

File ref: FTAA-2509-1100

23 January 2026

Far North Solar Farm Limited
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Tēnā koe

Request for information from Far North Solar Farm Limited in relation to the Point Solar Farm application under the Fast-track Approvals Act 2024

The Point Solar Farm Expert Panel (the Panel) has directed the Environmental Protection Authority (EPA) to request further information from you under section 67 of the Fast-track Approvals Act 2024 (the Act), relating to the Point Solar Farm application.

At the direction of the Panel, the EPA is seeking further information from Far North Solar Farm Limited regarding **the following**:

1) Resource Management Act (RMA) Matters

1.1. Construction Phase Stormwater Consent

Looking at table 7 on pages 34 - 35 of the application's Assessment of Effects on the Environment (AEE), the applicant does not appear to have sought a construction phase stormwater consent (Rule 5.94B of Canterbury Land and Water Regional Plan) in relation to construction phase stormwater outside of lot 3 (Transpower's GIP lot) and lot 4 (the applicant's substation). It is said that the rule 5.94B is triggered because "the area disturbed at any one time may exceed 2ha." Yet neither lots 3 (6340m²) or 4 exceed (3489m²) singularly or together exceed 2Ha in area. At the Applicant's presentation to the Panel on 16 January 2026 the Panel members understood the Applicant to advise that the Canterbury Regional Council now considers that such a consent is required for the proposal, but it is not at all clear about what that refers to.

The requests for information are:

- a) Will the 2ha standard be breached outside of lots 3 and 4 such that a resource consent under rule 5.94B is required for the whole application site?
- b) Has the applicant sought a resource consent under rule 5.94B for the whole site or just the areas to be contained within lots 3 and 4?
- c) If a rule 5.94B consent has not been sought for land outside of lots 3 and 4, and a consent is required, how does the Applicant propose to deal with this omission?

1.2. Proposed Subdivision Consent

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The substantive application seeks a subdivision consent to create 4 lots. It was understood that the proposal is an orthodox subdivision of the freehold estate with associated easements. In the course of the Applicant's presentation to the Panel on Friday 16 January 2026, it became apparent to the Panel members that the Applicant may intend that a subdivision consent be granted to further subdivide the resultant lots 2, 3, and 4 by way of the grant a leasehold interest that exceeds 35 years. That is consistent with what is said on page 31 of the AEE. However, we are not satisfied that is correct.

The Panel's understanding is that the proposal is to enter into leases after title for the new lots 1-4 have been raised. Each of the proposed leases would be for whole allotments. If that understanding is correct, then the proposed leases would not constitute a subdivision since they are not a "lease of part of the allotment" (Section 218(1)(a)(iii) of the Resource Management Act 1991).

The requests for information are:

- a) Can the applicant confirm whether only whole allotments are to be leased for a duration exceeding 35 years, and in that event, a leasehold subdivision is not sought?
- b) If the proposal is to lease part allotments for a term that exceeds 35 years, then the applicant is to confirm whether a subdivision consent is sought for the creation of leasehold interests exceeding 35 years.
- c) If so, the applicant is asked to liaise with the Mackenzie District Council as to their requirements for leasehold subdivisions and lodge new set of scheme plans for the leasehold subdivision and new sets of conditions for both types of subdivision consents that are sought (i.e. freehold and leasehold).
- d) Please set out unambiguously what consents are sought under clause 4.7 of the application.

1.3. Hazardous Substances

It is now understood by the Panel that the proposed transformers require substantial quantities of oil to be stored.

The requests for information are:

- a) What consent requirements are triggered under the Hazardous Substances and New Organisms Act 1996 and the Resource Management Act 1991?
- b) What consents are sought from this Panel?
- c) If consents are sought from this Panel, what conditions are proposed in relation to this matter?
- d) If consents are required, but no consents are sought from this Panel, how does the Applicant propose to deal with this omission?

1.4. Access Road

The Panel now understand that the Applicant intends that the construction of a new section of access road is to be considered and approved as part of this substantive application.

The requests for information are:

- a) Explain how the scope of the substantive application includes the construction of the new access road?
- b) Provide details as to the construction of the new access road (location, earthworks, slope, vegetation removal). Please provide a revision of earthworks volumes.
- c) Are there any required consents? See question 3.d) above

1.5. Water Supply

On 16 January 2026 the applicant confirmed that all water requirements for the project (irrigation, firefighting, dust suppression, potable) will be delivered by tanker trucks and stored on site.

The requests for information are:

- a) What monthly and annual volume requirements have been assumed?
- b) What are the details of the proposed location and method of water storage for irrigation and dust suppression?
- c) How has water delivery truck movements been assessed?

1.6. Transport Assessment

No traffic and transportation assessment has been included in the substantive application. On 16 January the Applicant advised that it is having an assessment report prepared.

The request for information is:

- a) Please file a traffic and transportation assessment report together with proposed conditions relating to those matters.

1.7. For all permissions sought

The request for information is:

- a) What term is sought for each kind of permission sought?

1.8. Construction hours and days of operation

The request for information is:

- a) What are the proposed hours and days for construction works?

1.9. Proposed Conditions

On 16 January 2026 the applicant provided a further revised suite of proposed conditions for the applications sought. The Panel observe that the Panel Convenor suggested the applicant engage a specialist condition writer and note that the applicant has not done so. The Panel has concerns as to the form, substance and mechanics of proposed conditions received to date. Those concerns relate to:

- i. There is not a clear link in the application to show that there is a condition for every effect. This needs to be set out clearly for the Panel to give it an assurance that all effects are covered;
- ii. Which conditions are for mitigation and which are for compensation;
- iii. Which aspects of the conditions are being offered on an *Augier* (A condition volunteered by an applicant that would otherwise be ultra vires) basis;
- iv. Which consents the conditions apply too, so that it can be seen how the conditions relate to the specific consent sought;
- v. Limits and standards are included within management plans, whereas they should be set out in separate conditions;
- vi. There is inconsistent references to “must”, “should”, “shall” and “may”, whereas the usual practice is to just use one of those verbs (“must” being preferable)¹;
- vii. Lack of specification as to the activity authorised by each consent;
- viii. Lack of specification as to the relevant consent authority (Canterbury Regional Council or McKenzie District Council) as to which consents apply or who certifies which management plans;
- ix. Specification of duration of 35 years which appears to apply to subdivision and land use consents, and no separation of construction or operation consents/conditions;
- x. Monitoring and Reporting details not specified;
- xi. The proposed Management Plans need more detail, for instance how management plans are proposed to show how standards/limits conditions will be delivered, insufficient detail on proposed contents of management plans, inconsistency in process for certification, no detail or consistency in process for amendment; and
- xii. Insufficient details in the conditions when outside material is referred to, as to referencing that material.

The requests for information are:

- a) Does the applicant propose to engage a specialist condition writer to address these matters?
- b) If the applicant does not propose to engage a specialist condition writer, how does the applicant propose to address these matters?

1.10. Treatment and Discharge standards

Detail is missing from the proposal as to discharge stormwater from both the construction-phase and operational phase and no draft Erosion and Sediment Control Plan is provided.

The requests for information are:

- a) What methods of treatment are proposed for stormwater prior to discharge?
- b) What standards are to be met by the proposed discharges (e.g. clarity, pH, contaminants etc).
- c) How are proposed standards to be monitored?
- d) Provide a copy of a draft Erosion and Sediment Control Plan.

¹ Law Commission TE.AKA.MATUA.O.TE.Ture – Report 35 Legislation Manual Structure and Style, 1996 Wellington, Page 43, Para 172

2) Ecological Issues

From an initial review of the substantive application documentation, previous feedback, and the applicant's verbal and written responses to the Panel's questions set out in Panel Minute 1, the Panel seeks further comment from the applicant on ecological matters. This information is required to enable the Panel to make an informed and evidence-based decision regarding the assessment of ecological effects and the proposed effects management measures.

At present, the key ecology-related reports provided in the substantive application include:

- Appendix G: Assessment of Ecological Effects for the proposed solar farm between the lower reaches of the Tekapo and Twizel Rivers, Mackenzie District (Wildlands, May 2023)
- Appendix P: Ecological Enhancement Plan for The Point Solar Farm, Twizel (Wildlands, May 2025)

However, it is the Panel's understanding that the project footprint and habitat types within the updated project footprint have changed, and that key aspects of the existing information are now outdated and no longer relevant. Most importantly:

- A large area approximating 300 ha that was previously characterised as brome–hawkweed–sheep sorrel grassland/herbfield has been ploughed;
- Small areas of sweet briar–matagouri shrubland and rocky stonefield on the eastern periphery of the project footprint are now avoided.

It is acknowledged that some of these matters, and the implications of the changes, may be clarified in the context of a site visit by the Panel and through further engagement with invited parties. However, for the purposes of the Panel's assessment, it is prudent that the application includes a relevant and up-to-date assessment of ecological effects, which is currently not the case.

2.1. Field Investigations

The Panel seeks that the applicant commission quantitative vegetation and fauna surveys, and associated mapping, undertaken by appropriately experienced and qualified ecologists, to assist in understanding:

- a) The presence, distribution, and indicative relative abundance of biodiversity values within the project area and its immediate surrounds; and
The level of effects and the adequacy of the proposed effects management measures, in context.
- b) The level of effects and the adequacy of the proposed effects management measures, in context.

2.2. AgScience ecological assessment (17 December 2025)

The Panel seeks that the applicant commission quantitative vegetation and fauna surveys, and associated mapping, undertaken by appropriately experienced and qualified ecologists, to assist in understanding:

- a) To enable the Panel to understand the validity of AgScience’s conclusions regarding fauna values, based on site visits undertaken on 17 December 2025, the applicant is requested to provide information on the qualifications and experience of AgScience personnel in relation to ornithology, herpetology, and entomology.

2.3. Draft ecological management plans

The panel seeks the provision of or updates to existing management plans as set out below.

- a) The Panel seeks that the applicant provide a suite of draft ecological management plans informed by biodiversity survey results, and for which stated outcomes are supported by evidence to the degree practicable. The Panel considers it imperative that draft ecological management plans are provided to ensure sufficient detail and assurance that adverse ecological effects associated with the project will be adequately and appropriately addressed, and that Wildlife Act Authorities under the Fast Track process will be complied with. Such management plans are standard practice and invariably presented for proposals of this magnitude with potential residual adverse effects including for species protected under the Wildlife Act that have been detected or are likely present within the Project footprint based on available desktop information. We further note that A Wildlife Approval (Schedule 7, Clause 1 FTAA) is required under Section 42(4)(h) of the FTAA to handle, catch, release, or kill native fauna that are protected under the Wildlife Act. A Wildlife Approval provides lawful authority for acts such as catching, handling, taking samples from, killing, or relocating protected wildlife and their eggs, where these actions are a necessary consequence of the Fast Track Application.
- b) If Wildlife approvals are required, but no approvals are sought from this Panel, how does the Applicant propose to deal with this omission?
- c) The Panel seeks further information and assurance on the ability to achieve stated biodiversity outcomes through a large-scale, low-intensity management approach across the proposed 82 ha site. In this regard, the applicant is requested to explain why a smaller-scale but more intensively managed area—potentially including a pest exclusion fence—was not considered, noting the improved potential for:
 - a. Eliminating mammalian pests and avoiding undesirable outcomes for lizards and invertebrates associated with pest control operations that do not target, or cannot adequately control, mice; and
 - b. Improved weed suppression through denser plantings and more intensive and targeted weed control, providing greater certainty that stated outcomes for native vegetation will be achieved.
- d) The Panel seeks information on progress with the Department of Conservation in determining the applicant’s contribution towards avifauna conservation management as a means of compensating for residual adverse effects on notable avifauna. In this regard, the Panel seeks certainty on:
 - a. What is proposed;

- b. How the proposed measures are additional to what would occur in the absence of the project; and
- c. How the proposed measures interlink with, and are complementary to, avifauna compensation measures that are, or may be, proposed by other projects in the area.

3) Landscape Issues

Far North Solar appears to be relying on assessments undertaken in 2023, even though it is uncontested that the extent, configuration and density of the proposed mitigation planting have changed since that time. These changes are not reflected in either an updated report or an addendum from Rough Milne Mitchell Landscape Architects (RMM). This is why the specific matters and questions are raised.

The density of planting originally proposed was 'up to 500,000' at a rate of 1 plant per 1.3m² (allowing for the reduction in planting areas from an original 89ha down to 82ha). This is reasonably similar to the normal standard for revegetation of shrubland at 1 plant per 1.0m². The situation has now changed, though, with:

- 66,100 plants now proposed across 82ha of EEC Planting at the rate of one plant for every 12m²; while
- 62,500 plants are now proposed for 9.5ha of Screen Planting at the rate of one plant for every 1.5m².

This means that while the Screen Planting is reasonably close to the typical standards for shrubland revegetation, most of the planting proposed for the EEC areas would be far too 'thin' and patchy to achieve canopy closure, to suppress weeds (assisted by irrigation along with the proposed planting), and to assist with screening of the proposed solar farm. In turn, such concerns lead to the following questions, which the panel requests answers to:

- a) Has the applicant discussed the revised revegetation and screen planting proposals with DoC, and are they consistent with DoC's suggestions or recommendations to the applicant?
- b) Are the revised proposals and planting densities endorsed by Wildlands?
- c) Are the photo simulations prepared by RRM Landscape Architects still considered to accurately reflect the level of screening shown in RMM's photo simulations, given the changes set out above?
- d) After what time period would the level of screening shown in those simulations be achieved?

Supply of Information

In accordance with section 67(2) of the Act Far North Solar Farm Limited must:

- a) Provide electronic copies of the information or report requested; or

b) Advise the EPA, with reasons that you decline to provide the information or report requested.

Accordingly, please provide the requested information to the EPA by **6 February 2026**. If the information is not received by this date, the Panel will proceed on the basis that the request for further information has been declined.

Please note, the information will be provided to the Panel, the applicant and every person who provided comments on the application. The information will also be made available on the Fast-track website.

If you have any questions, please contact Application Lead, Mujahid Musa by email at info@fasttrack.govt.nz

Nāku noa, nā



Mujahid Musa
Application Lead, Fast-track Applications