

The Point Solar Farm Fast Track project – Comments on terrestrial flora and ecosystems components of proposal.

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Introduction and background

Prior to the Fast Track legislation The Point Solar Farm project was slated for an RMA consenting pathway and the Department of Conservation (DOC) was engaged in constructive pre-application discussions with the applicant in the second half of 2023.

The author was involved in those discussions pertaining to flora and ecosystems, attended a short overview site visit with applicant representatives on 6 October 2023, and provided advice to the applicant on appropriate ecological restoration and landscape screening planting species.

The site is a Naturally Uncommon Ecosystem (Inland Outwash Gravels)¹, which is classified as Critically Endangered². Therefore any indigenous vegetation is ecologically significant under NPS-IB³ and Canterbury RPS⁴ significance criteria.

Initially, in both RMA and Fast Track contexts, the project proposed large-scale ecological restoration plantings (c. 82 hectares), a position held until very recently. The latest proposal has substantially reduced the scale of restoration plantings, and details are to be provided by 23 February 2026, post-DOCs comments on the application being due to the Fast Track panel. In addition, further ecological survey work is being undertaken, the results of which will not be available to DOC prior to comments being due.

Therefore, these comments are broad and subject to change based on the results of further ecological survey work and redesign of the ecological restoration plantings.

Existing vegetation

Current vegetation is described in the May 2023 Wildlands ecological assessment (EA) based on a single day's field work by one person and subsequently verified by a Wildlands site visit on 20 January 2026. This level of survey effort is inadequate to determine the distribution and abundance of Threatened and At Risk plant species on and adjacent to the property, an issue

¹ Williams PA, Wiser S, Clarkson B, Stanley MC. 2007. New Zealand's historically rare terrestrial ecosystems set in a physical and physiognomic framework. *NZ Journal of Ecology* 31: 119-128.

² Holdaway RJ, Wiser SK, Williams PA. 2012. Status Assessment of New Zealand's Naturally Uncommon Ecosystems. *Conservation Biology* 26(4).

³ Ministry for the Environment. 2023. National Policy Statement for Indigenous Biodiversity (Appendix 1).

⁴ Environment Canterbury. 2021. Canterbury Regional Policy Statement 2013 (Appendix 3).

[CanterburyRegionalPolicyStatement2013July2021 \(1\).PDF](#). Accessed 26/11/2025.

identified by the Fast Track panel and being addressed by further survey work to be completed in late February after DOC's comments are due.

The EA found the site to be dominated by exotic pasture and herbfield. This is broadly correct, with some small gullies on the east of the property and stony ground on site margins supporting indigenous vegetation.

The EA identified 1 At Risk – Declining species (matagouri; *Discaria toumatou*) within the project footprint. This species is now classified as Not Threatened in the latest New Zealand Threat Classification report.⁵ Survey work by Wildlands on 20 January 2026 confirmed the presence of the At Risk -Declining scabweed (*Raoulia australis*) within the property.

A totally inadequate undated report by AgScience reported that the entire site has been cultivated and that no native floristic values remain, therefore no further ecological assessment is required. This report should be ignored as it is neither credible in substance nor source.

Most of the site has been substantially modified by physical clearance of indigenous vegetation and is now 'converted land' (land where indigenous vegetation has been fully removed and replaced with exotic pasture species or crops). However, small pockets of indigenous vegetation remain, and the time spent on site to date (survey effort) is insufficient to find occurrences of Threatened or At Risk plant species that were missed initially, may have recolonised since the initial survey work 3 years ago, or lie close to the boundary and maybe subject to cross-boundary edge effects⁶.

Project proximity to Threatened and At Risk species

The EA recorded the following Threatened and At Risk plant species just outside the site boundary:

- *Lepidium solandri* (Threatened - Nationally Critical)
- scabweed/*Raoulia australis* (At Risk – Declining)
- stout dwarf broom/*Carmichaelia monroi* (At Risk – Declining)⁷

A nationally important population of *Lepidium solandri* (Threatened - Nationally Critical) occurs immediately adjacent to the property on the terrace edges (see Map 1, Appendix 1). These plants are within 20-100m of the property boundary (see Map 2, Appendix 1). This proximity to major construction and landscape screening plantings with proposed irrigation is of major concern due to potential cross-boundary edge effects.⁸

⁵ de Lange PJ, Gosden J, Courtney SP, Fergus AJ, Barkla JW, Beadel SM, Champion PD, Hindmarsh-Walls R, Makan T and Michel P. 2024. Conservation status of vascular plants in Aotearoa New Zealand, 2023. *New Zealand Threat Classification Series 43*. 105 p.

⁶ Walker S, Brownstein G and Monks A 2019: Avoiding cross-boundary effects of agricultural land use on indigenous dryland habitats in the Canterbury region: consenting guidelines and planning recommendations. *Manaaki Whenua – Landcare Research Contract Report LC3636*. Prepared for Canterbury Regional Council (Environment Canterbury).

⁷ This is more likely *Carmichaelia vexillata* which has the same threat status.

⁸ Walker S. 2020. Measured edge effects on indigenous grassland and shrubland vegetation on low-relief topography in Canterbury. *Manaaki Whenua – Landcare Research Contract Report LC3866*, prepared for Environment Canterbury.

Such edge effects alter vegetation composition by increasing exotic grass cover beyond development footprints, and are usually associated with land use intensification and development, particularly irrigation and exotic forestry. These effects can extend 10's to 100's of metres by altering microclimate, soil moisture and seed input favouring exotic pasture species which outcompete low growing indigenous plant species.

In this case, the proposed solar farm is highly likely to result in greater exotic grass biomass across the site, and irrigation of plantings along the boundary will likely elevate soil moisture and promote exotic grass growth across the boundary.

Several other low-growing (and therefore vulnerable to habitat modification) At Risk plant and lichen species typical of Inland Outwash Gravel terraces are known to occur immediately adjacent to the property. These include *Raoulia monroi*, *Raoulia parkii*, *Convolvulus verecundus* f *verecundus*, *Muehlenbeckia ephedroides*, *Poa maniototo*, *Carex resectans*, and a lichen *Xanthoparmelia semiviridis*, (all At Risk – Declining).⁹ *Pimelea sericeovillosa* subsp. *pulvinaris* (Threatened – Nationally Vulnerable) is also likely to be present.

Landscape screening planting is proposed along the southern boundary and lower eastern boundary (and northern boundary). It is proposed to use irrigation to facilitate growth of the plantings. The addition of water will facilitate exotic grass and weed growth around the plantings, which could impact the survival and growth of the plantings. Spray irrigation could carry water significant distances in the strong north-westerly winds which are a common climatic feature in the Mackenzie Basin.

An RFI response by RMM Landscape Architects dated 9 February 2026 provides detail on landscape screening planting scale but does not address the proximity to Threatened and At Risk plant species or risks arising to those species. On the southern boundary a 1km x 40m wide strip of plantings is proposed, on the eastern boundary a 1.5km x 35m strip is proposed, and according to the mapping provided these will be close to or on the property boundary (Map 3 Appendix 1).

The May 2025 Wildlands Ecological Enhancement Plan mentions watering of plantings via knapsack spray or boom spraying from a truck. No irrigation should be considered within 100m of the property boundary due to the risk of edge effects via water spray drift, or via increased soil moisture/groundwater¹⁰.

Further survey work is required to understand the full range of Threatened and At Risk plant populations potentially affected by landscape screening plantings, and the risk of edge effects needs more thorough analysis by expert dryland ecologists.

Detailed monitoring of adjacent Threatened and At Risk plant populations must be included in conditions of consent, including baseline monitoring.

⁹ Mike Harding Environmental Consultant, pers. comm., 11 February 2026.

¹⁰ Brownstein G and Monks A. 2024. Adjacent land-use intensification facilitates plant invasions into indigenous shrubland fragments. *New Zealand Journal of Ecology* 48(1): 3569.

Ecological restoration plantings

Restoration planting can pose a threat to the ecological integrity of natural areas if it is not implemented in an ecologically informed way or if 'best practice' is not followed.

For example, planting 'ecologically inappropriate' indigenous species (e.g. North Island species, hybrids, cultivars, or species that would not occur naturally at the site) or planting into areas with existing indigenous vegetation (particularly sites with rare or threatened species) can cause harm to ecological values by disrupting natural vegetation patterns and food webs (e.g. plant-insect interactions), and/or making conditions less suitable for rare or threatened species.

Detailed knowledge about the ecology of the planting site, as well as the wider landscape and ecological district will be required in order to design and implement restoration plantings that are of long-term ecological benefit.

The ecological restoration plantings should be ecologically appropriate for the site, as per advice provided to the applicant in mid-2024 to design plantings that are compositionally similar to nearby short tussock grassland and native shrubland areas.

The area of ecological restoration plantings is now much reduced from the initial proposal and is to be within a proposed predator proof reserve of c. 14 hectares on the eastern boundary. This does not change advice pertaining to ecologically appropriate species.

A brief document outlining the proposed ecological enhancement approach from the applicant dated 2 February 2026 does not provide sufficient detail regarding planting design or species mix.

Use of properly eco-sourced¹¹ and hardened off ecologically appropriate plants is essential to minimise losses without irrigation.

Appropriate native plant species for ecological restoration planting are provided in Appendix 2 as they were provided to the applicant.

Landscape screening plantings

The landscape screening plantings should be ecologically appropriate to the site as per advice provided to the applicant in mid-2024 to design plantings that are visually and compositionally similar to nearby shrubland areas. If this can't be achieved then the need for screening planting must be questioned.

The landscape mitigation plant palette in the Landscape Assessment Report by RMM Landscape Architects dated 25 May 2023 predates advice provided to the applicant and includes several inappropriate (albeit native) species. Inappropriate screening plantings may

¹¹ Eco-sourced means that the plants have been propagated from seed collected from natural/remnant indigenous vegetation (i.e. not planted) in the applicable Ecological District or from similar dryland habitat in the applicable Ecological Region (note that reserves near houses, parks, and other planted sites may be genetically contaminated with seed or pollen from planted stock of unknown provenance, so in some cases it may be best to collect seed some distance away from the planting site rather than close to the site). Eco sourcing also involves collecting seed from a similar habitat to the planting site. This helps ensure that the plants are well-suited to the site (i.e. plants will be genetically adapted to the environmental conditions and therefore have better survival and growth), and do not compromise the ecological/genetic integrity of existing indigenous vegetation at the site by altering its genetic profile.

result in establishment of spreading native 'weeds' e.g., kānuka (*Kunzea robusta*), or visual effects less desirable than no screening e.g., tall rows of lowland ribbonwood (*Plagianthus regius*).

Use of properly eco-sourced and hardened off ecologically appropriate plants is essential to minimise losses without irrigation.

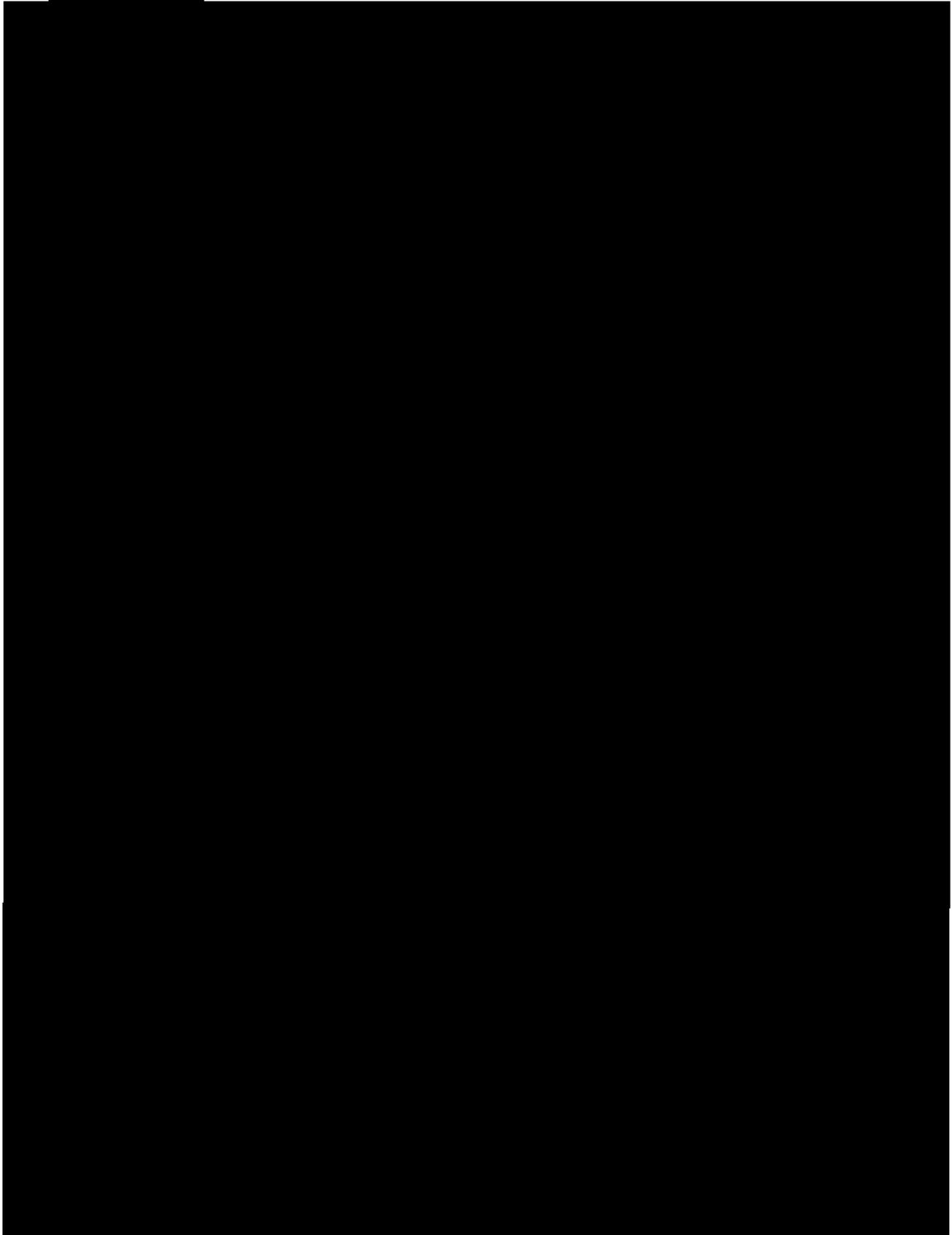
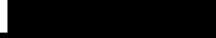
Appropriate native plant species for landscape screening planting are provided in Appendix 3, slightly modified from that previously provided to the applicant.

Conclusions and recommendations

1. Survey for Threatened and At Risk plant species is undertaken on terrace areas adjacent to proposed landscape screening planting and ecological restoration planting areas.
2. Baseline survey/monitoring of *Lepidium solandri* populations adjacent to the site is undertaken and repeated annually for the life of the project.
3. Baseline monitoring of the terrace plant communities to understand edge effects is undertaken and repeated bi-annually for the life of the project.
4. Ecological restoration plantings are restricted to the list in Appendix 2 and are not irrigated.
5. Landscape screening plantings are restricted to the list in Appendix 3, are not irrigated, and are placed a minimum of 50m from the property boundary fence inside the property.

Appendix 1. Proximity of Threatened plants.

Map 1.



Map 2.



Map 3. Landscape screening planting strips (green) close to Threatened and At Risk plant habitat.



Appendix 2. Plant species list for ecological restoration.

Scientific name	Common name/s	Threat status ¹²	Current abundance in nearby outwash gravels ¹³	Plant type	Size for type	Note
<i>Acaena buchananii</i>	bidibid, piripiri	At Risk - Declining	rare	herb	small	specific habitat requirements
<i>Acaena caesiiglauca</i>	glaucous bidibid	Not Threatened	rare	herb	small	
<i>Acaena inermis</i>	bidibid	Not Threatened	rare	herb	small	
<i>Aciphylla aurea</i>	golden speargrass	Not Threatened	rare	herb	large	
<i>Acrothamnus colensoi</i>	Colenso's mingimingi	Not Threatened	occasional	subshrub	medium	
<i>Anisotome aromatica</i>	aromatic aniseed	Not Threatened	occasional	herb	small	
<i>Anthosachne solandri</i>	blue wheatgrass	Not Threatened	common	grass	medium	
<i>Brachyglottis haastii</i>		Not Threatened	rare	herb	small	
<i>Carex breviculmis</i>	grassland sedge	Not Threatened	common	sedge	small	
<i>Carmichaelia crassicaulis</i> subsp. <i>crassicaulis</i>	coral broom	Threatened - Nationally Vulnerable	rare	shrub	small	
<i>Carmichaelia nana</i>	dwarf broom	Threatened - Nationally Vulnerable	rare	subshrub	medium	specific habitat requirements
<i>Carmichaelia petriei</i>	desert broom	At Risk - Declining	rare	shrub	medium	
<i>Carmichaelia vexillata</i>	dwarf broom	At Risk - Declining	occasional	subshrub	medium	specific habitat requirements
<i>Celmisia gracilentia</i>	common mountain daisy	Not Threatened	common	herb	small	

¹² Updated according to latest threat classification de Lange et al. (2024).

¹³ Based on author's observations and DOC records.

Scientific name	Common name/s	Threat status ¹²	Current abundance in nearby outwash gravels ¹³	Plant type	Size for type	Note
<i>Chionochloa rigida</i>	narrow-leaved snow tussock	Not Threatened	rare	grass	large	
<i>Colobanthus brevisepalus</i>	pin cushion	At Risk - Declining	occasional	herb	small	specific habitat requirements
<i>Convolvulus verecundus f. verecundus</i>	tussock bindweed	At Risk - Declining	rare	herb	small	specific habitat requirements
<i>Coprosma brunnea</i>		At Risk - Declining	rare	shrub	small	
<i>Coprosma petriei</i>	turfy coprosma	Not Threatened	common	subshrub	small	
<i>Coprosma propinqua</i>	mingimingi, mikimiki	Not Threatened	rare	shrub	medium	
<i>Corokia cotoneaster</i>	korokio	Not Threatened	rare	shrub	medium	
<i>Dichondra brevifolia</i>	dichondra	Not Threatened	rare	herb	small	
<i>Discaria toumatou</i>	matagouri	Not Threatened	occasional	shrub	medium	
<i>Festuca novae-zelandiae</i>	hard tussock	Not Threatened	dominant	grass	medium	
<i>Geranium brevicaule</i>	alpine crane's bill	Not Threatened	common	herb	small	
<i>Halocarpus bidwillii</i>	bog pine	Not Threatened	rare	tree	small	
<i>Helichrysum filicaule</i>	creeping everlasting daisy	Not Threatened	common	herb	small	
<i>Leptinella pectinata</i> subsp. <i>villosa</i>		Not Threatened	rare	herb	small	
<i>Leucopogon fraseri</i>	patōtara	Not Threatened	very common	subshrub	small	
<i>Luzula rufa</i> var. <i>rufa</i>	red woodrush	Not Threatened	very common	rush	small	
<i>Melicytus alpinus</i>	porcupine shrub	Not Threatened	common	shrub	small	
<i>Muehlenbeckia axillaris</i>	creeping pōhuehue	Not Threatened	common	liane	small	
<i>Muehlenbeckia complexa</i>	small-leaved pōhuehue	Not Threatened	occasional	liane	medium	

Scientific name	Common name/s	Threat status ¹²	Current abundance in nearby outwash gravels ¹³	Plant type	Size for type	Note
<i>Muehlenbeckia ephedroides</i>	leafless pōhuehue	At Risk - Declining	rare	liane	small	specific habitat requirements
<i>Olearia odorata</i>	scented tree daisy	At Risk - Declining	rare	shrub	large	
<i>Pentapogon avenoides</i>	mountain oat grass	Not Threatened	common	grass	small	
<i>Pentapogon crinitus</i>	long-hair plume grass	Not Threatened	common	grass	small	
<i>Pimelea oreophila</i>	pimelea	Not Threatened	common	shrub	small	
<i>Pimelea sericeovillosa</i> subsp. <i>pulvinaris</i>		Threatened - Nationally Vulnerable	occasional	subshrub	small	specific habitat requirements
<i>Poa cita</i>	silver tussock	Not Threatened	occasional	grass	medium	
<i>Poa colensoi</i>	blue tussock	Not Threatened	common	grass	medium	
<i>Poa lindsayi</i>	Lindsay's poa	Not Threatened	common	grass	small	
<i>Racomitrium pruinosum</i>	woolly moss	Not Threatened	very common	moss	medium	interesting experiment, or is it <i>R lanuginosum</i> ?
<i>Ranunculus multiscapus</i>	grassland buttercup	Not Threatened	occasional	herb	small	
<i>Raoulia australis</i>	scabweed	At Risk - Declining	common	cushion	medium	
<i>Raoulia hookeri</i> var. <i>hookeri</i>		Not Threatened	occasional	cushion	medium	
<i>Raoulia monroi</i>	fan-leaved mat daisy	At Risk - Declining	rare	cushion	small	specific habitat requirements
<i>Raoulia parkii</i>	celadon mat daisy	At Risk - Declining	occasional	cushion	medium	
<i>Raoulia subsericea</i>	turf mat daisy	Not Threatened	common	cushion	medium	
<i>Rytidosperm setifolium</i>	bristle tussock	Not Threatened	occasional	grass	medium	
<i>Scleranthus uniflorus</i>		Not Threatened	rare	cushion	small	
<i>Sophora prostrata</i>	prostrate kōwhai	At Risk - Declining	rare	tree	small	nearby shrublands

Scientific name	Common name/s	Threat status¹²	Current abundance in nearby outwash gravels¹³	Plant type	Size for type	Note
<i>Stellaria gracilentia</i>	slender chickweed	Not Threatened	common	herb	small	
<i>Viola cunninghamii</i>	mountain violet	Not Threatened	occasional	herb	small	
<i>Vittadinia australis</i>	white fuzzweed	Not Threatened	rare	herb	small	
<i>Wahlenbergia albomarginata</i> subsp. <i>albomarginata</i>	NZ harebell	Not Threatened	common	herb	small	
<i>Xanthoparmelia semiviridis</i>	Resurrection lichen	At Risk - Declining	occasional	lichen	small	interesting experiment

Appendix 3. Plant species list for landscape screening.

Scientific name	Common name	Threat status ¹⁴	Other comment
<i>Aristotelia fruticosa</i>	mountain wineberry	Not Threatened	in nearby shrublands
<i>Carmichaelia kirkii</i>	scrambling broom	Threatened - Nationally Vulnerable	in nearby shrublands
<i>Carmichaelia petriei</i>	desert broom	At Risk - Declining	in nearby shrublands
<i>Coprosma intertexta</i>		At Risk - Declining	in nearby shrublands
<i>Coprosma propinqua</i>	mingimingi/mikimiki	Not Threatened	common to dominant in nearby shrublands
<i>Coprosma rigida</i>		Not Threatened	
<i>Coprosma virescens</i>		At Risk - Declining	in nearby shrublands
<i>Corokia cotoneaster</i>	korokio	Not Threatened	
<i>Discaria toumatou</i>	matagouri	Not Threatened	common to dominant in nearby shrublands
<i>Halocarpus bidwillii</i>	bog pine	Not Threatened	likely historic component, low planting rate
<i>Leptospermum scoparium</i>	mānuka	Not Threatened	in nearby shrublands, flammable?
<i>Muehlenbeckia complexa</i>	small-leaved pōhuehue	Not Threatened	
<i>Olearia odorata</i>	scented tree daisy	At Risk - Declining	
<i>Ozothamnus leptophyllus</i>	cottonwood, tauhinu	Not Threatened	
<i>Parsonsia capsularis</i> var. <i>capsularis</i>	NZ jasmine	Not Threatened	in nearby shrublands, is it var. <i>rosea</i> ?
<i>Rubus schmidelioides</i>	bush lawyer	Not Threatened	in nearby shrublands

¹⁴ Updated according to latest threat classification de Lange et al. (2024).