

FTAA-2508-1097 & FTAA-2508-1100

UNDER the Fast-track Approvals Act 2024

IN THE MATTER of Haldon Solar Farm

AND

IN THE MATTER of The Point Solar Farm

JOINT MEMORANDUM OF THE CONDITION WRITERS
Dated: 24 March 2026

JOINT MEMORANDUM OF THE CONDITION WRITERS

1. This Memorandum responds to paragraph 5 of the Expert Panel's Joint Minute (Minute #8 for the Haldon Solar Farm (**Haldon**) and Minute #11 for The Point Solar Farm (**The Point**)). It has been jointly prepared by the following experts:
 - (a) For Haldon: Mark Henry;
 - (b) For The Point: Laila Alkamil and Carolyn Wratt;
 - (c) For Canterbury Regional Council: Dwayne Daly, Reuben Herz-Edinger, Jeremy Ecker and Joanne Mitten; and
 - (d) For Mackenzie District Council: Nick Boyes.

2. Since the issue of the Expert Panel's earlier Joint Minute (Minute #6 (Haldon) and Minute #7 (The Point)), the condition experts for the applicants have undertaken the following:
 - (a) Developed an engagement process (set out in **Figure 1** annexed to this joint memorandum);
 - (b) Undertaken a comparative exercise, lining each condition for Haldon and The Point against each other and identifying the level of consistency and divergence for each;
 - (c) Participated in four workshops, conducted in accordance with expert conferencing protocols recorded in section 9.4 of the Environment Court Practice Note 2023. The purpose was to work through each condition and align the conditions where appropriate. Details of the discussions were recorded including areas agreed, explanations for any amendments, areas of disagreement and reasons for each;
 - (d) Convened meetings with Canterbury Regional Council (both separately and jointly);

- (e) Meeting with Mackenzie District Council; and
 - (f) Initiated discussions with iwi representatives.
3. A summary of the progress made to date by the condition experts is provided in **Table 1** annexed to this Joint Memorandum.
 4. An explanation of the remaining workflows and tasks the condition experts would like to complete in order to file a Joint Witness Statement with the Expert Panel on 10 April 2026 is provided in **Table 2** annexed to this Joint Memorandum.
 5. Furthermore, at this stage the conditions experts have not engaged beyond the consenting authorities and Ngāi Tahu. This approach reflects that the other section 53 parties—namely the Department of Conservation, Forest and Bird, and the Environmental Defence Society—are primarily interested in ecological matters. For both Haldon and The Point, further information on ecological matters is currently being prepared, and it is anticipated that engagement with these parties will be more appropriately undertaken once that information is available.
 6. As noted by the Expert Panel in its latest Minute (Minute #8 for Haldon and Minute #11 for The Point, a number of Requests for Information have been issued by the Expert Panel which may lead to amendments to the conditions. Consequently it is likely that conditions will continue to evolve and the version of the conditions submitted to the Expert Panel on 10 April 2026 could be quickly superseded by an updated version.

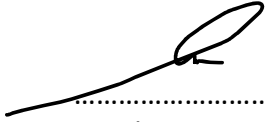
Dated: 24 March 2026



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Mark Henry



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Laila Alkamil



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Carolyn Wratt



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Dwayne Daly - For Canterbury Regional Council



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For Mackenzie District Council

Figure 1 Engagement Process

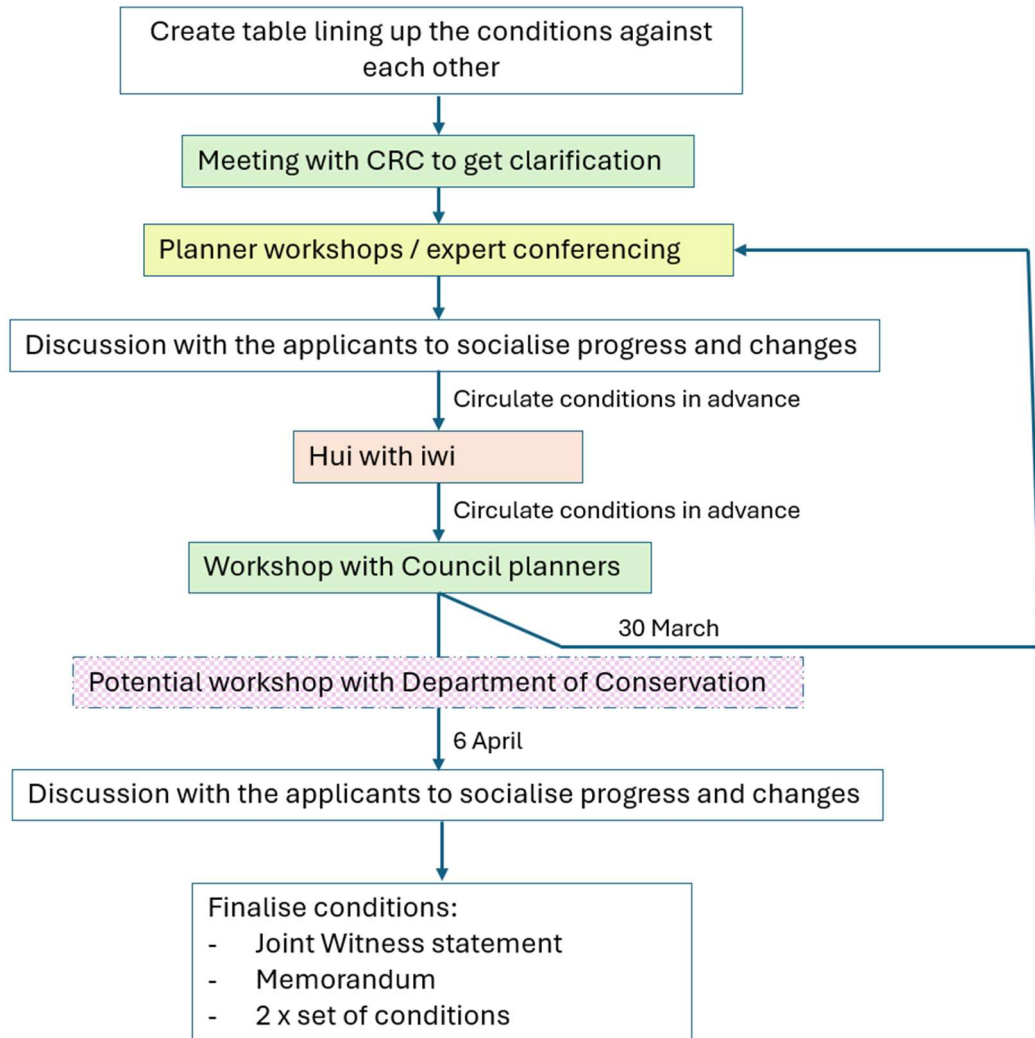


Table 1

Date	Planners involved	Summary
5 March 2026	The Point: Carolyn Wratt, Laila Alkamil Canterbury Regional Council: Dwayne Daly; Reuben Herz-Edinger	Discussions on the following matters: <ul style="list-style-type: none"> • Canterbury Regional Council is developing a template set of conditions for solar farms; • Process for how the expert condition writers could work together; and • Whether NES-CS matters sit in the regional or district set of conditions.
6 March 2026	Haldon: Mark Henry The Point: Carolyn Wratt, Laila Alkamil	Meeting with both applicants to discuss a methodology and timing to address the Minute from the Expert Panel.
9 March 2026	Haldon: Mark Henry	Circulation of Haldon conditions updated in accordance with Panel direction and following Canterbury Regional Council template.
12 March 2026	Carolyn Wratt, Laila Alkamil	Created two tables, one table for the conditions of each local authority. The purpose of the tables was to line up each of Haldon's conditions against the equivalent condition of The Point and note the differences or similarities. The differences were described in detail and colour coded to indicate where the conditions were: <ul style="list-style-type: none"> • Consistent across both consents (or very close); • Noticeable differences between wording or processes; or • Completely different conditions or significant misalignment.
12 March 2026	Canterbury Regional Council: Dwayne Daly, Jeremy Ecker,	Met with iwi authorities (Te Rūnanga o Ngāi Tahu, Aoraki Environmental Consultancy, and

Date	Planners involved	Summary
	Reuben Herz-Edinger, Joanne Mitten.	Aukaha), Mackenzie District Council's consultant planner, and the Department of Conservation to discuss approach to conditions workshopping, and to understand any engagement with the applicants thus far.
13 March 2026	<p>Haldon: Mark Henry</p> <p>The Point: Carolyn Wratt, Laila Alkamil</p> <p>Canterbury Regional Council: Dwayne Daly, Reuben Herz-Edinger, Jeremy Ecker and Joanne Mitten</p>	<p>Discussed a draft process to progress the Expert Panel's directions with the assistance of the two tables created.</p> <p>Clarified matters arising from the templated conditions provided by Council.</p> <p>Explored the split between Transpower conditions required by Transpower for its infrastructure and solar farm conditions.</p> <p>Canterbury Regional Council provided indicative solar farm template conditions and noted that Lodestone's regional conditions were appropriate as a basis for The Point's conditions. Canterbury Regional Council also recommended early consultation with Department of Conservation on ecological conditions.</p> <p>In addition, Canterbury Regional Council also indicated that they would prefer to be involved throughout the process of workshopping conditions, rather than just at the end.</p> <p>Canterbury Regional Council also noted the advantages of having the applicant and all relevant s53 parties meet together to workshop conditions, rather than individually.</p>

Date	Planners involved	Summary
16 March 2026	Condition Expert Workshop 1 Haldon: Mark Henry The Point: Carolyn Wratt, Laila Alkamil	Worked through the two condition tables to produce a revised set of regional and district council conditions. For each condition the discussions were recorded and then areas where we agreed / disagreed and the reasons.
17 March 2026	Condition Expert Workshop 2 Haldon: Mark Henry The Point: Carolyn Wratt, Laila Alkamil	
18 March 2026	Condition Expert Workshop 3 Haldon: Mark Henry The Point: Carolyn Wratt, Laila Alkamil	
19 March 2026	Condition Expert Workshop 4 Haldon: Mark Henry The Point: Carolyn Wratt, Laila Alkamil	
18 March 2026	Haldon: Mark Henry The Point: Carolyn Wratt, Laila Alkamil	Following the workshops, a single set of conditions was developed for regional consents. This is displayed as a table which notes: <ul style="list-style-type: none"> • Where the condition is the same between both projects • Indicates part of, or whole of a condition which applies to only one project • Indicates where project-specific information would be provided for each project • The changes to conditions that were agreed by the condition writers.

Date	Planners involved	Summary
20 March 2026	<p>The Point: Carolyn Wratt, Laila Alkamil</p> <p>Ngāi Tahu: Amy Beren, Deidre Francis; Kylie Hall, Tim Vial</p>	<p>Discussed the draft process to progress the Expert Panel's Minute.</p> <p>Provided an update on progress.</p> <p>Originally proposed workshop with Ngāi Tahu in the week beginning 23 March but this will need to be rescheduled to 31 March due to Ngāi Tahu attendance at annual NZPI Conference.</p> <p>Likely to be amendments to cultural monitoring conditions.</p> <p>Condition experts to provide draft conditions to Ngāi Tahu no later than 26 March 2026 to facilitate review before meeting on 31 March.</p>
23 March 2026	<p>Haldon: Mark Henry</p> <p>The Point: Carolyn Wratt, Laila Alkamil</p> <p>Mackenzie District Council: Nick Boyes</p>	<p>Discussed the process so far to align the conditions, and progress to date.</p> <p>Talked through next steps and the best way to involve Mackenzie District Council.</p>

Table 2: Next steps

Week starting	Tasks	Planners involved
23 March 2026	Develop a single set of conditions for the district consents. This will match the layout and level of information for the regional conditions and note: <ul style="list-style-type: none"> • Where the condition is the same between both projects • Indicates part of, or whole of a condition which applies to only one project • Indicates where project-specific information would be provided for each project • The changes to conditions that were agreed by the condition writers. 	Haldon: Mark Henry The Point: Carolyn Wratt, Laila Alkamil
	Workshop with Council planners to work through conditions (27 March 2026)	Haldon: Mark Henry The Point: Carolyn Wratt, Laila Alkamil Canterbury Regional Council Mackenzie District Council planners
	Update conditions to reflect any feedback	Haldon: Mark Henry The Point: Carolyn Wratt, Laila Alkamil
30 March 2026	Workshop with Ngai Tahu planners to work through conditions	Haldon: Mark Henry The Point: Carolyn Wratt, Laila Alkamil Ngāi Tahu planners
	Update conditions to reflect any feedback	Haldon: Mark Henry The Point: Carolyn Wratt, Laila Alkamil
	Circulate updated set of conditions to both Councils and Ngai Tahu	Haldon: Mark Henry

Week starting	Tasks	Planners involved
		The Point: Carolyn Wratt, Laila Alkamil
	Workshop ecological conditions with Department of Conservation if they are advanced sufficiently (<i>depends on progress with the requests for information on this matter</i>)	To be confirmed
6 April 2026	<p>Expert conferencing that focusses on key conditions and outstanding matters.</p> <p>Draft Joint Witness Statement and collate working documents</p> <p>Confirm updated condition set</p>	<p>Haldon: Mark Henry</p> <p>The Point: Carolyn Wratt, Laila Alkamil</p> <p>Canterbury Regional Council</p> <p>Mackenzie District Council</p> <p>Ngāi Tahu</p> <p>Possibly Department of Conservation (only if ecological matters / RFIs are sufficiently advanced).</p>