

SUPPLEMENTARY WRITTEN COMMENTS

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Please ensure that you have authority to comment on the application on behalf of those named on this form.			
Organisation name (if relevant)			
First name	<div style="background-color: black; width: 100%; height: 15px;"></div>		
Last name	<div style="background-color: black; width: 10%; height: 15px;"></div>		
First name	<div style="background-color: black; width: 10%; height: 15px;"></div>		
Last name	<div style="background-color: black; width: 20%; height: 15px;"></div>		
Postal address	<div style="background-color: black; width: 100%; height: 15px;"></div>		
Home phone / Mobile phone	<div style="background-color: black; width: 100%; height: 15px;"></div>	Work phone	N/A
Email (a valid email address enables us to communicate efficiently with you)	<div style="background-color: black; width: 100%; height: 15px; margin-bottom: 5px;"></div> <div style="background-color: black; width: 100%; height: 15px;"></div>		

2. We will email you draft conditions of consent for your comment			
YES	I can receive emails and my email address is correct	<input type="checkbox"/>	I cannot receive emails and my postal address is correct

SUPPLEMENTARY COMMENTS ON THE POINT SOLAR FARM FAST-TRACK SUBSTANTIVE APPLICATION

Original comments provided: 19 February 2026

Supplementary comments provided: 12 March 2026

Introduction

1. These supplementary comments are made on the substantive application for consent under the Fast Track Approvals Act by Far North Solar Farm Limited (the **Applicant**) for 'The Point Solar Farm' (the **Application**).
2. [REDACTED] is the registered proprietor of Lot 1 DP 470213 (**Lot 1**) and Section 3 SO Plan 432605 (collectively, the **Property**). [REDACTED] and [REDACTED] primary residence is located on Lot 1.
3. We were invited to provide written comments on the Application, which we did by the due date of 19 February 2026. In these written comments, we explained there had been an administrative error that caused us not to receive the invitation to comment until 12 February 2026.
4. Subsequently, we received a letter dated 20 February 2026 acknowledging the EPA sent us the invitation to comment later than intended only providing us with 5 working days to respond. We were provided with the opportunity to submit any further material, with the revised due date being 12 March 2026.
5. This supplementary comment is provided in addition to our original comments dated 19 February 2026, which we understand has already been received by both the Panel and the Applicant. We respectfully request these supplementary comments be considered in addition to the written comments we previously provided.

Communication with the Applicant

6. We understand that on 26 February 2026, the Applicant provided their response to the comments received from invited parties. In particular, the Applicant provided the following response to our original comments:¹

Submission Number	Submitter	Issue / comment number	Issue or comment	Response
20	[REDACTED]	99	<p>The [REDACTED] neighbours commented that the project was still intending to cross their land, using the existing ROW that is in place for The Point block. They asked that FNSF investigate and report on alternative access options and an alternative route be required that does not use their land. Both these actions have been undertaken and the alternative route has been applied for in the DOC concession as part of this application. The undertaking to arrange an alternative route was confirmed to them in the email dated 16 Feb 2024, included with their submission.</p> <p>As part of the Fast Track application, FNSF has included the required DOC concession application that shows the route to the site being via the [REDACTED] entrance, crossing the DOC/LINZ administered Bendrose stream, thus avoiding the need to cross the [REDACTED] property.</p>	<p>FNSF acknowledges that the route to the site was not shown in the Fast Track application form itself, but was shown as part of the DOC concession application and the reports attached with that application.</p> <p>FNSF has continued to work with other landowners to avoid the [REDACTED] land during construction and whenever possible uses this alternative route when moving to and from the site during the construction phase of the project.</p> <p>MDC has noted that the route to the solar farm is outside of this application.</p> <p>NZTA has used the alternative entrance in their review and comments.</p>

7. We only became aware of the Applicant's intention to use an alternative access after reading the above response to our original comments.

¹ Applicant's Response to Comments Received, Attachment 0 – Index, Submission Number 20, Issue/Comment Number 99.

8. On this basis, we engaged in direct discussions with the Applicant. The emails between our legal counsel and John Andrews (on behalf of the Applicant) are attached to this supplementary comment as **Annexure A**.
9. Summarily, we requested the Applicant:
 - (a) Provide confirmation that the easement across our Property will **not** be used for any activities associated with or ancillary to the proposed Solar Farm project, during either the construction or operational phases;
 - (b) Provide a single plan showing the proposed access route in relation to our Property; and
 - (c) Provide details of the mitigation measures proposed to address potential dust, noise, visual amenity and vibration effects on our Property.
10. In an email dated 11 March 2026, the Applicant confirmed:
 - (a) “[The right of way over Lot 1 (granted by Easement Instrument 8634143.6)] **will not** be used for any construction traffic, heavy vehicle movements or construction-related activities associated with The Point Solar Farm project.”
 - (b) “Access during the construction phase will be via an alternative construction traffic route specifically developed to entirely bypass [the] Property (Lot 1 DP 470213 and Section 3 SO 432605).”
 - (c) “[The Applicant] intends to maintain and exercise [their] legal rights under the existing easement for access during the operational phase of the solar farm. [...] Operational access is expected to be limited to light vehicles only (for routine maintenance, monitoring, and emergencies), and any use will be consistent with the rights implied in the easement under the Land Transfer Regulations and Property Law Act.”
11. In this email the Applicant also provided a Plan showing the proposed access route (reproduced below), and provided references to the Construction Management Plan that details the Applicant’s proposed mitigation measures for dust, visual amenity, and traffic volumes and timing.

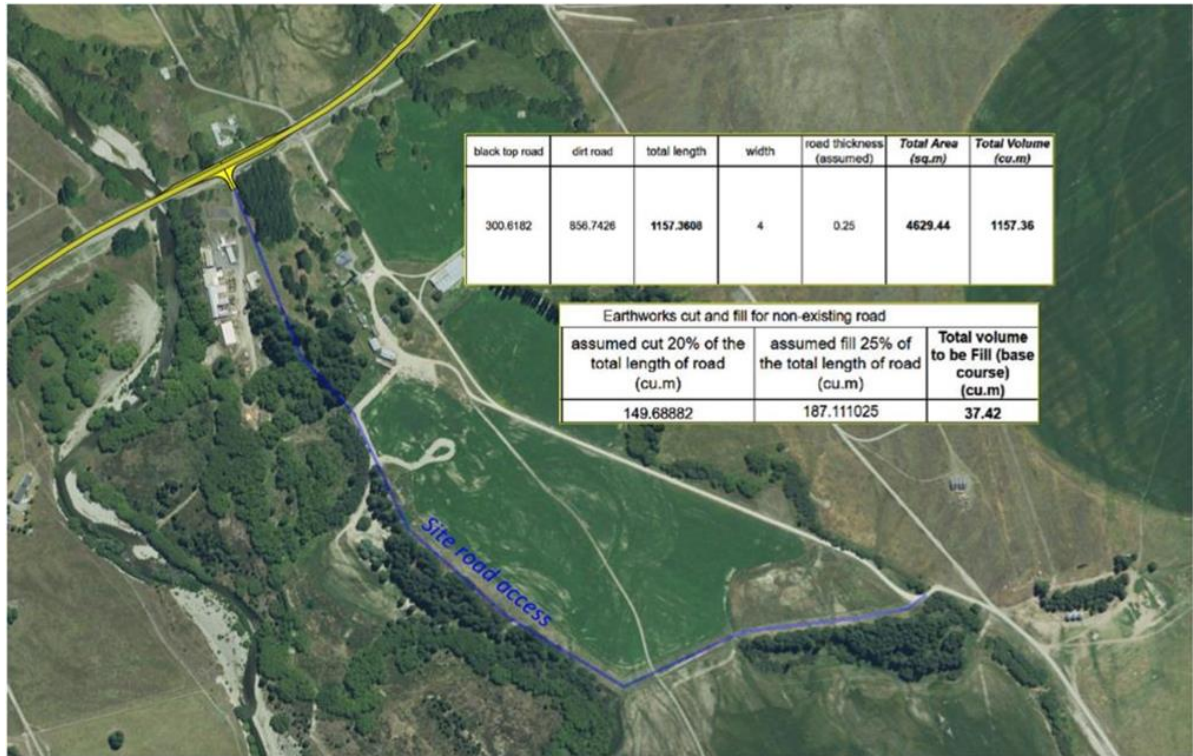


Figure 3.8: Site Access Plan Route connecting SH8(yellow) to the local site access route(blue)

Use of Right of Way/Easement over our Property

12. We strongly oppose the Applicant's use of the right of way over Lot 1 for any purposes, including 'Operational Phase' traffic, for the reasons set out in our original comments.
13. In fact, it appears (from Mackenzie District Council's review of the Application dated 11 June 2025², and from our legal counsel's review³) that the application proposed that all access to the solar farm site be **exclusively** via [REDACTED] (i.e., not using the easement over our Property). On this basis, it appears that the application does not seek (and therefore has not assessed the effects of) any use by the Applicant of the easement over our Property. Given this, use of the easement over our Property by the Applicant is not able to be authorised as part of this application.

Relief Sought

14. On the basis that the Applicant has not applied to use the Right of Way over Lot 1, we respectfully request if the Panel is minded to grant consent:
 - (a) A condition stating that the right of way over Lot 1 DP 470213 (granted by Easement Instrument 8634143.6) shall not be used for any purpose related to The Point Solar Farm;
 - (b) A condition requiring that access to The Point Solar Farm shall be limited to that shown on the plan labelled as Figure 3.8 above;

² At page 2. Included within the Updated Substantive Application dated 27 August 2025 as Appendix V.

³ Which included a review of the Substantive Application and AEE dated 27 August 2025. At page 14 of the AEE (section 3.1), the access to the Site is described as follows: "The Site is accessed off State Highway 8, east of the Twizel River and via a 7 km gravel farm track through the Bendrose Farm."

- (c) A condition requiring construction activity and the use of the approved access road shall be limited to the hours of Monday to Saturday, 7.30am to 6.30pm. No construction activity or use of the proposed access road may occur on Sundays and Public Holidays;
- (d) Comprehensive mitigation measures are required by way of consent conditions to avoid the effects (dust, noise, visual amenity, and vibration) of the use of the access route shown in the plan referred to in paragraph 11 above (labelled Figure 3.8) on us and our Property including:
 - (i) Limits on the numbers and types of vehicles using the access route each day, specific to all phases of the project (being construction, operational, and decommissioning phases);
 - (ii) The use of 'blacktop' proposed for the access way⁴ - we seek that the sealed length of the accessway be increased to the stream crossing point shown on the plan labelled Figure 3.8 above;
 - (iii) That existing trees and vegetation along the access route shown on the plan labelled Figure 3.8 above shall not be trimmed to lower than their existing heights and shall not be removed, to retain screening of the access way from our Property. Any dead or diseased vegetation shall be replaced with fast growing trees within the next growing season;
 - (iv) The construction of a 2m high natural bund and supplementary planting of fast growing trees and/or grasses (required to be of a suitable minimum height to provide screening of traffic on the access road from our Property at the time of planting) at the location shown in the following figure, to fill in gaps in existing vegetation that exists near the Bendrose Stream crossing;
 - (v) A condition requiring preparation of a Dust Management Plan by a suitably qualified and experienced air quality expert which identifies measures to be taken to ensure that no nuisance dust reaches our dwelling on Lot 1. Such measures shall include regular water cart use on the unsealed parts of the access way, maximum speed limits along the access road, and a requirement that all loads carrying fine material shall be covered; and
 - (vi) A requirement for a complaints process including complaints register, with an effective complaints response process.

⁴ As described in the email from John Andrews dated 11/03/2026 at 3, with further details being provided in the attachment to that email – being, “300.6182m of black top road” proposed for the sealing of the access route.



Conclusion

15. If a hearing is held, we maintain our wish to be heard as a person that provided comments under s 53.
16. We also understand that as a person that provided comments under s 53, we will be invited to review/comment on conditions of any consent. We appreciate and look forward to this opportunity.
17. In addition to the photos of our Property that we provided in our original comments, we have included a further photo below of a truck using the gravel track past our Property to illustrate the effect of dust we are concerned about.⁵

Thank you,

████████████████████

⁵ We note this photo was taken one day after rainfall. The effect of dust is often much greater than what is pictured.



ANNEXURE A – EMAIL CORRESPONDENCE WITH THE APPLICANT

From: [REDACTED]
Sent: Tuesday, 10 March 2026 12:42 pm
To: 'john [REDACTED] richard [REDACTED]'
Subject: The Point Solar Farm
Importance: High

Dear John and Richard,

I act for [REDACTED]. [REDACTED] is the registered owner of Lot 1 DP 470213 and Section 3 SO Plan 432605. The dwelling on the property is located on Lot 1.

My clients were invited to provide comments on FNSF's Fast Track application in relation to the Point Solar Farm, which they have done. They are particularly concerned about the potential effects of access to the solar farm on their property, and that the easement over their Lot 1 (Easement Instrument 863414.6) (a gravel farm track) is not used for any purposes related to the solar farm. In my view, the easement cannot properly be used for such purposes.

My clients have been granted an extension until this Friday (12/3/26) to provide further comments to the panel.

I have reviewed FNSF's response to my clients' initial comments (response dated 26/02/202, Attachment 0 - comment 20 Issue 99). In that response, FNSF acknowledges that the access route to the site was not shown in the Fast Track application itself, but states that the route was shown as part of the DOC concession application and the reports accompanying that application. It appears, from FNSF's response, that access to the solar farm is now proposed to be via land owned by [REDACTED]. However the response does not expressly exclude use of the easement over my clients' land.

Could you please urgently provide by midday tomorrow (11/03/2026):

1. Confirmation that the easement across my clients' property will **not** be used for any activities associated with or ancillary to the proposed Solar Farm project, during either the construction or operational phases; and
2. A single plan showing the proposed access route in relation to my clients' property; and
3. Details of the mitigation measures proposed to address potential dust, noise, visual amenity and vibration effects on my clients' property.

Kind regards,
Monique Thomas | Barrister

[REDACTED] Level 3, Parkview@22, 22 Moorhouse Avenue, Christchurch

PO Box 33058, Christchurch 8244 | www.moniquethomas.co.nz



[REDACTED]

This email is intended solely for the use of the addressee and may contain information that is confidential or subject to legal privilege. If you receive this email in error please notify me immediately and then delete the email. I do not accept responsibility for any computer viruses.

From: John Andrews [REDACTED]
Sent: Wednesday, 11 March 2026 11:00 am
To: Monique Thomas [REDACTED]
Cc: richard [REDACTED]
Subject: Re: The Point Solar Farm

Dear Monique,

Thank you for your email of 10 March 2026.

1. Use of the easement We confirm that Easement Instrument 8634143.6 (the right of way over part Lot 1 DP 470213) will not be used for any construction traffic, heavy vehicle movements or construction-related activities associated with The Point Solar Farm project.

Access during the construction phase will be via an alternative construction traffic route specifically developed to entirely bypass your clients' property (Lot 1 DP 470213 and Section 3 SO 432605). This alternative route was confirmed directly with [REDACTED] by email and is shown in the attached March 2026 access route document.

We do, however, intend to maintain and exercise our legal rights under the existing easement for access during the operational phase of the solar farm. These rights will be by virtue of a registered lease over the land owned by [REDACTED] and Waitaki Trustees (Golden Acres) Limited which has the benefit of the right of way easement. Operational access is expected to be limited to light vehicles only (for routine maintenance, monitoring and emergencies), and any use will be consistent with the rights implied in this easement under the Land Transfer Regulations and Property Law Act.

2. Plan showing the proposed access route Please find attached a document titled "Access Route to The Point Solar Farm March 2026".

This document clearly shows:

- the construction route leaving the State Highway and proceeding through [REDACTED] land only;
- complete avoidance of your clients' dwelling on Lot 1 before rejoining existing gravel farm track/easement across [REDACTED] and
- the connection to the site via the remainder of easement facility only over [REDACTED] (not crossing your clients' land).

It illustrates the bypass in relation to the [REDACTED] dwelling and title.

3. Mitigation measures for dust and noise Because the chosen construction route avoids your clients' property and dwelling entirely, potential effects from construction traffic are already minimised. The Construction Traffic Management Plan (CTMP – Appendix 2 to the RFI response) contains the following specific measures that will apply to the access route:

- **Dust** – regular water-cart suppression on all access tracks, speed limit of 30 km/h. We are proposing to blacktop the new alternative route from the highway to past the farm buildings.

- **Visual amenity** – the new route is screened by topography and vegetation as far as the bridge over Bendrose Stream.

- **Traffic volumes and timing** – we have provided limits on the truck movements and times in the CTMP.

We can provide the CTMP if required.

We remain available for a short call to go through the plan and answer any further questions. Please let us know a convenient time.

Kind regards,

John

John Andrews.

General Manager FNSF

(I am based in Wellington)

E. [REDACTED] M. [REDACTED]

ATTACHMENT TO JOHN ANDREWS' EMAIL DATED 11/03/2026, "ACCESS ROUTE TO THE POINT SOLAR FARM MARCH 2026"

Proposed construction traffic route to The Point Solar Farm

This paper shows the proposed route for construction traffic to the site.

These images are from the document Appendix-2 REG_FNSF RFI Response_Transport Impact and Construction Traffic Management Plan.pdf, which was provided as part of the response to RFI on 9 February 2026.

They further detail the response in the table of 53 responses to submitters. Details of truck numbers and delivery times are included in the traffic management plan.

Figure 3.8 (shown) in that document details the route from the highway to the start of the larger [redacted] area, which demonstrates the bypassing of the [redacted] property.

The intention is to blacktop the road past the buildings on the [redacted]

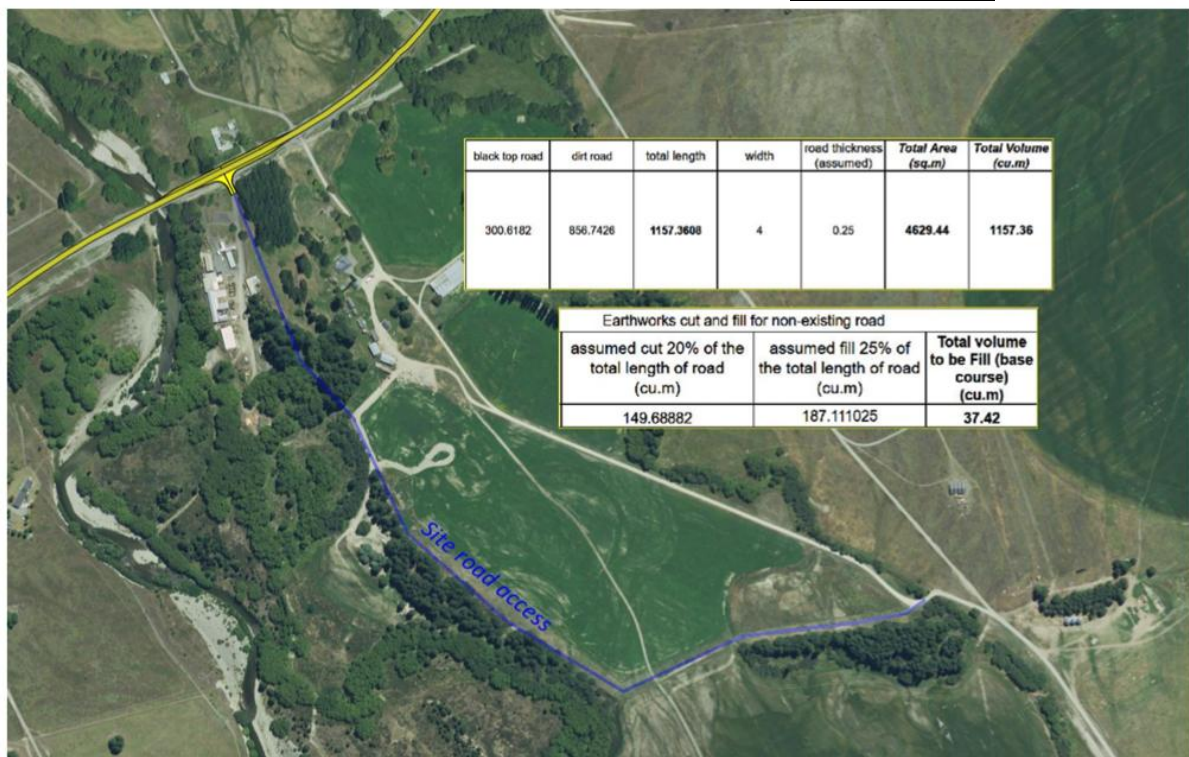


Figure 3.8: Site Access Plan Route connecting SH8(yellow) to the local site access route(blue)

Figures 3.1 and 3.3 (below) are drone photos showing the route leaving the highway, and 180 degrees from that photo, towards The Point block.

Figure 3.3 shows the [redacted] and how the entire track across that title is avoided.

The route from The Point to where it approaches the Bendrose Stream crossing is covered by easement 8634143.6. over [REDACTED]. This easement continues across title 634605 (Lot 1 DP470213) to the highway.

The route shown here is an alternative that has been developed (for construction traffic) to the site, as was confirmed by email with the [REDACTED]

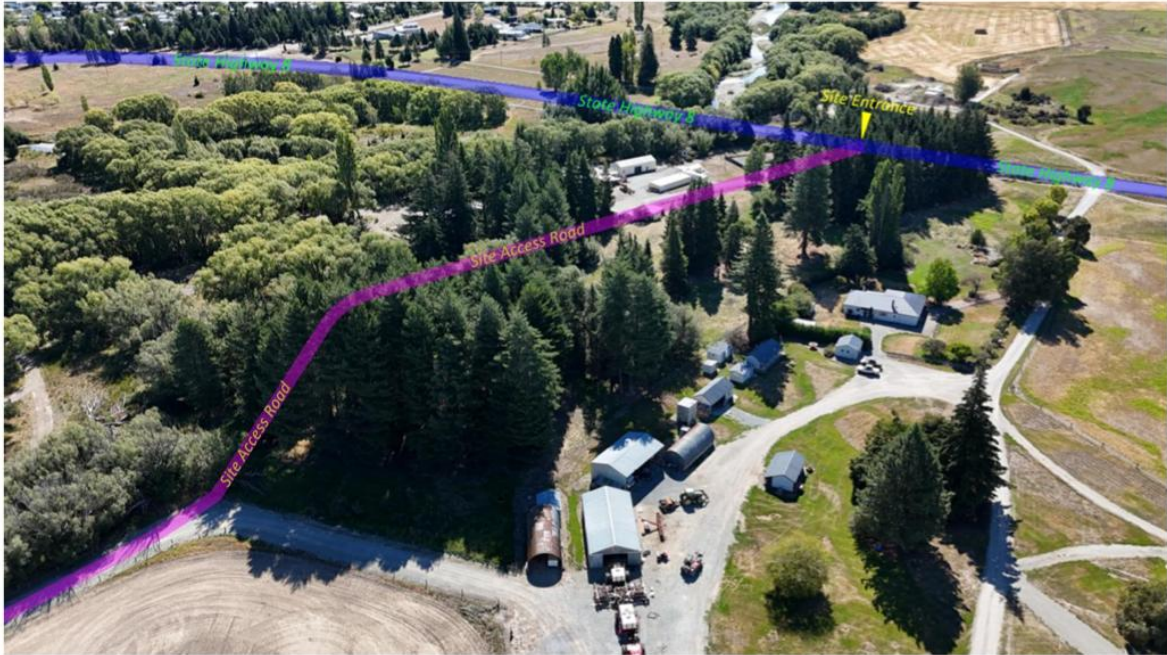


Figure 3.1: The Site Entrance Perspective View



Figure 3.3: Local road unsealed typical view