



13 July 2026

The Expert Panel
Haldon Solar Farm
Environmental Protection Authority
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Tēnā koutou katoa,

FTAA-2508-1097- HALDON SOLAR FARM- COMMENTS ON DRAFT CONDITIONS

Thank you for the opportunity to provide comments on the draft conditions for the Haldon Solar Farm application by Lodestone Energy under the Fast-Track Approvals Act 2024.

Overall, we acknowledge the significant work that has been undertaken by the applicant, the Expert Panel, and the various technical experts (including section 53 parties) in developing the revised condition package. In our view, the revised conditions represent a significant refinement of the earlier condition package and provide a strong framework for the management of cultural and ecological effects throughout the life of the project. In particular, we appreciate the extent to which the Mana Whenua specific conditions developed through collaborative engagement with the applicant have been adopted or incorporated into the draft conditions.

The attached tables provide comments on the Mackenzie District Council and Canterbury Regional Council draft condition sets. The majority of the comments relate to the Mackenzie District Council conditions, which establish the primary cultural and ecological management framework for the project. A review of the Canterbury Regional Council conditions has also been undertaken, with only a limited number of additional comments identified.

Our comments do not generally seek substantive changes to the overall approach reflected in the draft conditions. Rather, they are intended to identify opportunities to further improve the clarity, consistency and practical implementation of what is already considered to be a comprehensive condition framework.

In preparing the attached comments, we have sought to review the conditions as an integrated package rather than as a series of individual conditions. This has resulted in some comments focusing on the relationships between conditions and the practical operation of the overall framework, rather than the wording of individual conditions in isolation.

For ease of reference, the comments have been grouped into two broad categories.

Mana Whenua conditions

Overall, the Mana Whenua conditions are supported and largely reflect the wording originally sought by Mana Whenua. Our comments primarily relate to minor drafting refinements intended

to improve consistency across the condition set and maintain transparency throughout the consultation process.

The key themes arising from our review are summarised below.

Consistency and transparency of consultation

The revised conditions establish a comprehensive framework for ongoing engagement between the Consent Holder and Mana Whenua through the Kaitiaki Governance Group and Strategic Cultural Programme. The comments primarily seek to improve the consistency and transparency of that consultation framework by ensuring that advice received is appropriately documented and responded to.

Examples include:

- improving consistency in the way consultation feedback is recorded and responded to (Conditions 16, 27, 34, 154 and 166);
- ensuring that where advice is not adopted, the reasons for that decision are clearly documented (Condition 16); and
- making minor drafting refinements to improve clarity and consistency without altering the intent of the conditions (Conditions 20 and 22).

These refinements are intended to support an open and transparent consultation process throughout implementation of the consent and contribute to an enduring working relationship between Mana Whenua and the Consent Holder.

The Canterbury Regional Council conditions have also been reviewed. Overall, they establish a robust framework for managing regional council matters, including stormwater management, erosion and sediment control, groundwater protection and contamination risks. Only a limited number of comments have been identified, primarily relating to consistency between the two consent authorities' condition sets and the continued integration of the overall management framework.

Ecological conditions

Overall, the ecological conditions establish a comprehensive ecological management framework comprising ecological management plans, monitoring, reporting, review, adaptive management and compensation. The overall framework is supported.

Similar to the approach outlined above, the attached comments primarily seek to improve how the various components of the ecological management framework are intended to operate together throughout the life of the project.

The key themes arising from our review are summarised below.

Better integration of the ecological management framework

The ecological conditions establish a comprehensive framework for managing ecological effects. However, in several places the relationship between the various components appears to be implied rather than expressly stated. Additional cross-referencing or clarification would assist

in demonstrating how the ecological management plans, monitoring, annual reporting, Technical Review Panel, adaptive management and compensation provisions are intended to operate collectively.

The review also identified examples within the Canterbury Regional Council conditions where consistency between management plans certified by the two consent authorities is expressly recognised and supported.

Examples include:

- how ecological monitoring informs annual reporting (Conditions 120, 128 and 129);
- how annual reporting informs the Technical Review Panel's review functions (Conditions 66 and 128);
- how the Technical Review Panel informs adaptive management, monitoring and compensation (Conditions 66, 73, 120 and 123);
- how the various ecological management plans collectively contribute to the broader ecological outcomes sought by the consent (Conditions 61–65, 113 and 128); and
- ensuring the stated purpose of individual management plans accurately reflects their role within the broader ecological management framework (Conditions 113 and 128).

Clearer implementation pathways

A small number of conditions establish clear processes for investigation, review or assessment but are less explicit regarding the implementation pathway that follows. The comments primarily seek clarification regarding how outcomes arising from ecological monitoring, Technical Review Panel reviews, adaptive management and compensation are intended to be implemented where required.

Examples include:

- implementation of additional mitigation measures identified following bird collision investigations (Condition 122);
- implementation of ecological compensation where adaptive management has been unsuccessful (Condition 123);
- implementation of Technical Review Panel determinations (Conditions 66 and 73); and
- implementation of recommendations arising from ecological monitoring, reporting and adaptive management (Conditions 66, 120, 128 and 129).

Long-term operation of the ecological management framework

Several of our comments seek greater certainty regarding how elements of the ecological management framework are intended to operate beyond the initial monitoring, reporting and review periods, particularly where obligations may continue throughout the operational life of the Solar Farm or following decommissioning.

Examples include:

- continuation of ecological monitoring beyond the initial monitoring periods (Condition 120);
- continuation of annual ecological reporting where ongoing monitoring remains necessary (Condition 129);
- implementation of any additional compensation area(s) identified through the Technical Review Panel (Condition 73); and
- long-term management of the Compensation Area following decommissioning of the solar farm (Conditions 71, 72 and 165).

Overall, the attached comments are intended to assist in refining what we already consider to be a comprehensive cultural and ecological management framework. They are offered to further improve the clarity, integration and practical implementation of the conditions so that they can be readily understood and effectively implemented throughout the life of the project.

Conclusion

Overall, Mana Whenua, Te Rūnanga o Ngāi Tahu, Aoraki Environmental Consultancy Limited (AECL) and Aukaha appreciate the opportunity to provide comments on the draft conditions. We look forward to continuing the collaborative relationship established through the substantive application process and working with Lodestone Energy throughout implementation of the resource consents and the long-term stewardship of the project.

Key Contacts

Please contact AECL's Principal Planner, Kylie Hall, on [REDACTED] or at [REDACTED] if you have any questions or require further clarification from AECL.

Please contact Aukaha's Senior Planner, Tim Vial, on [REDACTED] or at [REDACTED] if you have any questions or require further clarification from Aukaha.

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Kā mihi,



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