



Far North Solar Farm Limited

Level 1

65 Main Road

Kumeū

Auckland 0810

Email: richard@fnsf.co.nz

25 May 2026

Hon Raynor Asher KC

The Point Solar Farm Expert Panel Chair

c/o Environmental Protection Authority

Level 10, 215 Lambton Quay

Wellington 6011

Re: Response to Request for Information 11 – The Point Solar Farm Application under the Fast-track Approvals Act 2024 (File ref: FTAA-2509-1100)

Dear Hon. Raynor Asher KC,

I write on behalf of Far North Solar Farm Limited (FNSF) in response to the Panel's Request for Information dated 18 May 2026 pursuant to section 67 of the Fast-track Approvals Act 2024.

The Panel requested that FNSF respond to matters raised in the neighbouring landowners' submission dated 14 May 2026 regarding operational access arrangements, vehicle movements, operational noise, dust management, monitoring and enforcement conditions, and other related matters associated with the proposed The Point Solar Farm.

FNSF appreciates the opportunity to clarify these matters for the Panel and has addressed each of the questions raised in the Request for Information below.

FNSF continues to maintain that:

- the Bendrose Farm access route will be used for all construction and decommissioning traffic;
- the existing legal right of way over Lot 1 DP 470213 remains the appropriate and lawful operational access route for low-volume operational traffic;
- operational traffic volumes associated with the solar farm will be very low in comparison to construction activities and consistent with current farming volumes, and



- the proposed management framework and consent conditions are capable of appropriately managing any operational effects associated with traffic, dust, noise, and maintenance activities.

FNSF has also considered a number of the monitoring, reporting, and management refinements proposed by the neighbouring landowners and is willing to accept several practical amendments to provide additional certainty and transparency during the operational phase.

FNSF trusts the information below fully addresses the Panel's request and remains available to provide any further clarification or conferencing assistance the Panel may require.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Richard Homewood', written in a cursive style.

Richard Homewood
Director
Far North Solar Farm Limited



Response to Request for Information 11

1(a) In relation to the operational phase of the project, where it is proposed that the vehicle access to and from the solar site will be via the existing right of way (RoW) across Lot 1 DP470213, does the Applicant accept that the Panel is able to impose conditions on the number of vehicles that are able to access the site?

FNSF Response:

FNSF accepts that the Panel has the ability to impose conditions on the number of vehicles using the right of way over Lot 1 DP 470213 during the operational phase. FNSF does not intend to relinquish the legal right to use this right of way, which is the established legal access to the site and was put in place for this title. FNSF is willing to accept reasonable and enforceable conditions on vehicle numbers, types, and frequency via this route and has proposed revised conditions to that effect.

Should the Panel impose a condition on FNSF's vehicle movements via the right of way, FNSF's position is that any such limit should be expressed as a quarterly average rather than a strict daily cap. A quarterly averaging approach better reflects the intermittent nature of operational and maintenance activities, where most days will see 2–3 vehicles on site but occasional higher-activity days such as equipment deliveries or specialist inspections may occur within an otherwise low-volume quarter.

1(b) Noting the differences in number of vehicles proposed to use the RoW across Lot 1 DP470213 during the operational phase (2-3 vehicle movements per day, 5 vehicle movements per day, 5 - 10 vehicle movements per day), what is the number of vehicles proposed?

FNSF Response:

FNSF will use the right of way over Lot 1 DP 470213 for site access purposes. That right of way is not limited by vehicle number or type, and FNSF's operational access via this route may include both light vehicles for routine maintenance and, on an infrequent basis, heavier service or delivery vehicles where required. The proposed quarterly average cap of 5 vehicle returns per day applies to all vehicle types combined. This is consistent with the nature and scale of traffic that the right of way was established to accommodate.



1(c) Noting the issues raised by the neighbouring landowners as to the proposed use of NZS 6803:1999 construction noise principles being applied during the operational phase of the project, does the Applicant have any response?

FNSF Response:

FNSF confirms that operational noise will be managed against the Mackenzie District Plan limits for the Rural Zone, consistent with Condition 103 which already sets operational noise limits applicable to the site.

In relation to the operational access route via Lot 1 DP 470213, FNSF notes that this is an existing right of way currently used for farming operations on the site, including heavy agricultural vehicles. The solar farm's operational traffic, averaging approximately 5 vehicle returns per day, does not represent an unprecedented volume for such an access way.

On that basis, a specific acoustic assessment of the operational access route is not considered necessary, as there is no reasonable expectation of increased noise effects above those that already exist from current land use. Operational noise from the solar farm itself will be managed in accordance with Condition 103 and the Mackenzie District Plan Rural Zone limits.

1(d) Noting the issues raised by the neighbouring landowners as to photograph taken by Applicant (Appendix A to the RFI-7 response), does the Applicant have any response?

FNSF Response:

FNSF notes that the photograph was taken at adult eye height of approximately 1.6 m from ground level at the property, as directed by the panel in RFI 7, Point 3) a). FNSF acknowledges that the [REDACTED] dwelling is constructed on a raised platform and that the floor level and front door are therefore higher than the surrounding ground level. Notwithstanding this, the contour plans and cross-sections provided in the RFI 7 response appendices give a full picture of the topography and lines of sight, and that the existing vegetation along the access route provides some screening that is illustrated in the photograph.

1(e) Noting the various monitoring and enforcement conditions raised by the neighbouring landowners, does the Applicant have any response?

FNSF Response:



FNSF accepts a number of the monitoring and enforcement improvements sought by the neighbours and proposes the following revisions to the operational phase conditions, consistent with the planner's advice:

Annual road condition inspections to be carried out by a suitably qualified person, with reports provided to the neighbouring landowners and MDC within 10 working days of completion. A dispute resolution mechanism to be included in consent conditions for disagreements regarding road condition or remediation attributable to FNSF traffic.

Access hours to remain 07:30–18:00 Monday to Saturday, consistent with construction hours. Out-of-hours access to remain available given this is a utility project where faults require immediate response, however all out-of-hours access will be recorded and reported to MDC in the regular reporting. Planned night works will be notified to the neighbours in advance and efforts made to manage the volume and timing of access outside normal hours, with these volumes to be included in the average vehicle counts.

The existing complaints management condition covers the full duration of all activities including the operational phase. FNSF confirms this applies to operational complaints.

1(f) Noting the issues raised by the neighbouring landowners as to dust, can the Applicant advise as whether or not its proposed dust management plan is proposed to cover the full length of the Bendrose Farm access corridor, and to which project phases (construction, operational and decommissioning) the dust management plan will apply?

FNSF Response:

The Dust Management Plan will cover the full length of the Bendrose Farm access corridor for the construction and decommissioning phases as a matter of best practice, with dust suppression forming part of the broader management plan framework. FNSF notes that the access corridor is an existing unsealed rural road that already carries some level of traffic-generated dust, and that the aim is to manage dust to best practicable standards for the duration of works rather than achieve a zero-dust outcome, which would not be achievable on an existing unsealed rural road with multiple users.

For the operational phase, dust management via the Lot 1 right of way will be addressed through the Operational Management Plan, including speed limits on unsealed sections, water based dust suppression with regular occurrences, and responsive action to dust complaints. The existing MDC and ECan consent conditions already include boundary limit standards that apply across all phases.



FNSF confirms that neighbours will be provided with a copy of the draft Dust Management Plan for comment prior to certification by ECan.

1(g) As for any other matter raised by the neighbouring landowners in their response of 14 May 2026, does the Applicant wish to make any response?

FNSF Response:

Primary position - Right of Way and Site Access: FNSF does not accept the primary position sought by the neighbours that the right of way over Lot 1 DP470213 should be prohibited from use for any purpose associated with the solar farm. The Bendrose Farm alternative access was arranged specifically to address their concerns about construction-phase traffic, as confirmed in prior correspondence. It is not appropriate to extend that arrangement to exclude FNSF from using the existing legal right of way during the operational phase.

Visual amenity - vegetation and bunding: The existing vegetation along the access route that provides screening is not within FNSF's lease area, and the location proposed for a bund near the Bendrose Stream crossing is also not on the solar farm lease. Nonetheless, FNSF acknowledges the amenity concern and is willing to contribute to a reasonable bunding and planting solution near the stream crossing on the basis of a joint approach, which would require the neighbour's cooperation given the location will be required to be on their title.

CTMP notification to neighbours: FNSF supports the inclusion of a condition requiring the neighbours to receive the draft CTMP at the same time as NZTA, with 10 working days to provide feedback, and for that feedback to be provided to MDC with the submission.

Pre-construction site meeting: FNSF supports inclusion of these neighbours in the invitation list for the pre-construction site meeting.

Phase length limits: FNSF considers strict phase duration conditions to be unworkable and potentially onerous. The robust management plan framework, consent conditions, and activity limits already proposed are considered sufficient to manage effects without the need for strict phase expiry dates.

ECan earthworks dust (s9): An additional boundary limit condition for the s9 earthworks consent is not considered necessary. The solar farm construction area is approximately 6 km from the [REDACTED] property, and the alternative access route development works are minor and located approximately 150 m from their boundary, covered by standard working practice conditions.

ECan operational dust (s15): The existing limit conditions for dust in both the MDC and ECan consent sets address the concern regarding operational dust reaching



neighbouring properties. No additional ECan operational dust condition is considered necessary.

MDC Condition 124 - Operational Management Plan: The matters sought by the neighbours are largely addressed through other consent conditions. Operational traffic volumes are very low and reasonable considering the existing farming activity on the site area. Construction hours and access limits are to apply. The complaints process is addressed by separate conditions covering both construction and operational phases of the project.