

Attachment 19

FNSF Response to Mackenzie District Council (MDC) comments

26 February 2026

Far North Solar Farm Limited (FNSF) thanks Mackenzie District Council (MDC) for its detailed Section 53 comments dated 19 February 2026 and the supporting peer reviews by Ben Espie (landscape), Nick Fuller (transport), and others. We appreciate MDC's constructive engagement and technical input throughout the fast-track process.

Updated consent conditions are currently being finalised by expert condition writer Carlyne Wratt and will be provided to the Panel on 3 March 2026. FNSF continues to work directly with MDC staff on the land-use consent conditions to ensure they are clear, enforceable, and appropriately allocated between consent authorities.

This response addresses every point raised in MDC's submission (including the annexures). Where relevant, we cross-reference:

- **RMM** – Landscape evidence (S53 Response dated 26 February 2026 and RFI Response 2 dated 23 February 2026)
- **REG** – Transport Impact Assessment (TIA) and Hazardous Substances response (dated 28 January 2026 and 4 February 2026)
- **Wildlands** – February 2026 surveys and management plans (Contract Reports 6621h series)
- **WWLA** – Planning Evidence of Laila Alkamil dated 26 February 2026

Statutory Requirements and FTAA Purpose (paras 17–21)

FNSF agrees that the Panel must apply s 85(3) FTAA (proportionality test) and give greatest weight to the FTAA purpose under s 81(2). We also agree that RMA s 104(1)(a) (actual and potential effects, including cumulative) is imported via cl 17 Sch 5 FTAA and must be considered even for the first application in the Basin (as confirmed in WWLA evidence at paras 16–17 and consistent with Environment Court authority in *Dye v ARC* and the Mackenzie PC13/PC18 decisions).

The evidence now before the Panel demonstrates that adverse effects are appropriately managed and are not out of proportion to the project's significant national and regional benefits.

This is discussed further in the Planning Evidence of Ms Alkamil.

National and Regional Benefits (paras 22–23)

FNSF agrees with MDC that the benefits are significant and largely national in scale. The project will deliver 450 MWp of renewable generation ($\approx 6\%$ of daytime national demand), create hundreds of construction jobs, and provide ongoing operational employment and supply-chain benefits.

Crucially, the project connects **directly to the existing 220 kV BENMORE-ISLINGTON line**. This high-voltage connection results in **very low transmission losses** (typically $< 1\text{--}2\%$ to the HVDC link at Benmore). In contrast, many other proposed solar projects require longer lower-voltage connections, leading to higher losses and greater network congestion. This efficiency, combined with immediate co-location with Waitaki hydro, enables daytime solar to allow hydro operators to store water for evening, winter, and dry-year peaks — delivering genuine national grid resilience under the NPS-REG.

These benefits are detailed further in the Planning Evidence of Ms Alkamil (paras 15 and 32) and are not disputed by MDC.

Mackenzie District Plan Assessment (paras 24–70 and Annexure 1 – Landscape)

Renewable Electricity Generation Chapter (operative)

FNSF agrees with MDC (and RMM) that the REG chapter is operative and provides a stand-alone enabling framework that anticipates renewable electricity generation in the Mackenzie Basin ONL, subject to appropriate management of effects. The proposal is consistent with REG objectives and policies (including REG-O1–O3 and REG-P1–P6). Adverse effects on ONL values are minor to more than minor with full mitigation in place (RMM S53 Response, Section 2.5 and RFI Response 2, Section 2.1).

Outstanding Natural Landscape (ONL) effects (Annexure 1 – Espie)

RMM has directly addressed Mr Espie's peer review points in its S53 Response (26 February 2026) and RFI Response 2 (23 February 2026):

- **Irrigation and cross-boundary effects:** Irrigation is now limited to a truck/tractor with boom arm, directed into the site, with no irrigation within 50 m of the boundary and none on high-wind days (RMM S53 Response, Section 2.2). This eliminates the risk raised by Espie and DOC.
- **Plant species and establishment:** The palette has been updated per DOC advice (eco-sourced, locally appropriate species only). Conditions require plants to establish and mature to 3 m (RMM S53 Response, Section 2.3). Mulch and water crystals will assist establishment.
- **Setbacks from terrace edge:** Addressed in RFI Response 2; no irrigation or planting within the setback zone.
- **Visual mitigation success:** Dependent on good establishment, which is secured by the adaptive conditions and three-year monitoring.

Cumulative landscape effects with Haldon Solar and Waitaki HEPS remain acceptable at the wider basin scale (RMM RFI Response 2, Section 2.5 – very low to low at Basin scale; moderate locally but clustered and not perceptually dominant).

Ecological Offsetting / Compensation – residual avifauna effects and \$1 m contribution

Higher-value habitats are avoided or included in the 81 ha ecological enhancement area. Net ecological gain will likely be delivered on-site via the 14 ha invertebrate reserve, lizard corridors, and site-wide, long-term pest plant and animal control. Any residual avifauna risk is addressed through on-site mitigation (anti-reflective coatings, 55° nighttime storage position, carcass monitoring with autopsy, enforceable mortality thresholds triggering a Bird Collision Management Plan), **plus** the \$1,000,000 DOC Avifauna Compensation Strategy (formalised, ring-fenced, paid on construction commencement). This contribution will fund targeted basin-wide actions and will be detailed in the amended conditions on March 3rd, satisfying REG-P6.5 and CRPS Chapter 9.

Transport rules (Annexure 2 – Fuller)

FNSF agrees with Mr Fuller’s review and thanks him for the detailed input. The REG TIA (28 January 2026) and Mr Fuller’s recommendations are accepted. Key responses:

- Construction traffic (max 30 heavy vehicle trips/day) will be managed via a Construction Traffic Management Plan (CTMP) certified by MDC (as road controlling authority for the private access).
- Access design details (width, passing bays, sight lines, sealed length to prevent material tracking onto SH8) will be certified by MDC prior to construction (recommended Condition 82.B).
- Parking for up to 80 staff vehicles (at 2.5 occupancy) will be provided on-site.
- Loading/unloading wholly within the site.
- Non-compliances with TRAN-R4, TRAN-R6, and TRAN-R7 are less than minor and will be managed through the CTMP and certified access/parking details. No significant adverse transport effects are anticipated.

All recommendations in Attachment 2 to Mr Fuller’s review will be incorporated into the final conditions (to be provided 3 March 2026).

Hazardous Substances (REG response dated 4 February 2026)

Transformer oil storage is permitted under CLWRP Rule 5.181 (bundling to 110%, setbacks, monthly inspections as the site will be staffed) and Mackenzie District Plan Rule HAZS-R1 (no storage in High Flood Hazard Area). No separate consent is required. Full details are in the REG memorandum.

Canterbury Regional Policy Statement Assessment (paras 71–80)

FNSF agrees with MDC that the proposal must be assessed against the relevant objectives and policies of the Canterbury Regional Policy Statement (CRPS, operative version as amended). The evidence now before the Panel demonstrates that the project is consistent with the CRPS, particularly Chapters 9 (indigenous biodiversity) and 12 (outstanding natural landscapes), as well as relevant provisions in other chapters.

Chapter 9 – Indigenous Biodiversity

Chapter 9 seeks to maintain and enhance indigenous biodiversity, with particular emphasis on avoiding adverse effects on significant indigenous vegetation and significant habitats of indigenous fauna (Objective 9.2.1, Policy 9.3.1). Where avoidance is not practicable, effects must be remedied, mitigated, offset or compensated to achieve no net loss or net gain (Policy 9.3.2 and Appendix 2 significance criteria).

The February 2026 Wildlands surveys (Contract Report 6621h-vi) confirm low indigenous values inside the 678 ha operational solar farm footprint on this highly modified cultivated terrace (exotic improved pasture grassland/herbfield dominant). No Threatened or At Risk vascular plants were detected in the solar farm footprint during the vegetation surveys. The terrace does not meet the Appendix 2 criteria for significant habitats of indigenous fauna.

Higher-value areas (stonefield drylands, gullies, river margins) are located on the periphery and are either avoided entirely or included within the 81 ha ecological enhancement area. Net ecological gain is delivered through:

- Complete avoidance of significant vegetation on the perimeter and in the eastern gullies (Vegetation Management Plan 6621h-iii).
- Creation of a 14 ha invertebrate reserve (largest of its kind proposed in the Mackenzie Basin) to provide secure, pest-controlled habitat for the Nationally Vulnerable robust grasshopper (*Sigaus robustus*) and other native invertebrates (Terrestrial Invertebrate Management Plan 6621h-ii).
- Eastern gully lizard corridors with enhancement planting and habitat enhancement to improve connectivity, and long-term pest mammal control (Lizard Management Plan 6621h-v).
- Site-wide and enhanced-area pest animal and weed control for the full consent duration (Pest Mammal Management Plan 6621h-iv and Vegetation Management Plan 6621h-iii).

These measures exceed the requirements of Policy 9.3.2 and Appendix 2, achieving measurable net gain and maintaining or enhancing indigenous biodiversity values.

Residual avifauna risk (collision) is addressed through on-site mitigation in the Avifauna Management Plan (6621h-i) (pre-works surveys, 100 m nest setbacks, anti-reflective coatings, nighttime storage position at 55°, carcass monitoring with autopsy, enforceable mortality thresholds triggering a Bird Collision Management Plan), plus Basin-scale compensation via the \$1,000,000 DOC Avifauna Compensation Strategy (predator control in Godley/Cass Rivers, kākī transmitter tracking, wetland enhancement, and targeted invertebrate research). This provides additionality and landscape-scale benefits, consistent with Policy 9.3.2.

Assessment of Applicable National Policy Statements (paras 81–90)

The NPS-REG is the primary national direction applicable to this proposal. It is strongly enabling and requires decision-makers to recognise and provide for the national significance of renewable electricity generation (REG).

Policy B

“Recognise and provide for the importance of ... enabling cumulative increases of REG capacity and output at any scale and any location.”

The Point Solar Farm directly gives effect to Policy B by delivering 450 MWp of new solar capacity in one of New Zealand’s highest-irradiance locations. This will provide approximately 6% of national daytime electricity demand during peak generation periods. The project’s co-location with Waitaki hydro storage and the existing 220 kV BENMORE-ISLINGTON line enables hydro operators to store water during daylight hours for release during evening peak, winter high-demand periods, and dry-year shortages. This hydro-solar synergy significantly improves grid resilience and security of supply - a nationally important outcome that aligns with the NPS-REG’s emphasis on cumulative REG increases.

Policy F

F(1): “Decision-makers must enable REG assets and activities in all locations and environments.”

F(2): Where proposed locations are likely to have adverse effects on matters of national importance under s 6 RMA, the NPS-REG is to be read alongside other relevant national direction, regional policy statements and district plans.

The proposal satisfies Policy F(1) by locating the project in an environment with exceptional solar resource, large flat already-modified land, and immediate access to existing transmission infrastructure.

Policy F(2) requires balancing against s 6 RMA values. The February 2026 Wildlands surveys confirm very low indigenous values inside the panel footprint on this cultivated terrace (exotic pasture dominant). No Threatened or At -Risk vascular plants were detected in the solar farm footprint during the vegetation surveys). Higher-value peripheral habitats are avoided or included in the 81 ha ecological enhancement area. Landscape effects are addressed in RMM’s evidence (20260226_FNSF_ThePoint_FT_S53Response_Landscape.Finall). Any residual avifauna risk is proposed to be managed through on-site mitigation measures and addressed at a Basin scale through the \$1,000,000 DOC Avifauna Compensation Strategy. The functional and operational need is clearly established. The proposal therefore gives full effect to Policy F when read alongside other relevant directions.

This is discussed further in Ms Alkamil’s Planning Evidence.



Summary of Key Findings and Overall Position

FNSF agrees with MDC that the project delivers significant national benefits that outweigh its localised and manageable adverse effects.

The updated conditions (finalised 3 March 2026) will provide the necessary certainty and enforceability. FNSF remains committed to working with MDC on any final refinements.