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16-February 2026

Daniel Cunningham  
GM Development  
Lodestone Energy Limited

By Email: [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

Tēnā koe

**Request for information from Lodestone Energy Limited in relation to the Haldon Solar application under the Fast-track Approvals Act 2024**

The Haldon Solar Expert Panel (the Panel) has directed the Environmental Protection Authority (EPA) to request further information from you under section 67 of the Fast-track Approvals Act 2024 (the Act), relating to the Haldon Solar application.

At the direction of the Panel, the EPA is seeking the following information following receipt of the s 53 comments from parties and Lodestone Energy Limited's s 55 response:

**Landscape Effects**

**1. Mitigation Condition 25A:**

This new condition addresses the issue of compensatory screen planting if any or all of the current screen planting next to Lake Benmore should be lost. However, the proposed condition is unclear where this new planting would be located and whether it is within the Lodestone site or within Haldon Station land.

- a) Please clarify on a suitable map or aerial photograph, that also shows the solar farm extent, where the compensatory planting would be located
- b) Please detail the plant species, plant spacing, irrigation and maintenance requirements which would guide that planting.

fasttrack.govt.nz | [info@fasttrack.govt.nz](mailto:info@fasttrack.govt.nz) | 0800 FASTRK

Fast-track is administered by the Environmental Protection Authority  
Private Bag 63002, Wellington 6140, New Zealand | NZBN: 9429041901977

## 2. The Mitigation of Effects on Haldon Arm Road:

In the course of the site visit to the Haldon site, it became apparent that much of Haldon Arm Road and the camping ground users of that road would be appreciably exposed to the Haldon Solar proposal, despite the setback from the road that is proposed. However, the effects on that road could be reduced by utilising the adjoining 'conservation area' (south-west of the pivot irrigation system) and incorporating a mixture of low shrubland, grey shrubland and manuka planting within its near margins – without the need to screen them entirely. However, it is unclear what Lodestone's intentions for the 'conservation area' are. The Panel notes that Page 8 of the 3. Ecology document in response to comments includes "Establishment of on-site nursery function in Conservation Area Zone 1" and "Dryland-appropriate planting and reinforcement in conservation areas and selected project footprint areas." However, the extent of this is unclear.

- a) Has partial screening of the solar farm along the margins of the Haldon Arm Road conservation area been considered as a mitigation option?
- b) Are there any known barriers to this occurring?

### **Ecology Effects**

The Expert Panel is concerned that the applicant does not appear to have fully grasped the scale and robustness of the effects management package required to attain the applicant's claimed 'no net loss' outcomes<sup>1</sup>. The Panel is of the provisional view that the type and quantum of proposed effects management are not commensurate with the type and magnitude of adverse effects that need to be addressed. In particular, there is a concern about the size and nature of the proposed residual effects management zones. To provide areas to meet this concern would involve two possible developments in the proposal. It would involve either sacrificing part of the area of proposed solar panels to make way for a much larger, preferably single, zone in an appropriate area within the existing solar farm area. Alternatively, it would involve more land to make space available for such a necessary zone or zones. The areas would need to be suitable, and surveys to show this should be part of the proposal to make sure the values needed to offset/compensate are actually present and the benefits will be commensurate with impacts.

#### **1) Invertebrates**

The Panel notes that the invertebrate survey report confirmed four nationally threatened or at risk with the stated conclusion that additional notable species were likely present. Could the Applicant please:

- a) Assess the impacts on the invertebrate assemblage associated with:
  - I. habitat loss associated with construction activities
  - II. habitat loss and or degradation associated with solar panel shading
  - III. habitat loss and or degradation associated with the decrease in bare ground and increase in exotic weed cover associated with the exclusion of rabbits inside the proposed rabbit exclusion fence.

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<sup>1</sup> Esp at Part C of 3. Ecology response document.

- b) Provide information on the salvage and relocation programme to minimise effects on nationally threatened or at risk invertebrates and adequately address compliance with the Wildlife Act
- c) Provide further information on how the location and quantum of residual effects management on invertebrates was determined.<sup>2</sup> Most importantly:
  - I. Please provide further information on why the pest exclusion fence is proposed to be in the area of lowest invertebrate values in the footprint and why the location recommended by SLR in their survey report was not adopted
  - II. Please explain, how the scale of the proposed residual effects management would achieve stated 'no net loss' outcomes. In this regard the panel notes that:
    - i. 'No net loss' are offsetting terms and offsets must be demonstrated via a like for like quantitative loss/gain calculation
    - ii. -Compensation does not requires this calculation, but indigenous biodiversity values lost must be addressed by positive effects that outweigh the adverse effects (often termed 'net positive').

## 2) Vegetation

The Panel notes that brief surveys undertaken by ecologists representing parties invited for comment doubled the known presence of nationally threatened or at risk species not previously detected. We also note that incidental threatened plant recordings undertaken during the SLR invertebrate surveys illustrated the abundance of the nationally At Risk declining tussock bind weed and also recorded the presence of the nationally Threatened (nationally critical) Maniototo peppergrass within the project footprint.

- a) Given that vegetation values onsite are notably higher than initially assessed, please assess the impacts on the threatened or at risk vascular and non-vascular plant assemblage from:
  - I. habitat loss associated with construction activities
  - II. habitat loss and or degradation associated with solar panel shading
  - III. habitat loss and or degradation associated with the decrease in bare ground and increase in exotic weed cover associated with the exclusion of rabbits inside the proposed rabbit exclusion fence.
- b) Please explain how the type and scale of the proposed residual effects management would achieve stated 'no net loss' outcomes noting the above comments.

### **Supply of Information**

In accordance with section 67(2) of the Act Lodestone Energy Limited must:

- a) Provide electronic copies of the information or report requested; or
- b) Advise the EPA, with reasons that you decline to provide the information or report requested.

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<sup>2</sup> Should the above questions trigger a reassessment of the offset/compensation, please provide this for the updated proposal.

Please provide the further information to the EPA by **23 February 2026**.

If the information requested is not received, the Panel must proceed as if the request for further information has been declined.

Please note, the information will be provided to the Panel, the applicant and every person who provided comments on the application. The information will also be made available on the Fast-track website.

If you have any questions, please contact Application Lead, [REDACTED] by email at [info@fasttrack.govt.nz](mailto:info@fasttrack.govt.nz)

Nāku noa, nā

[REDACTED]

**Application Lead**