

# Referral application form to use for the fast-track process

Under the Fast-track Approvals Act 2024

## About this referral application

This referral application form has been approved by the Secretary for the Environment in accordance with the fast-track approvals process of the Fast-track Approvals Act 2024 (the Act). All referral applications under the Act must be submitted using this form.

We recommend you discuss your referral application and the information requirements with us before you lodge the referral application. Please contact the Fast-track support team on 0800 327 875 or email [info@fasttrack.govt.nz](mailto:info@fasttrack.govt.nz)

**Please provide a general level of detail in your application; sufficient to inform the Minister's decision on the referral application.**

You must use this form to apply for referral applications and complete all relevant fields, even where you provide supporting attachments that are more detailed. Include attachment or appendix numbers in the relevant fields and list the attachments in section 5 of this form.

If the required information and relevant supporting material is not provided, the application will be returned to you as incomplete.

If your application is determined to be complete, and the Ministry for the Environment (MfE) considers that your project may be capable of satisfying the assessment criteria and does not appear to involve an ineligible activity, and you have paid all related fees, charges and/or levies, then we will provide it to the Minister for Infrastructure (the Minister).

Unless the Minister decides to decline the application before doing so, the Minister will invite comments on the application from relevant local authorities, Ministers, administering agencies, identified Māori groups, owners of Māori land in the project area and any other person the Minister decides is appropriate. The Minister may also request further information from you, the relevant local authorities, or relevant administering agencies before making a decision on the referral application.

If the Minister accepts your referral application, then you may lodge a substantive application with the EPA and the substantive application may be considered by a decision-making panel.

## Application fees and Cost recovery

Under the Fast-track Approvals (Cost Recovery) Regulations 2025 (the Regulations), applicants lodging a referral application are required to pay a fee (deposit) of \$12,000 (plus GST), and a levy of \$6,700 (plus GST) to the Environmental Protection Authority (EPA). The fees are set in

Schedule 1 of the Regulations. These fees must be paid before lodgement of your referral application. If the required amount is not paid the application will be returned as incomplete.

Please note the final costs payable at the referral stage may exceed the referral application fee (deposit) paid. More information about cost recovery under the Fast-track Approvals Act 2024 is available from [Fast-track approvals cost recovery process](#).

## Submitting your application

You will need to submit this form through our digital Fast-track portal. You will need to receive a link to register/access the portal.

If you need any help with the form, you can call or email us:

- 0800 327 875 (0800 FASTRK) (from within New Zealand)
- email: [info@fasttrack.govt.nz](mailto:info@fasttrack.govt.nz)

### How to send your completed form to us

Use the application portal – you will need to receive a link to register/access: [Fast-track website](#)

## Your personal information

The Ministry for the Environment (MfE) is collecting your personal information for the purpose of administering your referral application under the Fast-track Approvals Act 2024. We will only use the information for the purposes of contacting you in relation to this application.

MfE may provide your application, or details from your application to other agencies or local authorities for the purpose of administering your referral application. If your application is accepted as complete and progresses through the referral process, the Minister may consult with other agencies and groups on your application. This will require the Minister to share the details of your application with the EPA, the Panel Convener, and those groups.

We will store your personal information securely. You have the right to access the personal information we hold about you and to ask for it to be corrected if it is wrong. If you would like to access your personal information, or have it corrected, please contact us at [referrals@fasttrack.govt.nz](mailto:referrals@fasttrack.govt.nz)

## Official information

All information you provide with this application is subject to the Official Information Act 1982 and may be released in accordance with that Act.

## Publishing your application

We intend to publish your referral application on the Fast-track Approvals website.

Any personal contact details in application documents will not be made publicly available. Please provide a copy of the application with all personal contact details redacted.

MfE may also redact certain information from publication in accordance with the Official Information Act 1992. If you think your application contains information which should be withheld, please clearly identify it and provide an explanation as to why it should be withheld.

## Section 1: Applicant details

*A person or persons may apply to use the fast-track process for a project. Where there is more than one person, the referral application must be lodged jointly by all of the persons who are proposed to be authorised persons for the project.*

*If the referral application is accepted and referred by the Minister, the person or persons who lodged the referral application will be specified as the person who is, or the persons who are, authorised to lodge a substantive application for the project.*

### 1.1 Applicant(s) – repeat for all applicants

**1.1.1 Organisation name:** Nova Energy Ltd

**1.1.2 NZBN (optional):**

**1.1.3 Contact name:**

**1.1.4 Phone:** s 9(2)(a)

**1.1.5 Email address:** s 9(2)(a)

**1.1.6 Postal address (if preferred method of contact):**  
N/A

### 1.2 Agent acting on behalf of applicant (if applicable)

**1.2.1 Organisation name:** BTW Company Ltd

**1.2.2 Contact name:** Trent Lynch / Cam Twigley

**1.2.3 Phone:** s 9(2)(a)

**1.2.4 Email address:** s 9(2)(a)

**1.2.5 Postal address (if preferred method of contact):**  
N/A

### 1.3 Finance – Agent acting on behalf of applicant (if applicable)

1.3.1 Organisation name: As per above

1.3.2 Contact name:

1.3.3 Phone:

1.3.4 Email address:

1.3.5 Postal address (if preferred method of contact):

*If you are making this application on behalf of the applicant, please attach evidence that you are authorised to make this application.*

1.3.6 Please direct all correspondence relating to this application (including correspondence from MfE) to:

☐ Applicant(s)

*If selecting Applicant and there is more than 1 person who lodged the referral application, please identify 1 person to receive all correspondence on behalf of all applicants.*

☒ Agent for applicant s 9(2)(a)

### 1.4.1 Compliance and enforcement history – repeat for all applicants

1.4.1 Have there been any compliance or enforcement actions taken against the applicant (or if the referral application is lodged by more than one person, any of those persons) under a specified Act definition for either ‘compliance’ or ‘enforcement’?

☒ Yes – see below      ☐ No – proceed next

1.4.2 If you answered yes above, please provide a summary of the relevant legislation and provisions, and any compliance or enforcement actions, and the outcome of those actions taken under the specified Act against the applicant or applicants, if the referral is being lodged jointly.

Nova is committed to developing projects in a compliant manner, always striving to meet or exceed consented baselines. It establishes comprehensive protocols and policies to ensure its staff, contractors and other personnel are acutely aware of its regulatory and legal obligations. There has been one instance Nova is aware of (from review of its records) where an abatement notice was issued, however

Nova is committed to developing projects in a compliant manner, always striving to meet or exceed consented baselines. It establishes comprehensive protocols and policies to ensure its staff, contractors and other personnel are acutely aware of its regulatory and legal obligations. There has been one instance Nova is aware of (from review of its records) where an abatement notice was issued, however work was undertaken in response to ensure compliance. Nova engages

collaboratively with local authorities and other stakeholders to ensure compliance at all levels for its projects.

## Section 2: Referral application summary

### 2.1 Project name

*This is the name by which the project will be known publicly. For example - avoid using street addresses, place names, company names.*

## 2.2 Project description and location

### 2.2.1 Provide a description of the project and the activities it involves

*The project description helps us with inviting comments from relevant parties on the application, and publishing information about the application.*

The project involves the establishment and operation of a solar farm which will generate up to 300

The project involves the establishment and operation of a solar farm which will generate up to 300 megawatts (MW) of renewable electricity and will connect to the National Grid via the Transpower Twizel Substation. The project will create enough electricity to power approximately 75,000 homes annually. The development is proposed as a single-stage construction project.

Activities to facilitate the project include general earthworks to establish the site. The proposal will require the construction of internal roads with a central trunk road running through the middle of the site with smaller maintenance tracks branching off the trunk road at intervals. Upgrades to State Highway 8 (SH8) will be required to facilitate increased vehicle movement during construction to maintain the safety and functioning of SH8. Existing fencing is currently fit for purpose, however, setbacks and buffer zones from various ecologically important areas as identified in local and regional plans, National Policy Statements and National Environment Standards will be marked out to ensure that no construction activities impact wetlands, natural waterbodies or any other area of ecological importance. An Erosion and Sediment Control Plan will be implemented to mitigate any effects of sediment mobilisation during earthworks. Following earthworks and site establishment, solar electricity infrastructure components will be installed onsite consisting primarily of solar panels and inverters. These will eventually connect to the grid via the Twizel Substation however, approvals for the grid connection will be sought separately to this application (if required). Management plans will be prepared and implemented during all phases for the project to ensure any environmental effects that may occur are appropriately managed. Stormwater discharge will occur during and post-construction and will in both instances, be discharged to ground via soakage.

### 2.2.2 Provide a description or map of the whole project area that identifies its boundaries in sufficient detail to enable consideration of the referral application.

*For example, site address(es), certificate of title(s), shape files*

The site is legally described as Lot 3 DP 422901 (489342) and does not have a physical address. The

The site is legally described as Lot 3 DP 422901 (489342) and does not have a physical address. The certificate of title and map of the site are included in Attachment 1.

## 2.3 Ineligible activity

*Your referral application must demonstrate that the project does not involve any ineligible activities as defined in Section 5 of the Act. Please consider each ineligible activity below and where relevant, provide the requested details.*

*When providing your response below, where possible, **provide details of any parties involved, the***

***extent of their holding and the activity relevant to their area.***

*Where a project involves an activity that may be the subject of a determination under sections 23 or 24, and you are intending to seek a Ministerial determination for that activity under either section, you must still complete this section in full. Determinations under, and information required in respect of, sections 23 and 24 are covered further under 2.5 Ministerial determinations under sections 23 and 24.*

*If your application relates to certain mining activities below the surface of the land and meets the other relevant criteria under section 5(2) of the Act then an agreement under section 5(1)(a), (b), (j) or (k) may not be required. This should be identified under the relevant questions below, and you must provide the additional information required in respect of section 5(2) under 2.3 Ineligible activity.*

**2.3.1** Does the project include an activity that would occur on identified Māori land as defined in section 4 of the Act?

☐ Yes – see below      ☒ No – proceed to next

a. If yes, please address the following:

i. identify the land involved and the owner(s) of the land.

ii. Confirm that the activity on the land has been agreed with the owners of the land and provide evidence of the written agreement; or

- A. advise whether it is proposed to seek a determination under section 23 and provide the information under 2.5 Ministerial determinations under sections 23 and 24 below; or
- B. advise whether it is proposed to rely on section 5(2) of the Act and provide the information under 2.3 Ineligible activity below.

**2.3.2** Does the project involve an activity that would occur in a customary marine title area?

☐ Yes – see below      ☒ No – proceed next

a. Address the following:

- i. Identify the relevant customary marine title area, who the customary marine title group is;
- ii. Provide evidence that written agreement has been obtained from the customary marine title group and provide a copy of the same; **or**
  - A. advise whether it is proposed to rely on section 5(2) of the Act and provide the information under 2.3 Ineligible activity below.

**2.3.3** Does the project involve an activity that would occur in a protected customary rights area?

☐ Yes – see below      ☒ No – proceed next

a. Address the following:

- i. Identify the protected customary rights area, the group who holds these rights and the nature of the protected customary right(s)
- ii. Explain your proposed activity and identify whether you consider that it would have a less than minor adverse effect on the exercise of the protected customary right(s), and briefly explain why; **or**
- iii. Advise whether you consider that your proposed activity would have a more than minor effect on the exercise of the protected customary right(s), and if so, confirm that the activity has been agreed to in writing by the protected customary rights group and provide a copy of that agreement.

**2.3.4** Does the project involve an activity that would occur on:  
Māori customary land; OR land set apart as a Māori reservation as defined in section 4 of Te Ture Whenua Māori Act 1993.



☐ Yes – see below      ☒ No – proceed next

- 2.3.5** Does the project involve an aquaculture activity or an activity that is incompatible with aquaculture activities that would occur within an aquaculture settlement area (under section 12 of the Māori Commercial Aquaculture Claims Settlement Act 2004); or an area reserved under another Treaty settlement for the aquaculture activities of a particular group?

☐ Yes – see below      ☒ No – proceed next

- 2.3.6** Provide details of the aquaculture activity or the activity that is incompatible with aquaculture and the location.

- 2.3.7** Provide details of the relevant aquaculture settlement area or Treaty settlement legislation reserving space for aquaculture and include details of the impacted parties or particular group.

- 2.3.8** Provide details on whether or not the applicant is authorised to apply for a coastal permit within the aquaculture settlement area, or area reserved under another Treaty settlement for aquaculture activities, including a copy of any such authorisation.

- 2.3.9** Does the project include an activity that would require an access arrangement under section 61 or 61B of the Crown Minerals Act 1991?

☐ Yes – see below      ☒ No – proceed next

- a. Provide the following information:

- i. what is the activity that would require the access arrangement; and
- ii. does the project include an activity that would occur on Crown owned land or internal waters and land of the common marine and coastal area described in Schedule 4 of that Act and provide details of the same.
- iii. If so describe how the activity meets the criteria in section 61(1A)(a-e) of the Crown Minerals Act 1991; **or**
- iv. Confirm and provide evidence that the project would not occur in an area for which a permit cannot be granted under that Act:

- 2.3.10** Does the project include an activity that would be prevented under any of sections 165J, 165M, 165Q, 165ZC, or 165ZDB (regarding the management of occupation in common marine and coastal area) of the Resource Management Act 1991?

☐ Yes – see below      ☒ No – proceed next

**2.3.11** Provide details about which section the project does not comply with and, if relevant, the provisions of the regional coastal plan that are applicable.

**2.3.12** Does the project include an activity (other than an activity that would require an access arrangement under the Crown Minerals Act 1991) that would occur on land that is listed in Schedule 4 of this Act?

☐ Yes – see below      ☒ No – proceed next

a. Provide the following:

- i. identify the activity and which clause under Schedule 4 is applicable; and
- ii. confirm whether you are seeking that the Minister make a determination under section 24, and if so, whether the determination sought relates to existing electricity infrastructure or new electricity lines and provide the information under 2.5 Ministerial determinations under sections 23 and 24 below.

**2.3.13** Does the project involve an activity that would occur on a national reserve held under the Reserves Act 1977 and requires approval under that Act?

☐ Yes – see below      ☒ No – proceed next

a. Address the following:

- i. identify the activity and type of national reserve under the Reserves Act
- ii. identify what approval(s) would be required under the Reserves Act.
- iii. Confirm whether you are seeking that the Minister make a determination under section 24 and if so whether the determination sought relates to existing electricity infrastructure or new electricity lines.? If so, provide the information under 2.5 Ministerial determinations under sections 23 and 24 below

**2.3.14** Does the project involve an activity that would occur on a reserve held under the Reserves Act 1977 that is vested in someone other than the Crown or a local authority?

☐ Yes – see below      ☒ No – proceed next

a. Address the following:

- i. identify the activity, the reserve type under the Reserves Act, and the person in whom it is vested.
- ii. provide evidence that written agreement has been obtained from the person in whom the reserve is vested and provide a copy of the same; or
- iii. advise whether it is proposed to rely on section 5(2) of the Act and provide the information under 2.3 Ineligible activity below.

**2.3.15** Does the project involve an activity that would occur on a reserve held under the Reserves Act 1977 that is managed by someone other than the Department of Conservation or a local authority?

☐ Yes – see below      ☒ No – proceed next

a. Address the following:

- i. identify the activity, the reserve type under the Reserves Act, and the person or body who manages the reserve.
- ii. Provide evidence that written agreement has been obtained from the person or body responsible for managing the reserve and provide a copy of the same; **or**
- iii. advise whether it is proposed to rely on section 5(2) of the Act and provide the information under 2.3 Ineligible activity below; **or**
- iv. advise whether you consider the activity falls within the scope of section 5(5) of the Act, and provide the information under 2.3 Ineligible activity below.

**2.3.16** Does the project involve an activity that is:

a. a prohibited activity under the Exclusive Economic Zone and Continental Shelf (Environmental Effects) Act 2012 or regulations made under that Act?

☐ Yes – please explain      ☒ No – proceed next

b. described in section 15B (Discharge of harmful substances from ships or offshore installations) of the Resource Management Act 1991 and is a prohibited activity under that Act or regulations made under it;

☐ Yes – please explain      ☒ No – proceed next

c. prohibited by section 15C (Prohibitions in relation to radioactive waste or other radioactive matter and other waste in coastal marine area) of the Resource Management Act 1991

☐ Yes – please explain      ☒ No – proceed next

**2.3.17** Does the project involve a decommissioning-related activity as described in section 38(3) of the Exclusive Economic Zone and Continental Shelf (Environmental Effects) Act 2012:

☐ Yes – please explain      ☒ No – proceed next

**2.3.18** Does the project involve an activity undertaken for the purposes of an offshore renewable energy project?

☐ Yes – please explain ☒ No – proceed next

## **2.4 Exemptions from requirement to provide agreement**

### **2.4.1 Mining activities under section 5(2)**

*The agreement of the relevant groups referred to under 3.5 Persons affected is not required for certain mining activities under section 5(2). If you think this might apply to your application, answer the questions below.*

**2.4.1.2** Is your application for an activity that is prospecting, exploration, mining or mining operations of Crown-owned minerals undertaken below the surface of any land or area?

☐ Yes –see below ☒ No – proceed next

**2.4.1.3** Provide details of the activity and identify the owner and occupier of the land and any relevant details concerning the land or area (such as whether it is identified Māori land)

**2.4.1.4** Explain the extent, if any to which your activity may be likely to cause any damage to the surface of the land or any loss or damage to the owner or occupier of the land.

**2.4.1.5** Explain the extent, if any to which your activity will be likely to have any prejudicial effect in respect of the use and enjoyment of the land by the owner or occupier of the land.

**2.4.1.6** Explain the extent, if any to which your activity will be likely to have any prejudicial effect in respect of any possible future use of the surface of the land, and if no such effects are anticipated, please explain why.

### **2.4.2 Activities on land proposed to be the subject of a land exchange**

*The agreement of relevant groups referred to in (subsection 5(1)(a) of the Act) is not required if section 5(5) applies. If you consider this section may be relevant to your application, complete the below.*

**2.4.2.1** Is the reserve on which the activity is to occur proposed to be the subject of a land exchange?

☐ Yes ☒ No

**2.4.2.2** Is the reserve a Crown-owned reserve?

☐ Yes ☒ No

**2.4.2.3** Are the person or persons responsible for managing the reserve in place because of a Treaty settlement?

☐ Yes ☒ No

**2.4.2.4** Provide any supporting details which may be relevant for your responses to the above questions.

## **2.5 Ministerial determinations under sections 23 and 24**

*Complete this section if you wish to seek a ministerial determination under section 23 or section 24 that your project is not an ineligible activity.*

### **2.5.1 Determination in relation to linear infrastructure on Māori land under section 23**

**2.5.1.1** Is your application seeking a determination under section 23 (linear infrastructure on certain identified Māori land)

☐ Yes – see below ☒ No – proceed next

Provide the following information:

**2.5.1.2** Confirmation that the activity is the construction of electricity lines or land transport infrastructure (and identify which it is)

**2.5.1.3** Confirmation that the above construction (or operation of) will be undertaken by a network utility operator that is a requiring authority, and that that same party is the applicant for the necessary approvals, providing details of the same.

**2.5.1.4** Confirmation that the activity would occur on identified Māori land that is Māori freehold land or General land owned by Māori that was previously Māori freehold land (and identify that land)

**2.5.1.5** Provide information on the rights and interests of Māori in that land

- 2.5.1.6** Provide an assessment of the effects of the activity on those Māori rights and interests and on the relevant land.

**2.5.2 Determination in relation to existing electricity infrastructure under section 24(2)**

- 2.5.2.1** Is your application seeking a Ministerial determination under section 24(2) (in relation to maintenance, upgrading, or continued operation of existing electricity infrastructure on certain Schedule 4 land or in a national reserve)

☐ Yes – see below      ☒ No – proceed next

Provide the following information:

- 2.5.2.2** Confirmation that the activity is the maintenance, upgrading, or continued operation of existing electricity infrastructure.

- 2.5.2.3** Confirmation that the activity would occur on eligible land, as defined in section 24(3).

- 2.5.2.4** Advise whether the activity would materially increase the scale or adverse effects of the existing electricity infrastructure and provide an explanation of the same.

**2.5.3 Determination in relation to new electricity lines under section 24(4)**

- 2.5.3.1** Is your application seeking a determination under section 24 (the construction and operation of new electricity lines on eligible land (as defined in schedule 4 excluding land classified as a national park or listed in subsections 2, 4, 5(a), 7 or 8 of that schedule)?

☐ Yes – see below      ☒ No – proceed next

Provide the following information:

- 2.5.3.2** Is the activity the construction and operation of new electricity lines? (provide any necessary details)

Would the activity occur on eligible land (and identify which category of eligible land);

- 2.5.3.3** Provide the requested information for each alternative site considered for the construction and operation of the new electricity lines:

**2.5.3.4** A description of the alternative site.

**2.5.3.5** A statement of the anticipated and known financial cost of undertaking the activity on the alternative site.

**2.5.3.6** A description of the anticipated and known adverse effects of undertaking the activity on the alternative site.

**2.5.3.7** A description of the anticipated and known financial cost and practicality of available measures to avoid, remedy, mitigate, offset, or compensate for the anticipated and known adverse effects of the activity on the alternative site.

**2.5.3.8** A description of any issues (including financial cost) that would make it impractical to undertake the activity on the alternative site.

**2.5.3.9** An assessment of whether it would be reasonable and practical to undertake the activity on the alternative site, considering the matters referred to above.

## **2.6 Appropriateness for fast-track approvals process**

*Here you must explain how the project meets the referral application criteria ([section 22](#)). Please consider and respond where relevant, to each question.*

*If the project is planned to proceed in stages, you must explain how each stage meets the referral application criteria.*

*If a part of the project is proposed as an alternative project, you must explain how each stage meets the referral application criteria,*

**2.6.1** The criteria for accepting a referral application is that the project is an infrastructure or development project that would have significant regional or national benefits. Explain how this project satisfies the criteria:

The Project is a large-scale infrastructure and development project that will provide for renewable energy,

The Project is a large-scale infrastructure and development project that will provide for renewable energy, maximising low-emissions electricity generation from the available solar resource, providing power generation for approximately 75,000 homes annually.

The project will increase daytime energy supply to support resilience within the National Grid. The Project will increase New Zealand's renewable electricity generation to support the national economy during daytime periods, allowing other energy sources to be reserved for high demand periods when supply capacity may become tight, such as during

periods of low rainfall (and snowfall) in the headwaters of the country's hydroelectric schemes and/or periods of low wind speeds across major windfarms.

The project will create high value employment activity during construction and operation to support general growth at a community, district, regional and national level.

The Project is entirely consistent with the NPS-REG and directly supports the overall objective to increase renewable energy generation as a matter of national significance. The District and Regional planning framework recognises the project as regionally and nationally significant infrastructure and seeks to enable it through the policy framework:

- Objective 2 of Section 16 Utilities in the Operative Mackenzie District Plan seeks to make specific provision for, and enables, the establishment, use and maintenance of utilities.
- Objectives ATC-O3 and ATC-O4 of the Proposed Mackenzie District Plan (PC23-27) recognise the importance to the District of nationally and regionally significant infrastructure, particularly renewable electricity generation and electricity transmission activities. An outcome sought under these objectives is to recognise and provide for this infrastructure.
- Objective REG-O1, and associated policy REG-P1, of the Mackenzie District Plan, seek to increase output from renewable electricity generation activities in the Mackenzie District for national, regional and local use to support achievement of the New Zealand Government's national target for renewable electricity generation.
- Objectives 5.22 and 16.2.2 and associated policies 5.3.2, 5.3.9, 16.2.2, 16.3.3 and 16.3.5 of the Canterbury Regional Policy Statement seek to provide for and enable regionally significant infrastructure with a particular focus on renewable energy generation.
- Objective 3.3 of the Canterbury Land and Water Regional Plan seeks to enable nationally and regionally significant infrastructure.

## **2.6.2** Explain how referring the project to the fast-track approvals process:

- ### **2.6.2.1** Would facilitate the project, including by enabling it to be processed in a more timely and cost-effective way than under normal processes; and



If the Project was to seek consent via the conventional RMA consenting pathways, the proposal

If the Project was to seek consent via the conventional RMA consenting pathways, the proposal would be publicly notified due to the adverse effects of the Project being more than minor. The statutory processing timeframes for a publicly notified application total 130 working days (at least) for a decision on the application to be issued, dependent on whether a hearing is required. However, these timeframes are often extended or suspended, particularly if further information requests are made. Under the Fast Track Approvals Act (FTAA), a decision from the Panel is required to be issued within 30 working days (default period) after comments from invited parties are received. Under the RMA, any submitter has a right of appeal to the Environment Court in respect of a matter raised in their submission. Under the FTAA, an appeal may be made only on a question of law and is made to the High Court. Therefore, as compared to the RMA, the FTAA essentially reduces the potential delays and uncertainties associated with appeals in the appellant Courts. Altogether, the FTAA provides a condensed timeframe for a decision on the resource consent applications and one forum/process for consideration for the proposal, including the consideration of multiple different approvals that a project may require under multiple Acts. The usual consent process with multiple processes, associated costs and longer timeframes can impose a significant barrier to new renewable electricity developments. Fast-tracking the resource consent process provides a much higher degree of timeframe and process certainty.

**2.6.2.2** Is unlikely to materially affect the efficient operation of the fast-track approvals process

The project is an eligible activity with significant national and regional benefits and is considered

The project is an eligible activity with significant national and regional benefits and is considered to be a project of the nature and scale that the FTAA was enacted for. The project is unlikely to materially affect the efficient operation of the fast-track

approvals process as it does not encompass an activity that is overly complex, relative to other large scale infrastructure projects. Nova/Todd owns the land and there are no statutory acknowledgment areas that pertain to the site or other complexities that might impact on the efficient operation of the FTAA process.

**2.6.2.3** Has the project been identified as a priority project in a central government, local government, or sector plan or strategy (for example, in a general policy statement or spatial strategy), or a central government infrastructure priority list?

*For example – a sector plan that specifically identifies the project including details such as location.*

☐ Yes – see below      ☒ No – proceed next

a. Identify the plan, strategy or list (or any other relevant document).

**2.6.2.4** Will the project deliver new regionally or nationally significant infrastructure

or enable the continued functioning of existing regionally or nationally significant infrastructure?

☒ Yes – see below      ☐ No – proceed next

a. Explain how the project will deliver this.

Renewable electricity generated from the 300 MW Solar Farm will connect to the national grid via

Renewable electricity generated from the 300 MW Solar Farm will connect to the national grid via the Twizel substation thereby allowing for commercial export to customers providing enough energy to power 75,000 homes. When considering the stated renewable energy output in megawatts (MW), the scale and benefits of the project are comparable, and in most cases are greater, than the 10 solar energy infrastructure projects that have been listed in Schedule 2 of the Fast Track Approvals Act and the two substantive applications currently being considered under the NBEA Fast Track (see below for an ordered comparison).

- FTA006 The Point Solar Farm, Canterbury. Far North Solar Farm Ltd. 420 MW
- FTA054 Bunnythorpe Solar Farm, Manawatū- Whanganui. Harmony Energy. 400 MW
- Twizel Solar. Nova Energy. 300 MW
- FTA329 Foxton Solar Farm. SolarGen JV. 180 MW
- FTA266 Haldon Station Ltd, Twizel. Lodestone Energy Limited. 180 MW
- FTOR00003 Glorit Solar Farm, North Auckland. Glorit Solar P LP and Transpower New Zealand Limited. 175 MW (NBEA)
- FTA094 Black Point Solar Farm, Waitaki, Canterbury. Black Point Solar Ltd. 147 MW
- FTA065 Hinuera Solar Farm, Waikato. Harmony Energy. 110 MW
- FTA035 Rotokawa Solar Farm, Waikato. Tauhara North No2 Trust. 105 MW
- FTA061 Huirangi Solar Farm, Taranaki. Harmony Energy. 100 MW
- FTA096 Balmoral Station Solar Array, Tekapo. Andrew and Karen Simpson. 88 MW
- FTA361 Wellsford Solar Farm. Energy Farms Ltd. 76 MW
- FTOR00005 Annies Way Solar Farm, Waikato. Annies Way Solar Farm Ltd. 75 MW (NBEA)

**2.6.2.5** Will the project increase the supply of housing, address housing needs, or contribute to a well-functioning urban environment (within the meaning of policy 1 of the National Policy Statement on Urban Development 2020). If yes, explain how the project will achieve this.

No

**2.6.2.6** Will the project deliver significant economic benefits, and if so, how?

When built the Solar Farm will represent a significant investment by Nova, which is expected to

When built the Solar Farm will represent a significant investment by Nova, which is expected to create the following economic benefits:

- Employment opportunities during construction;
- Creation of permanent skilled engineering, operations and maintenance jobs, when operational;

- Ongoing work for local contractors providing general and specialised maintenance and support services;
- Ongoing agricultural production post construction to positively contribute to the local and regional economy; and
- Direct contribution to New Zealand's transition to a low emissions economy and support of economic development through the addition of low cost renewable electricity.

**2.6.2.7** Will the project support primary industries, including aquaculture, and if so, how?

It is expected that grazing activities will be integrated with the renewable electricity generation

It is expected that grazing activities will be integrated with the renewable electricity generation equipment to support primary production, whilst increasing the supply of renewable electricity generation to the National Grid.

**2.6.2.8** Will the project support development of natural resources, including minerals and petroleum, and if so, how?

Yes, sunlight is a natural renewable resource that the Project will utilise to convert to electricity as

Yes, sunlight is a natural renewable resource that the Project will utilise to convert to electricity as described further in this application

**2.6.2.9** Will the project support climate change mitigation, including the reduction or removal of greenhouse gas emissions, and if so, how?

Yes. The project will directly serve to mitigate climate change by offering generation from a

Yes. The project will directly serve to mitigate climate change by offering generation from a renewable source which in turn, will reduce New Zealand's reliance on high emitting forms of electricity generation.

**2.6.2.10** Will the project support climate change adaptation, reduce risks arising from natural hazards, or support recovery from events caused by natural hazards, and if so, how?

Yes, renewable forms of energy generation form a key pillar to New Zealand's energy strategy as

Yes, renewable forms of energy generation form a key pillar to New Zealand's energy strategy as legislated to adapt to climate change by reducing reliance on high-emission electricity generation. Similar, the resilience provided through diversification of electricity generation will improve New Zealand's ability to adapt to climate change i.e. the project potentially provides minor support to adaptation, resilience and recovery from natural hazards through diversity of electricity generation technologies within the South Island.

**2.6.2.11** Will the project address significant environmental issues, and if so, how?

The project directly aligns with Government objectives and emissions obligations which serve to

The project directly aligns with Government objectives and emissions obligations which serve to address environmental issues.

**2.6.2.12** Is the project consistent with local or regional planning documents, including spatial strategies, and if so, how?

The project is consistent with local planning documents and regional planning documents through

The project is consistent with local planning documents and regional planning documents through its alignment with provisions related to energy generation, water bodies, landscapes and natural character amongst other matters. Please see Attachment 4 for an assessment of relevant provisions of local and regional planning documents.

The Mackenzie District Plan identifies the importance of renewable energy resources in the description of the Mackenzie District. Similarly, the proposal is consistent with Mackenzie District Plan's relevant objectives and policies.

The Canterbury Land and Water Regional Plan notably provides for regionally significant infrastructure that can ensure adverse effects are avoided, remedied and mitigated. The project's consistency with this, and the objectives and policies set out in the Canterbury Land and Water Regional Plan demonstrate its alignment with local and regional planning documents.

## Section 3: Project details

*Remember: at this stage only a general level of detail is required, enough to inform eligibility to use the fast-track approvals process.*

For construction activities, please state the anticipated commencement and completion dates.

On the basis of a successful referral application and subsequent consent approval via the Fast Track Approvals Act process,

On the basis of a successful referral application and subsequent consent approval via the Fast Track Approvals Act process, the project is planned for execution in a single stage over an approximate two-

year period, commencing in 2027.

### 3.1 Approvals required

*Applications must specify all of the proposed approvals sought but only need to provide a general level of detail about each proposed approval, sufficient to inform the Minister's decision on the referral application.*

*For each proposed approval an applicant must be eligible to apply for any corresponding approval under a specified Act. For example, if an approval is for a notice of requirement under the RMA, the applicant for that approval would need to be a requiring authority.*

*Applications for approvals under a specified Act, as required by in section 13(4)(y), are covered below in 3.8 Specific proposed approvals.*

#### 3.1.1 Outline the approvals sought under the Resource Management Act 1991.

Land use consent pursuant to section 9 of the RMA for renewable electricity generation.

Land use consent pursuant to section 9 of the RMA for renewable electricity generation.

Land use consent pursuant to section 9 of the RMA for earthworks activities;  
Discharge consent pursuant to section 15 of the RMA for construction stormwater discharge; and

Discharge consent pursuant to section 15 of the RMA for operational stormwater discharge.

#### 3.1.2 Outline the approvals sought under the Conservation Act 1987

None

#### 3.1.3 Outline the approvals sought under the Reserves Act 1977

None

#### 3.1.4 Outline the approvals sought under the Wildlife Act 1953

Wildlife Act Authorisation (permit) under section 53 of the Act for the handling/relocation of lizards

**3.1.5** Outline the approvals sought under the National Parks Act 1980

None

**3.1.6** Outline the approvals sought under the Heritage New Zealand Pouhere Taonga Act 2014

None

**3.1.7** Outline the approvals sought under the Freshwater Fisheries Regulations 1983

None

**3.1.8** Outline the approvals sought under the Exclusive Economic Zone and Continental Shelf (Environmental Effects) Act 2012

None

**3.1.9** Outline the approvals sought under the Crown Minerals Act 1991

None

**3.1.10** Outline the approvals sought under the Public Works Act 1981

None

**3.1.11** *Only applicable if more than one applicant:* Provide a statement of which approvals are proposed to be held by which applicant.

Not applicable

**3.1.12** Where there are any particular eligibility requirements to apply for an above approval; identify what they are, who the relevant applicant is, and confirm that the relevant applicant meets those requirements (including providing any necessary supporting information or documentation to evidence this).

No

**3.1.13** Are there any other types of consents, certificates, designations, concessions, and other legal authorisations (other than contractual authorisations or the proposed approvals) and you consider are needed to authorise the project (including any that may be needed by someone other than you as the applicant(s)). Provide details on whether these have been obtained.

Both Nova and Transpower will have new assets within the Twizel Substation as part of the project. At present,

Both Nova and Transpower will have new assets within the Twizel Substation as part of the project. At present, design within the substation is not sufficiently progressed to determine whether consents will be required. Nova and Transpower are in agreement that if consents are required for works within the substation they will be lodged separately to the application for the solar farm and line connection.

## **3.2 Project stages**

**3.2.1** If the project is planned to proceed in stages, provide:

1. A statement of whether the project is planned to proceed in stages, including:
  - a. an outline of the nature, scale and timing of the stages; and
  - b. a statement of whether you intend to lodge a separate substantive application for each of the stages.
    - i. If a substantive application is intended to be lodged for each stage, address the questions under the section (Appropriateness for fast-track approvals process) for each stage of the project

The project will be constructed in a single continuous stage that is expected to take two years to complete.

### 3.3 Alternative project

**3.3.1** If the project is proposed as an alternative project, provide:

1. A statement of whether a part of the project is proposed as an alternative project in itself; and
  - a. Describe that part of the project; and
  - b. Explain how that part of the project proposed as an alternative project meets the referral assessment criteria in section 22 of the Act.

Not applicable

### 3.4 Adverse effects

**3.4.1** Describe any anticipated and known adverse effects of the project on the environment.

To understand the magnitude of potential effects on the environment from the project, the following technical

To understand the magnitude of potential effects on the environment from the project, the following technical reports have been commissioned by Nova to assess and manage potential effects. These assessments are:

Assessment Company Author(s)

Archaeological Assessment of Effects: Nova Solar Plant Project Absolute Archaeology Ltd  
Shar Briden – BA + Post Grad Dip (Archaeology)

Assessment of Potential Ecological

Effects of The Proposed Nova Energy Solar Farm Near Twizel Wildlands Project Team:

- Kelvin Lloyd – Project oversight and management BSc (Hons) and PhD
- Rose Stuart – Report author (freshwater fauna)
- Fraser Gurney – Report author (avifauna)
- Della Bennet – Report author (avifauna)
- Samantha King – Report author (lizards)
- Vikki Smith – Report author (terrestrial invertebrates)
- Lydia Metcalfe – Report author (vegetation)
- Justyna Giejsztowt – Report author
- William Shaw – Peer review

Due Diligence Geotechnical Report Engineering Design Consultants Giles Learman - BSc (Hons), CMEngNZ, (PEngGeol), CGeol FGS

Twizel Solar Plant – Glint and Glare Study ITP Renewables Nicholas Logan BEng(Hons), BSc  
Landscape Assessment Report Rough Milne Mitchell Landscape Architects Paul Smith – BLA (Hons) NZILA (Registered)



Landscape Assessment – Peer Review Patch Ltd Stephen Skelton - NZILA (Registered)  
Twizel Solar Farm Acoustic Assessment Marshall Day Acoustics Damian Ellerton - MSc  
Integrated Traffic Assessment BTW Company Ltd Leon Vasey – DipEng (Civ.)  
Ian Steele CPEng, CMEngNZ

#### Assessment of Environmental Effects Summary:

Overall, any actual and potential adverse effects are considered to be appropriately avoided, remedied or mitigated for the following reasons:

- The scale of the Project will transform the character of the immediate surrounds from a rural landscape to a landscape containing energy infrastructure. Renewable electricity generation is however, anticipated in the Mackenzie District Plan and landscape effects will be avoided, remedied or mitigated as far as practicable. The solar farm will maintain dry stock farming on the site retaining an element of primary production;
- The project will not result in any significant adverse landscape and visual effects. With landscape mitigation the project will result in no more than a moderate (more than minor) degree of adverse landscape and visual effects;
- Potential nuisance-related amenity effects are able to be suitably managed during both construction and operation phases;
- Areas of indigenous values have been identified, largely around the margins of the site, and the solar project has been designed to avoid these areas with appropriate buffers maintained around them. Ecological management plans are proposed to manage any residual effects on ecological values which have been deemed to be no more than minor by Wildlands ecologists;
- Nova will adhere to a solar panel rest angle of no less than 5 degrees which will avoid any adverse effects of glint and glare from the panels;
- Project design controls and management plans will suitably manage effects related to potential hydro inundation, erosion and sediment runoff and flooding and stormwater effects within the Project site and surrounding area;
- Potential risk to human health associated with electric and magnetic fields (EMFs) is low with all electrical equipment to be designed to New Zealand standards;
- An archaeological assessment has found that there is a low risk of encountering archaeological features during construction. The potential for archaeological discovery during site development works will be suitably managed through adherence to an Archaeological Management Plan and Discovery Protocol;
- Nova has proactively engaged with mana whenua in acknowledgement of their role as kaitiaki and a cultural assessment has been prepared to further inform the project and mitigation. Nova is continuing to work with mana whenua to address concerns and enable opportunities that have been identified; and
- Safe and efficient site access will be provided with the proposed vehicle access point to SH8 to meet NZ Transport Agency (Waka Kotahi) design standards. Operational movements will be infrequent and construction traffic will be managed through a traffic management plan.

Please see Attachments 5, 6 and 7 for a copy of some of the key environmental assessments undertaken for the project.

- 3.4.2** Provide a statement of any activities involved in the project that are prohibited activities under the Resource Management Act 1991, and identify the relevant prohibited activity provision.

Not applicable

### 3.5 Persons affected

**3.5.1** Provide a list of the persons, groups and/or entities who you consider are likely to be affected by the project.

*The list should include, as relevant, local authorities, relevant Māori groups (as set out at section 13(4)(j)(ii)-(vii) of the Fast-track Approvals Act 2024), persons with a registered interest in land that may need to be acquired under the Public Works Act 198; and if the project includes a land exchange, the holder of an interest in the land that is to be exchanged by the Crown (see Consultation requirements for referral application).*

Mackenzie District Council (regulatory authority)

Mackenzie District Council (regulatory authority)

Environment Canterbury (regulatory authority)

Kāi Tahu Whānui (Mana whenua Iwi)

Te Rūnanga o Arowhenua, Te Rūnanga o Waihao, and Te Runanga o Moeraki (mana whenua rūnanga). Nova was advised by Kāi Tahu Whānui that these rūnanga hold mana whenua status over the takiwā.

Department of Conservation (regulatory authority and neighbouring landowner)

NZ Transport Agency Waka Kotahi (roading authority)

Transpower (neighbouring landowner)

Fire and Emergency New Zealand (government agency/interested party)

Meridian Energy (neighbouring landowner)

Bendrose Farms / WHL Holdings (neighbouring landowner)

McIntyre / Williams Partnership (neighbouring landowner)

Road Metals Holdings (neighbouring landowner)

SOL Quarries (third party quarry operator on site)

Glencairn Station (neighbouring landowner)

- 3.5.2** Provide a summary of any consultation undertaken with the above persons and/or groups who you consider are likely to be affected by the project, and any other groups required to be consulted with under section 11 of the Act, and how the consultation has informed the project.

Mackenzie District Council

**Mackenzie District Council**

To commence engagement with Mackenzie District Council (MDC), a meeting was held in Fairlie at MDC offices on 12 May 2022 to introduce Nova Energy and provide a high-level overview of the potential solar plant development. Further engagement with MDC took place on 8 October 2024 at MDC offices to provide an update on project development activities and a high-level overview of the consent application and approach. The intent of the meeting was to familiarise MDC staff with the application prior to lodgment. Attendees on behalf of MDC were Murray Dickson and Nick Boyes (consultant).

**Environment Canterbury**

The initial engagement with Environment Canterbury (ECan) was made via an online meeting on 28 April 2022 to introduce Nova Energy and provide a high-level overview of the solar plant development.

Following further project development, BTW engaged with ECan, on behalf of Nova, through the pre-application request portal on the ECan website. This was followed up with a virtual meeting on 16 October 2024. This meeting provided an opportunity for Nova to introduce the proposal to ECan through Elizabeth Hovell – Consents Team Leader for Significant Consents.

A presentation was provided in the meeting outlining a Q4 2024 update of the Project along with contact details of various technical experts for future consultation as part of the consent application. Elizabeth Hovell was agreed to be the contact person for subsequent correspondence up until consent lodgement.

**Kāi Tahu Whānui:**

Engagement commenced with Kāi Tahu in 2022 who provided information to Nova of the mana whenua relevant to project, in conjunction with consultants Aoraki Environment Consultancy (AEC) and Aukaha. This subsequently resulted in Engagement occurring through the Rūnanga which is set out in the following.

**Rūnanga:**

- Te Rūnanga o Arowhenua,
- Te Rūnanga o Waihao, and
- Te Runanga o Moeraki

In conjunction with cultural representatives from these Rūnanga, environmental consultancies have also featured in the consultation that has occurred. These consultancies are Aukaha and AEC. Collectively, Aukaha and AEC have produced a Manawhenua Report commissioned by Nova Energy to assist in the preparation of consent applications for the project. Nova is currently working to address matters raised in the Manawhenua Report and welcome the opportunity to enable the future opportunities identified.

Regular project meetings have occurred with Rūnanga representatives dating back to 2022 at the inception of the project. As the design of the project has progressed, these meetings have continued with a presentation of the project scheduled to occur at a marae.

**Department of Conservation**

Nova began engagement with the Department of Conservation (DOC) at the Twizel office on 11 May 2022 to provide an introduction to Nova and a high-level overview of the proposed solar plant development. Nova re-engaged with DOC on 18 October 2024

in Twizel and also on 7 November 2024 to provide a Q4 2024 stakeholder update on project progress and application timeline. The meeting also involved discussion regarding ecological management aspects of the project with respect to the Kākī (Black Stilt) recovery program located to the southwest of the proposed development.

Through consultation with DOC, concerns were raised (via letter, dated 28 February) as to the level of potential adverse effects particularly on avifauna (kākī / black stilt and Australasian bittern/ matuku-hūrepo). Effects on avifauna, along with effects on lizards, invertebrates and biosecurity, have been comprehensively addressed by technical experts engaged by Nova (Wildlands) – see Attachment 5 (Assessment of Ecological Effects). The concerns raised by DOC have informed the application and management of the potential effects raised by DOC will be addressed through a suite of ecological management plans, project design and volunteered conditions of consent. Based on the ecological assessment work of Wildlands, it is anticipated that the level of potential adverse effects can be managed to be ‘no more than minor’. These matters will be comprehensively addressed in the substantive application and supporting material.

NZ Transport Agency Waka Kotahi (NZTA):

Consultation has occurred with NZTA around the proposed design of the upgraded site access on SH8. This engagement is ongoing and will continue until such time as NZTA has provided approval of the proposed SH8 upgrades.

Transpower New Zealand Limited:

Nova has engaged with Transpower at various stages of the Project development.

Nova and Transpower will have new assets within Transpower’s Twizel Substation as part of the project, subject to Transpower’s approval. Design work within the substation is not currently sufficiently progressed to determine whether consents will be required. Nova and Transpower have agreed that any consents required will be lodged separately to the application for the solar farm and line connection. Each party will be responsible for consent requirements in relation to their assets. The parties have agreed that they will work collaboratively which includes Nova sharing a copy of any substantive consent application with Transpower for feedback prior to lodgment.

Fire and Emergency New Zealand (FENZ):

FENZ have been consulted early in the design of the project to gain an understanding how the project can appropriately manage fire risk. This consultation has seen the design of the project evolve to appropriately address the matters raised directly through consultation with FENZ.

Meridian Energy

Consultation with Meridian Energy began following purchase of the project site in mid-2022. Meridian Energy own the land that lies between Transpower’s Twizel Substation and the project site. Consultation has been ongoing predominantly to understand any potential effects of the proposed solar plant and determine substation access arrangements, with an “Agreement to Easement” executed between Meridian Energy and Nova Energy. Consultation will continue as Nova develops its consent application.

Adjacent and Adjoining Property Owners

Through advice provided by project environmental consultants, Nova established a catchment of adjoining and adjacent property businesses/owners with the potential to be adversely affected by the Project, predominately due to construction activities and visual effects (see plan included as Attachment 8). Since December 2021 Nova has engaged in face-to-face and online meetings, emails and phone calls to share project information, including environmental assessments, and to seek to understand any issues or concerns. These parties include:

- Bendrose Farms / WHL Holdings
- McIntyre / Williams Partnership
- Road Metals Holdings
- SOL Quarries
- Glencairn Station

**3.5.3 List any Treaty settlements that apply to the project area and provide a summary of the relevant principles and provisions in those settlements.**

Ngāi Tahu Treaty Settlement

**Ngāi Tahu Treaty Settlement**

**Principles and Provisions:**

- The Crown's settlement offer provided formal apology to acknowledge that Ngāi Tahu suffered grave injustices that significantly impaired its economic, social and cultural development.

- The Crown expressed its profound regret and apologised unreservedly for the suffering and hardship caused to Ngāi Tahu. The Apology also served to confirm the validity of the Ngāi Tahu Claims, which had been borne by seven generations.

- The Settlement provided for cultural redress to Ngāi Tahu which was aimed at restoring the ability of Ngāi Tahu to give practical effect to its kaitiaki responsibilities. The Cultural Redress elements of the Crown's Settlement Offer aimed to restore Ngāi Tahu's ability to give practical effect to their kaitiaki responsibilities.

- Ownership and control was offered by the Crown in the form of:

o Return of ownership of Pounamu to Ngāi Tahu

o Four Specific Sites:

② Arahura Valley: The creation of the Waitaiki Historic Reserve to be vested, at no cost, in the Mawhera Incorporation which will administer this land under the Reserves Act.

② Rarotoka: Transfer of the freehold title, exempt from marginal strip requirements, to Te Rūnanga o Ngāi Tahu and a 500 metre Fisheries Area has been created around the island.

② Whenua Hou: Codfish Island Nature Reserve has been changed to the Whenua Hou Nature Reserve. Crown provided Te Rūnanga o Ngāi Tahu with a Deed of Recognition (DoR) over Whenua Hou as well as a Statutory Acknowledgment (SA). Both of these statutory instruments recognise the Ngāi Tahu association with Whenua Hou and provide for the ongoing recognition of that association.

② Crown Titi Islands: Transfer of the freehold title, exempt from marginal strip requirements, to Te Rūnanga o Ngāi Tahu at no cost to the tribe. The islands are managed by Rakiura Māori as if they were a nature reserve. An administering body, made up of ten Rakiura Māori, has been appointed to control and manage the islands.

② Wāhi Taonga: the return to Ngāi Tahu of Tutaepatu (Woodend Lagoon) and financial compensation to restore the environment of the lagoon.

None of these sites are in proximity to the project site.

o High Country Stations:

② Elfin Bay, Greenstone and Routeburn stations purchased by the Crown and subsequently transferred to Ngāi Tahu at market value with their intention to gift the mountain tops to the nation in recognition of their conservation values. The bulk of the remaining area of bush, mountain lands and the huge Maroroa Valley – comprising about 90% of the total area will be leased back in perpetuity to the Department of Conservation at a peppercorn rental for conservation purposes. Ngāi Tahu retains a right to veto any commercial activities on these lands.

The settlement legislation provided the Crown's acknowledgement of statements of association (a statutory acknowledgement). Those statutory acknowledgment areas relevant to the project site are:- Te Ao Mārama (Lake Benmore); and - Lake Ohau

None of these sites will be affected by the project.

**3.5.4 If relevant, detail any principles or provisions in the Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019 that would be invoked by the project and identify which aspects of the application trigger or otherwise invoke these requirements.**

Not applicable

**3.5.5** Will the project be located on land returned under a Treaty settlement?

☐ Yes – see below      ☒ No – proceed next

**3.5.6** Provide evidence of written agreement by the owners of the land returned.

**3.5.7** Describe any processes already undertaken under the Public Works Act 1981 in relation to the project:

Not applicable

**3.5.8** Provide information identifying any parcels of Māori land, marae, or identified wāhi tapu within the project area:

Lakes Benmore and Ruataniwha are man-made lakes (outside the project development area) however, they

Lakes Benmore and Ruataniwha are man-made lakes (outside the project development area) however, they are considered culturally significant areas for Kāi Tahu and specifically Arowhenua, Moeraki and Waihao. Lake Benmore contains several kāika nohoaka (traditional villages used seasonally) sites, Māori rock art and culturally sensitive areas.

There are two sites identified by mana whenua that are in close proximity to the application site that are still relatively untouched by the introduction of the hydro scheme and a change in river flows, and they are “Para Arero” and “Kahuika”. Para Arero was a kāika nohoaka (traditional areas of communal living on tribal lands) and kāika mahika kai site. Located approximately halfway down the southern boundary of the application site and situated between the property boundary and the Ōhau River braid tuna (eels) and turnips were gathered and harvested for the winter months.

At the southern point of the application site is Kahuika, a kāika (a small settlement) located at the junction of the Ōhau, Pūkaki and Takapō Rivers where mahika kai such as tuna (eels) and turnips were gathered. Said to mean ‘meeting of the waters’ the top of Lake Benmore (Waitaki River) was deceiving and treacherous with long smooth swirls on the surface and strong twisting currents under the surface.

### **3.6 Legal interests**

**3.6.1** Provide a description of any legal interests you or any others applying, have in the land on which the project will occur, including a statement of how that affects your ability to undertake the work.

The following legal interests are noted to enable the project:

The following legal interests are noted to enable the project:

The land is held by a wholly owned subsidiary of The Todd Corporation Limited for the proposed solar plant development. Nova Energy Ltd is also a wholly owned subsidiary of Todd Corporation providing full control over decisions made to enable the project. The project will require approval from Meridian Energy Limited for a transmission line easement across Meridian’s land for Nova to access the Transpower substation. An “Agreement to Easement” has been executed between Meridian Energy and Nova Energy for this project.

The project will require approval from Transpower NZ Limited for the installation of equipment within the Twizel Substation and works to enable connection to the National Grid. Both parties have agreed to work collaboratively.

### **3.7 Other matters**

- 3.7.1** Have any activities included in the project, or any that are substantially the same as those involved in the project, previously been the subject of an application or a decision under a specified Act?

Please note the term 'application' includes a notice of requirement and any other means by which a decision may be sought under a specified Act.

☐ Yes – see below      ☒ No – proceed next

**3.7.2** If an application has been made, provide details of the application.

**3.7.3** If a decision has been made, also provide the outcome of the decision and the reasons for it.

**3.7.4** Provide a description of whether and how the project would be affected by climate change and natural hazards:

There are no direct effects from climate change. A portion of the site falls within the mapped Hydro

There are no direct effects from climate change. A portion of the site falls within the mapped Hydro Inundation Hazard layer, however it is noted this is not a natural hazard layer. The proposed works will not alter topography in a way that will exacerbate the hydro inundation risks that may occur as result of natural hazards. Additionally, the site is not located within the High Flood Hazard Area within the MDC PC28 overlay.

*Provide the additional details requested below as relevant to your application.*

### **3.8 Specific proposed approvals**

#### **3.8.1 Approvals under the Resource Management Act 1991**

##### **3.8.1.1 Resource consents**

If your application is seeking a consent for an activity that would otherwise be applied for under the Resource Management Act 1991, including an activity that is prohibited under the Act, provide the information below:

- An assessment of the project against any relevant national policy statement, any relevant national environmental standards and, if relevant, the New Zealand Coastal Policy Statement.

The National Policy Statement for Renewable Electricity Generation (2011) (NPSREG) provides strong

The National Policy Statement for Renewable Electricity Generation (2011) (NPSREG) provides strong policy support for the Project as a matter of national significance. The Project directly supports the overall objective to increase the proportion of New Zealand's electricity generated from renewable energy sources. The Project benefits directly align with the benefits recognised in Policy A. The Project supports Policy B(c) in contributing to the significant development of renewable electricity generation activities. Considerations under Policy C1 are relevant to the Project, noting the locational aspects of the Project site being well-suited to solar electricity generation to



include existing National Grid lines and proximity to an existing substation. For reasons set out in the effects assessment, it is considered there are no residual adverse effects requiring offset mitigation or environmental compensation, although it is noted Nova are committed to restoration of waterbodies and wetlands to achieve net positive ecological benefits (Policy C2). Policy E1 is notable for the requirement for regional policy statements, regional plans and district plans to include provisions to provide for renewable electricity generation activities to include solar.

Overall, the Project is entirely consistent with the NPSREG and directly supports the overall objective to increase renewable energy generation as a matter of national significance.

#### NPS – IB (Indigenous biodiversity)

Whilst this policy statement “is an essential part of our response to biodiversity decline in Aotearoa” the NPS IB does not apply to the development of renewable electricity generation assets [section 1.3 (3)] therefore this policy statement recognises the significance of this proposed renewable electricity generation project, in conjunction with the importance of indigenous biodiversity.

#### NPS – FM (Freshwater management) and NES-F (Freshwater)

The project will not directly impact freshwater values with project design providing appropriate buffers from surface waterbodies such that no consents are required under the NES-F.

#### NPS – ET (on Electricity transmission) and NES-ET (Electricity transmission activities)

The NPS-ET and the NES-ET do not apply to the project site however they have been included for consideration for the activities on Transpower’s Twizel substation to enable the grid connection, if applicable. The project will align with the provisions of the NPS-ET and NES-ET.

#### NES-CS (Contaminated soils)

A Preliminary Site Investigation indicates that there are no existing or historic HAIL activities on the project site and therefore the NES-CS does not apply.

- Information on whether, to the best of your knowledge, there are any existing resource consents relevant to the project site to which RMA section 124C(1)(c) (existing consent would need to expire to enable the approval to be exercised) or RMA section 165Z1 (space already occupied by the holder of an aquaculture permit) would apply if the approval were to be applied for as a resource consent under that Act

Not applicable

#### **3.8.1.2 Resource consents where the project includes standard freshwater fisheries activities**

If your application is seeking a resource consent and your project includes a standard freshwater fisheries activity, provide the information requested below:

## COMMERCIAL

- If an in-stream structure is proposed (including formal notification of any dam or diversion structure), provide a description of the extent to which this may impede fish passage.

Not applicable

- Indicate whether any fish salvage activities or other complex freshwater fisheries activities are proposed.

Not applicable

### **3.8.1.3 Designations**

If your application is seeking a designation or an alteration to an existing designation for which a notice of requirement would otherwise be lodged under the Resource Management Act 1991, provide the information below:

- An assessment of the project against any relevant national policy statement, any relevant national environmental standards, or, if relevant, the New Zealand Coastal Policy Statement.

Not applicable

### **3.8.1.4 Designations where the project includes a standard freshwater fisheries activity**

If your application is seeking a designation or an alteration to an existing designation and your project includes a standard freshwater fisheries activity, provide the information requested below:

- If an in-stream structure is proposed (including formal notification of any dam or diversion structure), provide a description of the extent to which this may impede fish passage.

Not applicable

- Indicate whether any fish salvage activities or other complex freshwater fisheries activities are proposed.

Not applicable

### **3.8.1.5 Change or cancellation of conditions**

If your application is seeking a change or cancellation of resource consent condition that would otherwise be applied for under the Resource Management Act 1991, provide:

- Information about whether the change or cancellation of the condition is material to the implementation or delivery of the project.

Not applicable

### **3.8.1.6 Certificates of compliance**

If your application is seeking a certificate of compliance that would otherwise be applied for under the Resource Management Act 1991, provide:

information that demonstrates the activity that the certificate of compliance is intended to cover can be done lawfully in the location without a resource consent.

Not applicable

### **3.8.2 Approvals relating to Conservation Act 1987, Reserves Act 1977, Wildlife Act 1953, and National Parks Act 1980**

#### **3.8.2.1 Concessions**

For applications seeking a concession that include a lease, answer the following:

- Will the lease be for a term (including any renewals that will, or is likely to, be more than 50 years?)  
☐ Yes – see below   ☐ No – proceed next
- Will the granting of the lease trigger a right of first refusal or a right of offer or return?  
☐ Yes – see below   ☐ No – proceed next
  - If you answered yes to both a. and b. above, provide evidence that the applicant has written agreement from the holder(s) of the right of first refusal or right of offer or return to waive that right for the purposes of the proposed lease.

#### **3.8.2.2 Land exchanges**

For applications seeking an approval for a land exchange involving conservation land, provide the details below:

- A description of both land areas proposed for exchange (for example, maps showing areas and location, addresses and legal descriptions where possible)  
Not applicable
- The financial value of the land proposed to be acquired by the Crown  
Not applicable
- A brief description of the conservation values of both pieces of land, including an explanation of why the exchange would benefit the conservation estate.  
Not applicable
- If the land exchange would trigger a right of first refusal or a right of offer or return, provide evidence that the applicant has written agreement from the holder of the right of first refusal or right of offer or return to waive that right for the purpose of the land exchange  
Not applicable
- Provide sufficient detail in respect of both land areas to confirm that no part of any land to be exchanged by the Crown is land listed in Schedule 4 or a reserve declared to be a national reserve under section 13 of the Reserves Act 1977.  
Not applicable

### 3.8.3 Approvals relating to complex Freshwater Fisheries activities

If your application is seeking an approval or dispensation that would otherwise be applied for under regulation 42 or 43 of the Freshwater Fisheries Regulations 1983 in respect of a complex freshwater fisheries activity provide the information requested below:

- Whether an in-stream structure is proposed (including formal notification of any dam or diversion structure), and a description of the extent to which this may impede fish passage.

Not applicable

- Whether any fish salvage activities or other complex freshwater fisheries activities are proposed.

Not applicable

### 3.8.4 Approvals relating to Exclusive Economic Zone and Continental Shelf (Environmental Effects) Act 2012

If your application is seeking a marine consent that would otherwise be applied for under the Exclusive Economic Zone and Continental Shelf Act 2012, provide the information requested below:

- Any information relating to whether the Minister for Conservation is an affected person.

Not applicable

- If the applicant or the proposed holder of the marine consent has already applied for a consent under the EEZ Act in relation to the project, provide:

- Details of any application made;
- An explanation of any decisions made on that application; and
- Any information that Minister may consider under section 22(6) (comparison of activity against current or likely use of the area).

Not applicable

- Additional information (in a summary form) about compliance or enforcement action taken against the applicant or the person who is identified in the application as the proposed holder of the marine consent by the EPA under the EEZ Act.

Not applicable

### 3.8.5 Approvals relating to Crown Minerals Act 1991

#### 3.8.5.1 *Access arrangements*

For an approval for an access arrangement that would otherwise be applied for under section 61 or 61B of the Crown Minerals Act 1991, provide:

- Information that confirms the applicant or the person identified in the application as the proposed holder of the access arrangement complies with section 59(1) and (2) of the Crown Minerals Act 1991 (which applies as if a reference to an access arrangement under that Act were a reference to an access arrangement under this Act) including;
  - Evidence that the applicant or person has provided each owner and occupier of the relevant land a notice in writing of their intention to obtain an access arrangement; and

- Evidence that the notice complies with the requirements in section 59(2) of the Crown Minerals Act, and any matters required by regulations. =

Not applicable

### **3.8.5.2 Mining permits**

For an approval for a mining permit that would otherwise be applied for under section 23A of the Crown Minerals Act 1991, provide the information requested below:

- A copy of the relevant exploration permit or existing privilege to be exchanged for a mining permit that entitles the holder to mine a Crown-owned mineral.  
Not applicable
- The name and contact details of the proposed permit participants and the proposed permit operator.  
Not applicable
- A proposed work programme for the proposed permit, which may comprise committed work, committed or contingent work, or both.  
Not applicable
- Evidence of the technical or financial capability of the proposed permit holder to comply with and give proper effect to the work programme.  
Not applicable
- Information about the proposed permit holder's history of compliance with mining or similar permits and their conditions.  
Not applicable
- The proposed date on which the substantive application is intended to be lodged (if your referral application is accepted) in accordance with section 42(11).  
Not applicable
- If the authorised person proposes to provide information under section 37 (to the relevant chief executive), the date on which the person intends to provide that information.  
Not applicable
- The proposed duration of the permit.  
Not applicable

### **3.8.5.3 Mining permits for petroleum**

If the proposed approvals include a mining permit for petroleum, provide:

- A map of the area over which the mining permit application is intended to be made, the area in which the surrender of an exploration permit or existing privileges is proposed (which must be the same area as the area over which the mining permit application is intended to be made), and the extent of the resource and reserves to which the development plan relates.  
Not applicable

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- The resources and reserves relating to the project, estimated in accordance with the Petroleum Resources Management System.

Not applicable

- A high-level overview of the following:
  - the proposed field development plan;
  - the proposed date for the commencement of petroleum production;
  - the economic model for the project;
  - the proposed duration of the proposed mining permit and;
  - decommissioning plans.

Not applicable

### 3.8.5.4 Mining permits for minerals other than petroleum

If the proposed approvals include a mining permit for minerals other than petroleum, provide:

- A map of the area over which the mining permit application is intended to be made, the area in which the surrender of an exploration permit or existing privileges is proposed (which must be the same area as the area over which the mining permit application is intended to be made), and the extent of the resource and reserves to which the development plan relates.

Not applicable

- For minerals other than gold or silver, a report or statement confirming the ownership of the minerals targeted

Not applicable

- Information on whether the application will be for a Tier 1 or Tier 2 permit.

Not applicable

- An estimate of the mineral resources and reserves relating to the project, including a summary on acquisition of the data and the data underpinning the estimate (such as information on sample locations, grade, and geology). For a Tier 1 permit application the resources and reserves relating to the project are to be estimated in accordance with a recognised reporting code such as JORC or NI 43-101.

Not applicable

- An indicative mine plan.

Not applicable


- A high-level overview of the following:
  - the proposed mining method;
  - the proposed date for the commencement of mining and estimated annual production;
  - the economic model for the project;
  - the status of or anticipated timing for completing any pre-feasibility or feasibility studies;
  - the proposed methods for processing mined material and handling and treating waste and;
  - anticipated plans for mine closure and rehabilitation.

Not applicable

## Section 4: Authorisation

To the best of my knowledge, the information contained in this application is true and correct.

- ☒ I confirm that I am authorised to make this application.
- ☒ I have provided a copy of the application with all contact details redacted.
- ☒ I understand that all actual and reasonable costs incurred in relation to this application by MfE, EPA and other central and local government agencies will be recovered from me in accordance with section 104 of the Act, and the Fast-track Approvals Cost Recovery Regulations 2025.

Signature: Cam Twigley  Digitally signed by Cam  
Twigley  
Date: 2025.04.04 11:37:04  
+13'00' **Date:** 08/04/2025

**Name:** Cam Twigley of BTW Company Ltd on behalf of Nova Energy

## Section 5: Attachments

List any documents submitted with the application.

- Remember: include a copy of your application with all contact details redacted.

Attachment number	Document name	Author	Document version
1	Site Plan and Certificate of Title	Nova Energy and LINZ	
2	Site / Development Plans	Aurecon	
3	Nova Energy letter of authorisation	Nova Energy	
4	Assessment of Relevant Planning documents	BTW Company Ltd	
5	Assessment of Ecological Effects	Wildlands	
6	Landscape Assessment with photo simulations and Landscape Assessment with photo simulations and planting plan	Rough Milne Mitchell and Virtual Rough Milne Mitchell and Virtual View	
7	Manawhenua Report	Aoraki Environmental Aoraki Environmental Consultancy Limited and Aukaha (1997) Limited on behalf of Te Rūnanga o Arowhenua, Te Rūnanga o Moeraki and Te Rūnanga o Waihao	
8	Plan of Adjoining and Adjacent Property Owners	BTW Company Ltd	






# Referral application checklist

Use this checklist to confirm you have completed all sections of the referral application form.

<b>Section 1: Applicant details</b>	<input checked="" type="checkbox"/>
1.2 & 1.3 Agent's evidence of authority to represent the applicant(s) - if applicable	<input checked="" type="checkbox"/>
1.4 Compliance and enforcement history	<input checked="" type="checkbox"/>
<b>Section 2: Referral application summary</b>	<input checked="" type="checkbox"/>
2.1 Project name	<input checked="" type="checkbox"/>
2.2 Project description and location	<input checked="" type="checkbox"/>
2.3 Ineligible activity	<input checked="" type="checkbox"/>
2.4 Exemptions from requirement to provide agreement	<input checked="" type="checkbox"/>
2.5 Ministerial determinations under sections 23 and 24	<input checked="" type="checkbox"/>
2.6 Appropriateness for fast-track approvals process	<input checked="" type="checkbox"/>
<b>Section 3: Project details</b>	<input checked="" type="checkbox"/>
3.1 Approvals required	<input checked="" type="checkbox"/>
3.2 Project stages	<input checked="" type="checkbox"/>
3.3 Alternative project	<input checked="" type="checkbox"/>
3.4 Adverse effects	<input checked="" type="checkbox"/>
3.5 Persons affected	<input checked="" type="checkbox"/>
3.6 Legal interest	<input checked="" type="checkbox"/>
3.7 Other matters	<input checked="" type="checkbox"/>
3.8 Specific proposed approvals	<input checked="" type="checkbox"/>
<b>Section 4: Authorisation</b>	<input checked="" type="checkbox"/>
<b>Section 5: Attachments</b>	<input checked="" type="checkbox"/>