

Technical Advice - Ecology by Andrew Briggs

Date	22 June 2026
To	Mhairi Rademaker, Senior Environmental Policy and Planning Advisor, Genesis Energy Limited
From	Andrew Briggs, Associate Ecologist, SLR Consulting New Zealand
Project advice provided for	Foxton Solar Farm – application for resource consents
Documents referred to	Ecological Impact Assessment - Foxton Solar Farm – Fast Track Approvals Act Application – SLR Consulting New Zealand. SLR Project No.: 810.V14848.00004. Dated 10 December 2025 (Revision: V4.0). Review of Foxton Solar Application for effects on wetlands and terrestrial ecology – Lambie Ecology on behalf of the Horizons Regional Council. Dated 20 May 2026. Technical Memorandum for potential effects on kāhu (<i>Circus approximans</i>) from solar farms – SLR Consulting New Zealand. SLR Project No.: 810.V14848.00004. Dated 16 May 2024. Comments from Department of Conservation (DOC) on the fast-track consenting application. Dated 16 June 2026. Comments from Manawatū-Whanganui Regional Council (Horizons) on the fast-track consenting application. Dated 16 June 2026.
Qualifications	I am an Associate Ecologist at SLR Consulting New Zealand (SLR). SLR is a global environmental and advisory consultancy specialising in sustainability and climate change strategy, planning, environmental management and impact assessment and waste management and remediation. I have been employed at SLR since October 2022. I hold the qualification of Master of Science: Conservation Ecology from the University of Stellenbosch (2016). I have been a member of the Certified Environmental Practitioner Scheme since September 2023. I have over ten years of ecological assessment experience, across South Africa and New Zealand. My experience includes completing wetland, aquatic, terrestrial and faunal ecological assessments and management plans for a variety of proposed infrastructural and environmental monitoring projects. Recent projects I have worked on include the Ōpunake, Marton and Carterton solar farms which were approved under the Covid-19 Recovery (Fast-track Consenting) Act 2020.
Code of Conduct	As an expert witness I have read, and I am familiar with, the Code of Conduct for expert witnesses contained in the Environment Court Practice Note 2023. This memorandum has been prepared in compliance with that Code. In particular, unless I state otherwise, this response is within my area of expertise and I have not omitted to

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	consider material facts known to me that might alter or detract from the opinions I express.
Signature	

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1. I have read the comments and associated material received from the Department of Conservation (DOC) and confirm that nothing in my opinion as expressed in the application documents has changed. I continue to support the position expressed in the application documents and make the following brief comments on aspects of the material I have read below.
2. I do propose minor amendments to the proposed consent conditions in response to the changes proposed by the Horizons Regional Council and comments made by DOC. These changes are proposed to conditions B26, and B28.

DOC advice, and SLR response as relates to Avifauna

3. In section 2.2. of the advice prepared by Mr Brass¹, he states:

The site that will be occupied by the footprint of the solar farm has low terrestrial ecological values, but the site is likely to be used, and flown over, by a range of indigenous birds, including three Threatened - Nationally Critical species (matuku-hūrepo / Australasian bittern, tara iti / fairy tern and kōtuku / white heron).

4. While I agree that there is a potential for the species listed above to fly over the site or temporarily utilise the site for foraging, I don't agree that it is likely. The sheer abundance of alternative, and more suitable habitat in the region, should allow for a rational assessment that it is possible (and not 'likely') that Australasian bittern may overfly or temporarily forage on site. In addition, it is highly unlikely that tara iti / fairy tern and kōtuku / white heron will utilise or overfly the site given the above rationale, as well as their likely very low abundance and number of records (particularly for tara iti / fairy tern) in the region. Note that the likelihood of tara iti / fairy tern and kōtuku / white heron utilising or overflying the site was not considered further in the advice prepared by Mr Brass.
5. In later sections 3.2. – 3.4., Mr Brass notes that SLR's assessment found that 34 Threatened or At Risk (TAR) species have been recorded within 10 km of the site and provides a table describing which of those 34 species could 'potentially overfly the site' or are 'most likely to use or overfly the site'. This language is inconsistent in making the point, which appears to settle on Australasian bittern being the only 'likely' threatened species to overfly the site and use the wetlands on site. Per the table in section 3.3. Australasian bittern primarily inhabit wetland and riverine environments. There is an abundance of this type of habitat in other parts of the region around the Manawatū River, the Manawatū Estuary and coastal lake complexes in the region (e.g. Lake Omanu, Lake Koputara, Lake Kaikopu, etc.). Most Australasian bittern sightings provided in section 3.4. are in these areas, while the Australasian bittern sighting shown along SH1 near the site is from 1955 and cannot be considered usable for the purposes of this assessment. The site land cover and current land use is consistent with the majority of agricultural operations in the region, and almost entirely comprises pasture grassland of negligible ecological value, 0.79 ha of low value exotic grass dominated natural inland wetland habitat, and low value drains / modified watercourses, most of which have little or no flow.

¹ Comments from DOC on the fast-track consenting application

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6. In sections 3.6.- 3.8. of the advice prepared by Mr Brass, he insinuates that the field effort undertaken by SLR has been insufficient to account for potential Australasian bittern presence on site, stating:

That survey approach would be highly unlikely to have detected Australasian bittern

7. While I agree, in principle, that Australasian bittern surveys should be more thorough compared to general bird surveys, I don't agree that an Australasian bittern-specific survey was required at this site for the proposed solar farm development, for the same rationale described in Point 4. and 5. above. SLR has implemented a similar survey effort for the three other solar farm projects I have worked on, which have gone through rigorous review and been approved, all of which were located in similar agricultural settings in the North Island.

8. In sections 3.12. of the advice prepared by Mr Brass, in describing the proposed approach to bird monitoring at the site, he states that:

DOC considers that such an approach is highly inadequate for a situation where there is a collision risk to Nationally Critical species

9. I acknowledge that there is a possibility that TAR bird species may overfly or temporarily forage on site, however, I don't agree that the monitoring proposed is highly inadequate based on the findings of the site survey which found that the ecological value of birdlife on site is 'low'. This finding has been echoed by Lambie Ecology, on behalf of the Horizons Regional Council (HRC), in their review of the effects of the proposal on wetlands and terrestrial ecology. In my opinion, the implied collision risk to Australasian bittern associated with the proposal may be overstated. It is based on hypotheses associated with the 'lake effect' and disorientation of birds, linked to the polarisation of light, results of which are varied for different species and require ongoing study (e.g. Flemming, 2025²). Incidental monitoring by solar farm staff is commensurate with the bird values on site, and should be adequate for identifying larger birds, such as Australasian heron (i.e. Australasian bittern; as mentioned by Lambie Ecology). I am inclined to agree with amending proposed conditions relating to the implementation of trigger management actions, which would require the compilation and implementation of an avifauna management plan (AMP) for submission to the Horowhenua District Council (HDC) and Manawātū-Whanganui Regional Council (MWRC) / HRC, should any of the thresholds provided in the table below be met.

Table : Criteria for identification of more than low EIANZ assessment thresholds

Threat classification	Threshold to trigger management actions to mitigate against more than minor effects
Threatened - Nationally Critical and Nationally Endangered species	1 carcass detected at any time related to collision mortality caused by the Project

² Fleming, P. A. (2025). All that glitters–Review of solar facility impacts on fauna. Renewable and Sustainable Energy Reviews, 224, 115995.

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Threatened - Nationally Vulnerable Species	2 carcasses detected within any single survey time related to collision mortality caused by the Project; or 5 carcasses cumulatively over an annual period time related to collision mortality caused by the Project
Threatened - Nationally Increasing and At-Risk species	5 carcasses cumulatively over an annual period time related to collision mortality caused by the Project
Non threatened indigenous species	5 carcasses detected within any single survey time related to collision mortality caused by the Project; or 20 carcasses cumulatively over an annual period time related to collision mortality caused by the Project

10. It is recommended that the condition of consent that will require the preparation of the Avifauna Management Plan (AMP) should any of the trigger values above be exceeded, should also require that the AMP include details of more frequent monitoring protocols, the adaptive management techniques that can be utilised by the solar farm consent holder and any other mitigation measures that can be utilised if the trigger values in the table above are breached. It is noted that Section 3.15. of the advice prepared by Mr Brass, outlines a number of adaptive management techniques that could be selected and implemented by the consent holder and the most appropriate of these measures should be outlined in the AMP in the unlikely event that this becomes required.

DOC advice, and SLR response as relates to Freshwater

11. In section 4.4. of the advice prepared by Mr Brass, he states:

DOC also considers that a monitoring requirement to assess effects on wetland extent and values after three years would be appropriate. Given the general loss and now rarity of wetlands in the area, an adaptive management approach should be employed to restore wetlands and/or offset or compensate for any loss of values.

12. As acknowledged in section 3.23. of the advice prepared by Mr Brass, the finding of the EclA is that wetlands identified within the site have low ecological value. These wetlands were dominated by exotic grasses and herbaceous cover, are within an active agricultural setting and are therefore subjected to ongoing associated impacts. I agree that wetland extent has reduced in the region, and indeed wetlands are an under-represented habitat type nationally. Restoration of an area of loosely contiguous low value wetland habitat in the central reaches of the site has been proposed by the applicant. This includes the planting and fencing-off of approximately 6.6 ha of wetland habitat and buffer areas, which should result in a long-term ecological benefit for the site when compared to the current situation. This is echoed by Lambie Ecology, on behalf of the Horizons Regional Council (HRC), who stated:

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As there are no significant residual adverse effects within the affected wetlands to be managed in the first instance, I am of the view that the strategy results in a demonstrable gain in wetland quality

13. In this regard, I don't agree that any offset, compensation or additional monitoring, above the planting and restoration specified in the Landscape Mitigation Plan (LMP), is necessary.

Conditions

14. I have provided input into the updated consent condition set included with this response and consider the changes proposed are more than adequate to appropriately avoid, remedy or mitigate the potential effect of the proposal on avifauna, bats and wetlands and do not consider that any further alterations to the conditions are required.

Andrew Briggs

22 June 2026