

Horizons Regional Council – Feedback Summary Table

The below table provides a summary of the feedback received from the Horizons Regional Council and how this feedback informs the project.

Matter raised by HRC	Response
Application appears reasonable as long as post-development flood and erosion effects will not increase, including effects on existing flood control scheme assets and their operation.	The project will be designed and assessed to ensure post-development flood and erosion effects are no greater than existing conditions. A Hydrological Assessment will be included in the application to assess flood risk and potential impacts on flood control assets.
The NPS-NH sets out the area for avoidance, in terms of flood risk. The proposed area may avoid 'very high' hazard, but the applicant should include this assessment if the proposed area avoids the 'very high' flood hazard risk during likely event (> 2% AEP).	The National Policy Statement for Natural Hazards (NPS-NH) requires that development avoids very high natural hazard risk (Policy 3.3(2)(a)). The proposal avoids areas classified as high flood hazard in the 0.5% AEP (1-in-200-year) flood event. As the 0.5% AEP event represents a rarer and more severe flood than the 2% AEP (1-in-50-year) event, avoidance of high hazard areas for the 0.5% AEP event necessarily means that high flood hazard areas associated with the 2% AEP event are also avoided.
The effect of 'Possibility of post development flows increasing beyond predevelopment flows' is listed, but there is no specific mitigation comment for dam operation. The application should demonstrate that the dam capacity, and spillway operation will not be compromised post development.	The proposal will be designed to avoid development in close proximity to the dam in order to mitigate potential adverse effects. A Hydrological Assessment will be undertaken to assess changes in stormwater runoff rates, volumes, and flow paths resulting from the development. The assessment will also identify and comment on any design or mitigation measures required to ensure that post-development flows do not adversely affect dam performance, including storage capacity or spillway operation.
The scheme operational function requires site access for maintenance works. The application should demonstrate that access to the scheme assets are maintained.	Ongoing access to flood control scheme assets will be maintained at all times. This will be demonstrated through the proposed site layout and access arrangements, and, where necessary, secured through appropriate design measures and resource consent conditions to ensure continued operational and maintenance access.
There are extensive NPS-FM wetland issues noted. It looks like there might be potential for One Plan Schedule 6 wetlands in places already indicated as being avoided / avoidable (in the land owner retention areas). It would be helpful for the investigation to look into how effects on other natural inland wetlands could be avoided as they seem to be throughout. If loss is not avoidable, this may result in the activity status being non-complying which may have implications for the application and	The preliminary ecological assessment has identified a small number of natural inland wetlands within the site. These wetlands have been subjected to varying levels of modification and degradation and are generally of low ecological quality. The proposal will be designed to avoid where practicable development within identified wetlands. Where works are required within or within in proximity to wetlands, appropriate mitigation measures will be

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assessment. Horizons will be reviewing impacts on wetlands and any loss carefully. In reviewing the plans, there appears to be potential/opportunity within the broader property for biodiversity gains to offset loss of wetland extent.	implemented, informed by a suitably detailed ecological assessment. For the avoidance of doubt, resource consent has been sought on a precautionary basis as a discretionary activity under Regulation 45 of the National Environmental Standards for Freshwater, including for earthworks and vegetation clearance within and within 10 metres of a natural inland wetland, should such activities be required.
Possibility of native bat and bird issues noted. We anticipate these can be addressed as anticipated / probably not difficult issues to traverse. The application will need to think a bit about collision potential and how to measure and monitor that.	The preliminary ecological assessment has identified that potential adverse effects on avifauna are Low in significance. The assessment also identifies that threatened bat species may be present within the wider area. However, with the implementation of recommended mitigation measures, including the preparation and implementation of a Bat Management Plan, this matter will be appropriately addressed. The assessment concludes that potential adverse effects on bats are Low to Moderate in significance.
Lizards and invertebrates are not highlighted as issues, likely because they have not been identified as high-risk issues. However, these need to be looked at as not addressing the potential presence and possible strategies to limit effects to no more than minor will leave a notable information gap.	The preliminary ecological assessment concludes that the ecological value for lizard species is likely to be low, as no native lizard species were recorded during site surveys. Notwithstanding this, the assessment recommends that an Incidental Discovery Protocol be prepared and implemented during construction works to manage any unforeseen encounters with lizards.
Please ensure any application include details of any stream crossings, including existing and new. Any new crossings should include information on fish passage, how the design fits with the NES-F conditions, and have regard for the NZFPGs.	All existing and proposed stream crossings will be identified in the substantive application. New crossings will be designed to provide for fish passage and to comply with NES-F and the New Zealand Fish Passage Guidelines.
Please ensure any meaningful waterway delineations are backed up with evidence and justification. The documents provided mentions intermittent waterways and artificial ponds, further information on these classifications to help inform the effects assessment and applicant consenting requirements/rule status will be needed. Furthermore, if any ephemeral flow paths have been identified, confirmation of their status may be needed i.e. ephemeral vs intermittent classification.	The substantive application will clearly identify and justify all waterway delineations, including confirmation of whether waterways are classified as ephemeral or intermittent, in accordance with the relevant regulatory definitions and assessment methodologies.
Specific details of mitigation measures mentioned such as riparian planting will also be needed.	Specific mitigation measures will be detailed in the substantive application, as required.
Erosion and sediment control: Detailed consideration of erosion and sediment effects, particularly given increased interaction with	An erosion and sediment control plan (ESCP) will be prepared and submitted as part of the substantive application. The ESCP will be tailored to the site conditions and soil characteristics and



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waterways and less free-draining soils compared to similar projects.	will demonstrate how potential adverse effects on adjacent and downstream waterways will be appropriately avoided, remedied, or mitigated.
Consideration of construction water demand, including water takes if requirements exceed readily available supplies.	FRV have experience delivering solar farm projects of this scale and will give detailed consideration to erosion and sediment control as part of the construction design process. A project-specific ESCP will address soil conditions and interactions with waterways. Construction water demand will be assessed, with options such as water tankers available to support effective sediment and dust control.
It would be interesting to know what piling method they will be using (if known at this stage), as this may inform the level of land disturbance and water demand - e.g.: are the piles driven straight in from the surface or could they dig or auger lots of small excavations which are backfilled with concrete.	Details of piling methodology will be addressed in the substantive application.
Potential for localised contaminated land from activities such as former sheep dips, farm dumps or bulk chemical storage. Therefore, it is expected that a PSI is undertaken as part of the application process and potentially a targeted DSI is undertaken either as part of the application process or as a condition of the consent.	A PSI has already been undertaken. There is a small potential for some works to be undertaken in the small pockets of HAIL land within the site. It is expected that a DSI will be prepared and provided as part of the substantive application.
One Plan Schedule 2 values – I note that with respect to the Schedule 2 'Flood Control and Drainage' value, this applies to the mainstem of the Tūtaenui Stream and to the dam identified in the plans (known as 'Tūtaenui Dam E4'). While the online maps do not show the dam as holding this Schedule 2 value, Table 34 in Schedule 2 shows this in the 'Rang_4d' section of the Flood Control and Drainage. This means that in addition to consideration of the designation under the Rangitikei District Plan, consideration against LF-AWBD-R68 will be required for works in proximity to the dam.	The proposed development will be designed to avoid the Tūtaenui Stream and the Dam E4 flood control asset. As a result, activities affecting the RP-SCHED2 Value of Flood Control and Drainage are not anticipated, and consideration of LF-AWBD-R68 is therefore not expected to be required. However, in the unlikely circumstance that works are undertaken within proximity of the Tūtaenui Stream, consent is sought as a discretionary activity under LF-AWBD-R68.
Confirmation of engagement with Ngā Wairiki Ngāti Apa, as the relevant iwi authority for the site, and appropriate consideration of iwi values and interests.	FRV have consulted with Te Rūnanga o Ngā Wairiki Ngāti Apa since early 2026, having had approximately five online meetings and two face to face meetings to discuss the project.
Ongoing pre-lodgement and iterative engagement with Horizons Regional Council to support an efficient fast-track process and informed assessment.	FRV will continue proactive engagement with Horizons Regional Council throughout the fast-track process to support efficient assessment and resolution of issues.



Rangitikei District Council – Feedback Summary Table

The below table provides a summary of the feedback received from the Horizons Regional Council and how this feedback informs the project.

Matter raised by RDC	Response
Primary iwi groups within the Rangitikei District include Ngā Wairiki Ngāti Apa, Ngāti Raukawa ki te Tonga, Ngāti Tamakōpiri, Ngāi Te Ohuake, Ngāti Raingitūhia, Ngāti Hauti, and Ngāti Whitikaupek. Council anticipates involvement with iwi groups in the project and expects that FRV will engage appropriately and given due consideration to their interest and aspirations.	FRV have been and continue to undertake meaningful and positive engagement with Ngā Wairiki Ngāti Apa, who, based on the advice received from Te Rūnanga o Ngā Wairiki Ngāti Apa, are the sole mana whenua who have an interest in the project location. FRV will continue to engage with mana whenua throughout the life of the project.
Clarification of the net economic benefits of the Project, taking into account environmental, social, and cultural costs, not just gross economic benefits.	An Economic Assessment has been prepared by Insight Economics, which provides a comprehensive analysis of the project's economic benefits.
Further detail and supporting evidence for the stated peak construction workforce of approximately 250 FTEs, including the assumptions used in the economic modelling.	The Economic Assessment provides a detailed analysis of the likely construction and operational construction workforce, and provides additional context around the likely construction workforce.
Assessment of the loss of highly productive land, including downstream economic implications and impacts on existing businesses and supply chains reliant on that production.	The site contains LUC-3 soils. The NPS-HPL now accommodates specified infrastructure such as solar farms on LUC-3. The projects impact on rural productivity is appropriately mitigated through the opportunity to retain grazing across most of the site. The low-impact footprint of solar will minimise the loss of productive land and enable the land to be returned to rural production at the end of the project life.
Potential conflict with Council's long-term urban growth strategy, given the site's location within the MAR03 future urban growth area identified in the Pae Tawhiti Rangitikei Beyond Community Spatial Plan.	Consideration has been given to the Pae Tawhiti Rangitikei Beyond spatial plan, which identifies the southern portion of the wider project area as a potential future urban growth area. However, the relevant landowner has expressed opposition to urban development of this land, and it has subsequently been excluded from the Rangitikei District Council's Proposed Plan Change 3 – Urban Growth. More broadly, it is recognised that growth strategies are inherently adaptive and subject to change over time. While they provide an indication of potential future development patterns, they are not determinative and do not guarantee that identified areas will be developed.
Consideration of whether the project could constrain or preclude future urban development, or create reverse sensitivity effects, particularly in relation to adjacent MAR03 and MAR04 growth areas.	Consideration has been given to the potential implications of the project on identified future urban growth areas. In this regard, it is noted that the landowner of the MAR03 growth area has indicated an unwillingness to pursue urban development, and the area is therefore not expected to be actively progressed in the foreseeable future. It is considered that the project will neither constrain, nor be constrained by, potential future



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	development within the MAR04 growth area. The design of the project will incorporate appropriate setbacks and landscape planting, where required, to manage amenity, visual and functional interface effects, ensuring that both the project and any future growth can coexist without adverse constraints.
Management of construction traffic effects on the local road network, particularly Calico Line and Colemans Road.	A construction management plan will be prepared and implemented to ensure that traffic movements during construction works are appropriately manage effects on the roading network.
Design and location of site access works, including any right-turn bay or slip lanes, ensuring works are confined to the northern side of Calico Line and do not affect the shared pathway on the southern side.	The detailed design of any roading upgrades have not occurred at this preliminary stage of the project. Consideration of impacts of any required upgrades on the roading network (including existing and planned shared pathways) will be factored into the design.
Protection of the existing and planned shared pathway on the southern side of Calico Line, noting Council's shared path construction scheduled to commence in May 2026.	As above, the detailed design of any roading upgrades have not occurred at this preliminary stage of the project. Consideration of impacts of any required upgrades on the roading network (including existing and planned shared pathways) will be factored into the design.
Measures to address potential damage to local road assets from heavy construction vehicles, including pre- and post-construction road condition surveys and remediation.	A Preliminary Transport Assessment has been prepared, which assesses the effects of construction traffic on the roading network, and makes recommendations in terms of roading upgrades, site access and construction management in order to ensure that traffic movements during construction works are appropriately managed. The appropriateness of pre and post-construction road condition surveys and remediation will be further considered at the substantive application stage when the access arrangements have been confirmed.
Confirmation that construction traffic routing will primarily utilise State Highway 1, with access limited to Colemans Road and/or Calico Line to minimise wider network effects.	A Preliminary Transport Assessment has been prepared, which provides recommendations on the primary construction site access to minimise impacts on the roading network. It is anticipated that construction traffic routing will primarily be via SH1.
Commitment to a robust, evidence-based assessment and identification of appropriate avoidance, mitigation, and remediation measures for adverse effects on productive land, transport infrastructure, and the wider community.	The project is underpinned by an integrated effects management approach which prioritises avoidance where practicable, and otherwise will provide for appropriate mitigation measures to ensure that adverse effects on the environment are managed.

