

FTAA-2607-1268

29 September 2026

Christina Walker
Harmony Energy NZ #6 Limited

[REDACTED]
[REDACTED]

Tēnā koe,

Request for further information in relation to your application under the Fast-track Approvals Act 2024

You lodged a substantive application, Hinuera Solar Farm under the Fast-track Approvals Act 2024 (the Act) on 10 September 2026.

Prior to referring a substantive application to an Expert Panel, the EPA must assess the completeness and scope of the application to ensure it complies with section 46(2) of the Act. To assist with making this assessment, under section 46(2A) of the Act the EPA may seek further information from you.

Request for Further Information

To inform the EPA's assessment of the application for completeness, please provide a response to the following matters:

1. Assessment against Section 6 and 7 of the RMA

This comment was raised as part of the mandatory consultation the EPA undertook with Matamata-Piako District Council:

The substantive application does not provide a robust assessment addressing all the relevant subsections of Section 6 and 7 RMA that are identified in the Application Report (SLR ref:880.016894-Hinuera Substantive Application-v1.0).

For examples Sections 7(c) RMA (the maintenance and enhancement of amenity values) and 7(f) (maintenance and enhancement of the quality of the environment) are referred to in the Report, however no assessment is provided.

Please provide a complete assessment against Section 6 and 7 of the RMA to satisfy Schedule 5, Clause 5(1)(g) of the FTAA.

2. National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health (NES-CS)

This comment was raised as part of the mandatory consultation the EPA undertook with Matamata-Piako District Council:

The Preliminary Site Investigation report supplied in Appendix K has concluded that, based on “past experience,” a HAIL I activity is not present on the site in relation to the concentration of cadmium (through the use of superphosphate fertilisers in the southern farm block). It is preferable that the assessment be supported by soil testing to provide a more robust determination under the National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health (NES-CS).

In addition, the report does not take into account the effluent pond in the middle of the solar array to the north of the site (which is assumed would be removed from primary production in order to make way for the solar arrays), in which case resource consent under the NES-CS may be required. The report needs to provide clarity on this matter.

Please provide any further information you wish to have considered for the purposes of the EPA’s assessment under s 46(1) in response to these comments from MPDC.

3. National Policy Statements Assessment

This comment was raised as part of the mandatory consultation the EPA undertook with Matamata-Piako District Council:

The substantive application does not include an assessment against:

- *The National Policy Statement for Natural Hazards (NPS-N);*
- *The Hauraki Gulf Marine Park Act 2000 (HGMPA), noting that the site 4 is within the Hauraki Gulf catchment and sections 7 and 8 of the HGMPA have the status of a National Policy Statement; and:*

In addition, the Productivity Report supplied in Appendix EE does not include an assessment against the National Policy Statement for Highly Productive Land (NPS-HPL)

MPDC also note that:

The substantive application does not assess Policy 5 of the NPS-FM.

Please provide statutory assessments against Sections 7 and 8 of the Hauraki Gulf Marine Park Act 2000 or confirmation and explanation why this is not required.

Also, please provide statutory assessments against the National Policy Statement for Natural Hazards, the National Policy Statement for Highly Productive Land and Policy 5 of the NPS-FM to satisfy Schedule 5, Clause 5(1)(h) of the FTAA.

4. Operative Matamata-Piako District Plan

This comment was raised as part of the mandatory consultation the EPA undertook with Matamata-Piako District Council:

The substantive application does not assess the following objectives/policies of the Matamata-Piako District Plan:

- 2.4.2 Controlling activities - Objective 1 and Policy 1;
- 2.4.6 Integrating land-use and infrastructure - Objectives and Policies;
- 3.2.2.5 Earthquake hazard - Objective 1;
- 3.3.2.1 Sustainable activities - Objective 3;
- 3.7.2.1 Community infrastructure - Policy 9;
- 3.8.2 Transportation - Objectives 2 and 7 and Policies 1 and 12.

The assessment provided has not included the following rules of the District Plan, that could trigger additional land-use consent requirements under the District Plan:

- Rule 9.1.2(iii)(a)(v) – For the state highway network within a 100km/h speed environment, the Matamata-Piako Development Manual requires either a 200m or 500m separation distance from intersections (depending on whether the road carries more, or less than 10,000 vehicles per day). The assessment has not demonstrated whether the proposed vehicle access from State Highway 29 would comply with the separation distance requirement from the Eddy Road/State Highway 29 intersection to the west of the site.
- Meteorological devices are a Permitted Activity under Rule 8.9.1.4, subject to compliance with the Performance Standards set out in Rule 8.9.2. However, compliance with the relevant Permitted Activity standards has not been demonstrated.
- The application proposes the installation of private three-waters infrastructure. However, the proposed infrastructure has not been assessed under the consent requirements and standards in Section 8.5 of the District Plan.

Regarding earthworks, the assessment does not satisfy the information requirements in Part B, Rule 1.1.2 (ii)(b), (ii)(e) and (ii)(i) of the District Plan and has not addressed the Performance Standards for Cleanfill in Part B, Rule 4.12 of the District Plan.

Further, it is recommended that the applicable setbacks be clearly labelled and shown on the concept plans, to appropriately confirm that the solar arrays and all other buildings on the site will comply with the relevant District Plan setbacks from boundaries, the streams, and the National Grid line.

Section 3.2.2.4 of the Substantive Application details the legal instruments registered on the relevant Records of Title. Regarding the existing water permit (Transfer 243649 on RT SA292/111), the Applicant should demonstrate that the Instrument will not affect the ability to complete the development in accordance with the Concept Design Plans.

Please provide an assessment against the Matamata-Piako District Plan to satisfy Schedule 5, Clause 5(3) and (5) of the FTAA and any further information you wish to have considered for the purposes of the EPA's assessment under s 46(1) in response to these comments from MPDC.

5. Assessment of Effects on the Environment

This comment was raised as part of the mandatory consultation the EPA undertook with Matamata-Piako District Council:

The reports provided by the Applicant do not include sufficient detail to appropriately assess the following matters in Schedule 5, Clause 7 FTAA:

- *7(a) & (f): The substantive application refers to having the option of either utilising string inverters or string combiner boxes, as well as the option between central inverter stations or string transformer stations. The Acoustic Report in Appendix X does not appear to take these options into account in the assessment of noise on adjacent properties.*
- *7(a) & (d): The final Cultural Values Assessment has yet to be received.*
- *7(a): The Reflected Light Effects Assessment included in Appendix M does not contain an assessment on those properties that are vacant but could have a dwelling on them as a Permitted Activity under the District Plan (and therefore form part of the existing environment). In addition, the assessment does not provide data on potential glare on receptors, pre- vs post landscaping establishment on the site. It appears that the assessment relies on vegetation outside of the subject site, the retention of which is beyond the control of the Applicant. To determine whether adjacent receptors will potentially be affected by glare, the assessment should clarify its reliance on retention of landscaping outside of the subject site.*
- *7(b): The Landscape Effects Assessment in Appendix M places significant reliance on the proposition that solar farms constitute a 'productive' activity and that their increasing prevalence throughout New Zealand means they are becoming an accepted component of rural character. MPDC does not agree that this provides an appropriate basis for assessing the landscape and rural character effects of the proposal.*

The presence of one other solar farm within the Matamata-Piako District, at Te Aroha, is not considered sufficient to establish solar farms as a typical or prevalent component of the District's rural character. Similarly, reliance on the increasing occurrence of solar farms elsewhere in New Zealand does not adequately address the local landscape context within which the proposal is to be established. The assessment should therefore focus on the extent to which the scale, form and physical characteristics of the proposed solar farm are compatible with the existing and anticipated rural character in this particular locality.

Furthermore, we note that rural character is defined as follows under the District Plan:

"Rural character" includes the following elements:

- a. A predominance of natural features over human made features;
- b. High ratio of open space relative to built environment;
- c. Significant areas of vegetation in pasture, crops, forestry and/or indigenous vegetation;
- d. A rural working production environment;
- e. Presence of farmed animals;
- f. Noises, smells and effects associated with the use of rural land for a wide range of agricultural, horticultural and forestry purposes;
- g. Low population densities relative to urban areas;
- h. Existence of some narrow and/or unsealed roads;
- i. General lack of urban infrastructure;
- j. At a district wide level, infrequently occurring rural based industry.

While the proposed solar farm may represent a productive use of rural land in the broad sense, this does not in itself mean that its physical characteristics are consistent with the rural character identified in the District Plan. In particular, rural character as defined in the District Plan, is expressly characterised by a predominance of natural features over human-made features and a high ratio of open space relative to the built environment. The proposal would introduce extensive built elements within an otherwise open rural landscape.

The assessment should address whether the scale, intensity, and physical form of this proposal, appropriately responds to the established rural character of the site and surrounding locality. On the information provided, MPDC does not consider that Appendix M has adequately assessed this.

- *7(b): The Productivity Report supplied in Appendix EE does not assess the effects on the versatility of the productive soils on the site. This impacts the robustness of the assessment against the NPS-HPL.*
- *7(g): The Flood Assessment provided in Appendix J, refers to creating a displacement effect on neighbouring properties of up to 120mm. The assessment does not clearly identify which properties would be affected by such displacement. In addition, the assessment relies upon the use of conditions and detailed design at building consent stage to ensure that any adverse displacement effects are avoided. MPDC considers that further details and analysis are needed at the resource consent stage, to determine the appropriate measure(s) to avoid such an effect and its effectiveness (as commensurate to the scale of the proposal).*

Please provide an assessment of effects to satisfy Schedule 5, Clause 7 of the FTAA or any further information you wish to have considered for the purposes of the EPA's assessment under s 46(1) in response to these comments from MPDC.

6. Additional Comments

This comment was raised as part of the mandatory consultation the EPA undertook with Matamata-Piako District Council:

In addition, MPDC wishes to highlight, for the consideration of the EPA, the following matters on which the provision of further information will assist, in determining whether the application is complete and within scope (s46(2A) FTAA):

- *It is recommended that the following reports be peer reviewed to ensure that the reports supplied are appropriately robust, commensurate to the scale of the proposal:*
 - *Appendix H – Ecological Impact Assessment;*
 - *Appendix J – Stormwater Management and Flood Modelling Report;*
 - *Appendix K – Preliminary Site Investigation Report;*
 - *Appendix M – Landscape Effects Assessment (including the Reflected Light Assessment); and*
 - *Appendix X – Acoustic Assessment.*
- *MPDC considers that a decommissioning bond in relation to the proposed Decommissioning Plan, should be provided for in the draft conditions.*
- *Due consideration should be given to whether construction traffic will require the use of any District Roads; and the potential effects on adjacent property owners/occupiers during the construction period. This does not appear to have been considered in the Framework Construction Traffic Management Plan in Appendix Z.*
- *The substantive application notes that there will be staff on-site once the solar farm is operational, however no on-site car parks are proposed for staff members. It is recommended that provision be made for on-site parking (appropriately formed and marked). Earthworks and stormwater management measures associated with the parking areas will also need to be considered.*
- *The substantive application proposes to either construct a new vehicle crossing onto State Highway 29 or utilise the existing crossing (referred to as “Vehicle Crossing 2”). The Applicant proposes to restrict the use of the existing vehicle crossing (if this option is chosen) to two heavy commercial vehicle (HCV) deliveries per hour (10 maximum per day) during the construction period. MPDC considers that such a restriction would be difficult to enforce and questions whether the restriction would practically be adhered to, particularly during the peak construction period.*
- *The Landscape Effects Assessment relies upon the use of mitigation planting on neighbouring land (70A and 70B Gore Road) to mitigate the visual effects of the proposed solar farm. The conditions drafted by the Applicant rely on third party agreement in respect of mitigating the visual effects on the aforementioned properties. MPDC questions whether it is appropriate to rely upon third party approvals in the conditions (if consent were to be granted)? Ideally*

Harmony should hold an easement which allows it to undertake and maintain the planting for the life of the solar farm.

Please provide any further information you wish to have considered for the purposes of the EPA's assessment under s 46(1) in response to these comments from MPDC.

Responding to the Request for Further Information

Under the Act, you have until the end of the 20th working day from the date of this letter to provide a response to the EPA, which is 28 October 2026.

From the date of this letter, the 15 working day timeframe for the EPA to decide on completeness and scope of the substantive application ceases to run. The 15 working day timeframe will recommence once your response is received or after 28 October 2026, whichever is sooner.

If you wish to clarify any matter relating to the request, and the request was generated from the EPA's consultation with an administering agency or local authority, we suggest that you contact that administering agency or local authority directly before providing your response to the EPA.

If you require information from the EPA in relation to the request for further information, you may request that information from the EPA under section 46(2C) of the Act. Please send your request to projects@fasttrack.govt.nz.

The EPA intends to publish the information received from you in full, including your responses in our completeness memorandum, on the Fast-track website.

If you have any questions, please contact [REDACTED] Application Lead by email at info@fasttrack.govt.nz.

Nāku noa, nā



Ben Bond

Team Leader, Fast-track Applications