

File ref: FTAA-2508-1097

19 December 2025

[REDACTED]
GM Development
Lodestone Energy Limited

By Email: [REDACTED]
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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) thanks Lodestone Energy Limited for its response to its Minute-1 that was received 15 December 2025.

The Panel seeks further comment from the applicant on ecological matters in order to make an informed and evidence-based decision regarding the assessment of ecological effects and proposed effects management measures. It 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).

Ecological matters

The Panel is interested in further invertebrate, lizard and threatened plant surveys, and notes the apparent consideration of opportunities to seek positive ecological outcomes through ecological restoration efforts. Nevertheless, the Panel considers it imperative to signal this request for further comment as early as possible to allow the applicant adequate time to address matters outstanding. It is acknowledged that some of these matters may be clarified in the context of a site visit by the Panel and through further engagement with parties invited to comment.

From an initial review of the substantive application documentation, previous feedback, and verbal and written responses to the Panel's questions set out in Panel Minute 1, the Panel has a number of questions relating to the adequacy of the assessment of ecological effects.

To this end we seek a report from the applicant that covers off matters raised in items 1 – 4 set out below and that is provided by 23 January, which is prior to the Panel's site visit on 29 January.

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Fast-track is administered by the Environmental Protection Authority
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1. Despite vegetation survey methods being appropriate, the level of effort applied may be inadequate to characterise the presence of nationally Threatened, At Risk or otherwise notable flora. In this regard, please address the following matters:
 - a. The Panel's understanding that a number of nationally threatened species are present within dryland communities in the MacKenzie Basin, and that no desktop assessment has been undertaken to identify which species may be present.
 - b. The Panel's understanding that the 21 vegetation plots undertaken within the 320 ha site constitute <0.1% of the available habitat within the 320 ha study area. In other words, 99.9% of the site was not quantitatively surveyed or characterised, which the Panel considers to be a particularly low proportion of survey effort relative to site scale.
 - c. The Panel's understanding that the 1m² quantitative plots, which are most likely to detect small cryptic plant species, represent <0.01% of the study area. In other words, 99.99% was not surveyed, which again appears a particularly low level of survey effort relative to the size of the site.
 - d. The absence of a species accumulation curve or similar method to provide confidence that the level of effort was sufficient to detect the majority of indigenous species present, particularly nationally Threatened, At Risk or otherwise notable species.
 - e. The absence of information on the level of effort assigned to searching for and recording species present outside the vegetation plots.

2. The applicant has concluded in their verbal response that the level of effect is very low. The Panel seeks to understand this conclusion. In this regard, please address the following matters:
 - a. While it is acknowledged that the site is highly modified, exotic-dominated, and likely on a decline trajectory, it nevertheless appears to support indigenous biodiversity adapted to existing site conditions. This includes, but is not limited to, four nationally At Risk-declining flora detected to date, and the fact that 20% of the site is covered in indigenous lichen and moss assemblages, including an At Risk-declining lichen.
 - b. The site, at 320 ha, is large and the proposed changes would be material, both in terms of the construction and operation of the solar farm and the installation of a 7km rabbit proof perimeter fence. As stated in the applicant's ecology report, the decline in indigenous scab weeds (*Raoulia spp.*) reflects reduced grazing pressure from rabbit herbivory and an increase in competition from introduced species. Accordingly, it would be expected that three of the four detected vascular species on site which are *Raoulia spp.* would be adversely impacted by the establishment of a 7km rabbit proof fence. This adverse effect may be above and beyond impacts associated with the construction and operation of the proposed solar farm. The indigenous lichen and moss community, which currently comprises 20% of the site, may also decline due to increased competition from exotic weeds.
 - c. The applicant has stated in their response that the Ecological Impact Assessment Guidelines (EciAG) published by the Environmental Institute of Australia and New Zealand (EIANZ, 2018) have been used. However, this is not mentioned in the ecology report, and the outcomes of the assessment (particularly the level of effects) do not appear to reflect their application. For instance, under the EciAG, nationally At Risk-

declining species are assigned a 'High' ecological value. As such, the magnitude of effect on each of these nationally At Risk species may only need to be 'moderate' (after efforts to avoid, minimise or remedy effects) to constitute a high level of residual effect that warrants offsetting or compensation.

3. The panel seeks further information on the low-probability but potentially high consequence risks to nationally Threatened avifauna, including black stilt, wrybill and black-fronted tern, arising from the construction and operation of a solar farm located in proximity to significant habitats, and how potential effects could be addressed, including through offsite compensation.
4. The proposed monitoring and adaptive management measures outlined in the applicant's verbal response provide limited certainty or assurance that ecological effects will be adequately addressed, or that tangible biodiversity outcomes associated with proposed effects management measures (e.g. historic ecosystem restoration) will be realised. For instance, most indigenous species that were historically present and that would be appropriate for ecological restoration purposes are slow growing and would require sustained and intensive management to ensure success. Accordingly, the Panel seeks further comment on compensation actions, both on- or offsite, that specifically target the most threatened biodiversity values in the area and are expected to deliver tangible and certain net positive outcomes for significant local biodiversity, particularly outcomes that can be realised in the shorter term.

Please provide the further information to the EPA by **23 January 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, 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] email at info@fasttrack.govt.nz

Nāku noa, nā

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Application Lead