

12 June 2026

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Kia ora June,

CANTERBURY REGIONAL COUNCIL (CRC) RESPONSE UNDER SECTION 67 OF THE FAST-TRACK APPROVALS ACT 2024

Thank you for the section 67 further information request from the Panel, dated 3 June 2026, for The Point application by Far North Solar Farm Ltd (the Applicant) under the Fast-track Approvals Act 2024.

The request directed CRC to comment on the additional ecology information and conditions submitted by the Applicant.

The requested information is provided in Attachment 1.

CRC trusts this satisfies the section 67 information request but if you have any further questions please don't hesitate to get in touch.

Ngā mihi,

A handwritten signature in black ink, appearing to read 'Dwayne Daly', is written over a light blue horizontal line.

Dwayne Daly
Principal Consents Planner

ATTACHMENT 1: INFORMATION REQUESTED BY THE PANEL

Information Requested

1. CRC understands that the Panel seeks CRC's comments on:
 - 1.1. whether the updated ecology information satisfies (in whole or in part) any concerns previously expressed;
 - 1.2. whether CRC considers there are material deficiencies in the information now before the Panel; and
 - 1.3. what further amendments you consider are required to the updated condition sets, as to any ecology matters.
2. CRC's Land Ecology Team Leader, Dr Jean Jack, as well as external invertebrate expert, Dr Barbara Barratt, have provided technical advice on the questions from the panel
3. Dr Jack also provided the following additional files, which are **attached** to the cover email with this letter:
 - 3.1. Example of compensation quantum linked to risk for bird strike.docx
 - 3.2. Example of compensation quantum linked to risk for kaki bird strike.xlsx
 - 3.3. Attachment A Ecology Advice_Bluewattle Ecology_march'26.pdf
 - 3.4. Attachment-9B MDC Conditions from FT website June 4_JJComments.pdf
 - 3.5. Attachment-9A ECan Conditions from FT website June 4 2026_JJComments.pdf
 - 3.6. Attachment 4_INVERTEBRATE RESERVE FENCE DESIGN_Chinn 2024.pdf
4. Dr Jack and Dr Barratt expressed the following outstanding concerns around:
 - 4.1. Dr Jack
 - 4.1.i. The issues of bird strike risk and related compensation options;
 - 4.1.ii. Management plan details; and
 - 4.1.iii. Clarity around the grasshopper reserve.
 - 4.1.iv. Conditions – specific recommendations provided
 - 4.2. Dr Barratt
 - 4.2.i. Identification of invertebrate values at site, including the grasshopper reserve area;
 - 4.2.ii. Differing versions of the Terrestrial Invertebrate Management Plan referenced in supplied information;
 - 4.2.iii. Potential for covenant on grasshopper reserve;
 - 4.2.iv. Consider Grasshopper Management Plan, including addressing mice.
 - 4.2.v. Lack of Biosecurity Management Plan
5. The full advice from Dr Jack and Dr Barratt is provided below.

Advice of Dr Jean Jack – CRC Land Ecology Science Team Leader

RE: The Point FNSF_Feedback on new ecological info provided May 2026

The Panel have issued a new minute (attached) and asked for our feedback on new ecological info.

Specifically, the panel asks:

- (a) whether the updated ecology information satisfies (in whole or in part) any concerns previously expressed.
- (b) whether you consider there are material deficiencies in the information now before the Panel.
- (c) what further amendments you consider are required to the updated condition sets, as to any ecology matters.

My remaining concerns centre on:

- The issues of bird strike risk & related compensation options, their adequacy and consideration for cumulative effects.
- Management plan details (as per my comments in email dated 26th Feb and 28th April).
- Clarity regarding the Grasshopper Reserve

RE bird strike compensation. The Bluewattle Ecology report (dated March 2026) recommended, amongst other things, a PVA analysis for bird strike risk. FNSF states that it *does not consider that a reliable, defensible population viability analysis (PVA) can be prepared from the information currently available to the Applicant. A robust PVA for species such as kakī, black-fronted tern, bittern or crested grebe would require comprehensive DOC-held population data, including survival rates, recruitment data, age structure, detailed mortality records, and movement data.*

I don't see this as a satisfactory response – have they asked DOC for the data? Does the data exist?

Regardless, I think some simple numbers could be run using expert informed estimates to demonstrate how the offered compensation package might quantifiably address possible bird strike scenarios (i.e. 1,2 or 3 kaki strikes per year for the duration of the consent).

As for the Nova pre-application advice, I drafted up a rough example for how this might be approached – attached. This may be helpful to prompt discussion by expert ornithologists.

Ultimately, given the uncertainty and low-risk-high-consequence scenario, I would maintain my initial advice. Particularly regarding potential cumulative impacts. I understand multiple solar farms are proposed within the Lake Benmore area. I would recommend a precautionary approach towards the potential for cumulative effects of multiple solar farms being constructed simultaneously – i.e. to determine the impacts of one solar farm on avifauna before building another.

Re management plans - the updated ecology information doesn't address the concerns I had or recommendations I made in Feb/April (see below). These perhaps are operational matters and would be addressed through the proposed review/approval process of the management plans. As per the Bluewattle Ecology report however, having the condition set require certain details within the management plans would improve confidence in the management plans achieving their objectives to manage effects on ecology. I have addressed this somewhat by my recommendations on the currently proposed conditions.

Re the Grasshopper Reserve

The fencing quotation provided in the new information bundle, and the map of the proposed invertebrate / predator free reserve, indicates a cost of approximately \$1.4m to build the c. 2km perimeter fence for this area.

This is a significant investment that requires careful consideration to ensure the fence design and proposed management actions match the conservation objectives.

These two variables appear to still require confirmation.

At 1.2m the fence will not prevent feral cat jumping into the area, however FNSF are aiming to achieve reduced feral cat activity across the area and within the reserve.

FNSF have noted that the Grasshopper reserve may not achieve mouse-free status (conditions now refer only to control threshold targets for rats rather than rodents). If mice are not targeted this will reduce the value of the area for invertebrates. I have recommended in the conditions that mice are retained as an important target predator for management within the Grasshopper Reserve.

And that a Grasshopper Reserve management plan would be required to clarify the reserves purpose, key actions etc. Reference to Design notes provided by Warren Chinn, dated March 2024 (attached), and learning from the existing Patersons Robust Grasshopper fence would be helpful.

Please refer to Barbara Barratt's view on the overall value of the proposed Grasshopper Reserve for invertebrates.

Re Proposed Conditions - the table below includes my key recommendations; other flags such as spelling, numbering errors or minor recommendations are found alongside these in attached versions of the condition documents labelled with 'JJComments'.

My recommendations are largely as per my previous review of conditions provided on April 28th, 2026.

The MDC Condition Set

Condition # & Section Heading	Recommendation
Condition 59; Landscape Management	Add Indig. vegetation mgmt plan. It is important the Landscape plan is also informed by the indigenous vegetation mgmt. plan to avoid planting over indig. veg. values
Condition 67; Vegetation	Complete and submit the vegetation management plan prior to the landscape plan. This will allow it to inform the landscape plan i.e. avoid planting over any existing indig. veg. values. Or in some way ensure a review of the vegetation mgmt. plan prior to any landscape works to ensure works align with the indig. veg mgmt. plan objectives.
Condition 68; Vegetation	Adopt a consistent structure for all the management plans. i.e. XYZ plan will at minimum include: • The management plan context and background; • Ecological values being managed (species, habitats, baselines); • Actual and potential effects of the activity being managed; • Outcome-based purpose and measurable objectives; • Methodologies including monitoring design and standards (baseline measures, best practice benchmarks/guidelines etc); • Mitigation and management actions beyond monitoring; • Adaptive management (response to triggers and thresholds - mandatory response compliance framework); • Roles, responsibilities and reporting; • Data management; • Timeframes including pre/post construction/operation relevancy & plan review; • Alignment to other project & management plans; • Defined terms And be informed by the: A. Pest Mammal Management Plan; B. Avifauna Monitoring Plan; C. Lizard Management Plan; and

	D. Terrestrial Invertebrate Management
Condition 73; Pest Mammal Management	Include targets for mice. It is acknowledged that mice present greater difficulties, but worth including targets for mice in the plan / effort - at least until review might show thresholds are not feasible.
Condition 79; Lizards	Wording puts focus on salvage actions only. The wider picture of effects management should also be included. Including the enhancement of habitats (includes additional species to those only in the direct impact zone of the panel construction). This LMP needs to account for and manage potential effects of the other activities including the landscape plantings and grasshopper fencing etc. Add to Advice Note: The LMP must be consistent with the Department of Conservation guidelines for lizard management plans referenced as: Department of Conservation Lizard Technical Advisory Group 2018: Guidelines for conservation-related translocations of New Zealand lizards. Department of Conservation, Wellington. 26 p Available online - currently at https://www.doc.govt.nz/globalassets/documents/about-doc/concessions-and-permits/wildlife-research-permits/lizard-management-plan-template.pdf
Condition 81; Lizards	Remove. Condition 81 Duplicates condition 80.
Condition 84; Lizards	84c. Review required. The cessation of compliance monitoring reporting. As the final lizard release would occur in Year one / pre and during construction of the solar farm. There might be a final translocation/salvage report. The final LMP report would however be several years later. See Section 6.0 of the draft lizard management plan which states a 5 +5 year monitoring schedule: "Monitoring may not detect any changes in the population of lizards in the short term and may need to be carried out for at least five years. Therefore, monitoring will be established during the first lizard active season post-lizard salvage and will be undertaken by a suitably qualified herpetologist every year." and this may be extended by the proposed adaptive management plan approach: "If capture rates are determined to be declining during the initial lizard monitoring period at the release site, post-release monitoring will continue for another five years to determine if (any) management interventions are required." Also, review referenced condition numbers by the text of this condition, as these are now incorrect.
Condition 86; Invertebrates	Edit text ... "grasshopper and weta species."

		The draft invertebrate mgmt plan referred to 'notable invertebrates'. Recommend going with that, or here simply refer to 'invertebrate species'.
Condition 86; Invertebrates		Adopt a consistent structure for all the management plans. i.e. XYZ plan will at minimum include: • The management plan context and background; • Ecological values being managed (species, habitats, baselines); • Actual and potential effects of the activity being managed; • Outcome-based purpose and measurable objectives; • Methodologies including monitoring design and standards (baseline measures, best practice benchmarks/guidelines etc); • Mitigation and management actions beyond monitoring; • Adaptive management (response to triggers and thresholds - mandatory response compliance framework); • Roles, responsibilities and reporting; • Data management; • Timeframes including pre/post construction/operation relevancy & plan review; • Alignment to other project & management plans; • Defined terms And be informed by the: A. Pest Mammal Management Plan; B. Avifauna Monitoring Plan; C. Lizard Management Plan; and D. Terrestrial Invertebrate Management Given the effort going into the 'Grasshopper reserve' and presuming this mgmt plan is to cover that reserve, then recommend its explicit inclusion here for covering off. This is important particularly for detailing the roles and responsibilities for the various actions to implement within the Grasshopper reserve, including reporting. I note no condition requires the establishment of the Grasshopper Reserve, although there are several references to a Grasshopper reserve. Unless this is an Augier provision, include a condition.

		A Grasshopper Reserve management plan would be required to clarify the reserves purpose, key actions etc. Refer to Design notes provided by Warren Chinn, dated March 2024.
Condition 89; Invertebrates		Add a condition for annual monitoring compliance as per pests and lizards. i.e., During the construction of the Solar Farm, the Consent Holder must engage a suitably qualified and experienced practitioner to prepare an annual compliance monitoring report in accordance with the requirements of the Invertebrate Management Plan required by Condition 85.
Condition 91; Avifauna		Adopt a consistent (minimum) structure for all the management plans. i.e. XYZ plan will at minimum include: • The management plan context and background; • Ecological values being managed (species, habitats, baselines); • Actual and potential effects of the activity being managed; • Outcome-based purpose and measurable objectives; • Methodologies including monitoring design and standards (baseline measures, best practice benchmarks/guidelines etc); • Mitigation and management actions beyond monitoring; • Adaptive management (response to triggers and thresholds - mandatory response compliance framework); • Roles, responsibilities and reporting; • Data management; • Timeframes including pre/post construction/operation relevancy & plan review; • Alignment to other project & management plans; • Defined terms And be informed by the: A. Pest Mammal Management Plan; B. Avifauna Monitoring Plan; C. Lizard Management Plan; and D. Terrestrial Invertebrate Management

Condition 91; Avifauna	Ai) What is “adequate”? Recommend link to a detection probability as unlikely to be able to detect them all. Better to say “of sufficient intensity and design to provide reliable carcass detection and mortality estimation.”
Condition 108(?); Avifauna Compensation Strategy	a. Clarify intention. Is this to be read as 'may include these things, but might include other things'? or read as 'may only include'? i.e. be limited to XYZ. AND a.iv. Reads ambiguously... are the threatened species avifauna or the aquatic invertebrate? Presumably the former....
Decommissioning	Clarify who will look after the grasshopper reserve post decommissioning.
Condition 147; Decommissioning	g. Will this ensure effects of the activity are addressed if decommissioning occurs before outcomes can be achieved?

CRC Condition Set

S9 Earthworks (Solar Farm)	Regarding pre-work site meeting. At a minimum, the following must be covered:
Condition 7; Prior to Commencement of Works	Add: ecological expectations and obligations (i.e., setback and work exclusion areas);

Cheers

Jean

Advice of Dr Barbara Barratt – Emeritus Scientist, Bioeconomy Science Institute: Agresearch Group.

Request for information in relation to The Point Solar Farm application under the Fast-track Approvals Act 2024

Barbara I.P. Barratt

10 Jun 2026

The Point Solar Farm Expert 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 Point Solar Farm application.

At the direction of the Panel, the EPA is seeking further information from you regarding the updated ecology information and the associated updated conditions provided by the applicant (Far North Solar Farm Ltd) on 29 My 2026. Specifically:

- (a) whether the updated ecology information satisfies (in whole or in part) any concerns previously expressed.

For invertebrates, a ‘walk-through’ survey is not adequate to identify all invertebrate values at the site.

As far as I am aware no further surveys have been carried out since those reported in the Wildlands TIMP (Wildlands 2026a) in February 2023 and February 2026. For the 2023 survey a walk-through and sweep net survey was carried out and the only species of note that was found was the New Zealand Blue butterfly, presumably *Zizina oxleyi* (Felder & Felder). The survey in February 2026, also a walk-through survey, focussed more on the periphery of the site where higher invertebrate values were predicted and designed to ‘refine understanding of species distribution and abundance’ (Wildlands 2026b). No details were given of the methods by which this would be achieved. However, New Zealand blue butterflies were found, this time in quite large numbers, but also a number of Otago short-horned grasshoppers (assume *Phaulacridium otagoense* Ritchie & Westerman). *Sigaus minutus* Bigelow (minute grasshopper) was found outside but close to the western boundary of the site. The lack of any further, more comprehensive surveys as requested by the panel (Musa 2026), remains a concern. The approach that has been recommended by FNSF (Response to RFI 5) is essentially to avoid ‘highest value ecological areas’, retain and protect peripheral areas, carry out monitoring and adopt adaptive management frameworks. In the absence of more detailed survey information, this approach is reasonable.

Limited consideration of a small number of ‘notable species’ cannot be indicative of biodiversity values.

As mentioned above, there has been no further survey work, so nothing to enhance the scant terrestrial biodiversity information available for this site, or indeed the general area. However, as recommended previously, the opportunity should be taken to determine the impact of the installation of solar panels on the invertebrate fauna, preferably with comparable 'control' areas so that valuable information specific to these dryland ecosystems can start to be assembled. This research could be achieved cost-effectively with well-planned postgraduate student projects.

The opportunities of a 'grasshopper reserve'

In response to RFI 5 it is argued that the ecological rationale for establishing a reserve, FNSF (2026a) is fully justified. It is noted that the 'grasshopper reserve' is an ecologically based precautionary enhancement measure that will provide a protected habitat, with reduced pest pressure for the entire biodiversity that is represented within it. I agree with this position. It also provides an opportunity for research, and ongoing monitoring which will demonstrate the benefits of protecting biodiversity from predation and potentially restoring natural communities.

The planned establishment of the reserve early during the development of the solar site will allow for any translocations from the site during development to take place within the protected area. The success of 'salvage and translocation' of invertebrates is poorly known and the opportunity to assess this would be valuable as suggested by Wildlands in the TIMP (2026a).

With reference to the DOC proposal to established fenced invertebrate habitat reserves (Chin, 2024) it appears that options 1 and 3 are for locating the reserves partly or completely under array panels. Given that the only information available on the effect of solar panels on the invertebrate fauna comes from studies overseas, which indicate that the effect is to reduce abundance and diversity of invertebrates (see my previous review), it would seem that the benefits from the investment in fencing etc. would be risky. However, given that this has not been attempted previously in a New Zealand dryland ecosystem, research into the value of such an exercise for invertebrate conservation could be beneficial if sufficient funds were made available.

Option 2 was proposed for an area adjacent to the Pukaki River and outside of the array panels. As noted by Chin (2024), this could be particularly beneficial as a site for *Sigaus robustus* (Bigelow) since populations of robust grasshopper are known in this vicinity (Schori et al. 2024). The Wildlands (2026a) has proposed a much larger 13.8ha area in this location (Figure 3) in their TIMP which would be far preferable and has presumably superseded the DOC proposal.

I fully agree that the Paterson's Terrace grasshopper reserve experience will be invaluable in establishing and managing this new reserve (Chin 2024). I suggest that a more comprehensive invertebrate survey be carried out before planning translocation of invertebrates to this proposed reserve from other sites in the Mackenzie since robust grasshopper might already be present in the proposed reserve.

- (b) whether you consider there are material deficiencies in the information now before the Panel.

The Terrestrial Invertebrate Management Plan (TIMP)

In the FNSF Response to Request for Information 5, section 3.6(d), bullet point 3 where it refers to TIMP 6621h-ii, April 2026, Section 5. The Feb 2026 draft TIMP doesn't have a section 5. There

are a number of references throughout the response to RFI 5 to Section 4.7 in the TIMP, which is essentially Table 6 and not really relevant to most of the references made. Clearly section 4.7 is something else and more substantial in the April 2026 version.

FNSF has not been able to supply this updated version of the TIMP so this is a material deficiency in the information available.

The Wildlands TIMP (Wildlands 2026a) has been the major source of information for evaluating terrestrial invertebrate values, potential effects of the solar farm on invertebrates and their significance, and recommendations for future management including a predator-free invertebrate reserve. If further content has been added to the TIMP it is important that this be consulted.

- (c) what further amendments you consider are required to the updated condition sets, as to any ecology matters.

Long-term protection and management plan for the grasshopper reserve

The term of the consent for the FNSF is 35, or up to 60 years, so at the end of that period FNSF would presumably relinquish any management responsibilities for the reserve. It would be appropriate in my view to place the reserve under a covenant agreement (or other appropriate protection agreement) so that once the consent period expires, the reserve will continue to be protected into the future irrespective of the ownership or status of the land.

I share the view of Jack (2026) that a grasshopper reserve management plan would be valuable to guide on-going activities and management of the reserve. I agree also that mice could pose a threat to invertebrates and should be considered in the plan. As mentioned above, on-going monitoring and research in the reserve would be highly beneficial in informing future developments in this region and in providing invaluable biodiversity information for this dryland ecosystem.

Biosecurity Plan for the FNSF

As mentioned in my earlier review, I have found no mention of a biosecurity plan prepared by the applicant in relation to material, particularly soil that is brought on to the site during construction of the solar farm. This issue is, however, noted in the ECAN Standalone Conditions Section 19 on 'Dust Management'. In the Response to RFI 10 (FNSF 2026b), it is mentioned that a Biosecurity Management Plan has been removed from the documentation. Material such as soil from outside the site could potentially contain weed seeds of invasive species which could become a serious problem in the site, and in the proposed reserve. It could also contain other risk contaminants, and needs to be carefully managed.

References consulted:

Chin, W. (March 2024). Design notes for an indigenous invertebrate habitat reserve within the proposed Far North Solar Farm, Mackenzie Basin. Technical advice, invertebrate ecology. 14p.

FNSF Ltd. (29 May 2026a). Response to Request for Information 5. 47p.

FNSF Ltd. (29 May 2026b). Response to Request for Information 10. 4p + 6 attachments.

Jack, J. (5 Jun 2026). The Point FNSF: Feedback on new ecological info provided May 2026, 6p.

Musa, M. (23 Jan 2026). EPA Request for information from FNSF Ltd in relation to the PSF application 8p.

Schori J, Turner S, Murray T, Nelson D. 2024. Robust grasshopper population surveys and monitoring. Project River Recovery Internal Report. Department of Conservation; 2024. Report No.: DOC-7759601 Contract No.: DOC-7759601.

Wildlands Consultants Ltd. (February 2026a). Draft Terrestrial Invertebrate Management Plan for the Point Solar Farm at Twizel, Canterbury, Contract Report No. 6621h-ii, 29p.

Wildlands Consultants Ltd. (February 2026b). The Point Solar Farm: Response to ecological issues raised by the panel, Report No. 6621j, 5p.