effort is inadequate to determine the distribution and abundance of Threatened and At Risk plant species on and adjacent to the property, an issue

[13] Williams PA, Wiser S, Clarkson B, Stanley MC. 2007. New Zealand's historically rare terrestrial ecosystems set in a physical and physiognomic framework. NZ Journal of Ecology 31: 119-128.
[14] Holdaway RJ, Wiser SK, Williams PA. 2012. Status Assessment of New Zealand's Naturally Uncommon Ecosystems. Conservation Biology 26(4).
[15] Ministry for the Environment. 2023. National Policy Statement for Indigenous Biodiversity (Appendix 1).
[16] Environment Canterbury. 2021. Canterbury Regional Policy Statement 2013 (Appendix 3). CanterburyRegionalPolicyStatement2013July2021 (1).PDF. Accessed 26/11/2025.

identified by the Fast Track panel and being addressed by further survey work to be completed in late February after DOC's comments are due.

The EA found the site to be dominated by exotic pasture and herbfield. This is broadly correct, with some small gullies on the east of the property and stony ground on site margins supporting indigenous vegetation.

The EA identified 1 At Risk – Declining species (matagouri; *Discaria toumatou*) within the project footprint. This species is now classified as Not Threatened in the latest New Zealand Threat Classification report.[17] Survey work by Wildlands on 20 January 2026 confirmed the presence of the At Risk -Declining scabweed (*Raoulia australis*) within the property.

A totally inadequate undated report by AgScience reported that the entire site has been cultivated and that no native floristic values remain, therefore no further ecological assessment is required. This report should be ignored as it is neither credible in substance nor source.

Most of the site has been substantially modified by physical clearance of indigenous vegetation and is now 'converted land' (land where indigenous vegetation has been fully removed and replaced with exotic pasture species or crops). However, small pockets of indigenous vegetation remain, and the time spent on site to date (survey effort) is insufficient to find occurrences of Threatened or At Risk plant species that were missed initially, may have recolonised since the initial survey work 3 years ago, or lie close to the boundary and maybe subject to cross-boundary edge effects[18].

Project proximity to Threatened and At Risk species

The EA recorded the following Threatened and At Risk plant species just outside the site boundary:

- *Lepidium solandri* (Threatened - Nationally Critical)
- scabweed/*Raoulia australis* (At Risk – Declining)
- stout dwarf broom/*Carmichaelia monroi* (At Risk – Declining)[19]

A nationally important population of *Lepidium solandri* (Threatened - Nationally Critical) occurs immediately adjacent to the property on the terrace edges (see Map 1, Appendix 1). These plants are within 20-100m of the property boundary (see Map 2, Appendix 1). This proximity to major construction and landscape screening plantings with proposed irrigation is of major concern due to potential cross-boundary edge effects.[20]

---

[17] de Lange PJ, Gosden J, Courtney SP, Fergus AJ, Barkla JW, Beadel SM, Champion PD, Hindmarsh-Walls R, Makan T and Michel P. 2024. Conservation status of vascular plants in Aotearoa New Zealand, 2023. *New Zealand Threat Classification Series 43*. 105 p.

[18] Walker S, Brownstein G and Monks A 2019: Avoiding cross-boundary effects of agricultural land use on indigenous dryland habitats in the Canterbury region: consenting guidelines and planning recommendations. *Manaaki Whenua – Landcare Research Contract Report LC3636*. Prepared for Canterbury Regional Council (Environment Canterbury).

[19] This is more likely *Carmichaelia vexillata* which has the same threat status.

[20] Walker S. 2020. Measured edge effects on indigenous grassland and shrubland vegetation on low-relief topography in Canterbury. *Manaaki Whenua – Landcare Research Contract Report LC3866*, prepared for Environment Canterbury.

Such edge effects alter vegetation composition by increasing exotic grass cover beyond development footprints, and are usually associated with land use intensification and development, particularly irrigation and exotic forestry. These effects can extend 10's to 100's of metres by altering microclimate, soil moisture and seed input favouring exotic pasture species which outcompete low growing indigenous plant species.

In this case, the proposed solar farm is highly likely to result in greater exotic grass biomass across the site, and irrigation of plantings along the boundary will likely elevate soil moisture and promote exotic grass growth across the boundary.

Several other low-growing (and therefore vulnerable to habitat modification) At Risk plant and lichen species typical of Inland Outwash Gravel terraces are known to occur immediately adjacent to the property. These include *Raoulia monroi*, *Raoulia parkii*, *Convolvulus verecundus* f *verecundus*, *Muehlenbeckia ephedroides*, *Poa maniototo*, *Carex resectans*, and a lichen *Xanthoparmelia semiviridis,*(all At Risk – Declining).[21] *Pimelea sericeovillosa* subsp. *pulvinaris* (Threatened – Nationally Vulnerable) is also likely to be present.

Landscape screening planting is proposed along the southern boundary and lower eastern boundary (and northern boundary). It is proposed to use irrigation to facilitate growth of the plantings. The addition of water will facilitate exotic grass and weed growth around the plantings, which could impact the survival and growth of the plantings. Spray irrigation could carry water significant distances in the strong north-westerly winds which are a common climatic feature in the Mackenzie Basin.

An RFI response by RMM Landscape Architects dated 9 February 2026 provides detail on landscape screening planting scale but does not address the proximity to Threatened and At Risk plant species or risks arising to those species. On the southern boundary a 1km x 40m wide strip of plantings is proposed, on the eastern boundary a 1.5km x 35m strip is proposed, and according to the mapping provided these will be close to or on the property boundary (Map 3 Appendix 1).

The May 2025 Wildlands Ecological Enhancement Plan mentions watering of plantings via knapsack spray or boom spraying from a truck. No irrigation should be considered within 100m of the property boundary due to the risk of edge effects via water spray drift, or via increased soil moisture/groundwater[22].

Further survey work is required to understand the full range of Threatened and At Risk plant populations potentially affected by landscape screening plantings, and the risk of edge effects needs more thorough analysis by expert dryland ecologists.

Detailed monitoring of adjacent Threatened and At Risk plant populations must be included in conditions of consent, including baseline monitoring.

[21] Mike Harding Environmental Consultant, pers. comm., 11 February 2026.
[22] Brownstein G and Monks A. 2024. Adjacent land-use intensification facilitates plant invasions into indigenous shrubland fragments. New Zealand Journal of Ecology 48(1): 3569.

Ecological restoration plantings

Restoration planting can pose a threat to the ecological integrity of natural areas if it is not implemented in an ecologically informed way or if 'best practice' is not followed.

For example, planting 'ecologically inappropriate' indigenous species (e.g. North Island species, hybrids, cultivars, or species that would not occur naturally at the site) or planting into areas with existing indigenous vegetation (particularly sites with rare or threatened species) can cause harm to ecological values by disrupting natural vegetation patterns and food webs (e.g. plant-insect interactions), and/or making conditions less suitable for rare or threatened species.

Detailed knowledge about the ecology of the planting site, as well as the wider landscape and ecological district will be required in order to design and implement restoration plantings that are of long-term ecological benefit.

The ecological restoration plantings should be ecologically appropriate for the site, as per advice provided to the applicant in mid-2024 to design plantings that are compositionally similar to nearby short tussock grassland and native shrubland areas.

The area of ecological restoration plantings is now much reduced from the initial proposal and is to be within a proposed predator proof reserve of c. 14 hectares on the eastern boundary. This does not change advice pertaining to ecologically appropriate species.

A brief document outlining the proposed ecological enhancement approach from the applicant dated 2 February 2026 does not provide sufficient detail regarding planting design or species mix.

Use of properly eco-sourced[23] and hardened off ecologically appropriate plants is essential to minimise losses without irrigation.

Appropriate native plant species for ecological restoration planting are provided in Appendix 2 as they were provided to the applicant.

Landscape screening plantings

The landscape screening plantings should be ecologically appropriate to the site as per advice provided to the applicant in mid-2024 to design plantings that are visually and compositionally similar to nearby shrubland areas. If this can't be achieved then the need for screening planting must be questioned.

The landscape mitigation plant palette in the Landscape Assessment Report by RMM Landscape Architects dated 25 May 2023 predates advice provided to the applicant and includes several inappropriate (albeit native) species. Inappropriate screening plantings may

[23] Eco-sourced means that the plants have been propagated from seed collected from natural/remnant indigenous vegetation (i.e. not planted) in the applicable Ecological District or from similar dryland habitat in the applicable Ecological Region (note that reserves near houses, parks, and other planted sites may be genetically contaminated with seed or pollen from planted stock of unknown provenance, so in some cases it may be best to collect seed some distance away from the planting site rather than close to the site). Eco sourcing also involves collecting seed from a similar habitat to the planting site. This helps ensure that the plants are well-suited to the site (i.e. plants will be genetically adapted to the environmental conditions and therefore have better survival and growth), and do not compromise the ecological/genetic integrity of existing indigenous vegetation at the site by altering its genetic profile.

result in establishment of spreading native 'weeds' e.g., kānuka (*Kunzea robusta*), or visual effects less desirable than no screening e.g., tall rows of lowland ribbonwood (*Plagianthus regius*).

Use of properly eco-sourced and hardened off ecologically appropriate plants is essential to minimise losses without irrigation.

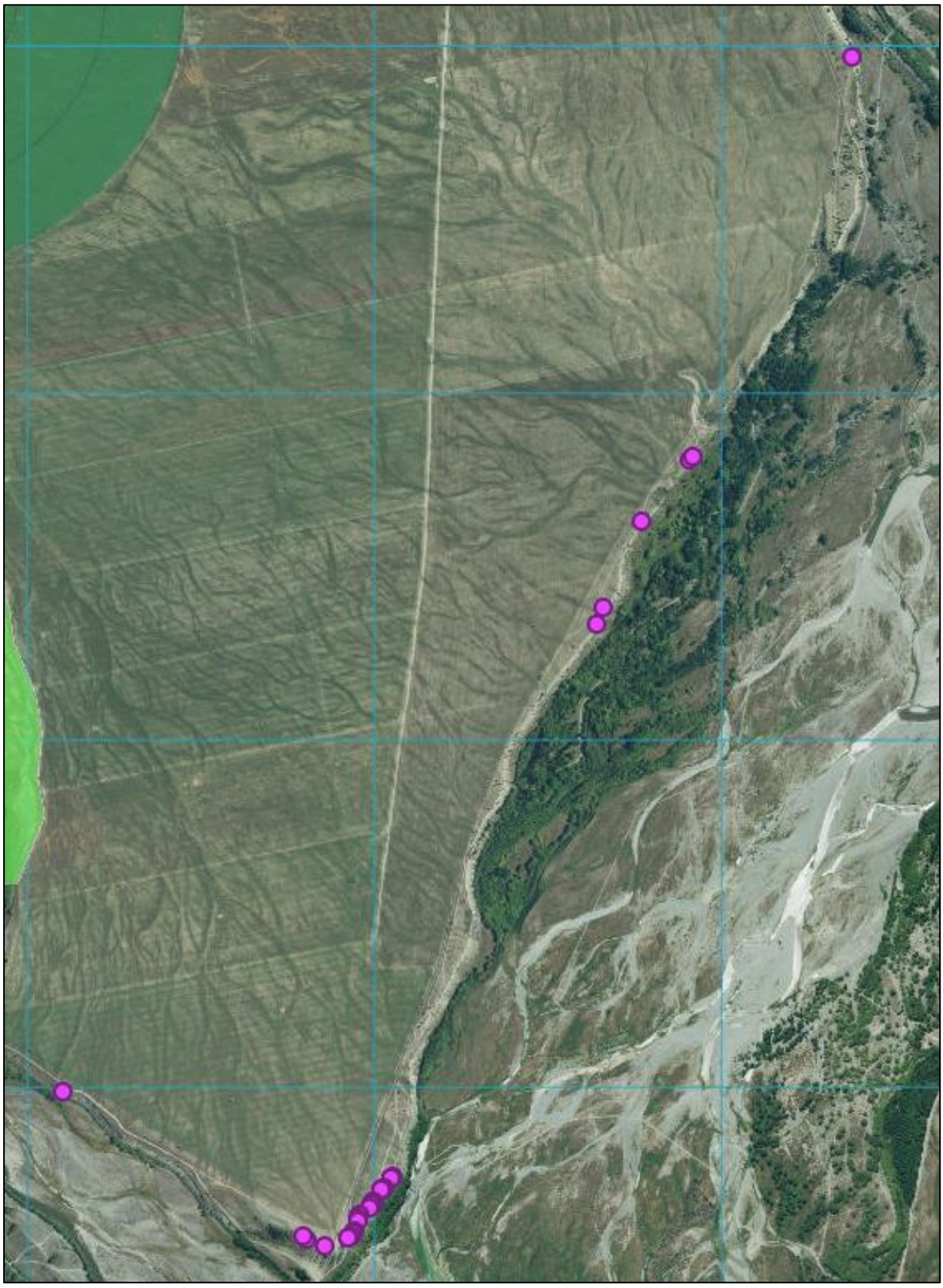
Appropriate native plant species for landscape screening planting are provided in Appendix 3, slightly modified from that previously provided to the applicant.

Conclusions and recommendations

1. Survey for Threatened and At Risk plant species is undertaken on terrace areas adjacent to proposed landscape screening planting and ecological restoration planting areas.
2. Baseline survey/monitoring of *Lepidium solandri* populations adjacent to the site is undertaken and repeated annually for the life of the project.
3. Baseline monitoring of the terrace plant communities to understand edge effects is undertaken and repeated bi-annually for the life of the project.
4. Ecological restoration plantings are restricted to the list in Appendix 2 and are not irrigated.
5. Landscape screening plantings are restricted to the list in Appendix 3, are not irrigated, and are placed a minimum of 50m from the property boundary fence inside the property.

Appendix 1. Proximity of Threatened plants.

Map 1. Location of Lepidium solandri *plants and populations (purple dots) on outwash terrace surface immediately adjacent to The Point Solar Farm. Locations supplied by Dr Susan Walker 16 January 2026.*



Map 2. Proximity of Lepidium solandri *plants and populations (purple dots) on outwash terrace surface immediately adjacent to southern boundary fence of The Point Solar Farm. Other* Lepidium solandri *plants and populations shown on Map 1 are within the range of 20m to 100m from the property boundary fence.*

Map 3. Landscape screening planting strips (green) close to Threatened and At Risk plant habitat.

Appendix 2. Plant species list for ecological restoration.

Scientific name	**Common name/s**	**Threat status**[24]	**Current abundance in nearby outwash gravels**[25]	**Plant type**	**Size for type**	**Note**
Acaena buchananii	bidibid, piripiri	At Risk - Declining	rare	herb	small	specific habitat requirements
Acaena caesiiglauca	glaucous bidibid	Not Threatened	rare	herb	small	
Acaena inermis	bidibid	Not Threatened	rare	herb	small	
Aciphylla aurea	golden speargrass	Not Threatened	rare	herb	large	
Acrothamnus colensoi	Colenso's mingimingi	Not Threatened	occasional	subshrub	medium	
Anisotome aromatica	aromatic aniseed	Not Threatened	occasional	herb	small	
Anthosachne solandri	blue wheatgrass	Not Threatened	common	grass	medium	
Brachyglottis haastii		Not Threatened	rare	herb	small	
Carex breviculmis	grassland sedge	Not Threatened	common	sedge	small	
Carmichaelia crassicaulis subsp. *crassicaulis*	coral broom	Threatened - Nationally Vulnerable	rare	shrub	small	
Carmichaelia nana	dwarf broom	Threatened - Nationally Vulnerable	rare	subshrub	medium	specific habitat requirements
Carmichaelia petriei	desert broom	At Risk - Declining	rare	shrub	medium	
Carmichaelia vexillata	dwarf broom	At Risk - Declining	occasional	subshrub	medium	specific habitat requirements
Celmisia gracilenta	common mountain daisy	Not Threatened	common	herb	small	

[24] Updated according to latest threat classification de Lange et al. (2024).
[25] Based on author's observations and DOC records.

Scientific name	Common name/s	Threat status[24]	Current abundance in nearby outwash gravels[25]	Plant type	Size for type	Note
Chionochloa rigida	narrow-leaved snow tussock	Not Threatened	rare	grass	large	
Colobanthus brevisepalus	pin cushion	At Risk - Declining	occasional	herb	small	specific habitat requirements
Convolvulus verecundus f. verecundus	tussock bindweed	At Risk - Declining	rare	herb	small	specific habitat requirements
Coprosma brunnea		At Risk - Declining	rare	shrub	small	
Coprosma petriei	turfy coprosma	Not Threatened	common	subshrub	small	
Coprosma propinqua	mingimingi, mikimiki	Not Threatened	rare	shrub	medium	
Corokia cotoneaster	korokio	Not Threatened	rare	shrub	medium	
Dichondra brevifolia	dichondra	Not Threatened	rare	herb	small	
Discaria toumatou	matagouri	Not Threatened	occasional	shrub	medium	
Festuca novae-zelandiae	hard tussock	Not Threatened	dominant	grass	medium	
Geranium brevicaule	alpine crane's bill	Not Threatened	common	herb	small	
Halocarpus bidwillii	bog pine	Not Threatened	rare	tree	small	
Helichrysum filicaule	creeping everlasting daisy	Not Threatened	common	herb	small	
Leptinella pectinata subsp. *villosa*		Not Threatened	rare	herb	small	
Leucopogon fraseri	patōtara	Not Threatened	very common	subshrub	small	
Luzula rufa var. *rufa*	red woodrush	Not Threatened	very common	rush	small	
Melicytus alpinus	porcupine shrub	Not Threatened	common	shrub	small	
Muehlenbeckia axillaris	creeping pōhuehue	Not Threatened	common	liane	small	
Muehlenbeckia complexa	small-leaved pōhuehue	Not Threatened	occasional	liane	medium	

Scientific name	Common name/s	Threat status[24]	Current abundance in nearby outwash gravels[25]	Plant type	Size for type	Note
Muehlenbeckia ephedroides	leafless pōhuehue	At Risk - Declining	rare	liane	small	specific habitat requirements
Olearia odorata	scented tree daisy	At Risk - Declining	rare	shrub	large	
Pentapogon avenoides	mountain oat grass	Not Threatened	common	grass	small	
Pentapogon crinitus	long-hair plume grass	Not Threatened	common	grass	small	
Pimelea oreophila	pimelea	Not Threatened	common	shrub	small	
Pimelea sericeovillosa subsp. *pulvinaris*		Threatened - Nationally Vulnerable	occasional	subshrub	small	specific habitat requirements
Poa cita	silver tussock	Not Threatened	occasional	grass	medium	
Poa colensoi	blue tussock	Not Threatened	common	grass	medium	
Poa lindsayi	Lindsay's poa	Not Threatened	common	grass	small	
Racomitrium pruinosum	woolly moss	Not Threatened	very common	moss	medium	interesting experiment, or is it R lanuginosum?
Ranunculus multiscapus	grassland buttercup	Not Threatened	occasional	herb	small	
Raoulia australis	scabweed	At Risk - Declining	common	cushion	medium	
Raoulia hookeri var. *hookeri*		Not Threatened	occasional	cushion	medium	
Raoulia monroi	fan-leaved mat daisy	At Risk - Declining	rare	cushion	small	specific habitat requirements
Raoulia parkii	celadon mat daisy	At Risk - Declining	occasional	cushion	medium	
Raoulia subsericea	turf mat daisy	Not Threatened	common	cushion	medium	
Rytidosperm setifolium	bristle tussock	Not Threatened	occasional	grass	medium	
Scleranthus uniflorus		Not Threatened	rare	cushion	small	
Sophora prostrata	prostrate kōwhai	At Risk - Declining	rare	tree	small	nearby shrublands

Scientific name	**Common name/s**	**Threat status**[24]	**Current abundance in nearby outwash gravels**[25]	**Plant type**	**Size for type**	**Note**
Stellaria gracilenta	slender chickweed	Not Threatened	common	herb	small	
Viola cunninghamii	mountain violet	Not Threatened	occasional	herb	small	
Vittadinia australis	white fuzzweed	Not Threatened	rare	herb	small	
Wahlenbergia albomarginata subsp. *albomarginata*	NZ harebell	Not Threatened	common	herb	small	
Xanthoparmelia semiviridis	Resurrection lichen	At Risk - Declining	occasional	lichen	small	interesting experiment

Appendix 3. Plant species list for landscape screening.

Scientific name	**Common name**	**Threat status**[26]	**Other comment**
Aristotelia fruticosa	mountain wineberry	Not Threatened	in nearby shrublands
Carmichaelia kirkii	scrambling broom	Threatened - Nationally Vulnerable	in nearby shrublands
Carmichaelia petriei	desert broom	At Risk - Declining	in nearby shrublands
Coprosma intertexta		At Risk - Declining	in nearby shrublands
Coprosma propinqua	mingimingi/mikimiki	Not Threatened	common to dominant in nearby shrublands
Coprosma rigida		Not Threatened	
Coprosma virescens		At Risk - Declining	in nearby shrublands
Corokia cotoneaster	korokio	Not Threatened	
Discaria toumatou	matagouri	Not Threatened	common to dominant in nearby shrublands
Halocarpus bidwillii	bog pine	Not Threatened	likely historic component, low planting rate
Leptospermum scoparium	mānuka	Not Threatened	in nearby shrublands, flammable?
Muehlenbeckia complexa	small-leaved pōhuehue	Not Threatened	
Olearia odorata	scented tree daisy	At Risk - Declining	
Ozothamnus leptophyllus	cottonwood, tauhinu	Not Threatened	
Parsonsia capsularis var. *capsularis*	NZ jasmine	Not Threatened	in nearby shrublands, is it var. rosea?
Rubus schmidelioides	bush lawyer	Not Threatened	in nearby shrublands

[26] Updated according to latest threat classification de Lange et al. (2024).

Appendix 3.

Before the Fast-track Panel

Under:	The Fast-track Approvals Act 2024
In the matter of:	FTAA-2508-1097 The Point Solar Farm project

Statement of advice Richard Ewans

Senior Technical Advisor Ecology

DOC

20 March 2026

Department of Conservation
Te Papa Atawhai

Te Kāwanatanga o Aotearoa
New Zealand Government

Introduction

1. My full name is Richard Andrew Ewans.

Instruction

2. I am providing expert advice on behalf of the Department of Conservation (DOC) on The Point Solar Farm. My advice addresses indigenous flora and ecosystems values and effects relating to the project.

3. I have provided two sets of written advice, headed “The Point Solar Farm Fast Track project – Comments on terrestrial flora and ecosystems components of proposal” dated 11 February 2026 and “The Point Solar Farm Fast Track project – Comments on updated information pertaining to terrestrial flora and ecosystems components of proposal” dated 5 March 2026, which both have been provided to the Panel.

4. I have also contributed to DOC’s s53 comments (dated 19 February 2026) and subsequent comments on the applicant’s further vegetation reports (dated 5 March 2026), and I will continue to provide advice and contributions as required.

Qualification and Experience

5. I am currently employed by the Department of Conservation (DOC) as a Senior Technical Advisor – Ecology in the national Flora and Ecosystems Team, which is a component of the Terrestrial Biodiversity Unit. My role provides botanical and ecosystem advice to DOC on threatened plants management, Crown Pastoral Lease issues, Fast Track applications, permissions and concessions, policy issues, and for resource management processes. My primary areas of expertise are ecological assessment and biodiversity monitoring.

6. Prior to joining DOC, my two most recent roles were Partnerships Lead – Biodiversity for the Otago Regional Council (January 2022 to June 2023), and Biodiversity Advisor (council ecologist) for the Dunedin City Council based in the planning team (October 2018 to January 2022).

7. I hold a Bachelor of Science (Hons) First Class in Plant Ecology from the University of Otago (2000).

8. From January 2000 until June 2004, I worked as an independent ecological contractor in Dunedin. From July 2004 until August 2013, I was employed as a Biodiversity Ranger - Monitoring for the Department of Conservation (DOC) in the Fiordland District Office. From September 2013 until February 2014, I worked as an Ecologist for Contract Wild Animal Control Limited in Te Anau. From March 2014 until September 2018, I ran my own ecological consultancy called Eco-South, based in Dunedin.

9. My work experience includes providing botanical expertise on programs such as the Waitaki and Mackenzie Districts Significant Natural Areas assessments, South Island High Country Tenure Review (Otago), the Mackenzie Basin braided riverbeds vegetation survey, Environment Southland Wetland GIS Inventory and Monitoring Project, Hunua Ranges Watercare Catchment Restoration Project, monitoring of

Oceana Gold Macraes mining ecological consent conditions, and Department of Conservation Tier 1 monitoring (a national biodiversity monitoring program).

10. My previous role at DOC involved establishing, maintaining, and reporting on multiple vegetation outcome monitoring programs and providing expertise on threatened plants and ecosystems, and plant pests.

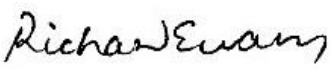
11. I have extensive experience working in indigenous non-forest ecosystems including drylands and wetlands and have described over 50 Significant Natural Areas (SNAs), mostly dryland sites, for Mackenzie and Waitaki District Councils in the Mackenzie Basin while subcontracting to a consultant.

12. I have completed over 200 Resource Management Act 1991 (RMA) ecological significance (or similar) type surveys on private land in the lower South Island and reviewed/critiqued many ecological assessments as part of consenting or compliance processes.

Code of conduct

13. 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 complied with it when providing my advice and contributions outlined above. I will continue to do so for all further advice and contributions. Unless I state otherwise, my advice and contributions are within my area of expertise, and I have not omitted to consider material facts known to me that might alter or detract from the opinions I express.

14. For the avoidance of doubt, in providing advice and contributions as an expert witness in accordance with the Code, I acknowledge that I have an overriding duty to impartially assist the Panel on matters within my area of expertise. The views expressed are my own expert views, and I do not speak on DOC's or the Director-General of Conservation's behalf.



Richard Ewans