

22 June 2026

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Application Lead, Fast-track Applications
Environmental Protection Authority
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BY EMAIL: info@fasttrack.govt.nz

Dear Emma,

SUBSTANTIVE APPLICATION UNDER THE FAST-TRACK APPROVALS ACT 2024
FTAA-2604-1217: NOVA ENERGY LIMITED

Thank you for your letter, dated 10 June 2026, regarding the Nova Energy Limited (Nova) Twizel Solar Project application.

Please find below the response from the Mackenzie District Council on considerations of the completeness of the Applicant's Substantive Application under the Fast-track Approvals Act 2024 (the Act / FTAA). Namely this relates to consideration of:

- a) Whether the application documentation regarding the RMA approval as provided by the applicant, meets the requirements of sections 42 and 43 of the Act and has been provided in sufficient detail to satisfy the purpose for which it is required, in accordance with section 44 of the Act; and
- b) Whether any relevant matters listed in clauses 5 to 9 of Schedule 5 (information required in resource consent application) have not been addressed or have not been provided in sufficient detail.

Sections 42 and 43 of the FTAA

The application is for a land use activity that accords with section 42(4) of the Fast Track Approvals Act 2024 (FTAA) in that it could otherwise have been applied for as a resource consent under the Resource Management Act 1991 (RMA). The Mackenzie District Council is the relevant consent authority for such a resource consent that would otherwise be applied for under the RMA (section 42(4)(a) of the FTAA).

In terms of section 42(5), it is noted that:

- a) The activity for which approval is sought is not a prohibited activity under the RMA; and
- b) No existing resource consent/s apply to the proposed activity on the application site.

Based on the information provided in the Substantive Application (and its appendices), the Mackenzie District Council considers that the Operative Mackenzie District Plan (as recently amended by Plan Changes 18 and 23 to 30) would apply.

The Council considers that, based on the current understanding of the project proposal, the relevant planning documents identified by the Applicant in the Assessment of Environmental Effects (AEE) are correct. However, the Applicant does not appear to have provided an assessment of the relevant provisions included in Plan Change 18 (PC18) relating to Ecosystems and Indigenous Biodiversity.

It is noted that the Final Determination of the Environment Court relating to the appeals lodged on PC18 was issued by the Environment Court dated 26 May 2026 [2026] NZEnvC 120.

In terms of section 43(1) and (3) of the FTAA, the application includes the information set out in clauses 5 to 9 of Schedule 5. Section 44 sets out that the *“information required by section 43 must be specified in sufficient detail to satisfy the purpose for which it is required”*.

Clauses 5 to 9 of Schedule 5

Schedule 5, Clause 7(a) refers to *“any effect on the people in the neighbourhood and, if relevant, the wider community, including any social, economic, or cultural effects:...”*

It should be noted that the Council has delegated the assessment and comment on all ecological matters in relation to these Fast Track projects to the Canterbury Regional Council/Environment Canterbury (the Regional Council). In that context the Council does not make any specific comment on the detail of the ecological assessment undertaken, but adopts and supports any comments provided by the Regional Council on its behalf.

Beyond that, the Council notes that cumulative effects on the Te Manahuna/Mackenzie Basin Outstanding Natural Landscape (ONL) require further assessment given this is the third Fast Track project located in this southern part of the identified ONL.

From the information provided to date the Mackenzie District Council has not seen any assessment related to the potential social impacts on the townships (namely Twizel) within the Mackenzie District resulting from the potential lack of adequate workers accommodation; and any subsequent distributional and social changes arising from staffing requirements for existing businesses and the disruption to the residential rental market caused by the increased demand for staff and housing over the construction period.

Summary

Whether that substantive application made available to the Mackenzie District Council, meets the requirements of sections 42 and 43 of the Act and is provided in sufficient detail to satisfy the purpose for which it is required in accordance with section 44 of the Act is difficult to fully assess given the timeframe provided.

However, overall, the Mackenzie District Council considers the application provides a comprehensive suite of technical reports, but is concerned that the rules included in PC18 do not appear to have been considered; and an assessment of the cumulative impacts both in terms of landscape and visual effects and the economic and social impacts on Twizel Township do not appear to have been adequately assessed in the assessment provided to date.

Kind Regards,



Julie Shanks
Planning Manager