

File ref: FTAA-2509-1100

13 February 2026

Far North Solar Farm Limited  
C/- Richard Homewood  
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Tēnā koe

### **Request for information from Far North Solar Farm Limited in relation to the Point Solar Farm application under the Fast-track Approvals Act 2024**

The Point Solar Farm Expert Panel (the Panel) 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), relating to The Point Solar Farm application.

At the direction of the Panel, the EPA is seeking further information from Far North Solar Farm Limited regarding **the following**:

#### **1) Mana whenua issues**

##### **1.1. Nature of the relationship with the mana whenua that recognises their cultural rights and responsibilities as kaitiaki for the Mackenzie Basin**

The Applicant is aware that the iwi with recognised kaitiaki responsibilities for the site where they propose to establish a solar farm is Ngāi Tahu. The organisational arm for the tribe is Te Rūnanga o Ngāi Tahu (TRONT). TRONT has advised that authority for expressing mana whenua rights and expectations with the use of the land sits with local rūnanga (the organisations that represent the local hapū of the iwi).

In the Mackenzie Basin that authority is held by Te Rūnanga o Arowhenua, Te Rūnanga o Waihao me Te Rūnanga o Moeraki (the Waitaki Rūnanga). These three rūnanga use their resource management companies to assist them in mana whenua responsibilities: Aoraki Environmental Consultancy AEC) and Aukaha.

The request for information is:

- a) The Point Solar Farm representatives were due to meet with mana whenua representatives recently. Can The Point Solar Farm verify how and when they have met with any of the Waitaki Rūnanga over the last 12 months?
- b) Can The Point Solar Farm clarify what discussions were held with one or more of the Waitaki Rūnanga or their environmental companies?
- c) What were outcomes for working with the Waitaki Rūnanga on The Point application?

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- d) Did the rūnanga, as the mana whenua, outline any expectations of The Point application to meet their expectations re use of the land?

## **2) Scope issues**

### **2.1. Omitted Construction Phase Stormwater Consent Application and reliance on “scope”**

The requests for information are:

- a) In relying on “scope” is it submitted that an application for a particular consent can be made in a Fast Track application by implication?
- b) If so what is the authority for this proposition?
- c) Assuming that an application could be implied, what is the basis for the implied application for a construction phase stormwater consent in this application?

## **3) Resource Management Act (RMA) Matters**

### **3.1. Specialist Condition Writer**

In section 1.9 of the 9 February 2026 Applicant’s Response to the Panel’s Request for further information, the Applicant has advised that they will appoint a specialist condition writer to assist with reviewing and refining the consent conditions. However, the Panel has not been given any details of this.

The requests for information are:

- a) Who is the specialist condition writer, and what are their qualifications and experience?
- b) The Panel direct that the revised suite conditions from the specialist condition writer is to be provided by the date below.

### **3.2. Erosion and Sediment Control Plan**

In Appendix 3 of the 9 February 2026 Applicant’s Response to the Panel’s Request for further information, the appended letter responded to the Panel’s questions as to operational and construction stormwater. The Erosion and Sediment Control section of the letter states:

*“Expected cut/fill earthworks quantities are as follows:*

*Piling for the PV tables 4800m<sup>3</sup>*

*Transpower Substation in the centre of the Solar Farm 4041m<sup>3</sup>”*

The Panel observe that these figures do not appear to align with the volumes advised by the Applicant in their response to Minute 1 (Dated 15 Jan 2026), which states at Row 21;

*The internal roading will have a work area of 119,344 m<sup>2</sup>, and an estimated volume of 23,868 m<sup>3</sup> if required to cut to 0.2m. The cable trench area is 30,000 m<sup>2</sup>, with a volume of 39,000 m<sup>3</sup>, which will be replaced or removed depending on volume of infill material required. The substation has an expected cut volume of 3105 m<sup>3</sup>, being the full 9545 m<sup>2</sup> cut to 0.3m. Much of this material will be reused, and additional material will be placed above this provide for the platform for the*

*substation. The updated conditions require Soil Contamination Reporting (PSI, DSI, RAP) before earthworks commence (PART A).*

In addition, the Panel observe that the volumes of earthworks in the substantive application (noting the overland flow paths) and the additional earthworks for the now proposed access road including works in the vicinity of the stream crossing give rise to questions as to the accuracy and adequacy of the information provided.

The requests for information are:

- a) The Applicant is to provide a single document specifying the location and volume of all earthworks for the proposed activity.
- b) The Panel direct the Applicant provided a copy of a draft Erosion and Sediment Control Plan for the subject site and full access roadway including examples.

### **3.3. Decommissioning**

In Appendix 12 of the 9 February 2026 Applicant's Response to the Panel's Request for further information, the revised draft conditions refer to decommissioning and a decommissioning management plan.

The request for information is:

- a) What is the estimated time frame for the physical decommissioning of the solar farm?

## **4) Concessions sought under the Conservation Act 1987**

### **4.1. Section 51 Fast Track Approvals Act (FTAA) – Feedback**

On the 9 February 2026, the Panel received a copy of the feedback on the application from the Department of Conservation under Section 51 of the FTAA in relation to concessions. The Panel observe that at the Project Overview Conference on the 16<sup>th</sup> of January 2026, the Applicant advised that they were going to withdraw part of the concession application by Transpower and that the Applicant would communicate the withdrawal in writing. The Panel has received no such communication and seeks clarification.

The request for information is:

- a) The Applicant is to provide in writing details as to which parts of the application for concessions is to be withdrawn and advise on implications as to the Department of Conservation's feedback under Section 51 of the FTAA.

## **5) Ecological issues**

### **5.1. Ecological Assessment**

The Panel has few ecological questions at this time. However, once survey results are provided, we are likely to have questions on the survey results, level of effort applied to surveys and the corresponding implications on the assessment of effects and adequacy of effects management, including offsetting or compensation.

The Panel is particularly interested in understanding how the Applicant will determine the level of residual effects and for those residual effects deemed to be moderate or higher, how the Applicant will determine the scale of offset/compensation measures required and whether the Applicant has considered offsetting or if it is proposed to default to compensation.

The requests for information are:

- a) We note that avifauna matters are likely to be of particular concern to invited parties- in this regard could the Applicant please provide the Panel with the qualifications and experience of ornithologist(s) who will be providing avifauna expertise on their behalf.
- b) Please provide further detail on how the proposal to contribute \$1,000,000 over the life of consent will benefit birds and the degree to which this adequately compensates for potential effects. To help the Panel understand this please provide:
  - i. Confirmation that the funding will be ring-fenced to achieving tangible biodiversity outcomes for target avifauna and not re-allocated elsewhere;
  - ii. The location, scale and intensity of the proposed pest control; and
  - iii. The degree of benefit that is expected from allocation of \$28,571/year relative to potential impacts.

## **6) Landscape Effects**

### **6.1. Conditions**

The revised conditions remain quite broad-brush and do not appear to be specific enough to effectively manage The Point's effects. This concern lies at the core of the following questions.

The requests for information are:

- a) Could the proposed conditions address the maximum heights of the solar panels, inverters and structures in the proposed substation (bus, transformers and building) and ensure that these are consistent with those assessed by RMM?
- b) Could the proposed conditions address the colours to be applied to the solar farm's main structures with reference to the columns of the BS5252 colour chart or similar?
- c) Could the proposed conditions address the specification of plant species (including sizes at the time of planting), plant spacings and irrigation in the Landscape Mitigation Areas to ensure that they are consistent with the Landscape Mitigation outlined on page 9 of the Application Appendix F (together with GA Sheets 9 and 10) and the planting proposals detailed on pages 5 and 6 of RMM's Appendix 5?

## 6.2. Cumulative Effects

At the Project Overview Conference (Teams) presentation on the 16th of December 2025, the Applicant was asked to address cumulative effects with regard to both the Haldon Solar Farm and the existing Waitaki HEPS structures – to explore whether or not the combination of new solar farms and existing infrastructure would start to turn the Mackenzie Basin into an ‘energy production landscape’. The RFI addresses cumulative effects in the context of the Haldon Solar Farm proposal, but not Meridian’s Waitaki HEPS.

The request for information is:

- a) Could RMM address the issue of cumulative effects, with regard to both the Haldon Solar Farm proposal and the Waitaki HEPS, to determine if this might lead to the creation of an ‘energy production landscape’ within the Mackenzie Basin?

## 6.3. Assessment of Landscape Effects – Appendix 5 of RFI Response

In Section 2.4 (p.7) of RMM’s Appendix 5 it is stated that the proposed Landscape Mitigation Planting has been designed to address solar panels that have a tilted height of 1.5m to 2.2m height. However, as indicated above, this is not consistent with proposed Condition 72, which accommodates panels with a maximum tilted height of 4.5m.

The requests for information are:

- a) Could the Applicant clarify which maximum height is applicable to the proposed solar panels?
- b) If the maximum tilted height remains at 4.5m, does this mean that RMM’s Landscape Mitigation Planting and its assessment of effects need to be amended accordingly?

## Supply of Information

In accordance with section 67(2) of the Act Far North Solar Farm Limited must:

- a) Provide electronic copies of the information or report requested; or
- b) Advise the EPA, with reasons that you decline to provide the information or report requested.

Accordingly, please provide the requested information to the EPA by **5pm 23 February 2026**. If the information is not received by this date, the Panel will proceed on the basis that the request for further information has been declined.

Please note, the information will be provided to the Panel, the Applicant 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, Mujahid Musa by email at [info@fasttrack.govt.nz](mailto:info@fasttrack.govt.nz)

Nāku noa, nā

A handwritten signature in black ink, appearing to read 'Mujahid'.

**Mujahid Musa**  
**Application Lead, Fast-track Applications**