

**The Point Solar Farm [FTAA-2509-1100]
by Far North Solar Ltd**

**Response of the Mackenzie District Council to
Minute 2 of the Panel Convener**

13 November 2025

Introduction

- 1 The memorandum is provided by the Mackenzie District Council (MDC) in response to Minute 2 of the Panel Convener, dated 6 November 2025. More specifically it responds to the matters set out in Schedules 1 and 2.

Schedule 1 – FTAA Timeframes

- 2 The MDC understands that the timeframes are largely set out in the Fast Track Approvals Act 2024 (FTAA).
- 3 The MDC's ability to respond to the requirements set out in the FTAA relies on engaging an external planning and other technical expert advisors. The MDC does not have sufficient 'in-house' resource to respond to applications of this scale and significance. It is on that basis that the MDC and Environment Canterbury (ECan) have agreed that ECan undertake a full ecological peer review of these FTAA applications, including those matters within the jurisdiction of the MDC.
- 4 In response to The Point solar farm project, the MDC has engaged planning as well as technical landscape and traffic expertise to review the application.
- 5 Notwithstanding, the MDC is mindful that the upcoming Resource Management Act 1991 (RMA) shut down period, during which many planning practitioners take leave, means that meeting the timeframes presents a challenge. This is particularly so in terms of the ability to provide comments within a 20 working day period in accordance with sections 53 & 54 of the FTAA. Particularly if that period takes in much of January 2026 when many practitioners are likely to be away from the office.

- 6 Set out below is the MDC's completed Schedule 1 setting out provisional time requirements. The MDC requests that comments not close prior to 20 February 2026; and otherwise be offset by at least 5 working days from the other solar project in the Mackenzie District currently in the FTAA process. This will enable MDC to better manage workload and time commitments.
- 7 The MDC is happy to discuss these timeframes further at the Panel Convener Conference.

Task	Working days	Date
Panel commencement	N/A	TBA (nominal)
Invite comment from relevant parties	10 W/D later	TBA
Comments close (ss 53 & 54)	20 W/D later	Not before 20 February 2026
Comments close for applicants (s 55)	5 W/D later	27 February 2026
Any other procedural steps, evaluation and decision writing	10 W/D	13 March 2026
Draft decision is to approve		
Draft decision and conditions to Ministers (s 72)	5 W/D	20 March 2025
Response from Ministers. (s 72)	10 W/D later	7 April 2026*
Applicant response to Ministers comments (if any)	5 W/D later	14 April 2026
Draft conditions and decision to participants (s 70(1))	5 W/D	21 April 2026
Participant comments on draft conditions (s70(2))	5 W/D later	29 April 2026**
Applicant response to participants on conditions (s 70(4))	5 W/D later	6 May 2026
If not agreed, procedural step in relation to draft conditions.	10 W/D	20 May 2026
Evaluate and finalise decision	5 W/D later	27 May 2026 (approx.)
Decision release	5 W/D later	4 June 2026***

* Accounts for Good Friday and Easter Monday

** Accounts for ANZAC Day

*** Accounts for Kings Birthday

Schedule 2 – Matters to Consider when Preparing for Conference

- 8 The following comments address each of the matters set out in Schedule 2 relevant to the MDC.

Number and Range of Approvals Sought

- 9 The document prepared to support the substantive application identifies the nature of the approvals required falling within the jurisdiction of the MDC.
- 10 In the case of this project this involves both land use and subdivision consents under sections 9 and 11 of the RMA respectively.
- 11 The MDC considers that Far North Solar has applied for all necessary resource consents that would otherwise be required from it under the RMA to construct, maintain and decommission a solar farm. This includes a land use consent under the Mackenzie District Plan (MDP) having a non-complying activity status; and subdivision consent having a discretionary activity status.
- 12 The land use consent includes the following activities:
 - (a) the construction, operation, maintenance and decommissioning of a photovoltaic solar farm;
 - (b) the establishment of a substation;
 - (c) the use and/or storage of hazardous substances;
 - (d) earthworks, including in an Outstanding Natural Landscape and Lakeside Protection Area;
 - (e) indigenous vegetation clearance; and
 - (f) buildings and structures within the General Rural Zone.

Other Approvals

- 13 The substantive application notes that the appropriate approvals from Transpower NZ have been sought separately for the connection of the solar farm to the electricity transmission network in accordance with the Electricity Industry Participation Code 2010; and that the connection between the existing lines and the new Grid Injection Point (GIP) is outside of the scope of the application.
- 14 The substantive application states that Transpower NZ will obtain any necessary consents under Regulation 39 of the Resource Management (National Environmental Standards for Electricity Transmission Activities) Regulations 2009.

Legal Complexity

- 15 Two separate resource consent approvals are sought, reflecting activities specified in sections 9 and 11 of the RMA. There are a number of activities within the land use approval that trigger the need for consent, as described above.

- 16 The MDC is at the later stages of a comprehensive district plan review. Stage 3 of the Mackenzie District Plan Review included new provisions relating to the General Rural Zone, Natural Environment Values (including Outstanding Natural Landscapes (ONL)), and Energy, Infrastructure and Transport (including Renewable Electricity Generation (REG)). The Council's decisions on submissions on Stage 3 were notified on 5 August 2024, with appeals lodged by a number of parties.
- 17 Those appeals have now been resolved, with the Environment Court issuing its Determination on 7 November 2025 (Decision No. [2025] NZEnvC 364). On that basis any legal complexity in terms of multiple rules and the weight to be given to certain provisions no longer applies; except in relation to the removal of indigenous vegetation under Plan Change 18 (PC18). PC18 remains under appeal.

Evidentiary Complexity

- 18 On the basis that the MDC has yet to receive formal planning and other technical peer review advice regarding the complete application, the Council are not yet able to comment on the evidentiary complexity of the application relating to any conflicting factual or opinion evidence.
- 19 However, the application proposal involves a large number of technical reports, some of which are detailed. This will require time to review and consider.

Factual Complexity

- 20 Similarly, the extensive nature of the application and breadth of technical reports creates a challenge in terms of the factual complexity. A great deal of technical analysis of highly specialised subject matter relating to landscape, ecosystems and indigenous biodiversity, natural hazard risk, geotechnical considerations and transportation planning (amongst others) is required.
- 21 The application site is considered to be sensitive to visual change, being within an Outstanding Natural Landscape. The assessment of landscape, both in terms of changes at the site itself and in terms of the contribution to any change in character of Te Manahuna/the Mackenzie Basin, is considered to be a primary issue to resolve in the consideration of this proposal.

Council Consultation and Engagement

- 22 The Applicant has previously engaged with the MDC on this project. A resource consent application (Council Reference RM230057) was lodged in June 2023 under the RMA. That application proceeded through a joint public notification process (along with the consents required from ECan), with submissions received, before being placed on hold. Those applications were formally withdrawn on 12 February 2025 following the project being listed in Schedule 2 of the FTAA.
- 23 The notification and submission process of this previous consent application identified the key matters of community concern, summarised as:

- (a) Adverse effects on the outstanding landscape values of Te Manahuna/the Mackenzie Basin.
- (b) Visibility from public spaces, nearby roads, tracks and higher points such as the Benmore Range.
- (c) The potential loss of threatened bird breeding habitat for species such as kāki/black stilt, tarāpuka/blackbilled gull, pohowhera/banded dotterel and tarapirohe/ black fronted tern.
- (d) Risk of bird strike, bird deterrence and bird disturbance.
- (e) Site access via an existing easement and the adverse effects resulting from use of this easement by vehicles during the construction period in particular.
- (f) Weed and pest control concerns and the management of on-going biosecurity risk.
- (g) Potential adverse effects of the solar panels on native flora and fauna, due to shade and intensive reflected light.
- (h) Fire risk.
- (i) Adverse impacts on the safe and efficient functioning of State Highway 8 in terms of ensuring an integrated, safe, and sustainable transport system.
- (j) Cumulative effects and precedent set by the construction and operation of this large scale solar proposal in Te Manahuna/Mackenzie Basin.
- (k) Adverse impact on the character of the ancestral landscapes in the takiwā of Te Rūnanga o Moeraki and Te Rūnanga o Waihao.
- (l) Energy intensive nature of solar panel construction and sustainability concerns.

24 Changes have been made to the application proposal and additional assessments provided as part of the substantive application in response to some of the matters raised by the previous resource consent process.

25 The MDC also provided comments on the draft substantive application made under the FTAA (dated 11 June 2025). However, since that time the MDC has had little engagement with Far North Solar Ltd on this project.

Panel Membership

26 The substantive application by Far North Solar Ltd is one of up to five FTAA applications concerning solar farms in the Mackenzie District, and more particularly within Te Manahuna/the Mackenzie Basin ONL.

27 On that basis MDC sees merit in having some degree of continuity of panel members to consider this and future applications made under the FTAA.

28 Planning and legal RMA knowledge, skills and expertise will be required to decide this application. Furthermore, as is recognised in the MDP and other higher order planning documents, Te Manahuna/the Mackenzie Basin is a unique environment and acknowledged as an ONL. As such its protection from inappropriate use and development is a matter of national importance.

- 29 MDC considers that Panel members with extensive planning/legal RMA experience, particularly in relation to the consideration of complex landscape issues, will be required to decide the application under the FTAA. Technical landscape architecture expertise may also assist; this could take the form of an expert to assist the panel consideration rather than a particular panel member.
- 30 MDC also considers that an appreciation of cultural values is also relevant to decision-making on this proposal; the application site is located adjacent to Sites and Areas of Significance to Māori listed in the MDP. The relevant iwi authorities and Treaty settlement entities listed in Schedule 3 of the Minute are better placed to provide specific comment on the requirement for cultural expertise.

Procedural Requirements

- 31 The MDC is willing to engage directly with the panel as necessary to assist the consideration of this application under the FTAA, including attendance at mediations.
- 32 The MDC is not yet able to confirm any requirement for any form of hearing process until all technical peer reviews are completed.
- 33 The MDC is happy to discuss specific matters with the Applicant in more detail and intends to continue ongoing discussions with all relevant parties regarding its peer review of the application proposal and proposed conditions.



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13 November 2025