

BEFORE THE PANEL

FTAA-2508-1100

IN THE MATTER of the Fast-track Approvals Act 2024 (FTAA)

AND

IN THE MATTER of an application for approvals under the FTAA
for Far North Solar Farm Limited

**FURTHER COMMENTS OF THE ENVIRONMENTAL DEFENCE SOCIETY
INCORPORATED**

12 June 2026

Environmental Defence Society Inc
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Counsel Acting: Rob Enright
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INTRODUCTION

1. These are the Environmental Defence Society's (**EDS**) further comments on ecological aspects of Far North Solar Farm Limited's (**Applicant**) substantive application (**Application**) under the Fast-track Approvals Act 2024 (**FTAA**) for The Point Solar Project (**Project**).
2. They are provided in accordance with the Panel's direction of 3 June 2026 and respond to the further information provided by the Applicant on 29 May 2026, in response to Request for Further Information No. 5 (**RFI No. 5**).
3. While the Panel does not have specific questions on the Applicant's additional information for EDS to answer, we note that it would be assisted by EDS identifying:
 - a. Whether the updated information satisfies (in whole or in part) any concerns previously expressed;
 - b. Whether EDS considers there are material deficiencies in the information now before the Panel; and
 - c. What further amendments EDS considers are required to the updated condition sets, as to any ecology matters.¹
4. EDS has engaged Dr Susan Walker to review the further information and provide expert evidence.

FURTHER COMMENTS

5. EDS provided s53 comments on the Project, outlining key concerns including:
 - a. The location of the Project within both a significant natural area, and an outstanding natural landscape;
 - b. The adverse impacts of the Project on both ecological and landscape values;
 - c. The cumulative effect of impacts; and
 - d. The proposed conditions of consent.²
6. Ecological impact concerns were informed by Dr Walker's evidence and related to the inadequacy and uncertainty of information provided by the Applicant.³ Dr Walker expressed concerns that:

¹ Per Letter from Environmental Protection Authority on behalf of The Point Solar FTAA Expert Panel, dated 3 June 2026.

² Environmental Defence Society, s53 Comments, dated 19 February 2025 (**EDS s53 Comments**).

³ EDS s53 Comments, at [40].

- a. The Applicant’s ecological surveys were inadequate;
 - b. The critical and endemic flora and fauna values present remained largely unknown;
 - c. The Project site was ecologically significant as a habitat for Threatened or At Risk species; and
 - d. The proposed effects management framework may result in additional negative impacts on remnant significant ecological values.⁴
7. EDS therefore acknowledges the Panel’s concern “as to the adequacy of the ecological effects assessment and proposed effects management framework” as expressed in RFI No. 5.⁵
8. The Applicant’s response to RFI No. 5 asserts that it has prepared a “comprehensive response” regarding ecological matters, supported by independent expert input.⁶ It says that the response demonstrates that the Project “applies the effects management hierarchy rigorously”, thus delivering a net ecological improvement to the baseline.⁷
9. Dr Walker disagrees with this assessment. She says:
- a. The ecological information provided by the Applicant is a repetition of historic information, and remains inadequate and incomplete;
 - b. The Applicant has not adequately assessed the impacts of screening plantings and solar panel arrays to determine appropriate setback from the terrace edges and limit edge effects on significant vegetation values;
 - c. Despite a step forward in the proposed monitoring plans, the methods suggested are incapable of appropriately detecting material adverse effects in a timely manner;
 - d. The Applicant’s adaptive management proposal for dryland species does not provide certainty or reassurance that the management plans will be effective or enforceable; and
 - e. Vegetation monitoring and associated vegetation management remain outside of the condition sets, and therefore risk not being complied with.
10. Accordingly, the further ecological information provided by the Applicant does not satisfy EDS’ concerns with the Project’s ecological impacts.

⁴ EDS s53 Comments, at [40].

⁵ Request for information from Far North Solar Farm Limited in relation to the Point Solar Farm application under the Fast-track Approvals Act 2024, dated 11 March 2026 (**RFI No. 5**), at 6.

⁶ Far North Solar Farm Limited, Re: Response to Request for Information 5, dated 29 May 2026.

⁷ Ibid.

11. There remain deficiencies in the baseline surveying and assessment of ecological values within the Project site. Further, the proposed condition set will not result in effective management of ecological impacts. The risk to significant vegetation values remains, especially in relation to edge effects from screening plantings and panel arrays on terrace edges.
12. EDS maintains its position that the Project should avoid the proposed site, as the Applicant still has not demonstrated that the overall ecological effect results in a net gain. The proposed conditions remain inadequate in the face of the expected ecological effects.