



Far North Solar Farm Limited

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23rd February 2026

Hon Raynor Asher KC

The Point Solar Farm Expert Panel Chair
c/o Environmental Protection Authority
Level 10, 215 Lambton Quay
Wellington 6011

Dear Hon. Raynor Asher KC

Re: Response to Request for Further Information – The Point Solar Farm Application under the Fast-track Approvals Act 2024 (File ref: FTAA-2509-1100)

I am writing on behalf of Far North Solar Farm Limited (FNSF) to submit our response to the Panel's Request for Further Information dated 13 February 2026, pursuant to section 67 of the Fast-track Approvals Act 2024.

The attached document below provides detailed responses to each of the queries raised in your letter. These responses address key areas including:

- Mana whenua engagement and partnership development (including recent and upcoming hui with Waitaki Rūnanga representatives, agreement in principle on a Kaitiaki Governance Group, Cultural Management Plan, capacity building, and exploration of equity participation);
- Scope of consents (clarifying that construction-phase stormwater discharges under Rule 5.94B of the Canterbury Land and Water Regional Plan are expressly contemplated and assessed within the lodged application, with confirmation from Environment Canterbury);
- Earthworks, erosion and sediment control plans;
- Ecological matters, including the proposed \$1,000,000 Avifauna Compensation Strategy contribution to DoC (with detailed funding breakdown, ring-fencing confirmation, and benefits relative to potential project effects);
- Landscape effects (including proposed conditions on heights, colours, and planting specifications, and assessment of cumulative effects).

Supporting materials are included as appendices to ensure comprehensive coverage of the requested information.

We confirm that all requested information has been provided, including the onsite ecological surveys which are being submitted concurrently with this response. Engagement with mana whenua remains ongoing and constructive, with a further face-to-face hui scheduled for 4 March 2026 at Ngāi Tahu's offices.

The appendices attached to our response are as follows:

- Appendix 1: RMM Proposed Landscape Mitigation Plan
- Appendix 2: RMM Response Letter Sec6_Landscape Effects
- Appendix 3: Response Sec1a_FNSF mana whenua emails correspondences
- Appendix 4: Response Sec2a_ECAN correspondences email
- Appendix 5: FNSF Response Sec3.2(a) FNSF_Earthworks Plan
- Appendix 6: Haigh Workman's Draft ESCP report Sec3.2(b)
- Appendix 7: Haigh Workman's Draft ESCP Plan
- Appendix 8: FNSF Module Mounting Structure Cross sectional Drawing
- Appendix 9: Section 51(2)(a) concession report from DoC
- Appendix 10: Easement Plan

Should the Panel require any further clarification, additional details, or wish to discuss any aspect of this response, please do not hesitate to contact me directly. We remain available to support the Panel in its deliberations and look forward to progressing the application.

Best regards

A handwritten signature in black ink, appearing to read 'Richard Homewood', is written over a horizontal line.

Richard Homewood

Director

Far North Solar Farm Limited

Re: Response to Request for Further Information 3 – The Point Solar Farm application under the Fast-track Approvals Act 2024 (File ref: FTAA-2509-1100)

Thank you for your letter dated 13 February 2026 requesting further information under section 67 of the Fast-track Approvals Act 2024.

We respond to each request as framed in your letter. Supporting material is provided in the attached appendices.

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

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?”

FNSF has met three times with mana whenua since we re-engaged with them in November 2025. We are also scheduled to meet again face to face at Ngā Tahū’s offices on 4 March 2026. The meetings have been:

- Online hui: 17 December 2025
- Site visit: 20 January 2026
- Hui kanohi ki te kanohi: 21 January 2026

We have also included our records of emails. Kindly refer *Appendix-3: FNSF mana whenua emails correspondences*

b) “Can The Point Solar Farm clarify what discussions were held with one or more of the Waitaki Rūnanga or their environmental companies?”

We have engaged directly with representatives of Waitaki Rūnanga as mana whenua for the project area. At the hui a constructive and open dialogue occurred regarding The Point Solar Farm proposal.

The discussions with mana whenua have focussed on working together and ensuring we can build a long-term relationship. We are ensuring that we proceed with respect and care to the needs and concerns expressed by mana whenua.

We expect a more detailed discussion at our next hui scheduled for March 4th, 2026.

The subjects covered at the hui on 21 January were:

Cultural

- Both parties agreed on the approach of establishing a Kaitiaki forum, whose role it would be to lead engagement/consultation on management plans, including a cultural management plan.
- The management plans, including the cultural management plan, would aim to set clear and measurable deliverables that could be assessed against over time.
- In order to maintain and enhance connection with the whenua, the applicant would work with Manu whenua to establish an annual occasion for young people to celebrate their heritage and connection to the whenua.

Building capacity

- We agreed to collaborate together on employment and building local capacity and skills training for the next generation. The delivery of these outcomes would be managed by the Kaitiaki forum.

Cultural compensation and financial interest

- We discussed exploring the opportunity for mana whenua to participate in the project via way of equity or share purchase, with this to be discussed further and agreed between the parties.

Other points of discussion

- The Ohau solar farm development was discussed, with FNSF providing updates on the design, Transpower status, and consenting status.
- Both parties agreed that reaching consensus on a partnership approach to The Point solar farm would provide a foundation for further engagement on Ohau Solar Farm.

Since this meeting, we have provided draft proposed conditions around the Kaitiaki forum.

c) “What were outcomes for working with the Waitaki Rūnanga on The Point application?”

As described in above under section 1(b) above, the primary outcome of engagement to date has been agreement in principle to work toward a structured partnership framework.

Specifically:

- Agreement to establish a Kaitiaki Governance Group to guide engagement on management plans and cultural matters, with draft conditions provided by Ngai Tahū
- Recognition that a Cultural Management Plan should form part of the project’s environmental management framework, and draft conditions provided by Ngai Tahū
- Agreement to collaborate on employment, training, and capacity-building initiatives.
- Agreement to further explore equity or share participation mechanisms to enable shared beneficial outcomes.
- Commitment from both parties to continue engagement ahead of the Panel site visit and through subsequent project stages.

Engagement is ongoing, and both parties expressed a shared commitment to developing a positive and enduring partnership model.

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

Through the discussions, mana whenua outlined expectations consistent with their role as kaitiaki, including:

- Recognition of cultural values associated with the whenua.
- Establishment of formal structures (a Kaitiaki Governance Group) to guide cultural oversight and management plan development.
- Development of a Cultural Management Plan with measurable and accountable deliverables.
- Ongoing partnership engagement beyond consenting.
- Opportunities for capacity building and intergenerational development.
- Exploration of shared financial participation in the project to reflect a partnership model.

These expectations extend beyond mitigation of effects and reflect a broader partnership-based approach to land use, environmental stewardship, and shared long-term outcomes.

The Applicant has confirmed its willingness to continue working collaboratively with mana whenua to formalise these arrangements through consent conditions (where appropriate) and ongoing engagement mechanisms.

2) Scope issues

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

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?”

FNSF does not submit that a particular consent can be sought “by implication.” Rather, Table 7 of the Substantive Application identifies construction-phase stormwater consent triggers, being Rule 5.94B of the Canterbury Land and Water Regional Plan (CLWRP), in relation to Transpower’s GIP substation works. We acknowledge that this consent trigger also applies to the construction of the solar farm itself. Importantly, the consent trigger was identified in the application and the activity triggering that consent was assessed in the Stormwater Report contained in Appendix K of the application.

The scope of the application is defined by the Project described in the application — that is, the activities to be undertaken and the envelope of works — not solely by how individual triggers are then described or allocated in summary tables.

Further, Environment Canterbury (ECan) has confirmed (by email correspondence – see application *Appendix 4: Response Sec2a_ECAN correspondences email*) that the construction-phase stormwater consent is within scope.

b) “If so what is the authority for this proposition?”

Not applicable. The Applicant does not rely on any proposition that consents can be sought by implication. Rather, the position is that the construction-phase stormwater discharge consent applied for under Rule 5.94B of the CLWRP, falls within the scope of the application as lodged.

Table 7 of the Substantive Application and the Stormwater Report in Appendix K demonstrate that construction-phase stormwater discharges were expressly contemplated as part of the Project. The fact that the CLWRP consent trigger, Rule 5.94B, was described in connection with the GIP substation works does not exclude its application to the wider solar farm construction.

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?”

Without accepting that the consent is implied, the basis for including construction-phase stormwater discharges within the application is that such discharges are an inevitable and inseparable consequence of the authorised construction works (including site clearance, earthworks, installation of solar arrays, access tracks, cabling, and ancillary infrastructure).

The Substantive Application clearly includes the construction of the solar farm as part of the Project, which necessarily involves:

- site preparation and earthworks,
- installation of solar arrays and associated infrastructure,
- construction of access tracks and cabling, and
- associated sediment-laden stormwater discharges.

These activities — and their effects — are assessed within the application documentation, including the Stormwater Report in Appendix K. Table 7 confirms that such discharges were recognised as requiring consent.

Importantly, the activity tables summarising consent triggers do not define or limit the scope of the application. They are summary tools. The scope is defined by the Project description and the envelope of works assessed in the application.

3) Resource Management Act (RMA) Matters

3.1. Specialist Condition Writer

a) “Who is the specialist condition writer, and what are their qualifications and experience?”

Carolyn Wratt has been appointed as the specialist condition reviewer and will work alongside Laila Alkamil on refining the proposed conditions.

Ms Wratt is a resource management planner with over 26 years’ experience. She started her career at the former Manukau City Council and then moved into a multi-disciplinary consultancy before

establishing her own planning consultancy. Ms Wratt is an accredited Hearings Commissioner and serves as a Deputy Commissioner of the Environment Court.

Ms Wratt is familiar with the fast-track regime having assisted a number of expert panels in writing decisions under both the COVID-19 Recovery (Fast-track Consenting) Act 2010 and the more recent Fast-track Approvals Act 2024 (FTA).

b) “The Panel direct that the revised suite conditions from the specialist condition writer is to be provided by the date below.”

Following the commencement of her engagement, Ms Wratt has brought to FNSF’s attention the potential for the preparation of two, if not three, further sets of revised conditions resulting from the current, staggered deadlines applying to further information requests and s53 comments. To better assist the Panel, FNSF seeks the Panel’s consideration of a direction that the next provision of a set of revised conditions occurs on 3 March 2026, rather than the current 23 February deadline, to allow Ms Wratt to review and incorporate all relevant matters raised:

- In the further information provided by FNSF on 23 February; and
- Subsequent comments under s53 on that further information provided by invited persons on 27 February.

In the interim period, the most recent set of revised conditions is attached, which will be further revised by 3rd March 2026, following Ms Wratt’s review.

3.2. Erosion and Sediment Control Plan

a) “The Applicant is to provide a single document specifying the location and volume of all earthworks for the proposed activity.”

The single document specifying the location and volume table of all earthworks is attached as *Appendix 5 FNSF Response Sec3.2(a) FNSF_Earthworks Plan*.

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.”

The Erosion and Sediment Control Plan is in working draft and we expect the additional amendments before the ESCP is finalized (including the subject site, full access roadway and example drawings). Kindly refer the Appendix 6 Haigh Workman's Draft ESCP report Plan Sec3.2(b).

3.3. Decommissioning

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

The decommissioning of the solar farm is expected to take 16 months allowing for NZ logistics, weather disruption, constraints on heavy transport.

4) Concessions sought under the Conservation Act 1987

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

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."

Parts of the Application to be Withdrawn Based on the current scope of our application and the DoC s51 report dated 4 February 2026, no parts of the application for concessions are to be withdrawn. The application seeks approval for a single concession under Part 3B of the Conservation Act 1987, specifically for easements over the Bendrose Stream Marginal Strip. This includes:

- A right of way easement to provide vehicle access via an existing farm track.
- A right to convey telecommunications easement to install and operate fibre optic cables (approximately 8-12 mm diameter) alongside the track, including attachment to an existing box culvert.

Kindly refer the easement plan attached under Appendix 10 Easement Plan.

Our application does not include, and has not sought, any concessions or approvals under other legislation referenced in the FTAA definition of "concession," such as:

- Sections 14, 14A, or 14AA of the Wildlife Act 1953 (e.g., for lizard salvage or translocation, which was noted as a potential requirement in our initial Assessment of Environmental Effects but is not pursued as part of this concession application).
- Section 49(2) of the National Parks Act 1980 (not applicable, as no national park land is involved).

The concession sought is limited to the easements described above, consistent with the details assessed in DoC's report.

Implications for DoC's Section 51 Feedback: As no parts of the concession application are to be withdrawn, there are no material implications for DoC's s51 feedback. Key aspects of DoC's feedback include:

- **Effects Assessment:** DoC considers the adverse effects (primarily from fibre cable installation) to be low-risk and negligible, with minor earthworks managed through best-practice erosion and sediment controls. This aligns with our proposed mitigation measures.
- **Consistency with Statutory Documents:** The application is deemed consistent with the Conservation General Policy 2005, Canterbury (Waitaha) Conservation Management Strategy 2016, and the purpose for which the marginal strip is held (under s24C of the Conservation Act 1987).
- **Term Recommendation:** DoC recommends a 30-year term (commencing 1 May 2025, expiring 30 April 2055), rejecting our request for 60 years due to lack of "exceptional circumstances." We accept this recommendation, noting the option to apply for renewal at expiry.
- **Fees:** DoC proposes:
 - \$26,030.30 + GST per annum during site preparation and construction.
 - \$3,657.50 + GST per annum once operational.
 - Additional management (\$450 + GST per annum) and environmental monitoring fees at standard rates

- **Conditions:** DoC recommends standard easement conditions (as appended in their report), including requirements for an updated easement survey plan, vegetation management, hazardous substance controls, and an Accidental Discovery Protocol. We have no concerns with these and confirm they are appropriate. Kindly refer the *Appendix 9 Section 51(2)(a) concession report from DoC*.

5) Ecological issues

5.1. Ecological Assessment

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."

We have provided these details here:

Della Bennet – Associate Principal, Senior Avifauna Ecologist and Ecological Team Leader
Wildland Consultants Ltd, Christchurch

Della is a highly experienced ecologist with wide-ranging expertise on indigenous and exotic avifauna in Aotearoa/New Zealand with over 12 years of experience. Della has conducted ecological significance assessments and prepared ecological effects reports for a wide range of habitats, including forest, braided river, wetland, coastal and oceanic environments. She has provided expert evidence and participated in hearings for solar farms, wind farms, aquaculture, transport, bird strike risk assessments and residential and commercial developments. Della has a PhD in Biological Sciences, PGDipSci (distinction) and BSc (ecology endorsement) from the University of Canterbury.

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;”

The \$1,000,000 funding will be ring-fenced exclusively for the implementation of the Avifauna Compensation Strategy (ACS) ensuring it achieves tangible biodiversity outcomes for the target threatened avifauna species which include kakī, black-fronted tern, wrybill, banded dotterel and black-billed gulls. It is particularly designed to protect kakī nesting sites and improve survival of released captive-reared kakī into the area.

As per DoC's draft consent conditions, the payment is made directly to DoC "to be used for implementation of the ACS," with the strategy's objectives explicitly defined as improving survival and resilience through:

- (a) targeting predators within the Mackenzie Basin to increase the likelihood of survival.
- (b) enhancing key habitats; and
- (c) undertaking research for more effective species management.

The ACS will include certification, timing, and review requirements aligned with other ecology conditions, allowing for adaptive management while maintaining focus on these outcomes. This structure prevents re-allocation, as the funds are tied to specific activities, including:

1. \$595,000 for predator control over 7 years from July 2028,
2. \$405,000 for transmitter research over a 3-year research project,
3. \$35,000 for wetland enhancement over 3 years (with scope to expand or extend this if more funding was available), and
4. \$15,000 for instream invertebrate research over 1 year as a specific project.

Monitoring and reporting will be undertaken on an annual basis to verify delivery of the abovementioned activities.

This approach mirrors precedents in other Fast-Track projects, such as the Contact Energy Southland Wind Farm (one-off payment to fund landscape-scale pest animal control) and Waihi North (structured funding for ecological compensation), where funds are dedicated and auditable to ensure no diversion.

ii. “The location, scale and intensity of the proposed pest control; and”

The proposed pest control is focused on the Godley and Cass River areas within the Mackenzie Basin (South Island, Canterbury region), which are key breeding and foraging habitats for threatened braided river birds. These rivers are part of the upper Waitaki catchment, approximately 50-70 km northwest of the project site near Lake Benmore. They are important for species like kakī (black stilt), black-fronted tern, banded dotterel, and black-billed gulls—species that may occasionally traverse the site.

The funding allocation is \$595,000 over 7 years (approximately \$85,000 annually), ensuring sustained intensity to protect nesting sites and fledglings, with co-benefits for other species. This pest control component directly compensates for potential project effects by bolstering regional populations, and reducing predation pressure that could compound any site-specific risks.

iii. “The degree of benefit that is expected from allocation of \$28,571/year relative to potential impacts.”

The funding is structured as an upfront payment for implementation over 5-10 years, allowing concentrated investment for immediate, high-impact outcomes that deliver benefits persisting over the project's life (e.g., through improved survival leading to self-sustaining populations).

Expected benefits include:

1. Predator Control (\$595,000 over 7 years, ~\$85,000/year): Maintains kakī and black-fronted tern populations in the Godley and Cass areas, with documented improvements in survival (e.g., higher fledging rates) and co-benefits for other species. This addresses basin-wide predation, known to be the single greatest threat to aviary populations.
2. Transmitter Project (\$405,000 over 3 years, ~\$135,000/year): Funds a dedicated ranger for tracking 1-2-year-old kakī, identifying mortality causes and movements relative to solar farms. Enhanced recruitment to breeding populations (potentially increasing adult numbers by 10-20% through targeted interventions) and data to minimize future collision risks across the region.
3. Wetland Enhancement (\$35,000 over 3 years, ~\$11,667/year): Improves habitats at Dead Horse Swamp, Mailbox and Inlet, and Micks Lagoon, boosting resilience during floods (increasing with climate change). This compensates for any minor habitat loss at the site by enhancing wetlands that support foraging and refuge for threatened species, and improved resilience for Kaki.
4. Instream Invertebrate Research (\$15,000 over 1 year): Assesses food availability to optimise kakī release timing, potentially resulting in improved management of Kaki release and survival.

Overall, the ACS takes a strategic, evidence-based approach that is likely to achieve net positive outcomes, whilst also including review mechanisms to adapt activities, ensuring ongoing optimisation.

This funding compliments the long term, ongoing work on the site which is also designed to protect and enhance the habit for the species of interest. This includes targeted pest mammal and plant control across the site and enhancing over 81 hectares within the setback areas of the solar farm, together with the proposed grasshopper reserve and work to protect the eastern gullies as key lizard habitats.

6) Landscape Effects

6.1. Conditions

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?”

Kindly refer the Appendix 2 RMM Response Letter Sec6_Landscape Effects.

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?”

Kindly refer the Appendix 2 RMM Response Letter Sec6_Landscape Effects.

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?”

Kindly refer the Appendix 2 RMM Response Letter Sec6_Landscape Effects.

6.2. Cumulative Effects

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?”

Kindly refer the Appendix 2 RMM Response Letter Sec6_Landscape Effects.

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

a) “Could the Applicant clarify which maximum height is applicable to the proposed solar panels?”

The applicable maximum height of the proposed solar panels is 2.95 metres above ground level. This is confirmed in *Appendix 2 RMM Response Letter Sec6_Landscape Effects*”, which provides clarification on panel dimensions and addresses this matter in full.

Kindly refer the Appendix 8 FNSF Module Mounting Structure Cross sectional Drawing.

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?”

No amendment is required. The reference to a 4.5m maximum tilted height is not applicable to the solar panel structures. As clarified in *Kindly refer the Appendix 2 RMM Response Letter Sec6_Landscape Effects*, this matter has been addressed comprehensively in Section 2.1.1 of that letter.

In summary:

- The maximum height of the solar panels is 2.95 metres above ground level.
- The proposed native mitigation planting is anticipated to reach approximately 3 metres in height within five years.
- As such, the planting will exceed the height of the solar panels once established.

Accordingly, the anticipated level of screening described in the Landscape Report by RMM remains accurate and the conclusions of the Landscape Assessment are unchanged. No amendment to the Landscape Mitigation Planting strategy or assessment of effects is necessary.

Attachments

Appendix 1: RMM Proposed Landscape Mitigation Plan

Appendix 2: RMM Response Letter Sec6_Landscape Effects

Appendix 3: Response Sec1a_FNSF mana whenua emails correspondences

Appendix 4: Response Sec2a_ECAN correspondences email

Appendix 5: FNSF Response Sec3.2(a) FNSF_Earthworks Plan

Appendix 6: Haigh Workman's Draft ESCP report Sec3.2(b).

Appendix 7: Haigh Workman's Draft ESCP Plan.

Appendix 8: FNSF Module Mounting Structure Cross sectional Drawing

Appendix 9: Section 51(2)(a) concession report from DoC.

Appendix 10: Easement Plan