

Issue #	Party	Issue / Comment	Response Mapping 1	Detailed Response
1	Te Rūnanga o Arowhenua (via Aoraki Environmental Consultancy Ltd)	Iwi seek meaningful ongoing engagement, further information and engagement with Lodestone is expected to clarify or narrow outstanding issues.	5a. CRC Amended Conditions; 7. Mana Whenua - Haldon Solar - Response - FTAA-2508-1097	Lodestone commits to ongoing, meaningful partnership with Arowhenua, Aukaha and Kāi Tahu through design, construction, operation and monitoring. Please refer to Addendum 5 and 7, which contain more details.
2	Te Rūnanga o Arowhenua (via Aoraki Environmental Consultancy Ltd)	Continued access to Te Ao Mārama (Lake Benmore) shoreline for mahika kai harvest (raupō) must be secured.	5a. CRC Amended Conditions; 7. Mana Whenua - Haldon Solar - Response - FTAA-2508-1097	Lodestone confirms that ongoing customary access to the lakeshore for raupō harvest was agreed by all parties including the landowner during the 19 November 2025 site visit. These rights will be maintained for the duration of the project, subject to agreed health and safety protocols.
3	Te Rūnanga o Arowhenua (via Aoraki Environmental Consultancy Ltd)	Request to strengthen consent conditions for the Kaitiaki Working Group and require a Cultural Management Plan.	5a. CRC Amended Conditions; 7. Mana Whenua - Haldon Solar - Response - FTAA-2508-1097	Please refer to Addendum 5 and 7, which incorporate a KGG and Cultural Management Plan
4	Te Rūnanga o Arowhenua (via Aoraki Environmental Consultancy Ltd)	Substantive application lacks detailed cultural values assessment for SASM sites or objectives SASM-02, SASM-03 and SASM-04 or policies SASM-P1, SASM-P2, SASM-P3, SASM-P4, SASM-P5 and SASM-P6. The substantive application does not provide a detailed assessment of the relevant Strategic Direction provisions	5a. CRC Amended Conditions; 7. Mana Whenua - Haldon Solar - Response - FTAA-2508-1097	Lodestone acknowledges that accidental discovery protocols are necessary but not sufficient mitigation alone. Further cultural assessment will be undertaken with iwi input as part of the Cultural Monitoring Plan development, including in relation to SASM cultural landscape values.
5	Te Rūnanga o Arowhenua (via Aoraki Environmental Consultancy Ltd)	Clarification required on chemicals/materials stored onsite to determine whether the activity triggers "hazardous facility" status under SASM rules.	[8] Existing Conditions; 7. Mana Whenua - Haldon Solar - Response - FTAA-2508-1097	Please refer to Addendum 5 and 7, which cover details on the chemicals/materials stored on site in relation to the SASM.
6	Te Rūnanga o Arowhenua (via Aoraki Environmental Consultancy Ltd)	Concern that solar farm development on Te Ao Mārama edge may further alienate Kāi Tahu from Te Manahuna cultural landscape.	5a. CRC Amended Conditions; 7. Mana Whenua - Haldon Solar - Response - FTAA-2508-1097	Lodestone recognises the profound cultural sensitivity and whakapapa associations of Te Manahuna. Lodestone commits to mitigation and mana-enhancing measures, including meaningful iwi involvement, restoration investment, and enduring cultural safeguards to avoid further disconnection.
7	Te Rūnanga o Arowhenua (via Aoraki Environmental Consultancy Ltd)	Arowhenua would like to see solar developers to give back to the biodiversity of Te Mahahuna, the Rūnaka, the residents of Fairlie, Tekapo, Twizel, rural Mackenzie.	3. Ecology - Haldon Solar - Response - FTAA-2508-1097; 7. Mana Whenua - Haldon Solar - Response - FTAA-2508-1097	Lodestone are committed to ensuring a no net loss biodiversity outcome with further consideration in Addendum 3. Addendum 2 outlines the positive benefits of the development on a regional and national scale.
8	Te Rūnanga o Arowhenua (via Aoraki Environmental Consultancy Ltd)	Limited assessment of effects on taonga species; further consideration of bird presence and impacts on fish species and habitats requested. Further consideration of fish species and avifauna surveys are requested.	3. Ecology - Haldon Solar - Response - FTAA-2508-1097; 5a. CRC Amended Conditions	Lodestone thanks te Runage for this feedback. Note: additional work has been completed on these matters referred to in Addendum 3 and updated conditions of consent are provided in Addendum 5.
9	Te Rūnanga o Arowhenua (via Aoraki Environmental Consultancy Ltd)	Earthworks and operational activities may generate sediment and stormwater runoff which could impact taonga species (birds, fish, invertebrates and plants). Avifauna may also face an increased risk of injury or mortality.	[8] Existing Conditions; 3. Ecology - Haldon Solar - Response - FTAA-2508-1097	Lodestone has provided accurate estimates of earthworks volumes for the solar array and substation construction including site roads, inverter foundations, cable trenches and substation platform construction. This is outlined in section 4.4.1 of our substantive application. Lodestone are happy to discuss any concerns in this regard with Arowhenua during our next hui.
10	Te Rūnanga o Arowhenua (via Aoraki Environmental Consultancy Ltd)	No ecological restoration or planting proposed; reliance on willow/poplar screening on the embankment between the campground and the solar farm site is inadequate. A lack of screening on the southern end of the project site will result in the solar farm being visible from Te Ao Mārama (Lake Benmore) and	7. Mana Whenua - Haldon Solar - Response - FTAA-2508-1097; 5a. CRC Amended Conditions	Lodestone thanks Te Rūnanga o Arowhenua for this consideration - please see Addendum 5 for proposed condition to cover concern.
11	Te Rūnanga o Arowhenua (via Aoraki Environmental Consultancy Ltd)	Suggest extension of the ecological restoration project undertaken by Arowhenua and Te Kete Tipuranga O Huirapa Ltd close to the Haldon Arm Campground. There are opportunities for support of the Haldon Wetland and	7. Mana Whenua - Haldon Solar - Response - FTAA-2508-1097; 5a. CRC Amended Conditions	Lodestone thanks Te Rūnanga o Arowhenua for this consideration - please see Addendum 7 for response.
12	Te Rūnanga o Arowhenua (via Aoraki Environmental Consultancy Ltd)	The rabbit proof fence is not an environmental benefit as it does not assist in the management of the wild rabbit population.	n/a	Rabbit proof fencing will deliver an ecological benefit to the project envelope. Lodestone have committed to pest control within the project footprint. The wider management of the rabbit population is managed by Haldon Station, which will be aided by the rental revenues generated by the project.
13	Te Rūnanga o Arowhenua (via Aoraki Environmental Consultancy Ltd)	Fire risk assessment missing; remote location raises evacuation and emergency response concerns.	[10] Original Application Documents	There is a condition proposed that commits to preparation of an Emergency Management Plan prior to construction. This is in consultation with Fire and Emergency New Zealand and requires
14	Te Rūnanga o Arowhenua (via Aoraki Environmental Consultancy Ltd)	Flooding and stormwater risks not fully assessed, especially following January 2026 flooding impacts at campground/nohoaka sites. It is unknown whether the southern portion of the site was flooded which has not been modelled or considered in the substantive application.	[10] Original Application Documents	Beca has assessed flood hazards for events exceeding the January 2026 event (Appendix 5A of the Substantive Application). That assessment has included future climate resilience scenarios. Stormwater design will ensure no adverse effects on the nohoaka site, campground, or Te Ao Mārama catchment.

15	Te Rūnanga o Arowhenua (via Aoraki Environmental Consultancy Ltd	Concerns regarding potential contaminant sources including lubricants, oils and sediment laden runoff.	[10] Original Application Documents; [8] Existing Conditions	Operational and Construction stormwater management is covered by consent conditions with ECAN and associated management plans. As part of this Lodestone will undertakes to avoid discharge of contaminants to surface or groundwater. The major contaminant on site is the transformer oil in the main substation transformers (~100,000 litres). The transformers are banded to 120% capacity and all stormwater is filtered prior to being discharged.
16	Te Rūnanga o Arowhenua (via Aoraki Environmental Consultancy Ltd	Economic benefits may not flow locally long-term; jobs mostly short duration and likely sourced outside district. Restricted employment opportunities for local residents.	2. Benefits - Haldon Solar - Response - FTAA-2508-1097	Lodestone acknowledges construction employment is temporary and will explore opportunities for local procurement, workforce training, iwi employment pathways, and enduring benefit-sharing through restoration and community initiatives. We note that approximately 50% of labour for our Clandeboye project near Temuka, that is currently under construction, were from the local area of that project. We have experienced similar ratios on our other projects and think Haldon solar farm will be similar, albeit a higher labour requirement and needing to seek staff from further afield such as Timaru etc. Lodestone strongly advocate for local employment where feasible.
17	Te Rūnanga o Arowhenua (via Aoraki Environmental Consultancy Ltd	Constraints on the transmission network may directly influence which projects are able to be built.	6. Cumulative Effects - Haldon Solar - Response - FTAA-2508-1097; 4. Legal - Memorandum of Counsel - Response	Please refer to Addendum 6, which covers Transpower open access grid policies.
18	Te Rūnanga o Arowhenua (via Aoraki Environmental Consultancy Ltd	Cumulative effects of multiple solar farms in Te Manahuna not adequately addressed; Lodestone should consider combined impacts and incorporate the effects of existing electrical infrastructure in the area (hydro/transmission infrastructure). Concern if Haldon Solar and The Point were to proceed in conjunction with the existing hydro scheme.	6. Cumulative Effects - Haldon Solar - Response - FTAA-2508-1097; 4. Legal - Memorandum of Counsel - Response	Please refer to Addendum 6, which covers includes an updated cumulative effects report from Boffa Miskell.
19	Te Rūnanga o Arowhenua (via Aoraki Environmental Consultancy Ltd	Locating large solar farms in close proximity to each other means climatic and weather variance can't be accommodated.	2. Benefits - Haldon Solar - Response - FTAA-2508-1097	Please refer to the Cover Letter, Addendum 2 for site-specific details. Lodestone acknowledges that distributing renewable energy generation across New Zealand can help strengthen security of supply. Lodestone currently operates four geographically diverse solar farms, each located close to key load centres, and has a pipeline of similarly sized projects (approximately 30MWdc) planned for development. The Haldon Solar Project is situated in an area with exceptional solar irradiance (sunshine) and access to excess transmission capacity. However, due to the high cost of connecting to the 220kV high-voltage line, a minimum solar farm footprint is required to ensure the project remains economically viable. This site represents Lodestone's only transmission scale solar development currently planned, reflecting our agreement with AECL and aligning with Arowhenua's views on the importance of distributed renewable energy in supporting security of supply.
20	Te Rūnanga o Arowhenua (via Aoraki Environmental Consultancy Ltd	Accurate projections to include future electricity demand, peak demand levels and potential pinch points not available.	6. Cumulative Effects - Haldon Solar - Response - FTAA-2508-1097; 4. Legal - Memorandum of Counsel - Response	Please refer to the Cover Letter, Addendum 2 and 7, which talk to the need and opportunity this development.
21	Te Rūnanga o Arowhenua (via Aoraki Environmental Consultancy Ltd	Uncertainty over what capacity exists within the Transpower network and what capacity exists within any future network and how many solar farms projects can be accommodated. Request for information from Transpower to this effect.	6. Cumulative Effects - Haldon Solar - Response - FTAA-2508-1097; 4. Legal - Memorandum of Counsel - Response	Please refer to Addendum 6, which covers Transpower open access grid policies.
22	Te Rūnanga o Arowhenua (via Aoraki Environmental Consultancy Ltd	Cumulative effects assessment requested including The Point/other solar farms with a focus on ecological values, stormwater and flooding and landscape and visual.	6. Cumulative Effects - Haldon Solar - Response - FTAA-2508-1097; 4. Legal - Memorandum of Counsel - Response	Please refer to Addendum 6, which covers includes an updated cumulative effects report from Boffa Miskell as well as Addendum 4, which covers legal matters.
23	Te Rūnanga o Arowhenua (via Aoraki Environmental Consultancy Ltd	Further avifauna assessments with a focus on the southern end of the project site is advisable to gain a true understanding of the cumulative effects of multiple solar projects.	3. Ecology - Haldon Solar - Response - FTAA-2508-1097; 5a. CRC Amended Conditions	As set out in Addendum 3 and 5, an Avifauna Management Plan is to be developed that addresses bird feeding/breeding habitat for bird TAR species.
24	Te Rūnanga o Arowhenua (via Aoraki Environmental Consultancy Ltd	Consent conditions should formalise enduring governance mechanisms including preparation of a Cultural Management Plan incorporating the elements stated in item 78 of AECL/Arowhenua's comments.	7. Mana Whenua - Haldon Solar - Response - FTAA-2508-1097; 5a. CRC Amended Conditions	Lodestone agrees and understands the importance of this group, Lodestone commits to an ongoing and enduring relationship with the Rūnanga - please see Addendum 7 and 5 for further context.

25	Canterbury Regional Council (Environment Canterbury)	Invertebrate - residual effects acknowledgement: ECan peer reviewer states impacts on threatened invertebrates and habitat are unavoidable due to construction and altered microclimate.	3. Ecology - Haldon Solar - Response - FTAA- 2508-1097	Thank you for the comment response can be found in Addendum 3 and 5.
26	Canterbury Regional Council (Environment Canterbury)	Invertebrate - Invertebrate Management Plan condition: ECan notes conditions have not yet been updated to reflect the Terrestrial Invertebrate Assessment.	3. Ecology - Haldon Solar - Response - FTAA- 2508-1097; 5a. CRC Amended Conditions	Revised conditions have been proposed that require an Invertebrate Management Plan (IMP) to be produced by a suitably qualified and experience person that will respond to salvage protocols, habitat management, monitoring and reporting in Addendum 5b - MDC Amended Conditions
27	Canterbury Regional Council (Environment Canterbury)	Invertebrate - baseline surveys pre-construction: ECan supports further baseline research/monitoring before development but expects it to be clearly scoped.	3. Ecology - Haldon Solar - Response - FTAA- 2508-1097; 5a. CRC Amended Conditions	Revised conditions have been proposed that require an Invertebrate Management Plan (IMP) to be produced by a suitably qualified and experience person that will respond to salvage protocols, habitat management, monitoring and reporting in Addendum 5b - MDC Amended Conditions
28	Canterbury Regional Council (Environment Canterbury)	Invertebrate - Wildlife Act Authority (grasshoppers): ECan notes threatened grasshoppers are protected and DOC Wildlife Act Authority will be required for handling/killing/moving	n/a	Lodestone will apply for a DOC Wildlife Act Authority separate from this Fast Track application and align the consent IMP with DOC permit conditions.
29	Canterbury Regional Council (Environment Canterbury)	Invertebrate - imported material biosecurity risk: ECan identifies imported aggregate/fill as risk for weed seeds or non-local invertebrates.	5a. CRC Amended Conditions	Some imported fill can be anticipated for site foundations and cable trenches to improve site soil conditions and thermal resistivity. Lodestone will implement a Biosecurity and Materials Sourcing Protocol within the CEMP to manage imported material risks.
30	Canterbury Regional Council (Environment Canterbury)	Invertebrate - monitoring duration and reporting: ECan expects post-construction monitoring and reporting to ensure effectiveness.	3. Ecology - Haldon Solar - Response - FTAA- 2508-1097; 5a. CRC Amended Conditions	Revised conditions have been proposed that require an Invertebrate Management Plan (IMP) to be produced by a suitably qualified and experience person that will respond to salvage protocols, habitat management, monitoring and reporting in Addendum 5b - MDC Amended Conditions
31	Canterbury Regional Council (Environment Canterbury)	Lizard - incomplete survey information: ECan states lizard effects cannot be assessed	3. Ecology - Haldon Solar - Response - FTAA- 2508-1097; 5a. CRC Amended Conditions	Please find attached in Addendum 3 the final lizard survey report and updated effects assessment. This indicates presence of the McCann's skink (Not Threatened) and the Southern Grass Skink (At Risk - Declining). Further detail relating to management of effects is contained within Addendum 3
32	Canterbury Regional Council (Environment Canterbury)	Lizard - Wildlife Act Authority: ECan notes DOC Wildlife Act Authority may be required	n/a	Lodestone will apply for DOC Wildlife Act Authority in the near future separate from this Fast Track process and align the consent and LMP with DOC permit conditions.
33	Canterbury Regional Council (Environment Canterbury)	Lizard - pest control interactions: ECan cautions pest control may have unintended effects	3. Ecology - Haldon Solar - Response - FTAA- 2508-1097	Please find attached in Addendum 3 the final lizard survey report and updated effects assessment. This indicates presence of the McCann's skink (Not Threatened) and the Southern Grass Skink (At Risk - Declining). Further detail relating to management of effects is contained within Addendum 3
34	Canterbury Regional Council (Environment Canterbury)	Terrestrial ecology - significant dryland habitat loss: ECan concludes ~320 ha of significant dryland habitat will be transformed; residual effects unavoidable.	3. Ecology - Haldon Solar - Response - FTAA- 2508-1097; 5a. CRC Amended Conditions	Lodestone have prepared an Ecological Management Plan in Addendum 3 which addresses residual effects.
35	Canterbury Regional Council (Environment Canterbury)	Terrestrial ecology - SIVH classification: ECan considers site meets criteria for Significant Indigenous Vegetation and Habitats under CRPS.	3. Ecology - Haldon Solar - Response - FTAA- 2508-1097; 5a. CRC Amended Conditions	Lodestone agrees with this policy interpretation as set out in section 9.6.4 of the Substantive Application.
36	Canterbury Regional Council (Environment Canterbury)	Terrestrial ecology - threatened plant species: ECan notes multiple threatened plant species occur at site including Lepidium solandri.	3. Ecology - Haldon Solar - Response - FTAA- 2508-1097; 5a. CRC Amended Conditions	As set out in the revised conditions, an Indigenous Vascular Plant Management Plan is to be developed that addresses surveying and management of TAR plant species.
37	Canterbury Regional Council (Environment Canterbury)	Terrestrial ecology - avifauna habitat loss: ECan anticipates loss of bird feeding/breeding habitat for threatened/at-risk species.	3. Ecology - Haldon Solar - Response - FTAA- 2508-1097; 5a. CRC Amended Conditions	As set out in the revised conditions, an Avifauna Management Plan is to be developed that addresses bird feeding/breeding habitat for bird TAR species.
38	Canterbury Regional Council (Environment Canterbury)	Terrestrial ecology - bird strike uncertainty: ECan notes uncertainty around bird strike risk and DOC information has been circulated.	3. Ecology - Haldon Solar - Response - FTAA- 2508-1097; 5a. CRC Amended Conditions	As set out in the revised conditions, an Avifauna Management Plan is to be developed that addresses monitoring for potential bird strike and adaptive management measures in the event that TAR species are involved.
39	Canterbury Regional Council (Environment Canterbury)	Terrestrial ecology - fencing additionality: ECan requests clarification on whether fencing/pest control deliver measurable biodiversity gains.	3. Ecology - Haldon Solar - Response - FTAA- 2508-1097; 5a. CRC Amended Conditions	The role of and anticipated outcomes associated with the proposed pest-proof fencing and associated pest control are set out in Addendum 3.
40	Canterbury Regional Council (Environment Canterbury)	Offsets - expectation of no-net-loss approach: ECan expects compensation/offsets for residual ecological effects. ECan notes lack of proposed restoration compared with other solar farms.	3. Ecology - Haldon Solar - Response - FTAA- 2508-1097; 5a. CRC Amended Conditions	The response to ecological effects management is set out in Addendum 3.
41	Canterbury Regional Council (Environment Canterbury)	Groundwater - baseline water quality sampling: ECan notes no baseline groundwater quality assessment has been undertaken onsite.	5a. CRC Amended Conditions	Please refer to Addendum 5 for adjustments to the conditions and requirements in soil monitoring condition.
42	Canterbury Regional Council (Environment Canterbury)	Groundwater - trench interception risk: ECan notes excavations/cable trenches may intercept groundwater requiring minor dewatering.	5a. CRC Amended Conditions	The proffered conditions required the development of a CMP that will include management of groundwater if encountered during trenching.

43	Canterbury Regional Council (Environment Canterbury)	Groundwater - dewatering discharge pathway: ECan needs clarity on discharge/treatment approach and compliance pathway.	5a. CRC Amended Conditions	The proffered conditions required the development of a CMP that will include management of groundwater if encountered during trenching.
44	Canterbury Regional Council (Environment Canterbury)	Stormwater - contaminant management near substation: ECan notes insufficient information on expected contaminants from operational stormwater near	5a. CRC Amended Conditions	Please refer to Addendum 5 and requirement for stormwater management plan. Lodestone will provide stormwater contaminant assessment and treatment design for substation areas following
45	Canterbury Regional Council (Environment Canterbury)	Stormwater - soakage pit design detail: ECan cannot determine groundwater interaction without soakage pit depth/separation details.	n/a	Please refer to Addendum 5 for adjustments to the conditions and requirements in SWMP.
46	Canterbury Regional Council (Environment Canterbury)	Stormwater - spill prevention and response: ECan expects spill management for hydrocarbons/oils associated with substations.	5a. CRC Amended Conditions	Please refer to Addendum 5 for adjustments to the conditions and requirements in SWMP.
47	Canterbury Regional Council (Environment Canterbury)	Natural hazards - satisfied that the location is not in a high natural hazard zone and as a result have no objections to the proposal or mitigation methods proposed. Overland flow path protection: comfortable effects are minimal if swales are not filled or obstructed. Culvert sizing and scour risk: raises culvert sizing/road scour and maintenance considerations.	n/a	Natural Hazards Lodestone acknowledges ECan's confirmation that the site is not within a high natural hazard zone and agrees that no additional mitigation is required.  Overland Flow Paths Lodestone agrees that effects on overland flow paths are minimal and confirms that swales will not be filled or obstructed.  Culverts and Scour Lodestone acknowledges ECan's comments regarding culvert sizing, scour risk, and maintenance. Culverts will be appropriately sized, with scour protection provided where necessary, and ongoing maintenance undertaken as part of site management.
48	Canterbury Regional Council (Environment Canterbury)	Contaminated land - earthworks near landfill: ECan notes PSI relied on aerial/drone information; landfill interface needs verification. ECan notes access road earthworks may intersect landfill area requiring management controls. ECan recommends accidental discovery protocol condition for unexpected contamination. ECan seeks clarification on separate soil monitoring regimes proposed.	5a. CRC Amended Conditions	The proffered conditions include provisions for the actions to be taken with any discovery of contaminated soils
49	Canterbury Regional Council (Environment Canterbury)	CRC request confirmation that the adopted values of Table C-3 for Controlled fills of the Technical Guideline for Disposal to Land (WasteMINZ, 2023). Trigger limits for concentrations in soil for silver, antimony and PFAS have been requested.	5a. CRC Amended Conditions	Please refer to Addendum 5a for adjustments to the conditions to include trigger limits
50	Canterbury Regional Council (Environment Canterbury)	CRC propose an additional condition for proper management of PV waste during decommissioning	5a. CRC Amended Conditions	Please refer to Addendum 5a for adjustments to the conditions related to decommissioning.
51	Canterbury Regional Council (Environment Canterbury)	Soils - exceedance mitigation plan requirement: ECan notes no defined mitigation response if soil guidelines exceeded.	5a. CRC Amended Conditions	Please refer to Addendum 5a for adjustments to the Soil Monitoring Plan.
52	Canterbury Regional Council (Environment Canterbury)	Soils - sampling under panel driplines: ECan suggests long-term sampling directly under panel driplines with GPS repeatability. ECan references 5- and 10-	5a. CRC Amended Conditions	Please refer to Addendum 5a for adjustments to the Soil Monitoring Plan.
53	Canterbury Regional Council (Environment Canterbury)	Erosion - wind erosion risk: ECan notes wind erosion risk and need for stabilisation planting/groundcover.	[8] Existing Conditions	Proffered conditions require that all works are to be undertaken in accordance with a Construction Management Plan, an Erosion and Sediment Control Plan and a Dust Management Plan.
54	Canterbury Regional Council (Environment Canterbury)	Erosion - trench reinstatement monitoring: ECan requests revegetation checks at 2, 6 and 12 months post trenching.	[8] Existing Conditions	Proffered conditions require that all works are to be undertaken in accordance with a Construction Management Plan and an Erosion and Sediment Control Plan
55	Canterbury Regional Council (Environment Canterbury)	Rehabilitation - definition of restoration outcomes: ECan seeks clarity on what rehabilitation/restoration means in practice.	[8] Existing Conditions	The proffered conditions on the Mackenzie District land use consent includes a requirement for a Decommissioning Plan (including rehabilitation)
56	Canterbury Regional Council (Environment Canterbury)	Decommissioning - draft plan required now: ECan requests a draft decommissioning/rehabilitation plan before consent is granted.	[8] Existing Conditions	The proffered conditions on the Mackenzie District land use consent includes a requirement for a Decommissioning Plan (including rehabilitation)
57	Canterbury Regional Council (Environment Canterbury)	Vegetation management - grazing/fire risk control: ECan asks whether grazing will occur and how grass will be managed to reduce fire risk.	[8] Existing Conditions; 3. Ecology - Haldon Solar - Response - FTAA-2508-1097	Lodestone will confirm vegetation management method (occasional grazing as required) and include fire risk controls in O&M plan.
58	Canterbury Regional Council (Environment Canterbury)	Planning - cumulative effects not addressed: ECan notes cumulative effects of multiple solar farms in the area have not been considered.	6. Cumulative Effects - Haldon Solar - Response - FTAA-2508-1097; 4. Legal - Memorandum of Counsel - Response	Please refer to Addendum 6 which addresses comments on cumulative effects.
59	Canterbury Regional Council (Environment Canterbury)	Planning - cumulative construction traffic impacts: ECan highlights potential concurrent construction impacts on SH8/Haldon Road.	[8] Existing Conditions	Proffered conditions on the Mackenzie District land use consent require that construction traffic is management in accordance with a Construction Traffic Management Plan.
60	Canterbury Regional Council (Environment Canterbury)	Planning - worker accommodation demand: ECan notes concurrent projects may increase accommodation pressures.	n/a	Noted.

61	Canterbury Regional Council (Environment Canterbury)	Cultural matters - deference to Mana Whenua: ECan notes Mana Whenua are best placed to comment on cultural effects and will defer to iwi submissions.	7. Mana Whenua - Haldon Solar - Response - FTAA-2508-1097; 5a. CRC Amended Conditions	Please refer to Addendum 5 and 7, which set out Lodestone's continued engagement with mana whenua.
62	Meridian Energy Limited	Requests consultation condition on Emergency Hydro Inundation Response and Evacuation Plan due to adjacent operating easement and hazard overlay.	5a. CRC Amended Conditions	A condition has been incorporated into the revised condition set that requires an emergency hydro inundation response plan that will be developed in consultation with Meridian
63	DOC	Existing ecological assessment does not adequately identify significant indigenous biodiversity values on site.	3. Ecology - Haldon Solar - Response - FTAA-2508-1097; 5a. CRC Amended Conditions	The response to ecological effects management is set out in Addendum 3.
64	DOC	Further seasonal field surveys are required to confirm full extent of ecological values prior to construction.	3. Ecology - Haldon Solar - Response - FTAA-2508-1097; 5a. CRC Amended Conditions	Please refer to Addendum 3 Ecology and Biodiversity for a fulsome response and updated conditions in Addendum 5.
65	DOC	Threatened plant species occur within the array footprint including Lepidium solandri (Nationally Critical).	3. Ecology - Haldon Solar - Response - FTAA-2508-1097; 5a. CRC Amended Conditions	Please refer to Addendum 3 Ecology and Biodiversity for a fulsome response. Lodestone has considered offset and compensation for the presence of Lepidium solandri into the Ecological Management Plan after consideration of comments received.
66	DOC	Micro-site avoidance and plant protection protocols are required for threatened flora populations.	3. Ecology - Haldon Solar - Response - FTAA-2508-1097; 5a. CRC Amended Conditions	Please refer to Addendum 3 Ecology and Biodiversity for a fulsome response. Lodestone can confirm that micrositing and plant protection protocols have been incorporated into the Indigenous Vascular Plant Management Plan after consideration of comments received.
67	DOC	A Plant Monitoring and Adaptive Weed Response Plan is required for long-term vegetation change under panels.	5a. CRC Amended Conditions	Refer to Addendum 5 Flora Management Plan and Construction Management Plan.
68	DOC	Robust grasshopper populations likely present; residual habitat effects unavoidable due to shading/microclimate change. Minute grasshopper habitat requires protection and offset/compensation measures for unavoidable loss.	3. Ecology - Haldon Solar - Response - FTAA-2508-1097; 5a. CRC Amended Conditions	The final Terrestrial Invertebrate Assessment prepared by SLR Consulting New Zealand Ltd is provided in Addendum 3 Ecology and Biodiversity.
69	DOC	Tekapo ground wētā may occur; nocturnal survey and management protocols needed.	3. Ecology - Haldon Solar - Response - FTAA-2508-1097; 5a. CRC Amended Conditions	Lodestone can confirm the presence of the Tekapo Ground Wētā. Management protocols are included in the detailed Ecological Management Plan in Addendum 3 after consideration of comments received.
70	DOC	Wildlife Act Authorities will be required for any handling or relocation of protected invertebrates.	n/a	Lodestone confirm that we will be applying for a Wildlife Act Authority from the Department of Conservation (outside of the FTAA process).
71	DOC	An Invertebrate Management Plan must include salvage, relocation and a secure pest-proof receptor reserve.	3. Ecology - Haldon Solar - Response - FTAA-2508-1097	Refer to Addendum 3 for the detailed Ecological Management Plan.
72	DOC	Bird collision risk assessment is incomplete; precautionary approach required given threatened flyway species. Operational monitoring for bird strike (carcass searches, triggers) should be included in conditions. Lighting and overhead infrastructure should be minimised to reduce attraction and collision risk.	3. Ecology - Haldon Solar - Response - FTAA-2508-1097; 5a. CRC Amended Conditions	As set out in the revised conditions, an Avifauna Mortality Monitoring Plan is to be developed that addresses monitoring for potential bird strike and adaptive management measures in the event that TAR species are involved.
73	DOC	Cumulative effects of multiple solar farms in the Mackenzie Basin have not been adequately addressed.	6. Cumulative Effects - Haldon Solar - Response - FTAA-2508-1097; 4. Legal - Memorandum of Counsel - Response	Please refer to Addendum 6 for a detailed response to the cumulative effect matters raised.
74	DOC	Residual effects on dryland biodiversity require a clear offset/compensation package beyond on-site mitigation.	3. Ecology - Haldon Solar - Response - FTAA-2508-1097; 5a. CRC Amended Conditions	Please refer to Addendum 3 Ecology and Biodiversity for a fulsome response.
75	Te Rūnanga o Moeraki & Te Rūnanga o Waihao	Further engagement is sought with Lodestone to clarify or narrow outstanding issues, refine the conditions of consent, and to provide certainty that the cultural effects of the Haldon Solar project will be mitigated for the duration of the consent.	7. Mana Whenua - Haldon Solar - Response - FTAA-2508-1097	Lodestone acknowledges the deep cultural significance of the area. We are committed to continued engagement with the Rūnanga to ensure that cultural values are respected and enhancement where appropriate, taking guidance from mana whenua on what good looks like. Please see addendum 7 for further detail.
76	Te Rūnanga o Moeraki & Te Rūnanga o Waihao	Request establishment of a Kaitiaki Governance Group to oversee cultural and environmental matters. Cultural Monitoring Programme is required as a consent	7. Mana Whenua - Haldon Solar - Response - FTAA-2508-1097	Lodestone agrees and understands the importance of this group, Lodestone commits to an ongoing and enduring relationship with the Rūnanga - please see Addendum 7 and 5 for further
77	Te Rūnanga o Moeraki & Te Rūnanga o Waihao	Conditions should ensure clear communication channels and regular reporting back to rūnanga.	7. Mana Whenua - Haldon Solar - Response - FTAA-2508-1097; 5a. CRC Amended Conditions	Lodestone agrees and understands the importance of this group, Lodestone commits to an ongoing and enduring relationship with the Rūnanga - please see Addendum 7 and 5 for further context.
78	Te Rūnanga o Moeraki & Te Rūnanga o Waihao	Support for renewable generation acknowledged provided cultural and ecological safeguards are robust.	7. Mana Whenua - Haldon Solar - Response - FTAA-2508-1097	Lodestone thanks Te Rūnanga o Moeraki and Te Runanga o Waihao for their constructive comments on ongoing engagement and looks forward to continuing to build the relationship in the coming
79	Te Rūnanga o Ngāi Tahu	TRoNT emphasise the project's proximity to the Statutory Acknowledgement area for Te Ao Mārama and its deep cultural importance. They highlight the Waitaki travel pathway, inundated wāhi tapu/urupā/rock art sites, mahinga kai resources (tuna, kākahi, raupō), and broader mauri and identity values associated with the	7. Mana Whenua - Haldon Solar - Response - FTAA-2508-1097	Lodestone acknowledges the deep cultural significance of the area. We are committed to continued engagement with the Rūnanga to ensure that cultural values are respected and enhancement where appropriate, taking guidance from mana whenua on what good looks like. Our updated conditions in Addendum 5 reflect provision for continued engagement via the Kaitiaki Governance Group

80	Te Rūnanga o Ngāi Tahu	TRoNT raise strong concerns about stormwater management and the potential for increased runoff, erosion, flooding, and contaminants entering Te Ao Mārama during construction and operation. They note recent flooding/high lake levels in January 2026, possible shallow perched water tables reducing infiltration, and	7. Mana Whenua - Haldon Solar - Response - FTAA-2508-1097; [8] Existing Conditions	Lodestone appreciates TRoNT's concern about contaminated Stormwater runoff and hve provided further commentary in Addendum 7 and amended consents through Addendum 5
81	Te Rūnanga o Ngāi Tahu	TRoNT highlight the nearby Haldon Arm nohoanga entitlement and stress that effects are not limited to physical access, but also include the ability to use the nohoanga as a base for mahinga kai and cultural engagement with the wider landscape. They are concerned that large infrastructure may create indirect restrictions (H&S/security/infrastructure protection) and diminish cultural identity	7. Mana Whenua - Haldon Solar - Response - FTAA-2508-1097	Lodestone appreciate TRoN highlighting the importance of the closest nohoanga site including visiting it with Iwi representatives in November 2025. Please refer to Addendum 5 and 7, which cover Lodestone's intention for future engagement on these matters.
82	Te Rūnanga o Ngāi Tahu	TRoNT state the ecological assessment is incomplete, noting that taonga species schedules are not exhaustive (e.g., tuna is culturally important but not listed). They identify up to 17 taonga bird species potentially present, including kakī (nationally critical), and say the application lacks the dedicated avifauna/habitat assessment normally expected for large solar farms. They also mention raupō	3. Ecology - Haldon Solar - Response - FTAA-2508-1097; 7. Mana Whenua - Haldon Solar - Response - FTAA-2508-1097	Please refer to Addendum 3 Ecology for a fulsome response, updated conditions in Addendum 5 and commentary on taonga fish in Addendum 7.
83	Te Rūnanga o Ngāi Tahu	TRoNT are concerned that cumulative effects have not been adequately addressed across Te Manahuna, given multiple solar proposals alongside existing hydro and transmission infrastructure. They note awareness of nine solar projects and estimate that if all proceed, development could exceed 3,550 ha and involve more than 2 million panels, shifting the region toward an industrial landscape and	6. Cumulative Effects - Haldon Solar - Response - FTAA-2508-1097; 4. Legal - Memorandum of Counsel - Response	Lodestone notes TRoNT concerns around cumulative effects. Please refer to Addendum 6 which addresses comments on cumulative effects.
84	Te Rūnanga o Ngāi Tahu	TRoNT identify uncertainty about whether grid connection capacity exists for multiple solar projects. They note conflicting information between Far North and Lodestone and stress the need for confirmation from Transpower regarding available capacity, upgrade requirements, timing, and whether anticipated	6. Cumulative Effects - Haldon Solar - Response - FTAA-2508-1097; 4. Legal - Memorandum of Counsel - Response	We note TRoNTs concern about transmission capacity. Please refer to Addendum 6 which addresses comments on cumulative effects.
85	Te Rūnanga o Ngāi Tahu	TRoNT request strong consent conditions requiring mana whenua involvement throughout the project life, including establishment of a Kaitiaki Governance Group (KGG) for oversight/advice and a Cultural Monitoring Programme (CMP) to monitor cultural and environmental effects over time and inform mitigation.	7. Mana Whenua - Haldon Solar - Response - FTAA-2508-1097; 5a. CRC Amended Conditions	Lodestone have accepted TRoNT's proposed consent wording for the KGG and look forward to continued engagement with TRoNT and Rūnanga in this respect. Further context can be found in Addendum 7 and 5.
86	Mackenzie District Council (Planning Review - Nick Boyes)	MDC requests opportunity to participate further in refining land use conditions, noting limited time to produce a tracked-changes condition set.	5a. CRC Amended Conditions	Lodestone supports continued condition refinement with MDC (and Environment Canterbury) and provide a consolidated tracked-changes conditions suite for MDC review and Panel consideration in
87		MDC acknowledges that the project will deliver both national and regional benefits, noting in particular the positive contribution from temporary construction activity at th elocal level and the enduring national benefit of increased renewable electricity generation.	1. Cover - Haldon Solar - Response - FTAA-2508-1097	Lodestone acknowledges MDC's comments and notes that any adverse effects of the project are not sufficiently significant to be disproportionate to the project's regional and national benefits. We also emphasise the site-specific advantages, including a Tier 1 solar resource, access to the existing 220kV BEN-ISL-A transmission line enabling and efficient grid connection and the remote location as key factors in the proportionality assessment. Please see Cover Letter and Addendum 2 for additional information on regional and national benefits.
88		The Landscape Effects Assessment Report peer review engaged by MDC generally supports the Boffa Miskell methodology and considers the approach taken as comprehensive. The peer review considers some visual effects understated (Haldon Arm Road west; Ohau C/Falston Road views) and notes mitigation relies partly on lakeside vegetation outside Haldon Station control. Recommends additional planting near the south/southwest boundary to bolster	5a. CRC Amended Conditions	Lodestone acknowledge the concern about mitigation relying partly on lakeside vegetation outside Haldon Station control. Please refer to Addendum 5, which covers proposed conditions
89	Mackenzie District Council (Planning Review - Nick Boyes)	The peer review of the Landscape Effects Assessment Report notes that Haldon will not comibine with any existing or consented facility to create a cumulative effect, but that cumulative effects across the Outstanding Natural Landscape (ONL) will become an important issue in the future. MDC also refers to the well-established understanding that cumulative effects include the effects of a proposal in combination with other activities already forming part of the existing environment. In addition, MDC notes that a cumulative assessment including 'The	6. Cumulative Effects - Haldon Solar - Response - FTAA-2508-1097; 4. Legal - Memorandum of Counsel - Response	Please refer to Addendum 4 and 6, which covers comments of cumulative effects and updated reporting from Boffa Miskell.
90	Mackenzie District Council (Planning Review - Nick Boyes)	Ecology overall: considers the original ecological assessment understated impacts; additional reports with regards to lizards and invertebrates have filled some gaps but information gaps remain in quantifying effects and applying the effects management hierarchy (avoid-remedy-mitigate-offset/compensate) to achieve 'no net loss'. On the basis of more recent assessments, an offsetting or compensation approach will be required to addresss effects on significant	3. Ecology - Haldon Solar - Response - FTAA-2508-1097; 5a. CRC Amended Conditions	Please refer to Addendum 3 which for the final Lizard and Invertebrate Assessments completed by Blueprint Ecology Ltd and SLR Consulting New Zealand Ltd respectively. Lodestone has considered and documented the recommended approach to address residual effects on indigenous vegetation and invertebrates.
91	Mackenzie District Council (Planning Review - Nick Boyes)	Vegetation/botany: notes DOC recorded more indigenous vascular and non-vascular species than the application, including Lepidium solandri (Threatened - Nationally Critical), and concludes the site meets CRPS criteria for	3. Ecology - Haldon Solar - Response - FTAA-2508-1097; 5a. CRC Amended Conditions	Please refer to Addendum 3 Ecology and Biodiversity for a fulsome response and updated conditions in Addendum 5.

92	Mackenzie District Council (Planning Review - Nick Boyes)	Avifauna: the DOC peer review considers the application's bird assessment inadequate; identifies more threatened/at-risk birds likely to use the area and highlights collision risk for species flying over the site (including kaki/black stilt, black-fronted tern, matuku-hūrepo/Australasian bittern). Suggests a rigorous carcass monitoring programme with adaptive management and compensation to reverse impacts, supported by robust population monitoring to achieve 'no net loss'.	3. Ecology - Haldon Solar - Response - FTAA-2508-1097; 5a. CRC Amended Conditions	Please refer to Addendum 3 Ecology and Biodiversity for a fulsome response and updated conditions in Addendum 5.
93	Mackenzie District Council (Planning Review - Nick Boyes)	Lizards: notes lizard survey results were pending at the time of MDC comments; while habitat appears limited, presence of at-risk species cannot be ruled out until survey completion.	3. Ecology - Haldon Solar - Response - FTAA-2508-1097; 5a. CRC Amended Conditions	Please refer to Addendum 3 Ecology and Biodiversity for a fulsome response and updated conditions in Addendum 5.
94	Mackenzie District Council (Planning Review - Nick Boyes)	Invertebrates: additional assessments identify nationally endangered/at-risk invertebrates on site (robust grasshopper, minute grasshopper, Otago short-horned grasshopper, Tekapo ground wētā) and note construction mortality/habitat damage and shading-driven habitat change; concludes offsets/compensation likely required. Notes robust grasshopper is Schedule 7 Wildlife Act protected and a Wildlife Act Authority is required; that authority is not included within the FTAA approval suite sought by Lodestone.	3. Ecology - Haldon Solar - Response - FTAA-2508-1097; 5a. CRC Amended Conditions	Please refer to Addendum 3 Ecology and Biodiversity for a fulsome response and updated conditions in Addendum 5.
95	Mackenzie District Council (Planning Review - Nick Boyes)	It is stated that none of the natural hazards considered (geotechnical, flood, fire) represent a significant risk. With regards to fire risk MDC suggests the Emergency Management Plan should include detailed water supply provisions, safe PV/BESS shutdown/isolation method, vehicle fire extinguishers, vegetation management to reduce fire risk, and electrical fault monitoring/detection (incl CCTV/alarm).	5a. CRC Amended Conditions	Please refer to Addendum 5, for additional conditions related to this comment
96	Mackenzie District Council (Planning Review - Nick Boyes)	Traffic: MDC engaged Nick Fuller (Novo Group Ltd) to peer review the traffic effects assessment. MDC generally agrees that transport effects can be appropriately managed through a Construction Traffic Management Plan (CTMP), but notes that the draft CTMP provides limited detail on the off-site traffic management measures, which are only described at a high level in the Integrated Transport Assessment (ITA). MDC are concerned that without shared transport, construction personnel movements may exceed the estimate (~100 vehicle movements/day) and create adverse amenity effects for residents along the 23km unsealed section of Haldon Road; suggests shuttles/buses and/or barge options and a condition of consent in this regard.	5a. CRC Amended Conditions	Please refer to Addendum 5, for additional conditions related to a Construction Traffic Management Plan.
97	Mackenzie District Council (Planning Review - Nick Boyes)	Construction effects: notes MDC concern about worker accommodation pressures in Twizel and Lake Tekapo and employment market impacts. Notes in terms of the proportionality assessment any temporary adverse effects are considered to be minor and outweighed by the local economic benefits.	2. Benefits - Haldon Solar - Response - FTAA-2508-1097	Noted.
98	Mackenzie District Council (Planning Review - Nick Boyes)	Noise: recommends updating operational noise condition to align with District Plan NOISE-TABLE 1 day/night periods and express limits as LAeq(15 min), with measurement/assessment to NZS 6801:2008 / NZS 6802:2008.	5a. CRC Amended Conditions	Please refer to Addendum 5, conditions 33 and 34 have been amended accordingly.
99	Mackenzie District Council (Planning Review - Nick Boyes)	Separate comments are being provided on cultural effects from the relevant iwi authority as well as local Runanga.	7. Mana Whenua - Haldon Solar - Response - FTAA-2508-1097	Lodestone are actively working with Te Rūnanga o Ngāi Tahu, Te Rūnanga o Arowhenua, Te Rūnanga o Moeraki and Te Rūnanga o Waihao. Comments on cultural matters are covered in
100	Mackenzie District Council (Planning Review - Nick Boyes)	Lighting: notes the suite of conditions (hours, shielding, sensors, direction away from roads and Lake Benmore, colour temperature/spill limits) appropriately	n/a	Lodestone supports the protection of the Aoraki Mackenzie International Dark Sky Reserve and will ensure that detailed design and commissioning demonstrate full compliance.
101	Mackenzie District Council (Planning Review - Nick Boyes)	Minor matters of additional and/or amended conditions that are recommended in terms of landscape, fire risk, traffic and noise. Currently, there is not agreement that the project achieves a no net loss biodiversity outcome.	5a. CRC Amended Conditions	Please refer to Addendum 5, which contains commentary on policies and amended conditions set to result in no net loss.
102	Mackenzie District Council (Planning Review - Nick Boyes)	District Plan interpretation: notes Stage 3 provisions (REG/INF) now operative; REG chapter is stand-alone and more enabling of renewable generation within the ONL; activity status discretionary under REG-R7 due to ONL/SASM/significant vegetation.	5. Planning - Haldon Solar - Response - FTAA-2508-1097	Please refer to Addendum 5, which contains commentary on policies and amended conditions
103	Mackenzie District Council (Planning Review - Nick Boyes)	Substation classification: uncertainty whether substation is part of REG or electricity network infrastructure; cautious approach assesses separately under INF; possible interaction with National Grid Yard provisions.	5. Planning - Haldon Solar - Response - FTAA-2508-1097	Please refer to Addendum 5, which contains commentary on policies and amended conditions

104	Mackenzie District Council (Planning Review - Nick Boyes)	SASM / 'Hazardous Facility' uncertainty: if the substation were treated as a 'Hazardous Facility' within SASM it could shift to non-complying under SASM-R6; term not defined in the District Plan.	5. Planning - Haldon Solar - Response - FTAA- 2508-1097	Please refer to Addendum 5, which contains commentary on policies and amended conditions
105	Mackenzie District Council (Planning Review - Nick Boyes)	Fire/hazardous substances: notes hazardous substances (diesel/oil) and bunding for transformers; generally accepts mitigation but notes need for detailed EMP enhancements.	5a. CRC Amended Conditions	Please refer to Addendum 5a, which contains amended conditions
106	NZTA	NZTA confirms the lodged application is consistent with the draft proposal. Lodestone consulted them on in 2025. The key effects considered were traffic generation during construction and operation and glint and glare. NZTA notes glint and glare are not expected to be an issue given the site's distance from SH8. NZTA's overall position is neutral, provided the traffic and intersection-related consent conditions are imposed.	n/a	<p>Lodestone Energy Limited thanks NZTA Waka Kotahi for its submission on the Haldon Solar Project and for its continued engagement throughout the project's development.</p> <p>We acknowledge NZTA's confirmation that the substantive application aligns with the draft proposal previously shared with NZTA in 2025, and we appreciate NZTA's review of the Integrated Traffic Assessment and associated mitigation measures.</p> <p>Lodestone notes NZTA's position that potential transport effects can be appropriately managed through the implementation of the conditions requested by NZTA, including the detailed design and delivery of intersection works at Haldon Road / State Highway 8 prior to construction traffic movements.</p> <p>Lodestone confirms its acceptance of Conditions 20-22. We also note NZTA's clarification regarding condition numbering, and Lodestone supports amending the relevant consent condition to correctly reference Condition 20.</p> <p>Overall, Lodestone welcomes NZTA's neutral position on the application, subject to the requested conditions being imposed, and looks forward to ongoing coordination with NZTA to ensure the safe and efficient operation of the state highway network during construction and operation of the solar farm.</p>
107	EDS	Claim that the Project lacks a functional or operational need at this location	1. Cover - Haldon Solar - Response - FTAA- 2508-1097; 4. Legal - Memorandum of Counsel - Response	Please refer to the Cover Letter, Addendum 2, 3 and 4. The NPS-REG (REG-P6(1)) provides specific direction for decision makers on what constitutes operational or functional need for REG activities. This includes the need for those activities to i) be established where the renewable resource is located and available at a viable scale and quality to sustain generation activity; ii) be accessible and to connect to electricity networks and be nearby to electricity demand; and iii) have sufficient and available land to support all associated current and reasonably foreseeable future REG activities at that particular location. These matters apply to the Haldon site.
108	EDS	Assertion that alternative sites exist on already-intensified land with fewer ecological effects	4. Legal - Memorandum of Counsel - Response; 1. Cover - Haldon Solar - Response - FTAA- 2508-1097	Please refer to Addendum 4, neither the FTAA nor applicable RMA instruments contemplate an alternatives assessment. There is no comparative evidence provided that alternative sites exist that would have lesser impacts. This is a policy preference not a statutory requirement. Furthermore, there are no provisions within the NPS-REG, Canterbury Regional Policy Statement or Mackenzie District Plan that limit activities to "already developed land".
109	EDS	Ecological surveys are absent (invertebrates), inadequate, or inaccurate. Threatened and At Risk species presence has been underestimated. Assertion that the site is ecologically significant and wrongly characterised as "low value".	3. Ecology - Haldon Solar - Response - FTAA- 2508-1097; 5a. CRC Amended Conditions	Please refer to Addendum 3 for the final Lizard and Invertebrate Assessments completed by Blueprint Ecology Ltd and SLR Consulting New Zealand Ltd respectively.
110	EDS	Statement that adverse ecological effects exist including direct loss from construction activities, bird strike and electrocution, loss of habitat due to infrastructure and loss due to changes in conditions such as shade, moisture and temperature.	3. Ecology - Haldon Solar - Response - FTAA- 2508-1097; 5a. CRC Amended Conditions	Please refer to Addendum 3 which details that Lodestone has considered and documented the recommended approach to address residual effects on indigenous vegetation and invertebrates.
111	EDS	The Application failed to identify or apply the correct and most recent planning provisions	4. Legal - Memorandum of Counsel - Response	Please refer to Addendum 4. Lodestone relied on the operative and relevant planning instruments at lodgement, consistent with FTAA requirements, and that subsequent plan evolution does not retrospectively invalidate the assessment.
112	EDS	Offsets/compensation are mandatory and biodiversity net gain is required	3. Ecology - Haldon Solar - Response - FTAA- 2508-1097; 5a. CRC Amended Conditions	Please refer to Addendum 3 Ecology and Biodiversity for a fulsome response and updated conditions in Addendum 5.
113	EDS	Offsetting and compensation are unlikely to address landscape effects on nationally significant ONL values. Typical landscape mitigation such as screen planting is not proposed.	[10] Original Application Documents	Planting was intentionally excluded because it would introduce incongruous landscape elements, provide limited screening benefit, and risk additional ecological and visual effects. There is expert landscape evidence (refer to the Boffa Miskell Landscape Assessment in the substantive application) demonstrating low-moderate effects.

114	EDS	Concern about cumulative effects with other Mackenzie Basin solar projects	6. Cumulative Effects - Haldon Solar - Response - FTAA-2508-1097; 4. Legal - Memorandum of Counsel - Response	Please refer to Addendum 6 and Addendum 4, which address concerns about cumulative effects.
115	EDS	Assertion that transmission constraints mean Haldon and The Point cannot both proceed	6. Cumulative Effects - Haldon Solar - Response - FTAA-2508-1097; 4. Legal - Memorandum of Counsel - Response	Please refer to Addendum 6 for further detail on Transmission access and sequencing. This issue is not determinative under the FTAA per Addendum 4.
116	EDS	Proposed conditions are inadequate to manage ecological effects. EDS seeks the following amendments to the conditions of consent: offsetting or compensation so the Project results in an indigenous biodiversity net gain, monitoring of ecological impact, flora, avifauna and invertebrate management plans, re-consideration of the rabbit proof fence and other steps to address impacts on outstanding landscape values.	5a. CRC Amended Conditions; 3. Ecology - Haldon Solar - Response - FTAA-2508-1097	Please refer to Addendum 3 Ecology and Biodiversity for a fulsome response and updated conditions in Addendum 5.
117	EDS	Request for adaptive management triggers requiring removal of infrastructure and a bond to cover remediation and decommissioning.	4. Legal - Memorandum of Counsel - Response	Please refer to Addendum 4, which addresses adaptive management.
118	EDS	Assertion that Wildlife Act approvals may be required	n/a	Lodestone will apply for a DOC Wildlife Act Authority separate from this Fast Track application (for invertebrates and lizards) and align the consent Invertebrate Management Plan and Lizard Management Plan with DOC permit conditions.
119	EDS	The ability to undertake adaptive management if long-term or permanent effects arise after the solar farm is built is very limited.	3. Ecology - Haldon Solar - Response - FTAA-2508-1097; 5a. CRC Amended Conditions	Please refer to Addendum 3 Ecology and Biodiversity for a fulsome response and updated conditions in Addendum 5.
120	Forest and Bird	The Haldon site forms part of a broader fluvio-glacial outwash landscape in the Mackenzie Basin that supports indigenous biodiversity values, including habitats used by Threatened and At Risk species. Ecological connectivity across the Tekapo-Haldon outwash sequence would be disrupted.	3. Ecology - Haldon Solar - Response - FTAA-2508-1097; 5a. CRC Amended Conditions	Please refer to Addendum 3 Ecology and Biodiversity for a fulsome response and updated conditions in Addendum 5.
121	Forest and Bird	Highlights differences between the Applicant's ecological assessments and the conclusions reached by other experts, particularly in relation to survey coverage, methodology, and interpretation. Additional or more detailed surveys could assist in further characterising ecological values and potential effects across the site.	3. Ecology - Haldon Solar - Response - FTAA-2508-1097; 5a. CRC Amended Conditions	Please refer to Addendum 3 Ecology and Biodiversity for a fulsome response and updated conditions in Addendum 5.
122	Forest and Bird	Offsetting/compensation should have been assessed due to the scale of effects.	3. Ecology - Haldon Solar - Response - FTAA-2508-1097; 5a. CRC Amended Conditions	Please refer to Addendum 3 Ecology and Biodiversity for a fulsome response and updated conditions in Addendum 5.
123	Forest and Bird	Claim that Threatened and At Risk bird species use the site for nesting and/or foraging. The potential effect of mortality due to interactions with solar panels and other infrastructure was omitted.	3. Ecology - Haldon Solar - Response - FTAA-2508-1097; 5a. CRC Amended Conditions	Please refer to Addendum 3 Ecology and Biodiversity for a fulsome response and updated conditions in Addendum 5.
124	Forest and Bird	Assertion that cumulative effects of multiple Mackenzie Basin solar projects have not been adequately addressed	6. Cumulative Effects - Haldon Solar - Response - FTAA-2508-1097; 4. Legal - Memorandum of Counsel - Response	Please refer to Addendum 6 which addresses comments on cumulative effects.
125	Forest and Bird	Criticism that benefits assessment relies on a gross rather than net economic approach	2. Benefits - Haldon Solar - Response - FTAA-2508-1097	Please refer to Addendum 2, which addresses economic approach.
126	Forest and Bird	Claim that renewable electricity and emissions reduction benefits are overstated due to inappropriate comparators	2. Benefits - Haldon Solar - Response - FTAA-2508-1097	Please refer to Addendum 2, which addresses emissions reductions.
127	Forest and Bird	Argument that ecological effects outweigh regional or national benefits under s 85(3) FTAA	4. Legal - Memorandum of Counsel - Response; 3. Ecology - Haldon Solar - Response - FTAA-2508-1097	Please refer to Addendum 4, which addresses weighting direction.
128	Forest and Bird	Proposed conditions are inadequate, particularly for ecological monitoring	3. Ecology - Haldon Solar - Response - FTAA-2508-1097; 5a. CRC Amended Conditions	An updated set of conditions has been proffered including a large number of updates and additions to ecological conditions. Please refer to Addendum 5.

129	Forest and Bird	Objection to rabbit-proof fencing being treated as an ecological benefit, and concern about unfenced setbacks	3. Ecology - Haldon Solar - Response - FTAA-2508-1097; 5a. CRC Amended Conditions	Please refer to Addendum 3 Ecology and Biodiversity for a fulsome response and updated conditions in Addendum 5.
130	Forest and Bird	Lizards are known to be present in the wider area, and further work would be required before reaching a reliable conclusion as to their presence or absence at the Haldon site.	3. Ecology - Haldon Solar - Response - FTAA-2508-1097; 5a. CRC Amended Conditions	Please refer to Addendum 3 Ecology and Biodiversity for a fulsome response and updated conditions in Addendum 5.
131	Forest and Bird	No conditions to confirm active groundcover management such as mowing or short-duration grazing and targeted weed control.	3. Ecology - Haldon Solar - Response - FTAA-2508-1097; 5a. CRC Amended Conditions	Please refer to Addendum 3 Ecology and Biodiversity for a fulsome response and updated conditions in Addendum 5.
132	Forest and Bird	Construction and operation of the solar farm may disturb, displace, injure, or kill nesting and foraging birds, result in habitat loss and degradation, increase collision risk with infrastructure, and adversely affect the local and wider populations of Threatened and At Risk species.	3. Ecology - Haldon Solar - Response - FTAA-2508-1097; 5a. CRC Amended Conditions	Please refer to Addendum 3 Ecology and Biodiversity for a fulsome response and updated conditions in Addendum 5.
133	Forest and Bird	The greatest limitation to our understanding of potential adverse effects of solar farms on bird populations is lack of data. On top of this, the quality of available data is variable.	3. Ecology - Haldon Solar - Response - FTAA-2508-1097; 5a. CRC Amended Conditions	Please refer to Addendum 3 Ecology and Biodiversity for a fulsome response and updated conditions in Addendum 5.
134	Hon Simon Watts - Minister for Energy (30 Jan 2026)	Project delivers significant national and regional benefits through ~220 MW capacity and ~370 GWh/year, supplying ~45,000 households.	1. Cover - Haldon Solar - Response - FTAA-2508-1097; 2. Benefits - Haldon Solar - Response - FTAA-2508-1097	Lodestone thanks the Minister for his comments and for recognising the project's contribution to national and regional electricity supply and energy security.
135	Hon Simon Watts - Minister for Energy (30 Jan 2026)	Co-location of battery storage materially enhances system flexibility and dispatchability.	1. Cover - Haldon Solar - Response - FTAA-2508-1097; 2. Benefits - Haldon Solar - Response - FTAA-2508-1097	Lodestone thanks the Minister for his comments and for recognising the additional system benefits provided by integrated battery storage including increased dispatchability and flexibility
136	Hon Simon Watts - Minister for Climate Change (28 Jan 2026)	Project likely provides significant national and regional climate mitigation benefits; limited national-scale adaptation benefit but regional benefits expected.	1. Cover - Haldon Solar - Response - FTAA-2508-1097; 2. Benefits - Haldon Solar - Response - FTAA-2508-1097	Lodestone thanks the minister for his comments and for recognising the likely significant regional and national climate mitigation benefits.
137	Hon Tama Potaka - Minister for Māori Development (28 Jan)	Supports application subject to consideration of comments from relevant Māori groups under s18 and s53.	1. Cover - Haldon Solar - Response - FTAA-2508-1097	Lodestone thanks the Minister for Māori development and confirms our continued engagement with relevant Iwi groups.
138	Hon Tama Potaka - Minister for Māori Development (28 Jan)	Panel encouraged to have regard to statutory acknowledgement provisions for Te Ao Mārama / Lake Benmore.	1. Cover - Haldon Solar - Response - FTAA-2508-1097	Lodestone thanks the Minister for Māori development and confirms and confirm that statutory acknowledgements and cultural matters are recognised within the application and assessment
139	Hon Chris Bishop - Minister for Infrastructure & RMA Reform (28 Jan 2026)	Broad support for project as aligned with Government economic growth and infrastructure priorities.	1. Cover - Haldon Solar - Response - FTAA-2508-1097	Lodestone thanks the Minister for expressing support and acknowledge alignment with national infrastructure and growth objectives.
140	Hon Chris Bishop - Appendix 1 (28 Jan 2026)	Project broadly consistent with NPS-REG, enabling increased renewable generation even in sensitive environments, subject to effects management.	1. Cover - Haldon Solar - Response - FTAA-2508-1097; 4. Legal - Memorandum of Counsel - Response	Lodestone thanks the Minister for his support and notes the application's alignment with NPS-REG objectives and policy direction, subject to suitable effects management.
141	Hon Chris Bishop - Appendix 1 (28 Jan 2026)	Network upgrades and connection consistent with NPS-EN and NES-ETA requirements.	1. Cover - Haldon Solar - Response - FTAA-2508-1097	Lodestone thanks the Minister for his comments and recognition that the proposal appropriately integrates with the national electricity network framework. We are working closely with Transpower to ensure the project is integrated into the network in an appropriate way and aligned with the connection standards expected for a project of this scale.
142	Hon James Meager - Minister for the South Island (2 Feb 2026)	Significant construction spend (\$134-189m), job creation (direct and indirect), and ongoing operational employment.	1. Cover - Haldon Solar - Response - FTAA-2508-1097; 2. Benefits - Haldon Solar - Response - FTAA-2508-1097	Lodestone thanks the Minister for recognising the project's economic and employment benefits for South Canterbury and the South Island.
143	Hon James Meager - Minister for the South Island (2 Feb 2026)	Increased local renewable generation supports resilience and reduces transmission losses.	1. Cover - Haldon Solar - Response - FTAA-2508-1097	Lodestone thanks the Minister and acknowledges his comments on resilience benefits and local generation advantages.
144	Hon James Meager - Minister for Hunting & Fishing (2 Feb 2026)	Project expected to have little to no impact on hunting and fishing interests.	1. Cover - Haldon Solar - Response - FTAA-2508-1097	Lodestone thanks the Minister for confirming minimal effects on hunting and fishing values.

145	Hon Penny Simmonds – Minister for the Environment (29 Jan 2026)	Biodiversity values degraded but significant; effects likely manageable via robust conditions.	1. Cover - Haldon Solar - Response - FTAA-2508-1097; 5a. CRC Amended Conditions	Lodestone thanks the Minister for her comment and acknowledges the importance of managing biodiversity effects through appropriate consent conditions.
146	Hon Penny Simmonds – Minister for the Environment (29 Jan 2026)	Recommends strengthened monitoring and adaptive management for vegetation, pests, birds, herpetofauna, and invertebrates.	1. Cover - Haldon Solar - Response - FTAA-2508-1097; 5a. CRC Amended Conditions	Lodestone thanks the Minister for her comment and acknowledges the suggested enhancements to monitoring and adaptive management. We are proposing changes to our ecological management, enforced through conditions in response to these comments and those from other parties.