

## FTAA–2504-1044: Application received for referral of the project under the Fast-track Approvals Act 2024 – Stage 1 decisions

### Project Name: Twizel Solar Project

Date submitted:	30 April 2025	Tracking #: BRF– 6146	
Security level:	In-Confidence	MfE priority:	Urgent

	<b>Action sought:</b>	<b>Response by:</b>
To Hon Chris Bishop, Minister for Infrastructure	Decisions on recommendations in Table A	To be advised

Actions for Minister's Office staff	<b>Return</b> the signed briefing to MfE <a href="mailto:FTAreferalls@mfe.govt.nz">FTAreferalls@mfe.govt.nz</a> <b>Send</b> email to Ministers inviting written comments
Number of attachments: 3	Attachments: 1. Application documents for Twizel Solar Project: File exchange link provided in email 2. List of the Māori groups referred to in section 18(2) 3. Statutory framework summary

### Ministry for the Environment contacts:

Position	Name	Cell phone	1 <sup>st</sup> contact
Principal Author(s)	Antonia Croft and Stephen Church		
Manager	Stephanie Frame	s 9(2)(a)	✓
General Manager	Ilana Miller	s 9(2)(a)	

## Project location

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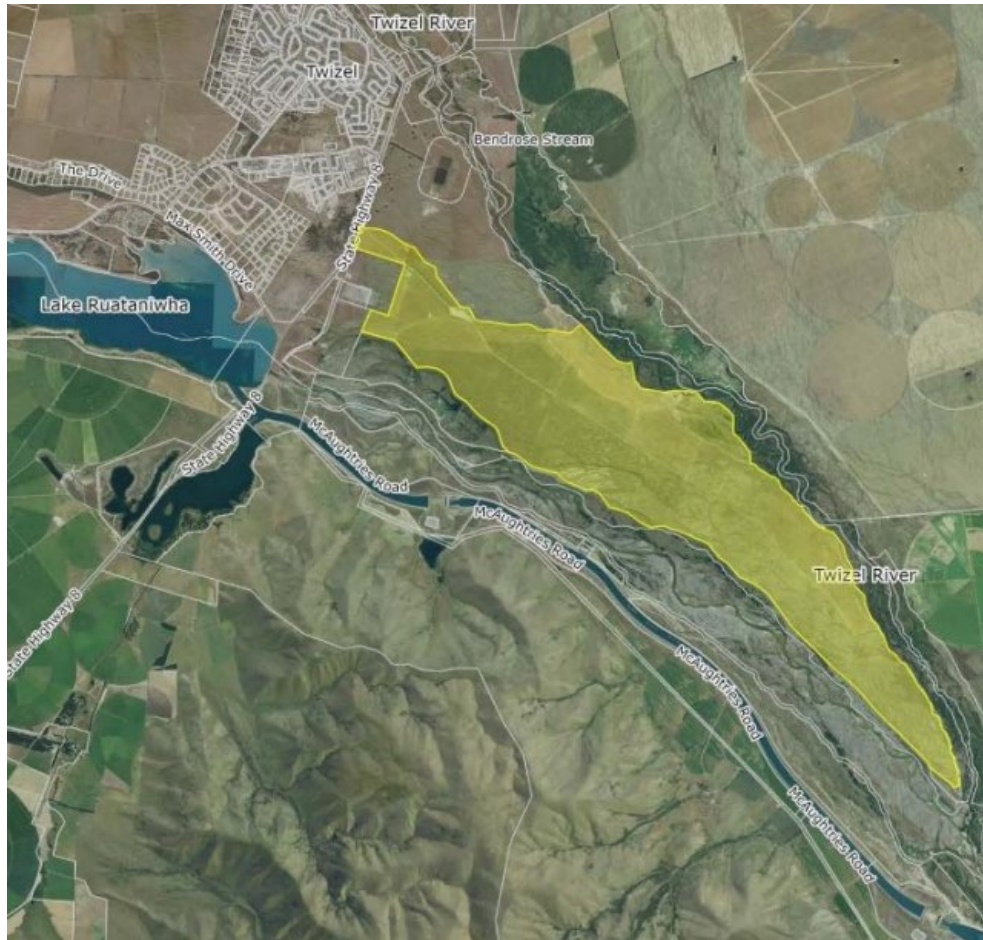


Figure 1 – Project site shaded yellow.

## Key messages

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1. This briefing seeks your initial decisions on an application from Nova Energy Limited to refer the Twizel Solar project (the project) under the Fast-track Approvals Act 2024 (the Act) to the fast-track approvals process. At this stage you can either decline an application for the reasons set out section 21, or provide the application to, and invite comments from, the parties identified in section 17. If you do not decline the application, you will receive a further briefing following receipt of comments, to support your final decision on whether to refer the project.
2. The project involves the establishment and operation of a 300-megawatt solar farm over 500 hectares of an 868-hectare site to the east of Twizel Township and State Highway 8 in the Canterbury Region.
3. The project also involves the construction of overhead transmission lines to connect the site to the National Grid via the Transpower Twizel Substation.
4. The project will generate enough renewable energy annually to power 75,000 homes.
5. The project will require the proposed approvals:
  - a. Resource consents under the Resource Management Act 1991.
  - b. Permits under the Wildlife Act 1953

6. We have undertaken initial analysis of the referral application, and this is presented along with our considerations and recommendations in Table A.
7. We have decided the application is complete and complies with section 14 of the Act, as the application complies with section 13 requirements, may be capable of satisfying the criteria in section 22 and does not appear to involve an ineligible activity. The applicable fee and levy has been paid.
8. We recommend you progress consideration of the referral application to the next stage of analysis (Stage 2) and invite written comments from the parties prescribed in section 17(1) of the Act being: local authorities, the Minister for the Environment and other relevant portfolio Ministers, relevant administering agencies, the owners of Māori land within the project area and identified Māori groups from section 18(2) of the Act. The parties are listed in Attachment 2.
9. We recommend that you also invite written comments from the following persons under section 17(5) of the Act.
  - a. The Minister for Regional Development
  - b. The Minister for Economic Growth
  - c. The Chief Executive of Transpower New Zealand Limited
  - d. The Chief Executive of Alpine Energy Limited
  - e. The Chief Executive of Meridian Energy Limited
  - f. The Chief Executive of the New Zealand Transport Agency.
10. We recommend that under section 20 of the Act you request further information from the applicant and the relevant local authorities as detailed in Table A.

### Action sought

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11. Please indicate your decisions on the recommendations in Table A.

### Signature

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A handwritten signature in black ink, consisting of a large, stylized 'I' followed by a horizontal stroke that tapers to a point.

Ilana Miller  
**General Manager – Delivery and Operations**

**Table A: Stage 1 analysis**

Project details	Project Name		Applicant		Project Location	
	Twizel Solar Project		Nova Energy Limited		The project site is located immediately east of Twizel township and State Highway 8 in the Mackenzie District, Canterbury Region.	
Project description	<p>The project involves the establishment and operation of a 300-megawatt solar farm over 500 hectares of an 868-hectare site to the east of Twizel Township. Once operational and connected to the National Grid, the project will generate enough renewable energy annually to power 75,000 homes.</p> <p>The project comprises:</p> <ul style="list-style-type: none"><li>• general earthworks and site establishment including the construction of operational and management buildings, inverters, internal roads/tracks</li><li>• solar panels situated on solar tables with a single axis tracking system covering 500 hectares of the 868-hectare site</li><li>• 33kv overhead transmission lines to connect the project to the Transpower New Zealand Twizel Substation</li><li>• establishment of exclusion areas and buffers to protect significant native vegetation, habitat and wetlands.</li></ul>					
Consultation undertaken	As required by s11, the applicant has consulted with:					
	Relevant local authorities	Relevant iwi authorities, hapu and Treaty settlement entities:	Relevant MACA groups	Ngā hapū o Ngāti Porou]	Relevant administering agencies	Holder of land to be exchanged
	<ul style="list-style-type: none"><li>• Mackenzie District Council</li><li>• Canterbury Regional Council</li></ul>	<ul style="list-style-type: none"><li>• Te Rūnanga o Ngāi Tahu</li><li>• Te Rūnanga o Arowhenua</li><li>• Te Rūnanga o Waihao</li><li>• Te Rūnanga o Moeraki</li></ul>	N/A	N/A	<ul style="list-style-type: none"><li>• Department of Conservation</li><li>• Ministry for the Environment</li></ul>	N/A
Section 22 assessment criteria						
The project is an infrastructure or development project that would have significant regional or national benefits [section 22(1)(a)]	<p>The Minister may consider any of the following matters, or any other matters the Minister considers relevant.</p> <p><i>The project has been identified as a priority project in a central or local government, or sector plan or strategy or a central government infrastructure priority list [s22(2)(a)(i)]</i> While the project has not specifically been identified as a priority project in a strategy or plan, the applicant considers that the project will contribute to New Zealand’s climate change targets that are set out in central government policies and plans, including assisting the New Zealand government to meet the overall objective to increase renewable energy generation as a matter of national significance.</p> <p><i>Will deliver new regionally or nationally significant infrastructure or enable the continued functioning of existing regionally or nationally significant infrastructure [s22(2)(a)(ii)]</i> The project is a large-scale infrastructure and development project that will provide for the generation 300 megawatts of renewable energy, maximising low-emissions electricity generation from the available solar resource, providing electricity annually for approximately 75,000 homes. The project will increase daytime energy supply to support resilience within the National Grid. The project will increase New Zealand’s renewable electricity generation to support the national economy during daytime periods, allowing other energy sources to be reserved for high demand periods when supply capacity from other generation sources may be constrained. The applicant notes the project will create significant employment and economic benefits at the regional and national level.</p> <p><i>Will deliver significant economic benefits [s22(2)(a)(iv)]</i> The applicant states that the project will create the following economic benefits:</p> <ul style="list-style-type: none"><li>• Employment opportunities during construction.</li><li>• Ongoing operations and maintenance jobs, when operational.</li><li>• Direct contribution to New Zealand’s transition to a low emissions economy and support of economic development through the addition of low-cost renewable electricity.</li></ul> <p><i>Will support primary industries, including aquaculture [s22(2)(a)(v)]</i> The project will continue to enable grazing activities following construction. The overall integration of the renewable electricity generation will increase the supply of renewable electricity generation to support other primary industry activities.</p> <p><i>Will support development of natural resources, including minerals and petroleum [s22(2)(a)(vi)]</i> Solar energy/sunlight is a natural renewable resource that the project will utilise to covert to electricity.</p> <p><i>Will support climate change mitigation, including the reduction or removal of greenhouse gas emissions [s22(2)(a)(vii)]</i> The applicant states that the project will mitigate climate change by offering generation from a renewable source which in turn, will reduce New Zealand's reliance on high emitting forms of electricity generation.</p> <p><i>Will support climate change adaptation, reduce risks arising from natural hazards, or support recovery from events caused by natural hazards [s22(2)(a)(viii)]</i> The applicant states that renewable forms of energy generation support climate change adaptation by reducing reliance on high-emission electricity generation sources. Similarly, the resilience provided through diversification of electricity generation will improve New Zealand’s ability to adapt to climate change, and support adaptation, resilience and recovery from natural hazards.</p> <p><i>Will address significant environmental issues [s22(2)(a)(ix)]</i> The project directly aligns with Government objectives and emissions obligations which serve to address environmental issues.</p> <p><i>Is consistent with local or regional planning documents, including spatial strategies [s22(2)(a)(x)]</i> A high-level assessment of the local and regional planning documents relevant to the project has been provided with the application. The applicant has considered that the project is consistent with the district and regional planning</p>					



	framework. The project site is within the Mackenzie Basin Subzone which is identified as an Outstanding Natural Landscape under the Mackenzie District Plan.		
referring the project to the fast-track approvals process [section 22(1)(b)]	<p><i>Would facilitate the project, including by enabling it to be processed in a more timely and cost-effective way than under normal processes [s22(1)(b)(i)]</i> The applicant notes that using the fast-track process would facilitate the project in a more timely and cost-effective manner than under the conventional RMA consenting pathways.</p> <p><i>Is unlikely to materially affect the efficient operation of the fast-track approvals process [s22(1)(b)(ii)]</i> The project is unlikely to materially affect the efficient operation of the fast-track approvals process as it does not encompass an activity that is overly complex, relative to other large scale infrastructure projects.</p>		
Minister invites comments	<p><i>You must copy the application to, and invite written comments from [s17(1)]:</i></p> <ol style="list-style-type: none"> <li>Relevant local authorities - Mackenzie District Council and Canterbury Regional Council</li> <li>The Minister for the Environment</li> <li>Other relevant portfolio Ministers: <ul style="list-style-type: none"> <li>the Minister of Conservation – as the project seeks approvals under the Wildlife Act 1953</li> <li>The Minister of Climate Change – as the project involves electricity generation and renewable energy from solar, and the applicant has considered that project will deliver regionally or nationally significant climate change mitigation/adaptation benefits</li> <li>The Minister for Energy – as the project involves electricity generation, and the applicant has considered that the project will deliver regionally or nationally significant energy benefits</li> </ul> </li> <li>Relevant administering agencies: <ul style="list-style-type: none"> <li>Ministry for the Environment</li> <li>Department of Conservation</li> </ul> </li> <li>The Māori groups identified in Attachment 2.</li> </ol>	<p><i>The Minister may also copy the application to, and invite written comments from, any other person[s17(5)].</i></p> <p>We recommend you invite comments from the following additional persons:</p> <ol style="list-style-type: none"> <li>The Minister for Regional Development</li> <li>The Minister for Economic Growth <ul style="list-style-type: none"> <li>We recommend that the Minister for Regional Development, and the Minister for Economic Growth be invited to comment on whether the benefits of the project are regionally or nationally significant.</li> </ul> </li> <li>The Chief Executive of Transpower New Zealand Limited, because the project requires connection to the National Grid operated by Transpower New Zealand Ltd.</li> <li>The Chief Executive of Meridian Energy Limited because the project will require approval from Meridian Energy Limited for a transmission line easement across land held by Meridian Energy Limited for the project to access the Transpower substation</li> <li>The Chief Executive of Alpine Energy Limited because Alpine Energy Limited manages the local electricity distribution network</li> <li>The Chief Executive of the New Zealand Transport Agency because the project requires access to and from State Highway 8.</li> </ol>	<p><i>The Minister may request further information about a referral application from the applicant, the relevant local authorities, or the relevant administering agencies to be provided within the time frame specified in the request.</i></p> <p>We recommend you request the following further information from:</p> <ol style="list-style-type: none"> <li>Mackenzie District Council – on whether it considers the project would have significant regional or national benefits, along with any comments on alignment with the relevant district plans, policies, and/or strategies in that context</li> <li>Canterbury Regional Council– on whether it considers the project would have significant regional or national benefits, along with any comments on alignment with the relevant regional plans, policies, and/or strategies in that context</li> <li>The applicant – to provide evidence and explanation to support their statements that that the project will deliver economic and employment benefits of regional or national significance.</li> </ol>
Recommendations			Minister's decision
a. Note that section 25 of the Act permits you to decline the referral application without inviting comments from the relevant local authorities and any relevant Ministers.			Noted
b. Note that you have not yet provided the application to, nor sought any comments on it from, the parties listed in section 17(1) but that you are required to do so if you do not decline the application under section 21 of the Act.			Noted
c. Note that section 17(5) of the Act permits you to forward an application to, and invite written comments from, any other person.			Noted
d. Note that if comments have been sought and provided within the required time frame you are required to consider it, along with the referral application, before deciding to decline the application.			Noted
e. Note that section 20 of the Act permits you to request further information from the applicant or relevant local authorities or relevant administering agencies at any time before you decide whether to accept or decline an application.			Noted
f. Agree to progress the Twizel Solar Project to our Stage 2 analysis (invitation to comment and s 18 report stage).			YES / NO
g. Agree to provide the application to, and invite comments from: <ul style="list-style-type: none"> <li>Mackenzie District Council and Canterbury Regional Council as the relevant local authorities under section 17(1)(a)</li> <li>The Minister for the Environment, the Minister for Climate Change, and the Minister for Energy as the other relevant portfolio Ministers under section 17(1)(b)</li> <li>The Ministry for the Environment and the Department of Conservation as relevant administering agencies under section 17(1)(c)</li> <li>The Māori groups identified in Attachment 2 under section 17(1)(d)</li> </ul>			YES / NO
h. Agree to provide the application to and invite comments from the following additional entities/persons under section 17(5): <ul style="list-style-type: none"> <li>The Minister for Regional Development</li> <li>The Minister for Economic Growth</li> <li>The Chief Executive of Transpower New Zealand Limited</li> <li>The Chief Executive of Meridian Energy Limited</li> <li>The Chief Executive of Alpine Energy Limited</li> </ul>			YES / NO

<ul style="list-style-type: none"> <li>The Chief Executive of the New Zealand Transport Agency.</li> </ul>	
i. <b>Agree</b> to seek further information under section 20 from: <ul style="list-style-type: none"> <li>Mackenzie District Council – on whether it considers the project would have significant regional or national benefits, along with any comments on alignment with the relevant district plans, policies, and/or strategies in that context</li> <li>Canterbury Regional Council – on whether it considers the project would have significant regional or national benefits, along with any comments on alignment with the relevant regional plans, policies, and/or strategies in that context</li> <li>The Applicant – to provide evidence and explanation to support their statements that that the project will deliver economic and employment benefits of regional or national significance.</li> </ul>	YES / NO
j. <b>Note</b> that you have agreed to delegate to the Secretary for the Environment your responsibility to send all correspondence other than to Ministers.	Noted

**Signed:**

Hon Chris Bishop  
**Minister for Infrastructure**

**Date:**

**Attachment 1: Application documents/link for Twizel Solar Project:**

## Attachment 2: List of the Māori groups referred to in section 18(2)

Name of group	Type of group (section of Act)
Te Rūnanga o Ngāi Tahu	Iwi authority (s18(2)(a)); Treaty settlement entity – Ngāi Tahu Claims Settlement Act 1998 (s18(2)(a))
Te Rūnanga o Arowhenua	Ngāi Tahu Papatipu Rūnanga – Iwi authority (s18(2)(a)); Treaty settlement entity (s18(2)(a))
Te Rūnanga o Waihao	Ngāi Tahu Papatipu Rūnanga – Iwi authority (s18(2)(a)); Treaty settlement entity (s18(2)(a))
Te Rūnanga o Moeraki	Ngāi Tahu Papatipu Rūnanga – Iwi authority (s18(2)(a)); Treaty settlement entity (s18(2)(a))
Aoraki Environmental Consultancy Limited	Entity owned by Papatipu Rūnanga (s18(2)(k))
Aukaha	Entity owned by Papatipu Rūnanga (s18(2)(k))



## Attachment 3: Statutory framework summary

### Statutory framework summary

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1. You are the sole decision maker for referral applications. If you accept a referral application then the whole or part of the project will be referred to the fast-track approvals process.
2. If a Treaty settlement, the Marine and Coastal Area (Takutai Moana) Act 2011, the Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019, a Man Whakahono ā Rohe or a joint management agreement provides for consideration of any document or procedural requirements, you must, where relevant:
  - a. Give the document the same or equivalent effect through this process as it would have under any specified Act; and
  - b. Comply with any applicable procedural requirements.
3. You must decline a referral application if:
  - a. you are satisfied the project does not meet the referral criteria in s22
  - b. you are satisfied the project involves an ineligible activity (s5)
  - c. you consider you do not have adequate information to inform your decision.
4. You may decline an application for any other reason, including those set out in s21(5) and even if the application meets the s22 referral criteria.
5. You can decline an application before or after inviting comments under s 17(1). However, if comments have been sought and provided within the required time frame, you must consider them, along with the referral application, before deciding to decline the application.
6. If you do not decline a referral application at this initial stage you must copy the application to, and invite written comments from:
  - a. the relevant local authorities,
  - b. the Minister for the Environment and relevant portfolio Ministers
  - c. the relevant administering agencies
  - d. the Māori groups identified by the responsible agency
  - e. the owners of Māori land in the project area:
  - f. you may provide the application to and invite comments from any other person.
7. You can request further information from an applicant, any relevant local authority or any relevant administering agency at any time before you decide to decline or accept a referral application (see section 20 of the Act).
8. However, if further information has been sought and provided within the required time frame you must consider it, along with the referral application, before deciding to decline the application.