04/05/2026

FRV Services New Zealand Limited (FRV)

c/ Tim Grace SLR Consulting

Rangitikei Solar Farm Project

Tēnā Koutou,

Re: Rangitikei Solar Farm Project

Thank you for the opportunity to comment on the formal notification under section 11(1) of the Fast-track Approvals Act 2024 (as amended by the Fast-track Approvals Amendment Act 2025) in relation to an intended Referral Application by FRV Services New Zealand Limited (FRV). Please be aware that these comments are high level only, noting that the Project is in the early stages. The Council encourage and expect on-going consultation as the Project progresses.

The Rangitīkei District comprises 4,500 square kilometres of largely rural land. It is a diverse district, ranging from sand plains on the south coast to hill country in the upper Rangitīkei. The district is characterised by its hills, which comprise 50% of the land and the Rangitīkei River, one of New Zealand's longest rivers, which starts in the Kaimanawa Ranges and flows out to the Tasman Sea. Key drivers of the Rangitīkei economy are primary production and downstream processing. Primary industries contribute to 30.1% of the District's GDP and provides 28.3% of employment.

Marton is the district's largest urban centre, with a population of approximately 5,500 people. The Rangitīkei coastline is relatively untouched and comprises rugged cliffs, black sandy beaches, and wild surf along the Tasman Sea. It is enjoyed by many for a range of recreational purposes including fishing, surfing, swimming, bird watching and coastal walks.

The primary iwi groups within the Rangitīkei District include Ngā Wairiki Ngāti Apa, Ngāti Raukawa ki te Tonga, Ngāti Tamakōpiri, Ngāi Te Ohuake, Ngāti Raingitūhia, Ngāti Hauiti, and Ngāti Whitikaupeka. Council anticipates the involvement of these iwi groups in the process and expects that FRV will engage appropriately and give due consideration to their interests and aspirations throughout.

Economic benefit

Rangitīkei District Council acknowledges that the Project has the potential to generate significant gross economic benefits for the region. However, the Council expects to understand through the process the net economic benefit, after accounting for environmental, social, and cultural costs.

In particular, further clarification is sought on the assumptions underpinning the Project's economic modelling. The stated peak workforce of approximately 250 full-time equivalent roles during construction is significant and would benefit from supporting evidence outlining how this figure has been derived. In addition, the proposal involves the conversion of a substantial area of highly productive land, and the downstream economic implications of this loss would need to be well understood. This includes potential impacts on existing businesses and supply chains that rely on that production.

District Plan Policy

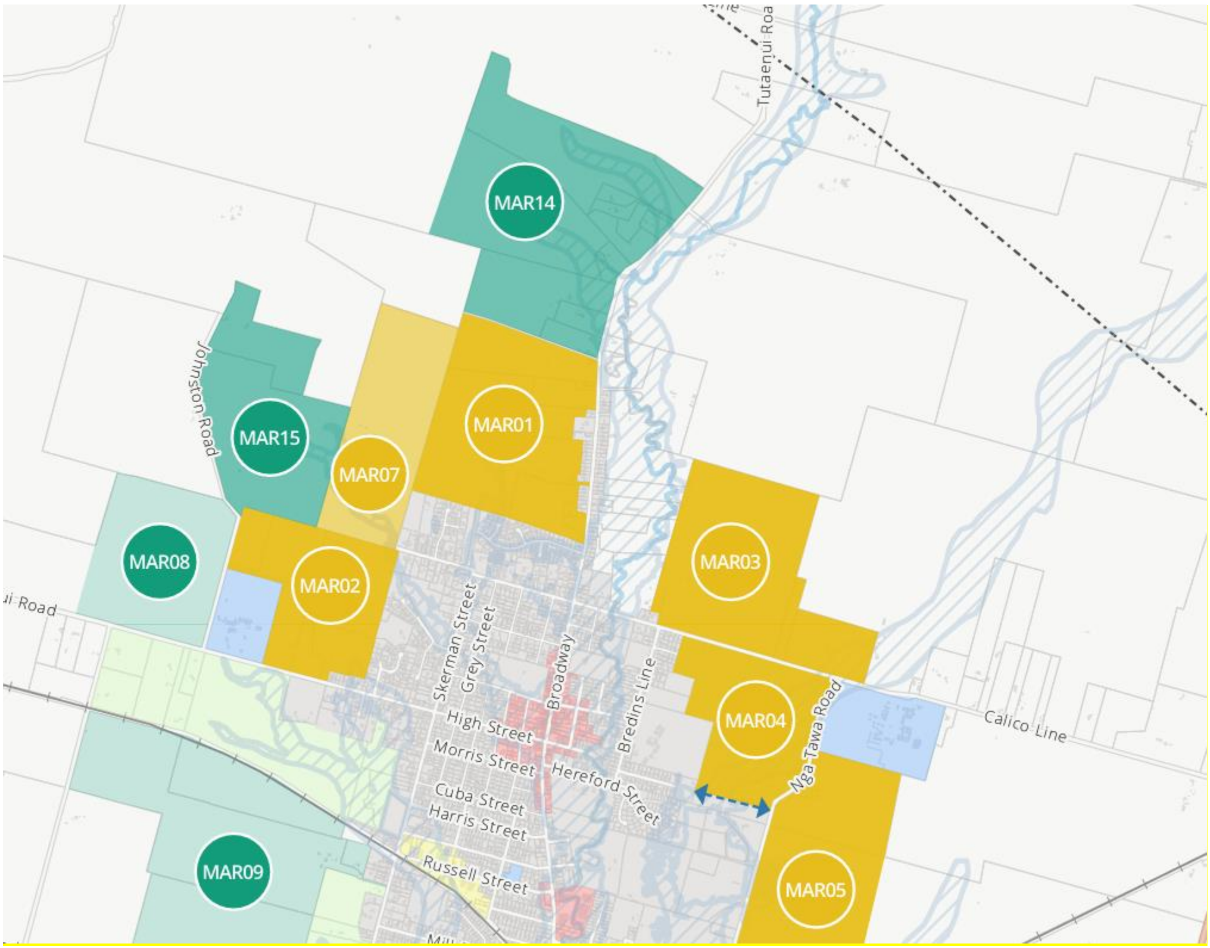
You should be aware that 65 Calico Line, Marton is within an identified future urban growth area incorporated into Pae Tawhiti Rangitīkei Beyond which is Rangitīkei District Council's Community Spatial Plan. This future urban growth area is known as "MAR03", and it ranked as having a "high" level of potential suitability for future urban when assessed for inclusion in the Community Spatial Plan.

The properties to the immediate east and west of 65 Calico Line are also within the MAR03 urban growth area and the land across the road and to the south is within the MAR04 future urban growth area.

It is noted that Council is currently in the consultation phase of Proposed Plan Change 3 – Urban Growth and that the properties within MAR03 have not been proposed to be rezoned from General Rural to General Residential as part of this plan change. However, at this stage the properties within MAR03 will remain within an identified urban growth area in the Council's Community Spatial Plan. Furthermore, 60 Calico Line which is within the MAR04 urban growth area is proposed to be rezoned to General Residential as part of this plan change.

The below map shows the future urban growth areas (in yellow) and future lifestyle growth areas (in green) for North Marton.

In this context, the Project represents a potential conflict with Council's long-term strategic planning for urban growth in Marton. The identification of this land for future urban development signals its importance in accommodating growth and managing urban form over time. Accordingly, the potential for the Project to constrain or preclude future urban development, or to introduce reverse sensitivity effects, should be carefully considered as part of the assessment process.



Transport and Roading

Council notes that the proposal will generate construction-related traffic effects on the local road network, particularly in relation to Calico Line and Colemans Road. These effects require careful management to protect both network function and existing infrastructure investment.

With respect to site access, any construction of a right-turn bay and associated left-in/left-out slip lanes from Calico Line into the site should be accommodated entirely within the northern side of Calico Line (being the same side as the proposed solar farm). No works are to impact or alter the shared pathway located on the southern side of Calico Line between Nga Tawa Road and Marton. Council notes that construction of this shared pathway is scheduled to commence in May 2026.

In relation to construction traffic, there is a risk of damage to local road assets due to increased heavy vehicle movements. Appropriate mitigation measures will be required, including pre- and post-construction condition assessments and remediation works to return affected roads, including Calico Line and Colemans Road, to at least their pre-construction condition.

Council also expects that construction traffic accessing the site from the local road network will do so via State Highway 1, with access limited to routes via Colemans Road and/or Calico Line, to manage effects on the wider local road network.

Please be aware that unfortunately the Council did not have sufficient time to review the draft *"Technical Memorandum – Preliminary Transport Assessment"* dated 30 April 2026, prepared by SLR, and therefore has not been able to incorporate any comments on that document into this response. Accordingly, the comments provided above have not been informed by, nor are they based on, the contents of that memorandum.

Mana Whenua

Council does not provide comment on matters of tikanga Māori, as these are most appropriately addressed by mana whenua and iwi authorities who it is expected have been and will continue to be invited to participate directly in this process. Rangitīkei District Council expects that FRV will appropriately engage with Rangitīkei iwi groups, both in accordance with the requirements of the regulations and in acknowledgement of iwi as an important stakeholder.

Conclusion

Rangitīkei District Council appreciates the opportunity to provide comment on the proposed Rangitīkei Solar Farm Project at this early stage of the Fast-track referral process. The Council emphasises the importance of robust evidence to support key assumptions, and a clear understanding of both the benefits and trade-offs associated with the proposal.

Council considers that appropriate avoidance, mitigation, and remediation measures will be critical to ensuring that adverse effects on the District's productive land, transport network, and wider community are effectively managed. Engagement with mana whenua and key stakeholders will also be an essential component of the Project's development.

Overall, the Council supports a precautionary and evidence-based approach to decision-making and expects that, if progressed, the Project can deliver positive and sustainable outcomes for the Rangitīkei District and its communities.

Ngā mihi,

Johan Cullis

Group Manager – Regulatory & Emergency Services