

## Fast Track Approvals Act 2024

### Foxton Solar Farm [FTAA-2510-1121]

#### Horizons Regional Council Response to Panel Convenor

15 April 2026

1. This memorandum is in relation to the proposed Foxton Solar Farm [FTAA-2810-1121] which is filed under the Fast Track Approvals Act 2024. Manawatū-Whanganui Regional Council (Horizons) thanks the panel convenor for the opportunity to provide a written response to the matters raised in Minute 1, dated 1 April 2026.
2. Horizons has been involved in this project through pre-application engagement, including meetings and the circulation of various material prior to the lodgment of both the referral application and the substantive application.

#### **Engagement with Applicant**

##### Pre-Lodgment

3. Horizons has been involved in pre-lodgment engagement regarding the Foxton Solar farm since April 2024. This has involved multiple online meetings, review of circulated material and feedback to the applicant on the Project.

##### Post-Lodgment

4. Horizons continues to engage with the Applicant post lodgment of the substantive application. This has involved emails and online meetings to discuss outstanding matters (as discussed in paragraphs 15-21 below).
5. Horizons staff and experts will be attending a site visit with the applicant and Horowhenua District Council on 28 April 2026. A meeting between Horizons ecologists and the Applicants ecologists is set down for 30 April 2026 to discuss the stream classification and bird strike monitoring.
6. Horizons and the applicant have an agreement in place regarding the matter of payment of costs, with the agreement regarding invoicing the applicant for any time which cannot be invoiced directly to the EPA.
7. Horizons is in the process of reviewing the proposed draft conditions included in the application and some initial comments have been provided to the applicant. It is

anticipated that further discussions will occur and an updated set of conditions provided – if there are any outstanding areas of disagreement then these will be highlighted and the reasons identified.

## **Minute Schedule 2 – Matters to consider**

### **Approvals Sought**

8. The application seeks regional consents as listed on page 9 of the main application document and the subsequent additional information dated 11 March 2026. To avoid repetition, the consents sought are not repeated here. Horizons agrees that the application has identified all the necessary consents for the proposed activities.

### **Complexity**

9. It is noted that solar farms are not unusual in New Zealand and the Horizons Region. Horizons has processed a number of consent applications for solar farms under the Resource Management Act, including on a non-notified basis, as well as under previous versions of Fast Track legislation<sup>1</sup>. Under the Horizons Regional Councils One Plan (joint Regional Policy Statement and Regional Plan) the activities are not unusual; being large scale land disturbance, land disturbance and vegetation clearance in proximity to waterways, activities in proximity to waterways holding a Schedule 2 value of Flood Control and Drainage and activities impacting natural inland wetlands.

### **Legal Complexity**

10. The legal complexity of this application is considered to be low. The regional consents sought are not considered to be unusual or unfamiliar. There are currently no legal matters of disagreement between the applicant and Horizons.

### **Evidentiary Complexity**

11. The evidential complexity is considered to be low to moderate in scale with outstanding evidential matters limited to a small number of discrete matters. These are currently being worked through and these matters are set out below.
12. While there are a number of technical experts involved, consideration of these types of effects or number of effects are not uncommon or out of the ordinary. For Horizons, the technical team includes an instream ecologist, terrestrial ecologist, erosion and

---

<sup>1</sup> Harmony Energy NZ #3 Limited under the Covid-19 Recovery (Fast-Track Consenting) Act 2020

sediment control/contaminated land expert and a planner. Collation of assessments from these experts are not considered to be largely complex.

### Factual Complexity

13. In terms of processing the Regional consents the factual complexity is considered to be low to moderate. The outstanding issues below set out those matters in which discussions are ongoing between the applicant and Horizons, but these are considered to be minor in scale and impact on the timeframes for processing this application.

### **Issues**

14. The matters Horizons consider integral to the assessment of this application include:
  - a. Effects on natural inland wetlands, including indigenous flora and fauna;
  - b. Effects on water quality from land disturbance and vegetation clearance, including disturbance of contaminated land;
  - c. Effects on flood control and drainage assets; and
  - d. Effects on cultural values (noting that iwi are a party to these proceedings and it is assumed they will speak to these matters).

### Outstanding Issues

#### *Waterway Classification:*

15. The applicant has assessed the waterways on the site as being ‘artificial waterways’, whereas Horizons consider there is potential for these waterways to be ‘modified waterways’ and therefore within the definition of ‘River’ under the RMA. Horizons notes that the site visit set down for 28 April 2026 will enable Horizons ecologists to confirm our opinion on the status of these waterways.
16. However, resolution of this matter is not considered to impact the processing and assessment of this application given the applicant has confirmed<sup>2</sup> that consent has been sought on a precautionary basis for land disturbance and vegetation clearance in proximity to waterways to manage this uncertainty.

#### *Flood Control and Drainage:*

---

<sup>2</sup> Additional information dated 11 March 2026 as part of the s46 completeness check

17. Horizons has confirmed to the applicant the 'Main Drain 3' within the project site holds the value of 'Flood Control and Drainage' under Schedule 2 of the One Plan, rather than the overland swale as shown in Figure 28 on page 64 of the main application document.
18. This classification has not largely impacted the application given the application seeks consent for activities affecting a waterway holding a status of Flood Control and Drainage. On this, Horizons has requested a number of matters be considered by the applicant including installing signage at the location of cabling and providing clear access on one side of the drain for ongoing maintenance.

*Erosion and Sediment Control:*

19. Horizons has provided initial feedback to the applicant with respect to the proposed consent conditions relating to the management of sediment laden runoff from exposed earthworks. These are minor in nature and relate to wording of proposed conditions.

*Contaminated Land:*

20. The addition of the discharge of contaminated stormwater from contaminated land has been added to the application during the s46 process. Feedback has been provided to the applicant requesting the inclusion of conditions of consent with respect to management plans and the inclusion of water quality conditions to address this.

*Bird Strike:*

21. Horizons has provided advice to the applicant with respect to confirming monitoring requirements for bird strike. As noted above, a meeting between the applicant and Horizons ecologists is set down to discuss this further.

Proposed Processes to Narrow Scope of Issues

22. Horizons has communicated the above matters to the applicant, and is continuing to engage with them to attempt to narrow or resolve these matters. The scheduled site visit, scheduled ecologists meeting and ongoing engagement with the applicant are proposed to narrow the scope of these matters.
23. While these matters are outstanding, from a procedural perspective, they are considered to be relatively minor in scale and impact subject to the outcomes of these ongoing discussions with the applicant.

### Activity Same or Similar

24. While applications for the construction of solar farms or the discrete activities associated with them in the Horizons Region are not uncommon, requests for further information pursuant to s92 of the RMA for these are varied depending on the quality of the application and the site-specific nature of effects. In this case, there do not appear to be any large information gaps.

### Statutory Process Coinciding

25. No statutory processes have been identified that would impact Horizons ability to provide comments within required timeframes and contribute to this process.

### **Panel Membership – Panel Composition**

26. In consideration of Clause 7 of Schedule 3 of the FTAA, Horizons suggests the panel be made up of:
- a. An experienced Making Good Decisions Accredited Chair, ideally with legal experience; and
  - b. A panel member with expertise in Mātauranga Māori to ensure that tangata whenua perspectives are given appropriate recognition and consideration during decision making (noting that the Panel Convenor has already approached a potential panelist with this experience); and
  - c. A panel member with experience in planning or ecology, ideally also with experience in decision making for solar farms.
27. With respect to Schedule 1, Clause 4(b) of the Minute, Horizons does not consider there to be any factors that warrant the appointment of more than four panel members.
28. It is noted that Clause 12 of the Minute states that nominations from Local Authorities has been sought separately from this written statement. A nomination from the Local Authorities will be provided.

### **Procedural Requirements**

29. Horizons Regional Council is willing to engage directly with the Panel as necessary to advance the process of the application in an efficient manner. We are able to participate in any expert conferencing, briefings, meetings or hearings as required.

### **Minute Schedule 1**

### **Timeframe for Comments and Decision**

30. Horizons have had advance pre-application engagement with the Applicant and is therefore familiar with the proposal and key issues.
31. Horizons does not anticipate any issue with the timeframe to provide substantive comments under section 54 of the FTAA.
32. Horizons note that activities associated with solar farms are not uncommon in this Region and the complexity and issues relating to this application are not substantial. However, we note that this is Horizons first application under the FTAA to reach the substantive decision where we have been involved throughout the entire FTAA process<sup>3</sup>. On this basis, we consider that an additional 10 working days to the standard 30 working day period for the panel to make the decision would assist Horizons with ensuring there is sufficient time to review draft conditions and ensure their workability and enforceability. If the convenor was of a view to set an alternative timeframe, we would ensure this is adhered to.

### **Attendance at Convenors Conference – Tuesday 21 April, 10am**

33. Horizons confirms attendance at the Convenors Conference, and will be represented by Ms. Sara Westcott, Team Leader Consents.

If you have any questions regarding this statement, please do not hesitate to contact me.



Sara Westcott

**TEAM LEADER CONSENTS**

15 April 2026.

---

<sup>3</sup> Horizons was invited to comment on the Taranaki VTM application under the FTAA 2025, but this was in a limited capacity.