



Far North Solar Farm Ltd

Level 1 Office 65 Main Road, Kumeu

Auckland 0810 New Zealand

25 August 2025

June Cahill Application Lead, Fast-track Applications Environmental Protection Authority Private Bag 63002 Wellington 6140 New Zealand

Email: [REDACTED]

Dear June,

Re: Amended Substantive Application for The Point Solar Farm (EPA Ref: FTAA-2504-1056) – Request for Acceptance Without Formal Re-Lodgement and Fees

I am writing on behalf of Far North Solar Farm Ltd (FNSF) to submit our amended substantive application for The Point Solar Farm, addressing the completeness issues identified in your decision letter and memo dated 14 August 2025. The table following this letter summarises how the amendments to the substantive application address the EPA's decision. We appreciate the EPA's detailed feedback, which has enabled us to refine the application efficiently.

As discussed in our previous correspondence and meetings, we believe the required changes are non-material and could have been resolved through minor clarifications. None involve substantive alterations to the project design, scope, or effects assessment; they are limited to expanded policy evaluations, statutory descriptions, and structural adjustments for compliance (e.g., FNSF to remove Transpower from the concession application); the EPA's review of the amended substantive application is correspondingly straight forward.

The amendments made in the substantive application to address the EPA's decision, particularly relating to the CRPS gaps and section 42 issues, could have been resolved during pre-lodgement consultation if ECAN had undertaken a robust review at that point in the process as FNSF would have expected. ECAN's subsequent change in reviewer did not assist, as it acknowledged, and the result arguably landed in a minor difference of opinion between expert planners.

We have just received confirmation from Transpower (**attached** letter dated 26 August 2025) that they will now lodge their own application for the right of way and telecommunications DoC Concession easement over the marginal strip on either side of the Bendrose Stream through the traditional processes. A copy of this letter is also annexed to the amended substantive application to ensure Transpower's position on this particular matter is clear to the expert panel.

In light of the above, potentially requiring FNSF to pay a second round of full fees and levy (\$250,000 + GST and \$140,000 levy + GST) on the lodgement of its amended substantive application arguably frustrates the statutory purpose of the FTA to facilitate the delivery of infrastructure with significant regional or national benefits. We request that the EPA accordingly exercises its discretion under Regulation 7(1) of the Fast-track Approvals (Cost Recovery) Regulations 2025 to waive a second fee and levy in their entirety because it is reasonable in these particular circumstances to do so.

In conclusion, we request the EPA accept this amended substantive application as complete under section 46(2) of the FTA.



Thank you for your time. We look forward to advancing this project.

Best regards,

Richard Homeward

Director

Far North Solar Farm Ltd

Email: [REDACTED]

Phone: [REDACTED]

EPA Comment/Issue	Relevant FTA/CRPS Requirement	Addressed in Amended Draft?	How Addressed (References in Draft)	Outstanding Gaps (If Any)
Insufficient or missing assessments against CRPS policies: 7.3.3, 7.3.6, 7.3.7, 9.3.1, 10.3.1, 10.3.2, 10.3.4, 11.3.1, 11.3.2, 11.3.5, 12.3.4, 18.3.1, 18.3.2.	Clauses 5(1)(h) and 5(2) of Schedule 5, section 44 (sufficiency).	Yes	Expanded assessments in Section 7.7, with detailed consistency evaluations (e.g., 7.3.3: riparian protection via EEP; 9.3.1: significance per Appendix 3, no net loss via EEP; 12.3.4: ONL cumulative effects minimized due to grid capacity limits). References ecology AEE/EEP for biodiversity/net gain.	None - All listed policies now covered with project-specific details and mitigation.
Insufficient assessments against CRPS objectives: 5.2.2, 9.2.2, 9.2.3, 10.2.3, 10.2.4, 15.2.1, 17.2.1.	Clauses 5(1)(h) and 5(2) of Schedule 5, section 44.	Yes	Updated Section 7.7 includes objective assessments (e.g., 5.2.2: infrastructure integration with GIP; 9.2.3: habitat protection via EEP reserves; 15.2.1: soil quality improved by reduced farming/revegetation).	None - Objectives now explicitly addressed, with EEP enhancements for biodiversity/soil.
Missing assessments against CRPS objectives: 9.2.3, 10.2.1, 10.2.3, 11.2.1, 18.2.1, 18.2.2.	Clauses 5(1)(h) and 5(2) of Schedule 5, section 44.	Yes	Added in Section 7.7 (e.g., 10.2.1: riparian enhancement in EEP; 11.2.1: no hazard risks, per geotech/flood assessments; 18.2.1: no hazardous substances, effects avoided).	None - All missing objectives now included with cross-references to AEE/EEP.
Insufficient assessments against CRPS policies: 5.3.9, 5.3.12, 7.3.1, 10.3.5, 15.3.1, 16.3.4, 16.3.5, 17.3.	Clauses 5(1)(h) and 5(2) of Schedule 5, section 44.	Yes	Enhanced in Section 7.7 (e.g., 5.3.9: adverse effects remedied via EEP net gain; 15.3.1: soil degradation mitigated by revegetation; 16.3.4: grid resilience with low effects).	None - Policies detailed with mitigation from EEP/ecology AEE.
Concession lacks consistency with Canterbury (Waitaha) CMS 2016.	Clause 3(1)(d) Schedule 6.	Yes	Added to Section 5.6.2/Appendix E, showing CMS alignment (e.g., biodiversity via EEP net gain, pest control expansion to river/delta for	None - Full CMS assessment now included, with DoC-led measures.

EPA Comment/Issue	Relevant FTA/CRPS Requirement	Addressed in Amended Draft?	How Addressed (References in Draft)	Outstanding Gaps (If Any)
No description of proximity to statutory areas (e.g., Te Ao Mārama/Lake Benmore).	Clause 5(1)(b)(i) of Schedule 5.	Yes	avifauna). DoC engagement (Appendix X) Confirms preferences (e.g., avifauna prioritization, kākī program support, invertebrate reserve). Explicit in Section 3.1, with Ngāi Tahu values protected (Appendix Q). Adjacency to Lake Benmore noted, no direct effects (stormwater onsite).	None - Description added, with cultural mitigation.
Non-compliance with section 42: Sought concession for Transpower (not applicant/authorised); easement under Land Act not allowable.	Section 42(3) and (4).	Yes	Removed Transpower as co-applicant for concession; FNSF now sole applicant. Transpower to lodge separately per their confirmation (attached letter/email). TWA/lease with Transpower (Appendix D) ensures coordination. Easement removed (now standard Land Act process; Appendix O).	None - Addresses section 42(3) non-compliance (sought concession for non-authorised person).
Other EPA Comments (from Spreadsheet/Memo): e.g., hazards (flood/fire), social/economic effects, cumulative landscape, soil contamination from run-off, hazardous substances in substations.	Section 44 (sufficiency); various CRPS.	Yes	Hazards: Flood/geotech assessments (Appendix M) show low risk; fire managed (Appendix W). Social/economic: Jobs/benefits detailed (Section 6.12). Cumulative landscape: Grid capacity limits additional solar (Benmore-Islington filled), low effects (Appendix F). Soil/run-off: No contaminants (panels inert, Appendix K onsite soakage). Hazardous: No HAIL (substations inert; Section 4.4), baseline clean. Ecology AEE/EEP	None - All addressed with details/mitigation; contamination clarified (no HAIL, no run-off issues).



EPA Comment/Issue	Relevant FTA/CRPS Requirement	Addressed in Amended Draft?	How Addressed (References in Draft)	Outstanding Gaps (If Any)
			address biodiversity/net gain.	