

File ref: FTAA-2509-1100

11 March 2026

Far North Solar Farm Limited
C/- Richard Homewood
By Email: [REDACTED]
CC: [REDACTED]

Tēnā koe

Request for information from Far North Solar Farm Limited in relation to the Point Solar Farm application under the Fast-track Approvals Act 2024

The Point Solar Farm Expert Panel (the Panel) has directed the Environmental Protection Authority (EPA) to request further information from you under section 67 of the Fast-track Approvals Act 2024 (the Act), relating to the Point Solar Farm application.

At the direction of the Panel, the EPA is seeking further information from Far North Solar Farm Limited regarding **the following**:

1) Concessions sought under the Conservation Act 1987

In RFI #2, dated 13 February 2026, section 4.1, the Panel recorded that,

“... (we) observe that at the Project Overview Conference on the 16th of January 2026, the Applicant advised that they were going to withdraw part of the concession application by Transpower and that the Applicant would communicate the withdrawal in writing. The Panel has received no such communication and seeks clarification.

The request for information is:

- a) The Applicant is to provide in writing, details as to which parts of the substantive application for concessions sought for Transpower is to be withdrawn and advise on implications as to the Department of Conservation’s feedback under Section 51 of the FTAA?”

The Applicant’s Response to the RFI , dated 23 February 2026, section 4.1, page 7, the Applicant states;

“Parts of the Application to be Withdrawn Based on the current scope of our application and the DoC s51 report dated 4 February 2026, no parts of the application for concessions are to be withdrawn.”

This does not answer the Panel’s question.

At the Project Overview Conference (16 January 2026), Mr Homewood stated at from Teams Transcript at 1:03:08,

“So there will be a separate application from Transpower now, which was originally bundled in the, Um our fast track application we're applying on behalf of Transpower they will now be seeking their own access arrangements, with DoC. So that is being done separately and independently by Transpower on the, we are gonna have some further engagement. With Doc on the concession also, and that's something we'll also look to report back on in the next few days. In more detail.”

The Panel requested that this withdrawal of the Transpower part of the application for the concession be notified to the Panel in writing.

The request for information is:

- a) The Applicant is to provide in writing, details as to which parts of the substantive application for concessions sought for Transpower is to be withdrawn and advise on implications, if any, as to the Department of Conservation’s feedback under Section 51 of the FTAA?

2) RMA matters

2.1 Sites of Significance to Māori (SASM)– Mackenzie District Plan

The s53 FTAA comments from Te Rūnanga o Arowhenua, Papatipu Rūnanga of Ngāi Tahu Whānui (Arowhenua)(Prepared by Aoraki Environmental Consultancy) at para 30, Arowheuna, suggest an assessment of the SASM Objectives and Policies in the Mackenzie District Plan.

In the Applicant’s response to that comment (dated 26 February 2026 – Attachment 20), the Applicant, states at paragraph 8, Page 3;

“FNSF also notes the request for assessment of adjoining SASM sites and relevant objectives/policies. FNSF is willing to provide further assessment if required, however, we also note the conclusions reached in the stormwater assessment that there would be no run-off effects outside the site perimeter. We are keen to discuss this further in the March 4 2026 hui and ensure that any further assessments address all outstanding issues and concerns.”

The Panel consider that an assessment of the adjoining SASM sites and any other matters identified following the hui scheduled for 4 March 2026 would be of assistance, noting that any assessment should be informed by consultation with Arowhenua.

The request for information is:

- a) The Applicant is to provide expert evidence in writing, an assessment of the proposal as to the adjoining SASM sites and other assessments as agreed in the 4 March 2026 hui?

2.2 Water Supply

The s53 FTAA comments from Te Rūnanga o Arowhenua, Papatipu Rūnanga of Ngāi Tahu Whānui (Arowhenua)(Prepared by Aoraki Environmental Consultancy) at paras 43 - 45, Arowheuna, raised issues around the use of stored water for firefighting and irrigation purposes and hence the adequacy of that supply.

In the Applicant's response to that comment (dated 26 February 2026 – Attachment 20), the Applicant, states at paragraph 3, Page 4;

FNSF notes the concern regarding fire risk and water storage. On-site fire water tanks will be sized and maintained in accordance with NZS 4509 and Fire and Emergency New Zealand guidelines. FNSF has engaged with FENZ on fire risk, both on this project and other projects around the motu. The draft conditions require a construction fire risk management plan (CFRMP) and Emergency Response Plan (ERP) (for both construction and operation) to be developed and approved by FENZ ahead of construction. This would be shared with the KGG for feedback ahead of being shared with MDC for certification at least 30 days prior to construction. FNSF is happy to discuss these concerns further at the March 4 2026 hui and provide further fire risk assessments if concerns remain.

It is unclear from the Applicant's response if the proposal is that water stored for fire-fighting purposes will also be used for irrigation.

The request for information is:

- a) The Applicant is to provide in writing, clarification as to whether or not water stored for fire-fighting purposes will also be used for irrigation?

2.2 Earthworks - Scope and Assessment

The s53 FTAA comments from Canterbury Regional Council (ECan) at para 32 – 34, Page 7 of 98, ECan state;

Earthworks

32. In the RFI response, the Applicant states that works along the access road within Lot 2 DP 470213 would be covered by the regional consents already sought in the substantive application. However, CRC consider these works to be out of scope of the application. This is discussed further below in relation to the scope of the application.

33. The nature and scope of upgrade works along the access road are not entirely clear from the application, and additional consents may be required. This was communicated to the Applicant who has undertaken an assessment against LWRP rules to determine consent requirements.

34. The Applicant provided their assessment to CRC on 17 February 2026. CRC have not had sufficient time prior to the s53 deadline of 19 February 2026 to review this and provide substantive comments back to the Applicant. CRC will provide the applicant with a review of their assessment by 27 February 2026.

As to paragraph 34 of the ECan s53 comments, the Panel is unaware of receiving the assessment by the applicant dated 17 February 2026 or the CRC response to that assessment, which we assume was dated 27 Feb 2026.

In the Applicant's response to the ECan comments, Ms Alkamil 's evidence (dated 26 February 2026 – Attachment 10), Ms Alkamil states at paragraph 47, Page 13;

“47. CRC asserts that works along the access road through Bendrose Farm could not be considered within scope due to procedural requirements in relation to how the site is described and identified, which would require additional landowners to be invited to comment under section 53(2) of the FTAA. I agree with this view and consider the additional works associated with the access road not to be within scope of the Substantive Application. FNSF will progress these arrangements outside of the FTAA process.”

Noting Ms Alkamil's agreement that the access road through the Bendrose Farm is outside the scope of the application, the Panel require further clarification as to whether or not the earthworks that are out of scope applies to both Bendrose properties, Lot 2 DP 470213 and Section 1 SO 43602, given the latter similarly not referred to in the substantive application.

The request for information is:

- a) The Applicant is to provide copies of the assessment by the applicant dated 17 February 2026 to ECan and the ECan response to that assessment?
- b) The Applicant is to provide in writing an explanation as to whether or not Section 1 SO 43602 is outside of the scope as to earthworks?

2.3 Dust Management

The s53 FTAA comments from Mr Allan/Ms Fordyce (Para 4 a. i. Page 3) states

- i. The Dust Management Plan prepared by Williamson Water & Land Advisory (Appendix Y) limits the DMP to the site of the proposed solar farm at Section 3 SO 384036, and excludes the proposed access route over our land;

The Panel observe that the Applicant has not applied for a discharge to air permit.

The request for information is:

- a) The Applicant is to provide in writing, clarification as to which areas the proposal as a whole the Dust Management Plan will apply to, including the identification of legal descriptions and the provision of a plan illustrating those areas?

2.4 Noise

The s53 FTAA comments from Mr Allan/Ms Fordyce (Para 4 a. ii. Page 3) states;

- ii. The Acoustics Memorandum prepared by Marshall Day Acoustics (Appendix R) wrongly assumed the proposed project to be “a considerable distance from nearby dwellings”, and has failed to identify the fact that our Property is located in close proximity to the proposed access route, which forms part of the proposed activity;

The Applicant in response (Submission # Row 20 of Applicant’s Table Issue / Comment # Row 99) identified that they are seeking an alternative route to avoid the need to cross the Allan/Fordyce land.

The Panel observe that the alternative route is still in close proximity to the Allan /Fordyce dwelling and as such the Panel would be assisted by acoustic assessment of the potential effects as to construction traffic.

The request for information is:

- a) The Applicant is to provide an expert acoustic assessment, as to the potential construction noise effects from the proposal in relation to the Allan/Fordyce property?

2.5 Transportation

The s53 FTAA comments from Mr Allan/Ms Fordyce (Para 4 b. i - ii. Page 3) states;

- i. Safety issues arising: For other users of SH8 and the farm track over our land, due to the type and volume of anticipated vehicle movements associated with the construction and operation of the proposed solar farm that would be utilising the proposed access point on SH8, which is in a dangerous location particularly given that access point forms part of the Alps 2 Ocean Cycleway (which is not identified in the Applicant’s technical assessments); and
- ii. For other legitimate users such as ourselves that would be required to share the access track with vehicles associated with the construction and operation of the proposed solar farm.

The request for information is:

- a) The Applicant is to provide an expert traffic assessment, as to the potential implications of the proposal for users of the Alps 2 Ocean Cycleway and other users of shared access track to the solar farm?

2.6 Management Plans and Conditions

The Panel observe that the most recent updated series of ecological management plans, at numerous places, includes reference to targets, standards, and triggers, monitoring and reporting, that should be detailed in the conditions themselves.

Information requested is:

That the set of conditions due for filing on 10 April 2026 (as referenced in Minute #7 for The Point FS) address this matter.

3) Ecology Matters

3.1 Broad assessment of applicant's ecological package

The Panel is concerned as to the adequacy of the ecological effects assessment and proposed effects management framework due to information gaps that create uncertainty regarding whether adverse ecological effects will be adequately avoided, minimised, remedied, or otherwise addressed. In addition, the Panel is of the provisional view that the type and quantum of the proposed effects management are not commensurate with the type and magnitude of adverse effects that need to be addressed. Finally, the Panel observe that a significant amount of additional ecological information has been provided in response to RFIs, with only a partial update as to the assessment of ecological effects from the substantive application. Material issues relate to:

- inadequate survey effort or methods, or inappropriate survey timing, particularly for invertebrates;
- incomplete assessments of ecological effects;
- insufficient detail and justification for several proposed effects management and monitoring measures; and
- an incomplete assessment of biodiversity outcomes for impacted ecological values.

To address these matters, for all nationally threatened or at-risk flora and fauna present or potentially present, provide expert ecological evidence as to:

- a) an assessment of residual effects for each threatened or at-risk species known or likely to be impacted after efforts to avoid, minimise or remedy have been considered, but before application of residual effects management; including;
 - i) addressing the uncertainties arising from limitations in survey effort, particularly for lizards, invertebrates and plants;
 - ii) The expected magnitude of each type of effect is amalgamated into an overall project effect for each species; and
 - iii) The interplay between threat status and the magnitude of effect, to arrive at a transparent overall level of residual effect.

- b) an assessment of expected outcomes after proposed residual effects management measures have been considered including;
- i) The expected biodiversity outcome following residual effects management is stated for each species, in terms of either:
 - no net loss (which requires provision of a disaggregated Biodiversity offset accounting model if this is claimed) and that is consistent with Policy 9.3.1 of the Canterbury Regional Policy Statement, including the methodology and assumptions relied upon; or
 - net positive (where evidence demonstrates that benefits stemming from compensation actions are expected to outweigh impacts); or
 - uncertain – in which it cannot be known at this stage whether net positive or net loss outcomes will occur; or
 - net loss –where net loss is expected, including an assessment of its magnitude (e.g., negligible to very high).
 - ii) An assessment of the proposed residual effects management package against commonly applied offsetting or compensation principles.

3.2 Vegetation and Threatened Plant Assemblages

The Panel acknowledges the additional vegetation survey undertaken, however, noting some of the s53 comments, the Panel's initial position is that the terrace edge survey does not appear to be complete, nor adequately assessed.

The request for information from an expert ecology witness is:

- a) Provide a detailed assessment of the potential indirect effects of project activities on the threatened plant assemblages located along terrace edges adjacent to the site;
- b) Provide an assessment of effects on resurrection lichen that factors in both threat status and the scale of the magnitude of effects. In addition, also provide an assessment of the expected outcomes, after effects management measures have been considered for this species.
- c) What is the ecological rationale for determining the minimum setback from the project footprint/landscape plantings and areas of high value for terrestrial plants; and
- d) Is it proposed that the setback between landscape planting and the boundary will be 10m along the southern and eastern margin?
- e) How dryland species communities will be adaptively managed if monitoring indicates that a decline is evident and likely attributed to the indirect effects of Project activities adjacent to areas with high plant values?
- f) Provide specific details of how the proposed dryland/threatened plant monitoring programme will detect a statistically significant (20%) decline when:
 - Monitoring is limited to include a minimum total of ten 2m x 2m plots (40m² total)

- There is potentially only a single plot replicate for each threatened species.?
- g) Provide specific detailed information on the level of effort applied to the proposed surveys for Maniototo peppercross (*Lepidium solandri*; Threatened - Nationally Critical); and the proposed propagation efforts and associated outcome monitoring for this species?

3.3 Avifauna

In response to RFI #2, the Applicant provided some explanation as to proposed \$1,000,000 compensation Avifauna Compensation Strategy (ACS), how the fund will be allocated, as well as, brief details as to objectives and monitoring. The Panel's initial view is that that this is not in sufficient detail to provide certainty as to implementation and outcome.

The request for information from the applicant is:

- a) What assurance or certainty is there that this funding is ring-fenced to braided river bird conservation and will not be re-allocated to other projects by the Department of Conservation?

The request for information from an expert ecology witness is:

- b) Provide a calculation that the benefits associated with this ACS fund are commensurate with, or ideally outweigh, potential impacts?
- c) Provide specific details as to the conservation actions proposed and how these will address residual adverse effects on avifauna?
- d) Provide specific details as to the ecological outcomes expected?
- e) Provide specific details of the monitoring and adaptive management framework proposed to evaluate the effectiveness of compensatory measures for avifauna?

In addition, resulting from Mr Kessel's report (see Minute #9), further information is sought in relation to avifauna.

3.3.1 Species-Specific Collision Risk Assessment for all Threatened and At-Risk species using or traversing the site

GPS data from DOC and university research demonstrates extensive bird movements over the project site that have not been analysed for collision risk. Without quantitative assessment, it is difficult to evaluate whether effects are minor or potentially more than minor for threatened populations. Existing research demonstrates hundreds of birds traverse the site nightly. The applicant's 12 flight observation surveys captured only 14 birds and missed the core threatened species entirely. Integration of existing datasets is essential to understand actual (not theoretical) collision risk exposure.

The request for information from an expert ecology witness is:

- a) Provide a species-specific collision-risk assessment for all Threatened and At-Risk species using or traversing the site, including:
 - (i) Flight frequency analysis based on available GPS tracking datasets and field observations
 - (ii) Flight height distributions and panel interaction zones
 - (iii) Seasonal and diurnal variation in collision exposure
 - (iv) Species-specific vulnerability factors (body size, flight behaviour, habitat requirements, polarised light sensitivity)
 - (v) Collision probability estimates for:
 - Kakī/black stilt
 - Black-fronted tern
 - Australasian bittern
 - Australasian crested grebe
 - Other waterbird species using the area
 - (vi) Known breeding, roosting, and foraging locations within 5 km

3.3.2 Panel Technology and Design Risk Analysis

Current panel design assumptions lack supporting evidence. Avi-fauna experts recommend vertical night positioning, but the applicant proposes 60-degree. Anti-reflective coatings are proposed without evidence of effectiveness. Panel configuration could significantly influence collision rates but remains unanalysed.

The request for information from an expert ecology witness is:

- a) Provide technical assessment of the proposed solar array configuration including:
 - i) Polarisation and UV reflectance signatures of proposed panels
 - ii) Evidence for efficacy of anti-reflective coatings in reducing bird attraction
 - iii) Comparative collision risk: 60-degree vs vertical night positioning
 - iv) Panel spacing effectiveness (3.8-4.8m gaps) in reducing the hypothetical "lake effect"
 - v) An updated literature review of proven panel technologies that demonstrably reduce bird mortality

3.3.3 Infrastructure Collision and Electrocutation Assessment

Avian mortality at solar installations results from multiple infrastructure types, not just panels. Expert evidence identifies overhead cables, fencing, and buildings as significant collision hazards that remain unassessed (International literature cited by expert witnesses).

The request for information from an expert ecology witness is:

- a) Provide assessment of bird collision and electrocution risks from non-panel infrastructure:
 - i) Perimeter fencing collision risk analysis
 - ii) Substation and inverter collision/electrocution potential
 - iii) Internal road and track collision risk
 - iv) Lighting impacts (construction and operational)
 - v) Building strike risk assessment
 - vi) Mitigation design for all infrastructure types

3.3.4 Monitoring System Technical Specifications

Current monitoring (monthly searches at representative locations) cannot reliably detect single kakī mortality. Expert evidence demonstrates that detecting one bird death in 670 hectares requires validated search methods. Representative sampling risks missing Nationally Critical mortalities. (McClellan paras 165-169, O'Donnell recommendations, international best practice).

The request for information from an expert ecology witness is:

- a) Provide detailed carcass monitoring methodology capable of detecting mortality of Nationally Critical species including:
 - i) Justification for whole-of-site vs representative sampling for kakī detection
 - ii) Use of trained conservation detection dogs
 - iii) Searcher efficiency trial protocols
 - iv) Carcass persistence trial protocols
 - iv) Autopsy requirements and cause-of-death determination
 - v) Panel surface eDNA swabbing for missed carcasses
 - vi) Statistical power analysis for detecting population-level changes

3.3.5 Population-Level Impact Thresholds & Adaptive Management Options

Population viability analysis necessary to determine acceptable risk levels and compensation requirements. Adaptive management requires pre-defined alternatives if initial approaches fail.

The request for information from an expert ecology witness is:

- a) Provide population viability analysis determining:
 - i) Maximum sustainable annual mortality rates for regional kakī population
 - ii) Population consequences of 1-2 adult kakī deaths per year
 - iii) Regional population estimates and trends for black-fronted tern, bittern, crested grebe
 - iv) Mortality thresholds that would trigger population declines for each Threatened and At-Risk species
 - v) Conservation context: relationship to existing conservation investments in the basin
 - vi) Adaptive management triggers and response mechanisms with defined timelines

3.4 Lizards

The Panel note the identified presence of southern grass skink (At Risk – declining) on the site.

The request for information from an expert ecology witness is:

- a) Provide an assessment of effects on southern grass skink (At Risk – declining) including;
 - i) The threat status of this species;
 - ii) The stated data limitations and constraints to the survey;
 - iii) The stated moderate to low densities in most areas of the impact area noting that the site is several km² in size;
 - iv) The recording of moderate densities of this species in habitat assessed as ‘Very Low’ as illustrated in Figures 2 and 3 of the Lizard Management Plan;
 - v) The uncertainties surrounding the success of salvage and relocation and the level of reduction in the severity of effects associated with this species; and

vi) The type and scale of lizard compensation measures proposed relative to impacts.

3.5 Invertebrates

The Panel notes that the Terrestrial Invertebrate Management Plan (TIMP) states, in summary that:

- The surveying undertaken so far at The Point has been qualitative;
- Some suitable habitat for minute and robust grasshopper has been identified and that minute grasshopper may be found in good Otago short-horned grasshopper habitat as their habitat requirements overlap; and
- Habitat requirements of Tekapo ground wētā (*Hemiandrus fabella*) are not well-understood, and they may be found throughout the site.

The Panel further observes that:

- a Research Grade iNaturalist record of minute grasshopper (observer: “longwing”) occurs within the solar panel footprint, dated February 2023; and
- a potential record of *Hemiandrus fabella* (observer: “xenacus”) occurs within 1 km north of the solar footprint in contiguous cropland habitat.

The request for information from an expert ecology witness is:

- a) What is the ecological rationale for establishing a pest exclusion fence in an area where:
 - minute grasshopper and robust grasshopper were not detected; and
 - habitat suitability for robust grasshopper was assessed as low?
- b) How the expected ecological benefits from restoration within the fenced area relate to the potential magnitude of project impacts?
- c) How a precautionary approach has been applied in light of survey limitations and uncertainties?

3.6 Mammalian pest management

The Panel note the Applicant’s further information supplied in relation to pest management fencing as set out in the Pest Mammal Management Plan. Further detail is required.

The request for information from an expert ecology witness is:

- a) Provide specific details as to the design, timing, construction, and long-term maintenance of the proposed pest exclusion fence, including:
 - i) fence specifications;
 - ii) pest exclusion methodology;
 - iii) monitoring and maintenance procedures;
 - iv) Surveillance and incursion response to ensure the area remains free of mice;

- v) Time differential between pest-free status in the fence and invertebrate or lizard salvage and relocation operations; and
- vi) Confirmation that XCluder Fence, the fence contractor stated in the application, is still building.

b) Provide alternative location(s) onsite or offsite for the establishment of a pest exclusion fence where existing ecological values are present and ecological benefits have the potential to achieve net positive outcomes that outweigh residual effects.

c) What is the duration of weed and mammalian pest control stated as 'life of the project'? Is it 35 years from the granting of consent (if granted)? If not, what is it?

d) The Panel note the target of less than 10% RTI for mice and rodents in intensive control zone. Provide evidence that this threshold is sufficient to achieve tangible benefits for invertebrates and lizards?

3.7 Biodiversity outcome monitoring and adaptive management

The Panel's initial view is that there is insufficient detail regarding the proposed biodiversity outcome monitoring programme for flora and fauna. This information is required to better understand the likelihood that ecological effects and the effectiveness of management responses can be determined and appropriately managed.

The request for information from an expert ecology witness is:

- a) Provide additional specific detail regarding the proposed biodiversity outcome monitoring programme for flora and fauna, including:
 - i) monitoring design;
 - ii) sampling replication;
 - iii) monitoring frequency; and
 - iv) statistical power to detect ecological change.

Supply of Information

In accordance with section 67(2) of the Act Far North Solar Farm Limited must:

- a) Provide electronic copies of the information or report requested; or
- b) Advise the EPA, with reasons that you decline to provide the information or report requested.

Accordingly, please provide the requested information to the EPA by **5pm Wednesday 25 March 2026**. If the information is not received by this date, the Panel will proceed on the basis that the request for further information has been declined.

Please note, the information will be provided to the Panel, the applicant and every person who provided comments on the application. The information will also be made available on the Fast-track website.

If you have any questions, please contact Application Lead, Mujahid Musa by email at info@fasttrack.govt.nz

Nāku noa, nā

A handwritten signature in black ink, appearing to read 'Mujahid'.

Mujahid Musa
Application Lead, Fast-track Applications