

13 July 2026

Environmental Protection Authority
Level 10, 215 Lambton Quay
WELLINGTON 6011

BY EMAIL: info@fasttrack.govt.nz

Dear Expert Panel,

FTAA-2508-1097: HALDON SOLAR FARM, HALDON STATION
MINUTE 19: COMMENTS ON DRAFT CONDITIONS

Thank you for providing the Mackenzie District Council with the opportunity to respond to the draft conditions pursuant to section 70 of the Fast Track Approvals Act 2024 (FTAA).

The Council has a key interest in the draft conditions being the statutory authority responsible for monitoring and enforcing the conditions imposed on any land use consent granted for the proposed Solar Farm. To this end the Council's review and subsequent comments below have focussed on the workability and implementation of the draft conditions.

Comments are made under the relevant headings below with a complete set of 'track changed' conditions attached for the benefit of the Expert Panel.

Conditions Numbering/Cross Referencing

The draft conditions are set out in tabular form, and it appears that some of the conditions have sought to be deleted without deleting the corresponding column including the condition number¹. This has meant that all condition numbering cross-references within the draft condition set do not refer to the applicable condition (once the track changes included therein have been accepted).

A clean tracked changed version of the draft conditions with updated numbering and cross-references is attached to these MDC comments. The condition numbering referred to in the balance of these comments uses the numbering as per the attached track changed document.

¹ This relates to condition numbers 2, 7, 8, 130, 131 and 162.

Site Descriptions

As outlined in the draft decision, there are various terms used to describe the wider project site and the various components of the solar project.

From reviewing the draft conditions it appears that there remains some element of inconsistency in the terms used to describe these components.

As the decision is understood, the term 'site' is to describe the wider area including all aspects of the project (including the Compensation Area and Conservation/Release Areas occurring beyond the Solar Farm footprint). Various changes have been made to the draft conditions to reflect that understanding, most notably including:

- Updating the title of Attachment 1 so that it refers to the General Solar Farm Layout (not overall site layout).
- Updating the title of Attachment 4 so that it refers to 'Compensation Areas' and 'Conservation/Release Areas'. It is also noted that whilst Conservation/Release Areas 3 and 4 are labelled thereon as "*lizard release and enhancement areas*"; Areas 1, 2 and 5 are not labelled at all. It is considered that this Attachment would further benefit from including a Key/Legend to better explain the purpose of Areas 1, 2 and 5 (particularly as these areas are not otherwise specifically referred to in any of the draft conditions). Related to this point, Condition 66 refers to "*lizard and invertebrate release sites (as shown on Attachment 4)...*". The balance of the decision/conditions uses the term 'Conservation/Release Sites' when describing these areas. Various changes have been suggested throughout the conditions to provide greater consistency when making reference to such areas.
- Updating the title of Attachment 5 to refer to 'Landscape Planting Concept for Conservation/Release Area 1'.
- Updating Condition 54 to cross-reference Attachments 3 & 4 when referring to the 'Lizard Conservation Areas'.
- Updating the heading before Condition 66 to refer to the 'Compensation Area and Conservation/Release Sites'.
- Updating Condition 72 to refer to Conservation/Release Areas.
- Updating the Table in Condition 73 to refer to the 'Solar Farm' as opposed to the 'Solar Site'.
- Updating Condition 92 c) to refer to Conservation/Release Areas.
- Updating Conditions 97, 99 and 101 to refer to Conservation/Release Areas as opposed to 'conservation zones'.

Otherwise various changes to the capitalisation of the terms 'Solar Farm' and 'Compensation Area' have been included to provide consistency throughout the draft conditions.

Technical Review Panel

Conditions 63 to 65 refer to the establishment of a 'Technical Review Panel', which has various roles as set out in the balance of the draft conditions. These functions are primarily aimed at the implementation of the matters included in the various ecological management plans required by other draft conditions, i.e., monitoring, reporting and review aspects of the ecological conditions.

Whilst there may be certain benefits arising from the independence of the certification and implementation/review functions, the Council does make the comment as to whether there is also a role for the Technical Review Panel in the certification of the various ecological management plans.

It is noted that independence does not appear to be a key factor, as these ecological management plans are presently to be developed in consultation with the Department of Conservation, which is noted as also having representation on the Technical Review Panel.

The Mackenzie District Council does not currently have any particular technical ecological expertise on staff. On that basis the Council's certification function is likely to rely heavily on either independent consultants or other regulatory agencies. In that context the potential expansion of the role of the Technical Review Panel to also include certification of the ecological management plans would provide greater continuity and also assist the Council's overall resourcing of consent condition monitoring and administration.

This expanded role of the Technical Review Panel could apply to the certification of the:

- a) Ecological Management Plan (Condition 58).
- b) Pest Animal Management Plan (Condition 71).
- c) Plant Management Plan (Condition 78).
- d) Lizard Management Plan (Condition 91).
- e) Terrestrial Invertebrate Management Plan (Condition 100).
- f) Avifauna Management Plan (Condition 109).
- g) Bird Collision Monitoring Plan (Condition 115).

Technical Review Panel – Compensation

The Council notes that draft consent Condition 63 includes that the Technical Review Panel being able to “*confirm compensation recommendations...*”. The condition then goes onto referring to the Technical Review Panel making a final determination on any requirement for ecological compensation in response to any residual ecological effects from the construction and operation of the Solar Farm that have not otherwise been avoided, mitigated or offset:

The scale and nature of any compensation determined by the Technical Review Panel must be commensurate with the actual residual impacts that have been identified and will be binding on the Consent Holder.

The Council supports such an Augier condition only where it is clearly binding on the Consent Holder, i.e., there is not an opportunity for the scale and nature of any additional compensation to be disputed by the Consent Holder at some point in the future.

Accidental Discovery Protocol

Draft Condition 47 refers to an Accidental Discovery protocol (ADP). The Expert Panel comment included in the right hand column of the table of conditions attached states that this condition differs from the condition on the CRC consents; and that alignment is preferred.

As noted in the MDC response to Minutes 13 and 14 (dated 29 April 2026), the MDC prefers the current wording as it is consistent with the ADP found in **EW-S4** of the Mackenzie District Plan (as recently amended by Plan Change 28). This protocol was developed in accordance with Aoraki Environmental Consultancy Ltd (AECL) on behalf of Te Rūnanga o Arowhenua.

Summary

The Council thanks the Expert Panel for the opportunity to provide comments on the draft conditions to be imposed on the Haldon Solar Fast Track project. The Council's interests, as outlined in the

comments above and the suggested changes to the draft conditions set out in the attached document, relate to the ability to efficiently and effectively implement and monitor those conditions.

Kind Regards,



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Planning Manager