

## Your Comment on The Point Solar Farm Fast-track substantive application

Please include all the contact details listed below with your comments and indicate whether you can receive further communications from us by email to [substantive@fasttrack.govt.nz](mailto:substantive@fasttrack.govt.nz).

1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
<b>Organisation name (if relevant)</b>	NZ Transport Agency		
<b>First name</b>	Nicola		
<b>Last name</b>	Foran		
<b>Postal address</b>			
<b>Home phone / Mobile phone</b>		<b>Work phone</b>	██████████
<b>Email (a valid email address enables us to communicate efficiently with you)</b>	██		

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

**Please provide your comments below, include additional pages as needed.**

# MEMORANDUM OF THE NEW ZEALAND TRANSPORT AGENCY WAKA KOTAHI ON THE POINT SOLAR FARM PROJECT

19 February 2026

## 1.0 Introduction

- 1.1 This memorandum presents the assessment undertaken by the NZ Transport Agency Waka Kotahi (**NZTA**) of the substantive application for The Point Solar Farm (**Application**) (reference FTA-006), submitted by Far North Solar Farm Limited (**Far North Solar Farm**) under the Fast-Track Approvals Act 2024 (**FTAA**).
- 1.2 NZTA appreciates the opportunity to comment on the Application.
- 1.3 The assessment has been prepared in response to an invitation from the Expert Panel (**the Panel**) to provide comments and includes a summary of preliminary findings relating to transportation effects.
- 1.4 This assessment is based on the Application materials submitted to the Environmental Protection Authority (**EPA**).

## 2.0 Background

- 2.1 NZTA has had previous pre-application engagement with Environment Canterbury (ECan) on a publicly notified resource consent application (**RM230057**) for the development that was publicly notified by ECan in November 2023. NZTA made a neutral submission on this application.
- 2.2 The concerns that were raised in that submission related to the effects of glint, glare and reflection of the solar farm onto State Highway 8 and the effects of the vehicle movements to and from the site via State Highway 8 during the construction, operation, and dismantling of the solar farm.
- 2.3 As part of the comments made in its submission, NZTA recommended the following measures be included in the Application:
  - The Construction Traffic Management Plan is required to be submitted to NZTA for review and approval.
  - The Deconstruction Traffic Management Plan is required to be submitted to NZTA for review and approval.
  - The provision of a site-specific glint and glare assessment that addresses the potential effects of glare onto State Highway 8.
  - The implementation of a condition of consent which enables Mackenzie District Council to review the resource consent application in the event that unanticipated glare effects arise.
- 2.4 In February 2025, RM230057 was withdrawn from the ECan public notification resource consent process prior to the application under the FTAA being made.

- 2.5 Following a review of the Glint and Glare Study titled 'The Point Solar Farm – Glint and glare study' prepared by ITP Renewables Limited and dated 17/07/2023 and given the distance between the solar farm and State Highway 8 (approximately 8.5km), NZTA confirms that the applicant has addressed and incorporated the previous feedback provided in the neutral submission on the RM230057 regarding glint, glare, and reflection effects on State Highway 8.

### 3.0 **Assessment**

- 3.1 NZTA's interest in the Application is confined to the transport effects in relation to the state highway network and ensure that these are adequately managed; in particular, the proposed increase in heavy traffic movements from the proposed solar farm onto State Highway 8.

#### **State Highway 8 and the Southwestern Vehicle Crossing at Section 1 SO 432605 (Record of Title 634899)**

- 3.2 A Traffic Impact Assessment (TIA) has been prepared for this Application by Renewable Engineering Group (REG) and dated 28/01/2026.
- 3.3 The TIA has identified that access for proposed solar farm will be gained to State Highway 8 via a 7km, unsealed gravel farm track and the southwestern vehicle crossing on and via Bendrose Farm (Section 1 SO 432605, Record of Title 634899) to the north-west. The site has rights-of-way (ROW) easements over this access area onto State Highway 8.
- 3.4 This section of State Highway 8 is declared a Limited Access Road under the Government Roading Powers Act 1989. Vehicle crossings on a Limited Access Road require a Crossing Place and associated Crossing Place Notice. There are no Crossing Places registered for the southwestern vehicle crossing via which the solar farm will gain access onto State Highway 8 on the Record of Title for Section 1 SO 432605 (Record of Title 634899).
- 3.5 Under the NZTA Planning Policy Manual: Access onto the state highway from private property, September 2025 (PPM), the southwestern vehicle crossing at Section 1 SO 432605 (Record of Title 634899) meets the minimum desired 300m sight distance but does not meet either the minimum desired 610m intersection spacing or the 210m accessway spacing standards. The effects of these breaches are considered by NZTA to be less than minor. This is because there is sufficient visibility towards the neighbouring accessways from the southwestern vehicle crossing, the neighbouring accessways are expected to continue to be infrequently used, and there are a number of other accessways which also breach the minimum desired 610m intersection spacing standard along this section of State Highway 8.

#### *Traffic Count Data*

- 3.6 As addressed in the TIA, NZTA understands that the operational traffic for the proposed solar farm will be minimal and that 30 two-way delivery heavy vehicle movements per day are anticipated during the construction of the proposed solar farm. In addition, an estimated peak maximum of 200 staff members will be on site and 80 light vehicle movements per day expected during the construction of the proposed solar farm. Based on the number of full-time equivalent (FTE) staff (5) that will be employed for the maintenance of the solar farm, NZTA understands that vehicle movements during the operation of the solar farm are expected to be relatively low.
- 3.7 The construction and delivery trips for the proposed solar farm along the state highway network will be distributed via State Highway 1 from the Lyttleton Port or State Highway 8 from the Timaru Port, with most of the construction and delivery trips to be distributed via State Highway 8.

- 3.8** A Construction Traffic Management Plan (CTMP) is also proposed for the management of construction traffic and deliveries to and from the proposed solar farm. As addressed in the TIA, the CTMP will be prepared in accordance with the Code of Practice for Temporary Traffic Management (now the New Zealand Guide to Temporary Traffic Management (NZGTTM)).
- 3.9** Given the size of the equipment and materials that are to be used and installed on the site of the solar farm, the consent holder may need to apply for all necessary over-dimension and / or overweight load permits from NZTA for any transportation of overweight and / or over-dimension loads to the location of the area of the construction works for the solar farm. NZTA therefore seeks advice note to be included within the document titled 'Proposed Conditions – Dated 16 June 2025' (**Proposed Conditions**) to address this matter.

*Proposed Upgrade to Southwestern Vehicle Crossing at Section 1 SO 432605 (Record of Title 634899)*

- 3.10** As addressed in the TIA, NZTA understands that the southwestern vehicle crossing at Section 1 SO 432605 (Record of Title 634899, Bendrose Farm) will be upgraded to align and be consistent with the requirements of the NZTA Access Type E standard, as per the PPM and the State Highway Geometric Design Manual. On this basis, NZTA seeks a condition of consent to be included within the Proposed Conditions to address this matter.
- 3.11** NZTA also understands that each lane within the section of State Highway 8 outside of the existing subject vehicle crossing will be widened from 3.5m to 6m and contain a widened sealed portion. The proposed widening meets the 300m Safe Intersection Sight Distance (SISD) requirements for a posted 100km/hr speed limit and the widening of this section of State Highway 8 has been designed in accordance with the PPM and AustRoads Guide to Road Design Part 4A for a Type E Access.
- 3.12** Prior to any works being undertaken within the state highway corridor, the consent holder is legally required to apply to NZTA for a Corridor Access Request and for that request to be approved. NZTA therefore seeks an advice note to be included within the Proposed Conditions to address this matter.
- 3.13** Due to the adjoining section of State Highway 8 being declared a Limited Access Road under the Government Roding Powers Act 1989, and the proposed solar farm resulting in a change in the land use on the subject site, the consent holder is to submit the a copy of the decision document issued by the expert panel for this Application to NZTA to proceed with the drafting of a new crossing place notice for the existing subject vehicle crossing at Section 1 SO 432605 (Record of Title 634899, Bendrose Farm), which will be relabelled as CP8A under section 91 of the Government Roding Powers Act 1989. This will then be registered on the Records of Title for the subject site and Section 1 SO 432605 (Record of Title 634899). NZTA therefore seeks an advice note to be included within the Proposed Conditions to address this matter.
- 3.14** Refer to Section 4.0 for further information on the amendments and additions as addressed above.

#### **4.0 Proposed Resource Consent Conditions and Required Amendments**

- 4.1** NZTA has reviewed the document submitted titled 'Proposed Conditions – Dated 16 June 2025' and considers that further amendments and additions to this document are required to address the concerns raised above.
- 4.2** Proposed Amendments to Condition 45 (Traffic Management Plan):

*Prior to the commencement of the construction of the Solar Farm, the Consent Holder shall prepare and submit to the Council's Roading Operations Engineer ~~or nominee~~ and the New Zealand Transport Agency for certification a TMP which shall be prepared in accordance with the New Zealand Guide to Temporary Traffic Management (NZGTTM) and include methods to ensure that appropriate measures are in place to avoid, remedy, or mitigate any potential traffic effects associated with the construction or commissioning of the works, including the following:*

- a. No more than 6 15 heavy vehicle trips (one-way) per day;*
- b. All deliveries (pick up and drop off) are to occur wholly within the site;*
- c. Methods to ensure that the appropriate erosion and sediment control measures are in place to avoid, remedy, or mitigate the potential effects of sediment runoff associated with the construction or commissioning of the works; and*
- d. Adjacent landowner and occupier liaison during the construction stage.*

*The TMP must be implemented for the duration of the construction works in relation to the solar farm.*

#### **4.4 Proposed Conditions to be included:**

*The southwestern vehicle crossing at Section 1 SO 432605 (Record of Title 634899) that will serve Bendrose Farm and The Point Solar Farm shall be upgraded in accordance with the New Zealand Transport Agency Access Type E standard, as outlined in the New Zealand Transport Agency Planning Policy Manual (2025) and the State Highway Geometric Design Manual, and to the satisfaction of the New Zealand Transport Agency Network Manager.*

#### **4.5 Proposed Advice Notes to be included:**

*Before the commencement of any physical work on the state highway, including the upgrade of the southwestern vehicle crossing at Section 1 SO 432605 (Record of Title 634899), the consent holder is legally required to apply to the New Zealand Transport Agency for a Corridor Access Request (CAR) and for that request to be approved. The consent holder is to submit the CAR application via [www.submitica.com](http://www.submitica.com) a minimum of fourteen working days prior to the commencement of any works on the state highway; longer is advised for complex works. The New Zealand Transport Agency and Mackenzie District Council-approved TMP must be submitted as part of the CAR application.*

*The consent holder may be required to obtain all necessary over-dimension and/or overweight load permits from NZTA for any transportation of overweight and/or over-dimension loads to the location of the area of the construction works for the solar farm no less than fourteen working days prior to the commencement of the construction works. A copy of all the permits that are issued to the consent holder in compliance with this condition must be provided to Mackenzie District Council within one working day of those permits being received by the consent holder.*

*As the property has access to a limited access road, once the decision document for the solar farm has been issued by the expert panel under section 87 of the Fast-Track Approvals Act 2024 and works have been completed to the satisfaction of the New Zealand Transport Agency Network Manager, crossing place notices per section 91 of the Government Roading Powers Act 1989 will be registered on the titles confirming the legal establishment of the crossing places.*

## **5.0 Conclusion**

- 5.1** NZTA appreciates the Applicant including some of the relevant transport and glint, glare, and reflection matters that NZTA had addressed as part of its neutral submission on RM230057. To ensure that NZTA is suitably informed of transport matters and the protection of NZTA assets, however, NZTA seeks that the Panel include the amendment, condition and advice notes as proposed within Section 4.0 (a clean copy is contained within the appendices attached).
- 5.2** NZTA welcomes further discussions with Far North Solar Farm regarding the upgrade of the southwestern vehicle crossing at Section 1 SO 432605 (Record of Title 634899) on State Highway 8.

**Amendment to Condition 45 (Traffic Management Plan):**

45. Prior to the commencement of the construction of the Solar Farm, the Consent Holder shall prepare and submit to the Council's Rooding Operations Engineer and the New Zealand Transport Agency for certification a TMP which shall be prepared in accordance with the New Zealand Guide to Temporary Traffic Management (NZGTTM) and include methods to ensure that appropriate measures are in place to avoid, remedy, or mitigate any potential traffic effects associated with the construction or commissioning of the works, including the following:
- a. No more than 15 heavy vehicle trips (one-way) per day;
  - b. All deliveries (pick up and drop off) are to occur wholly within the site;
  - c. Methods to ensure that the appropriate erosion and sediment control measures are in place to avoid, remedy, or mitigate the potential effects of sediment runoff associated with the construction or commissioning of the works; and
  - d. Adjacent landowner and occupier liaison during the construction stage.

The TMP must be implemented for the duration of the construction works in relation to the solar farm.

**Proposed Condition:**

- The southwestern vehicle crossing at Section 1 SO 432605 (Record of Title 634899) that will serve Bendrose Farm and The Point Solar Farm shall be upgraded in accordance with the New Zealand Transport Agency Access Type E standard, as outlined in the New Zealand Transport Agency Planning Policy Manual (2025) and the State Highway Geometric Design Manual and to the satisfaction of the New Zealand Transport Agency Network Manager.

**Proposed Advice Notes:**

1. Before the commencement of any physical work on the state highway, including the upgrade of the southwestern vehicle crossing at Section 1 SO 432605 (Record of Title 634899), the consent holder is legally required to apply to the New Zealand Transport Agency for a Corridor Access Request (CAR) and for that request to be approved. The consent holder is to submit the CAR application via [www.submitica.com](http://www.submitica.com) a minimum of fourteen working days prior to the commencement of any works on the state highway; longer is advised for complex works. The New Zealand Transport Agency and Mackenzie District Council-approved TMP must be submitted as part of the CAR application.
2. The consent holder may be required to obtain all necessary over-dimension and/or overweight load permits from NZTA for any transportation of overweight and/or over-dimension loads to the location of the area of the construction works for the solar farm no less than 14 working days prior to the commencement of the construction works. A copy of all the permits that are issued to the consent holder in compliance with this condition must be provided to Mackenzie District Council within one working day of those permits being received by the consent holder.
3. As the property has access to a limited access road, once the decision document for the solar farm has been issued by the expert panel under section 87 of the Fast-Track Approvals Act 2024 and works have been completed to the satisfaction of the New Zealand Transport Agency Network Manager, crossing place notices per section 91 of the Government Rooding Powers Act 1989 will be registered on the titles confirming the legal establishment of the crossing places.