

**Haldon Solar Project [FTAA-2508-1097]**

**Lodestone Energy Ltd**

**Mackenzie District Council**

**Written Response to Minute 1 of the Panel Convenor**

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**Introduction**

- 1 The purpose of this paper is to provide Mackenzie District Council's (MDC's) response as directed by Minute 1 of the Panel Convener. More specifically it responds to the matters set out in Schedules 1 and 2 of Minute 1.

**Schedule 1 – FTAA Timeframes**

- 2 The MDC understands that the timeframes are largely set out in the Fast Track Approvals Act 2024 (FTAA).
- 3 The MDC's ability to respond to the requirements set out in the FTAA relies on engaging an external planning consultant and other technical expert advisors. The MDC does not have sufficient 'in-house' resource to respond to an application of this scale and significance.
- 4 The process of engaging such advisors has commenced. However, the time of year and upcoming Resource Management Act 1991 (RMA) shut down period, during which many planning practitioners take leave, means that meeting the timeframes presents a challenge. This is particularly so in terms of the ability to provide comments within a 20 working day period in accordance with sections 53 & 54 of the FTAA. Particularly if that period takes in much of January 2026 when many practitioners are likely to be away from the office.

- 5 Timeframes will also depend on the ability of Lodestone Energy to supply additional information understood to currently be underway; including a Preliminary Site Investigation (PSI) and additional ecological assessment (survey of lizards and invertebrates).

## **Schedule 2 – Matters to Consider when Preparing for Conference**

- 6 The following comments address each of the matters set out in Schedule 1 relevant to the MDC.

### *Approvals*

- 7 The document prepared to support the substantive application identifies the nature of the approvals required falling within the jurisdiction of the MDC.
- 8 The MDC considers that Lodestone Energy has applied for all necessary approvals/resource consents that would otherwise be required under section 9 of the RMA to construct, maintain and decommission of a solar farm and battery energy storage system on Haldon Station. This includes a land use consent under the Mackenzie District Plan (MDP) having a non-complying activity status; and land use consent for the upgrade of an existing National Grid Transmission Line under Regulation 39 of the Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2009.

### *Legal Complexity*

- 9 The MDC is at the later stages of a comprehensive district plan review. Stage 3 of the Mackenzie District Plan Review included new provisions relating to the General Rural Zone, Natural Environment Values (including Outstanding Natural Landscapes (ONL)), and Energy, Infrastructure and Transport (including Renewable Electricity Generation (REG)). The Council's decisions on submissions on Stage 3 were notified on 5 August 2024, with appeals lodged by a number of parties.
- 10 Court assisted mediation took place during March, April and June 2025. As a result these Stage 3 appeals have either been withdrawn, had a Consent Order issued, or are subject to a signed Consent Memorandum and draft Consent Order currently being considered by the Environment Court.
- 11 On that basis the MDC expects that any legal complexity arising from appeals to the Stage 3 provisions affecting this application will likely be resolved in due course.

### *Evidentiary Complexity*

- 12 On the basis that the MDC has yet to receive formal planning and other technical peer review advice regarding the complete proposal, the Council are not yet able to comment on the evidentiary complexity of the application relating to any conflicting factual or opinion evidence.
- 13 However, the application proposal involves a large number of technical reports, some of which is detailed and this requires time to review and consider.

### *Factual Complexity*

- 14 Similarly, the extensive nature of the application and breadth of technical reports creates a challenge in terms of the factual complexity. A great deal of technical analysis of highly specialised subject matter relating to landscape, ecosystems and indigenous biodiversity, natural hazard risk, geotechnical considerations and transportation planning (amongst others) is required.

### *Council Consultation and Engagement*

- 15 The Applicant has been pro-active in engaging with Council on this project, with the site being visited with Lodestone Energy and their planning representatives back on 10 December 2024.
- 16 The application does not concern an activity for which a previous resource consent has been lodged with the MDC.

### *Panel Membership*

- 17 The substantive application by Lodestone Energy is the first of up to five FTAA applications concerning solar farms in the Mackenzie District, and more particularly within Te Manahuna/the Mackenzie Basin ONL.
- 18 On that basis MDC sees merit in having continuity of panel members to consider this and future applications made under the FTAA.
- 19 As is recognised in the MDP and other higher order planning documents, Te Manahuna/the Mackenzie Basin is a unique environment and acknowledged as an ONL. As such its protection from inappropriate use and development is a matter of national importance. Te Manahuna/the Mackenzie Basin is also of ecological significance.
- 20 The Haldon Solar Project is located within a Site and Area of Significance to Māori (SASM), being SASM9: Tauwharekura/Grays Hills. The

application site adjoins SASM19: Teo Ao Mārama/Lake Benmore (also a Statutory Acknowledgment Area), SASM48: Te Pā-o-Kāti-Kurī/Mount Maggie, and SASM68: Lake Benmore Nohoaka Site. These SASM were identified through Plan Change 24 to the Mackenzie District Plan introduced through Stage 3 of the district plan review.

- 21 MDC considers that specialist landscape and ecological expertise; along with iwi representation would be required to decide the application under the FTAA.

*Procedural Requirements*

- 22 The MDC is willing to engage directly with the panel as necessary to assist the consideration of this application under the FTAA, including attendance at mediations.
- 23 The MDC is not yet able to confirm any requirement for any form of hearing process until all technical peer reviews are completed.



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