The Point Solar Farm: Response to Ecological Issues Raised by the Panel

Prepared for:	Far North Solar Farms Ltd	Reviewed and approved for release by:	[redacted]
Authors:	Roland Payne, Andrew Wells, Nick Goldwater		Des Smith Director, Senior Principal Ecologist
Report No:	6621j		
Date:	February 2026		

1.0 Introduction

Far North Solar Farms Ltd (**FNSF**) has applied under the fast-track approvals bill to establish a new solar farm on a site at the northern end of Lake Benmore, in the Mackenzie District in South Canterbury (**The Point Solar Farm**).

This memorandum accompanies the Applicant's response to the ecological matters raised by the Panel in a letter dated 23 January 2026.

Additionally, an updated vegetation and habitats assessment following a site visit undertaken on 20 January 2026 (requested during the Applicant's Panel Briefing Teams meeting on 16 January 2026) has also been prepared separately to this memo[1].

2.0 Ongoing Work and Engagement

The Applicant acknowledges that some aspects of ecological effects management will be further informed by the upcoming targeted fauna surveys. The Applicant remains committed to ongoing engagement with the Panel, the Department of Conservation, and the relevant consent authority, and to refining management plans and consent conditions as necessary to ensure residual ecological effects are appropriately managed through enforceable and adaptive measures.

3.0 Questions raised by the Panel

2.1 Field Investigations

In response to points A and B, we consider the ecological field investigations undertaken to date are sufficient to characterise baseline ecological values at the site, identify key ecological receptors, and determine the principal risk pathways associated with the proposed solar farm. These investigations included field assessments of vegetation and habitats, lizards, avifauna, and invertebrates, supported by desktop analysis and consideration of the broader Mackenzie Basin ecological context.

The investigations have established that:

- The site is predominantly dominated by exotic pasture and herbfield, with no indigenous vegetation communities meeting the Mackenzie District Plan definition present within the project footprint;
- Indigenous lizards are present and utilise modified habitats on the site;

[1] Wildland Consultants 2026b. Vegetation and habitat survey of The Point solar farm, January 2026. *Contract Report No. 6621h(v)*. Prepared for Far North Solar Ltd.

- The site is used by Threatened and At Risk braided-river birds for foraging and potentially for breeding, consistent with use of similar modified landscapes elsewhere in the Basin; and
- Habitats present are ecologically significant under the Canterbury Regional Policy Statement due to their role in supporting threatened fauna, rather than intrinsic floristic values.

The Applicant acknowledges that these investigations do not fully quantify the abundance, distribution, or population structure of all flora and fauna groups present, particularly for lizards, invertebrates, and some avifauna species, and possibly threatened plants. This limitation has been explicitly recognised in the assessment and does not undermine the validity of the effects assessment. Rather, it reflects accepted ecological practice where:

- Baseline surveys identify presence and habitat suitability;
- Residual uncertainty is managed through precautionary assumptions in the assessment of effects; and
- Targeted surveys are undertaken to refine management responses prior to construction.

Accordingly, targeted surveys for lizards, invertebrates, avifauna, and threatened plants, together with quantitative vegetation surveys (RECCE plots), are scheduled for the week commencing 9 February 2026 (noting the extension granted by the Panel). These surveys are intended to:

- Refine understanding of species distribution and abundance;
- Confirm the presence or absence of Threatened or At Risk flora within and adjacent to the project footprint; and
- Inform the detailed design of ecological management and compensation measures, including management plans and sanctuary design.

The ecological assessment therefore does not rely on the outcome of future surveys to establish whether effects occur, but instead assumes that effects on fauna may occur and assesses those effects conservatively. Residual uncertainty is addressed through:

- Precautionary approach, particularly for threatened species;
- Proposed avoidance of high value habitats;
- Biodiversity compensation consistent with Appendix 4 of the National Policy Statement for Indigenous Biodiversity; and
- Monitoring and adaptive management secured through consent conditions.

The January 2026 site inspection provided additional contextual information on current site conditions and confirmed the absence of indigenous vegetation communities within the footprint, but it does not replace earlier investigations or negate the need for targeted surveys where these are required to inform effects management.

In summary, the field investigations undertaken to date are adequate for effects assessment at the consent stage, while the scheduled targeted surveys provide an appropriate and proportionate mechanism to reduce uncertainty and refine ecological management prior to construction, consistent with the precautionary approach adopted in the assessment.

We note that the Ecological Enhancement Plan and related fauna management plans will be supplied to the Panel by 23 February 2026.

2.2 AgScience ecological assessment (17 December2025)

The Panel has requested information on the qualifications and experience of AgScience personnel in relation to ornithology, herpetology, and entomology, which pertains to a site visit undertaken on 17 December 2025.

No mapping of vegetation was provided in this survey, and the vegetation communities on the cultivated land were not described. Wildlands was subsequently asked by FNSF to undertake a further site visit to clarify if the vegetation and habitats at The Point Solar Farm had changed since the December 2022 surveys. The additional vegetation survey was undertaken on 20 January 2026 by a qualified dryland botanist. Vegetation and habitat types were mapped over the site, with a particular focus on determining any areas of the site that had different vegetation and habitats present than in the previous Wildlands survey and mapping (refer to the separate memo provided to the Panel that provides more detail on the outcome of the January 2026 survey).

We suggest that any surveys undertaken by AgResearch will be superseded by the targeted ecological surveys scheduled to commence in the w/c 9 February. These include targeted surveys for lizards, grasshoppers, and birds, as well as a quantitative vegetation survey and threatened plant searches. Each survey will be undertaken by suitably qualified and experienced ecological specialists. As such, there is no need to provide information on the qualifications and experience of AgScience personnel in relation to ornithology, herpetology, and entomology. If requested, Wildlands can provide the Panel with the qualifications and experience of the ecologists who will undertake the surveys.

2.3 Draft ecological management plans

In response to points A and B, a suite of draft ecological management plans will be developed following the completion of the biodiversity surveys that are currently underway. The plans will be provided to the Panel on 23 February 2026. Targeted surveys (particularly for lizards and invertebrates) are required to fully quantify abundance, distribution, and effects. We agree that provision of draft management plans based on quantitative flora and fauna survey data is an important step in identifying and managing effects of the proposal.

Draft management plans proposed at this stage, subject to survey outcomes, include indigenous flora, avifauna, invertebrates, lizards, pest mammals, pest plants, and ecological enhancement.

We have not yet consulted with DOC on Wildlife Act approvals; however, we understand that the Applicant has been in discussions with DOC regarding the WAA process. The applicant will need to apply for a Wildlife Act Authority, noting that the substantive application includes the Wildlife Act Authority document, which comprises a table that references back to the relevant management plans. Accordingly, the Applicant has requested Wildlands to prepare the relevant documentation, which will be completed by 23 February 2026 and guided by the outcomes of the fauna field surveys.

In response to point C, the original Ecological Enhancement Plan (EEP) developed by Wildlands in 2025 focused on achieving ecological benefits primarily through extensive indigenous revegetation across the *c*.82 hectares The Point reserve, combined with weed and pest animal control. The vision for ecological enhancement was to create a relatively self-sustaining reserve around the perimeter of the site, with vegetation and habitat typical of naturally-occurring outwash plains in the Mackenzie Basin. Management measures aimed to catalyse the restoration process over five years, after which only minimal restoration would be undertaken. Establishing a small reserve (*c*.2ha) for robust grasshopper (*Sigaus robustus*; Threatened – Nationally Endangered) was also proposed.

However, since this EEP was developed there have been further discussions between FNSF, the Fast Track Panel, DOC, and Wildlands as to the preferred means of allocating enhancement resources to achieve the best possible ecological outcomes at the site. This has resulted in changes in the approach

envisioned for ecological enhancement measures for the proposed development. It is now agreed that a smaller-scale, but more intensively managed approach is preferable. This is likely to provide greater certainty of achieving desired outcomes, and will be easier to manage and monitor for desired outcomes. We agree that more extensive, less intensive measures are likely to provide more risky outcomes in dryland environments.

Full details of the revised draft EEP will be provided on 23 February 2026. However, a summary of the anticipated revised draft EEP scope is as follows:

- c.14ha predator-proof fenced enhancement area centred around the two gullies at the eastern margin of The Point reserve. This area will be managed to provide positive benefits for threatened invertebrates, lizards and flora.
- The enclosure will be centred around the two eastern gullies and adjoining outwash terrace, where the highest ecological values are currently found. The precise boundaries of the enclosure and the habitat enhancement measures to be undertaken will be developed based on outcomes of the quantitative flora and fauna surveys and with input from DOC specialists.
- Pest animal management throughout The Point site.
- Pest plant management throughout The Point site.
- Indigenous woody revegetation within the visual screening planting areas (as outlined in the Landscape Plan accompanying the Fast Track application). These areas will be rabbit-fenced.
- Indigenous woody revegetation within several additional clusters along the eastern side of The Point reserve (outside of the enclosure area). These clusters will be rabbit-fenced.
- Establishment of several rock features, as habitat enhancement for lizards and invertebrates, within The Point reserve (outside of the enclosure area).

We provide the following sub-sections in response to the issues raised in Point D:

Description of proposed compensation measures

The Applicant has been in liaison with DOC regarding potential funding support for existing DOC-led avifauna conservation programmes within the wider catchment. The Applicant proposes to contribute one million dollars over the life of the consent to support predator control programmes that benefit braided-river birds, including kakī. This is in addition to the site-wide predator control programme that will be operated for the life of the project.

Commentary on how the proposed measures are additional to what would occur in the absence of the project

The proposed financial contribution and site-specific predator control are intended to extend the spatial coverage, intensity, or longevity of existing programmes, rather than substituting for actions that would occur regardless of the project. As such, we consider that the proposed financial contribution is additional to what would occur if the project did not proceed.

How the proposed measures interlink with, and are complementary to, avifauna compensation measures that are, or may be, proposed by other projects in the area

The Mackenzie Basin already supports several long-running, DOC-led and partner-led predator control and habitat management programmes (e.g. within the Upper Waitaki catchment), which focus on improving breeding success and recruitment of braided-river birds such as kakī, black-fronted tern, wrybill, and banded dotterel.

The Applicant's proposal will provide financial support for an existing DOC-led predator control programme, rather than establishing a standalone programme that could fragment effort or compete for resources. This programme will target the same suite of priority pest species, rather than attempting to introduce novel or untested mitigation approaches. Furthermore, this approach ensures that the proposed measures add capacity and durability to conservation outcomes that are already known to be effective, rather than dispersing effort across multiple uncoordinated initiatives.