

30 July 2026

Environmental Protection Authority
Te Mana Rauhō Taiao
Private Bag 63002
Wellington 6140

Re: Haldon Solar Farm - Response to Conditions Workshop

Dear Panel,

Lodestone thanks the Panel for convening the conditions workshop on 28 July 2026. We consider the workshop made good progress in clarifying the remaining matters concerning the Technical Review Panel (TRP).

The discussion confirmed that the TRP should be a technically focused body, with members capable of interpreting ecological monitoring results and assessing the effectiveness of the required management responses. Given the range of ecological disciplines involved and the limited number of seats available, we consider the TRP should comprise representatives of members with strong ecological expertise and qualification who can take a suitably broad view across the relevant disciplines. The conditions enable the TRP to obtain more specialised technical advice if and when required.

During preparation of the revised conditions, Lodestone also identified that the conditions did not expressly provide for the Applicant to be represented on the TRP. Given that the TRP will make decisions and recommendations that may have material implications for the operation and management of the solar farm, we consider it essential that the Applicant is represented so that operational considerations and practical implementation can properly inform the TRP's deliberations. This does not diminish the TRP's technical capability or its ability to make decisions, noting the number and breadth of the other representatives and its ability to obtain further specialist advice.

The workshop also provided an opportunity to hear comprehensive views from the Department of Conservation, Forest & Bird, Environmental Defence Society, and Mana whenua on the remaining concerns associated with the thresholds, triggers and outcomes that will guide the TRP.

The conditions already provide for a substantial package of ecological protection, enhancement, monitoring and compensation, including:

- \$1 million in payments to the Department of Conservation at commencement in response to potential residual effects on avifauna;
- establishment and management of an approximately 180-hectare conservation and enhancement area with potential expansion to 350-hectares in response to potential adverse effects on outwash plains ecosystems;
- ongoing operational monitoring and publicly available ecological reporting;
- pest management, restoration and other ecological improvements across the site; and



- review by the TRP, including the ability to recommend course corrections and additional management responses during the initial ten-year monitoring period.

Those commitments create a strong framework for managing potential effects and provide an incentive for Lodestone to respond proactively to monitoring results, with the objective of minimising residual effects and any requirement for further compensation at the completion of the ten-year period.

However, Lodestone heard the concern that some uncertainty remained regarding how the TRP would assess the factual outputs of the monitoring programmes and determine whether further environmental responses were required. Following the workshop, Lodestone has therefore revised the conditions to address directly the three matters identified by the Panel:

- (a) the composition and technical capability of the TRP (refer updated conditions 63);
- (b) the process by which the TRP considers monitoring results and determines whether adaptive management or habitat enhancement are required (refer updated conditions 64, 84, 98, 104, 109, 115); and
- (c) the objectives, thresholds, triggers and outcomes that guide those decisions (refer updated conditions 64).

In parallel, Lodestone has reviewed the ecological management plans. Much of the detailed technical content sought through the workshop - including monitoring methodologies, thresholds, triggers, response actions and intended outcomes - was already contained within those plans. Where appropriate we have brought forward conditions from the relevant management plans that appropriately sit at condition level. These also clarify how the TRP is to use the certified management plans and factual monitoring results when undertaking its reviews.

Appendix A contains a summary of changes to conditions. Appendix B contains the complete condition set with tracked changes. We hope this approach aids the Panel's review.

Lodestone considers the revised drafting now appropriately addresses the outstanding matters raised by the Panel during the workshop. Per the previous response on process, should the Panel require, Lodestone would support a short hold period of two working days to allow for those parties to comment specifically on the proposed amendments.

Lodestone thanks the Panel and the workshop participants for their constructive engagement.

Yours faithfully,

Daniel Cunningham
GM, Development
Lodestone Energy Limited



Appendix A - Amended Conditions Summary

Condition	Type	Comments
General		
63	Amended	Inclusion of representation from the Consent Holder on the Technical Review Panel; clause (c) amended to reference the triggers, responses and thresholds in condition 64
64	New	Table setting out triggers, responses and thresholds, brought forward from the taxa-specific ecological management plans and the overarching Ecological Management Plan
65-67	Amended	Certification and implementation of the TRP determination by way of an Ecological Compensation Plan
76	Amended	Requirement to demonstrate that rights have been secured to 170 ha
93	Amended	Reworded to ensure that construction of critical Solar Farm infrastructure is not compromised; target number of individuals brought forward from the overarching Ecological Management Plan
Plant Management		
84	New	Sets out the overarching outcome anticipated
85	Amended	Changes following new condition 84
86(a)	Amended	Tie back to condition 64
Herpetofauna		
98	New	Sets out the overarching outcome anticipated
99	Amended	Changes following new condition 98
100(a)	Amended	Tie back to condition 64
104	New	Requirement for pre-construction survey
Invertebrates		
109	New	Sets out the overarching outcome anticipated
110	Amended	Changes following new condition 109
111(a)	Amended	Tie back to condition 64
115	New	Requirement for pre-construction survey



Appendix B - Complete Condition Set (tracked)

Blank page document to follow.