

19 February 2026

Nova Energy Limited
PO Box 3141, Wellington 6140

Fast-track Team

Email: substantive@fasttrack.govt.nz

To whom it may concern

Thank you for the invitation to comment on the application made by Far North Solar Farm Limited (**FNS**) under the Fast-track Approvals Act 2024 (**FTAA**) for The Point Solar Farm (**The Point**). NGL Farms Limited (**NGL Farms**) has been invited to comment on the basis it is an “adjacent landowner” under the FTAA, due to its ownership of the land described as Lot 3 DP 422901 (the **Nova Site**). The Nova Site is approximately 868 hectares, located to the east of the Twizel Township and to the west of the site for The Point. A map with site details is shown in the **Appendix** to this letter.

NGL Farms is a related company to Nova Energy Limited (**Nova**). Nova is currently preparing a substantive application for the Twizel Solar Project (the **Nova Project**) on the Nova Site, which was referred to the Fasttrack process by the Minister for Infrastructure on 1 August 2025.

The Nova Project

The Nova Project involves the establishment and operation of a solar farm over 565 hectares, which will generate up to 300 megawatts (MW) of renewable electricity and will connect to the National Grid via the Transpower Twizel Substation. The Nova Project will create enough electricity to power approximately 75,000 homes annually.

There are a number of locational, functional, operational, and technical matters Nova has considered in selecting the site for its development. The site demonstrates a range of attributes that make it suitable for large-scale solar development, including (without limitation):-

- a) high solar irradiation;
- b) proximity to Transpower’s Twizel Substation, with available capacity on the 220 kV National Grid to export renewable solar generation, reduced grid connection construction cost and reduced visual impact through the utilisation of existing grid substation infrastructure;
- c) multiple grid interconnection lines from the Twizel Substation that improve generation supply security and reduce transmission thermal energy losses ;
- d) flat site topography and low natural hazard risk;
- e) direct and safe access from State Highway 8;
- f) land that is not considered highly productive; and
- g) a low population density in the surrounding area, thereby minimising potential amenity effects.

The Nova Project has been designed consistently with the recommendations of Nova’s technical experts. In particular, it has been designed to avoid significant adverse effects on landscape values and ecologically significant flora, fauna, and wetlands. A comprehensive programme of ecological remediation and enhancement will also be proposed, including boundary planting, ecological corridors and nodes throughout the site, along with pest management works.

Nova is currently completing the technical reporting necessary to support its substantive application under the FTAA. Nova is also undertaking a programme of early-stage engagement with stakeholders. Work is progressing and Nova expects to lodge its application in Q2 2026.

The Point

NGL Farms is neutral in respect of the substantive application for The Point. However, NGL Farms generally supports development of solar generation in the Mackenzie Basin, particularly in areas in close proximity to existing hydroelectric and material grid infrastructure and the Twizel Township. NGL Farms and Nova anticipate that any effects associated with the development of the Nova Project, together with The Point Solar project and the nearby Haldon Solar Project, can be appropriately managed.

Nova's technical expert team has closely considered the application for The Point. If that development forms part of the existing environment at the time Nova's application is processed and determined, Nova will include a robust cumulative effects assessment with its application. The same approach will apply in respect of the Haldon Solar Project. However, for present purposes, Nova confirms that, at this stage, its technical expert team has not identified any potential cumulative effects arising from all three projects that cannot be effectively managed.

Further Steps

Nova is willing to discuss cooperation with Far North Solar Farm Limited and Lodestone Energy Limited on matters such as the coordination of construction activities and/or ecological remediation projects, to the extent that this may be beneficial once respective project development and construction are committed.

If there are any further questions or queries in relation to the above, these can be addressed to the following:

[Redacted]

Generation Development Lead

[Redacted]

[Redacted]

Senior Legal Counsel

[Redacted]

Our team is happy to meet to discuss any of the above issues, or to provide further comments as necessary.

Yours sincerely

[Redacted Signature]

Rob Foster
Director (NGL Farms Limited)

Appendix –Nova Site details



— Highways
— Roads

GENERAL NOTES
1. Coordinates are in terms of New Zealand Transverse Mercator
DISCLAIMER
GIS data and imagery are for indicative purposes only.
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BTW
COMPANY

SURVEYING
ENGINEERING
PLANNING
ENVIRONMENT

Twizel Solar Project Site Map



1:27,500 at



Export Date: 8/04/2025 11:34 AM



**RECORD OF TITLE
UNDER LAND TRANSFER ACT 2017
FREEHOLD
Search Copy**




R.W. Muir
Registrar-General
of Land

Identifier 489342
Land Registration District Canterbury
Date Issued 20 November 2014

Prior References
509804

Estate Fee Simple
Area 868.1193 hectares more or less
Legal Description Lot 3 Deposited Plan 422901
Registered Owners
NGL Farms Limited

Interests

817132 Gazette Notice declaring the State Highway Twizel - Omarama Road to be a limited access road - 9.12.1970 at 1.55 pm

Subject to Part IVA Conservation Act 1987

Subject to Section 11 Crown Minerals Act 1991

Subject to a right of way (in gross) for purposes of conservation management over part marked B, AE and AF and a right of way (in gross) for the purposes of public access over part marked AE and AF all on DP 422901 in favour of Her Majesty the Queen created by Easement Instrument 7584791.3 - 19.10.2007 at 9:00 am

Appurtenant hereto is a right of way for the purposes of farm management and stock access and a right to convey water created by Deed of Easement 7584791.4 see CIR 387078 - 19.10.2007 at 9:00 am

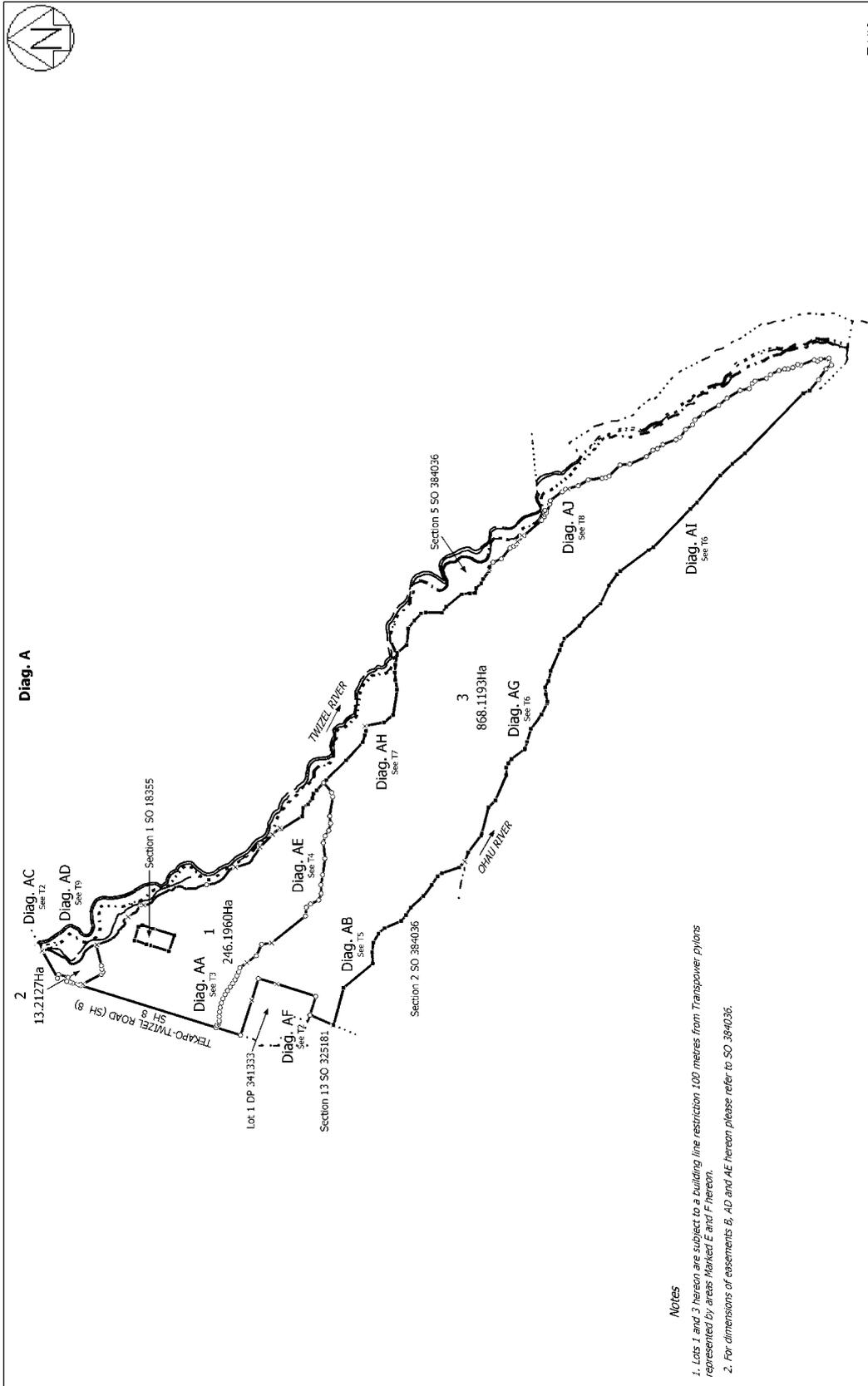
9877186.4 Consent Notice pursuant to Section 221 Resource Management Act 1991 - 20.11.2014 at 2:45 pm

Subject to a right (in gross) to convey electricity over part marked B, C, E, F, I on DP 478222 in favour of Meridian Energy Limited created by Easement Instrument 9906693.2 - 11.12.2014 at 4:52 pm

Subject to a right (in gross) to monitor ground water over part marked H on DP 478222 in favour of Meridian Energy Limited created by Easement Instrument 9906693.3 - 11.12.2014 at 4:52 pm

Land Covenant in Easement Instrument 9906693.4 - 11.12.2014 at 4:52 pm

9906693.5 Encumbrance to High Country Rosehip Orchards Limited - 11.12.2014 at 4:52 pm



Notes

1. Lots 1 and 3 hereon are subject to a building line restriction 100 metres from Transverse pylons represented by areas marked E and F hereon.
2. For dimensions of easements B, AD and AE hereon please refer to SO 384036.

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Land District: Canterbury	Lots 1 - 3 being subdivision of Section 1 SO 384036	Digital Title Plan LT 422901 Approved on: 7/10/2009
Digitally Generated Plan Generated on: 07/10/2009 07:45am Page 4 of 13	Surveyor: Russell Thomas Benque Firm: Davis Ogilvie & Partners Ltd (Christch)	