



Statutory Planning Report

Fast-track Referral Application - Rangitīkei Solar Farm

FRV Services New Zealand Limited

Prepared by:

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Basis of Report

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1.0 Introduction

FRV Services New Zealand Limited (FRV), as the Applicant, have engaged SLR Consulting New Zealand Limited (SLR) to provide planning and environmental services for the Rangitikei Solar Farm (the “project”). SLR have a breadth of experience on a wide range of developments, including renewable and infrastructure projects, under the Resource Management Act 1991 (RMA) and the Fast-track Approvals Act 2024 (FTAA).

This report provides a high-level assessment of the planning related components of the project to support a Referral application under the FTAA.

1.1 FRV

FRV is a global renewable energy solutions provider, with a strong presence in Australia since 2010. As a leading developer, owner, and operator of large-scale solar and storage projects, FRV has a portfolio of 11 projects operating or under construction across Australia and New Zealand. The company is committed to the responsible and long-term development of renewable energy and prioritises building meaningful relationships with local communities.

FRV has a track record of delivering innovative projects in Australia, and in 2025 in a joint venture with Genesis Energy commenced operations of a 63 MWp solar farm (referred to as the Lauriston Solar Farm) on the Canterbury Plains of New Zealand. The joint venture Lauriston Solar Farm covers a 93-hectare site and will power the equivalent of nearly 13,000 homes. The construction of the solar farm created more than 50 jobs and employs up to three full-time staff members.

2.0 Description of Project

FRV propose to construct, operate and maintain, and where necessary decommission, a utility scale solar farm, associated substation and battery energy storage system (BESS), and ancillary activities and infrastructure, including provision for access to the site, to connect and supply electricity to the National Grid near Marton.

2.1 Project summary

FRV proposes to construct, operate, maintain, and, if necessary, decommission a utility scale solar farm with a peak output to the National Grid of approximately 220 MWac on approximately 507 hectares of rural land located on the edge of Marton in the Rangitikei District. The solar farm will comprise of solar arrays installed on a single-axis tracking system or fixed-tilt mounts, inverters and transformers, underground cabling, battery energy storage system (BESS), and a new electricity transmission substation and associated connection to Transpower’s 220 kV overhead transmission lines running through the project site.

The project will have significant regional and national benefits for New Zealanders as it will provide a substantial addition to New Zealand’s renewable energy supply and generate enough electricity to power approximately 57,000 homes. The project will make a positive contribution to New Zealand’s workforce, as over the estimated 18 to 24-month build period, it is projected to support approximately:

- \$69 million in GDP;
- \$35 million in wages and salaries; and
- 435 FTE-years of employment in total.



This is equivalent to an average of approximately 218 to 290 full-time positions sustained at any given time across the construction programme, including all upstream supply-chain employment. Reflecting the typical construction profile for utility-scale solar projects, the on-site workforce is expected to peak at approximately 250 FTE during the 4 to 6-month installation phase.

Once operational, the solar farm would sustain approximately 4 to 6 permanent on-site FTEs, supplemented by contracted services for vegetation management, panel cleaning, electrical testing, and civil maintenance. Including indirect supply-chain effects, ongoing onsite activity is estimated to support approximately:

- 10 FTEs annually;
- \$1.1 million in annual wages and salaries; and
- \$3.0 million in annual GDP.

Ancillary infrastructure such as access, internal roads, roading upgrades (if required), buildings for storage, maintenance and offices, water tanks and security fencing and lighting is proposed. The project also includes landscape planting and ecological enhancement, through proposed screen planting and native riparian planting and pest control and management along watercourses and the project site boundaries.

The proposed development area will comprise some 403 hectares, which excludes non development areas such as boundary setbacks, riparian setbacks, streams, retained areas of vegetation, National Grid corridor and the designation area within the site. The landowners will retain land areas within their respective properties around the existing dwellings, farm buildings, ponds and bush remnants which will comprise a total of some 67.5 hectares. As the leases with the landowners exceeds 35 years the retention of these landowner areas constitutes a subdivision in terms of the RMA.

A summary of the project is provided in **Table 1** below, and indicative development plans of the project are provided in **Appendix B**.

Table 1: Rangitikei Solar Farm Project Summary

Project element	Summary
Addresses	119 and 178 Colemans Road, 206 Tūtaenui Road, 240 Tūtaenui Road and 65 Calico Line
District Council	Rangitikei District Council
Regional Council	Horizons Regional Council
Electricity Generating Works	Construction, operation, maintenance, and where necessary decommissioning, of a some 220 MWAC solar farm over an approximate development area of some 403 hectares, including elements such as: • Solar arrays installed on a single-axis tracking system or fixed-tilt mounts on pile-driven supports. It is anticipated that approximately 300,000 individual monocrystalline photovoltaic panels will be installed within a maximum height envelope of 4.5 metres. • Inverters and transformers and associated external cabling. • Underground cabling. • Provision for construction of some 190 MW BESS (battery energy storage system). • Construction of a new transmission substation and connection to Transpower's 220 kV overhead transmission lines which run through the site.



Project element	Summary
	The proposed development will be delivered as a single-stage construction project comprising the solar farm and all ancillary activities and infrastructure. The BESS is the only component that may be constructed separately, after the solar farm has been established and is operational. No further staging is proposed.
Ancillary Infrastructure	Construction of: - New primary site access from Calico Line and new secondary site access from Colemans Road. - Any necessary (yet to be determined) road or intersection upgrades, which may include widening of Colemans Road, and / or upgrade to the intersection of State Highway 1 / Colemans Road and / or right turn bay on Calico Line. - Temporary construction laydown and yard areas and associated temporary construction buildings and facilities. - Permanent storage and maintenance buildings and site office buildings and associated yard areas. - Water tanks and other fire prevention, management and mitigation measures, as required. - Internal access and maintenance roads and parking areas. - Lighting, fencing and security and monitoring cameras and devices. - Any necessary (yet to be determined) acoustic barriers.
Earthworks	Completion of earthworks required to construct the solar farm and the ancillary infrastructure, including: - Construction of new site accesses. - Completion of road upgrades (as required). - Formation of temporary construction laydown and yard areas. - Formation of internal access roads. - Piling of solar array support posts. - Construction of platforms for inverters and transformers. - Trenching of cables. - Formation of permanent building platforms and yard areas for substation and BESS.
Subdivision	Subdivision to give effect to long-term lease (lease more than 35 years) which at a minimum will result in the creation of new lots over land to be retained by the landowners, and resulting lots containing the solar farm and the associated infrastructure.
Planting	Boundary mitigation planting, riparian planting around streams and wetlands and mid-block mitigation planting around infrastructure.
Construction Duration	Anticipated 18 to 24 months, with an anticipated peak construction period of 4 to 6 months.
Construction Workforce	Approximately 250 FTE during peak construction period.
Operational Hours	24 hours a day, seven days a week.
Operational Workforce	Approximately 4 – 6 FTE.
Operational Duration	Approximately 40 years, unless repowered.
Decommissioning and Rehabilitation	At the end of the operational life of the project, if the solar farm is not repowered, infrastructure would be decommissioned and the site would be rehabilitated to enable resumption of agricultural activities.

PLEASE NOTE: The information in Table 1 may be subject to change over the course of the project, as the design is further progressed.



2.2 Conceptual design

The conceptual design for the project is continuing based on a site values and site constraints approach, having regard to physically and technically practicable outcomes, as well as environmental, social and cultural considerations. Values and constraints on the site including ecological, landscape, flooding, transport, acoustic and mana whenua are being considered, and the conceptual design refined to avoid and minimise adverse effects where practicable. This process will determine which areas of land will be excluded from development for solar arrays and associated infrastructure, and which areas are to be protected and enhanced. This includes setbacks from streams and the Tūtaenui flood management dam and avoidance of the high-risk 0.5% AEP flood areas. The proposal will incorporate riparian enhancement, as well as landscape mitigation. The initial details of the conceptual design are set out on the Indicative Solar Development Plan attached as **Appendix B**.

It is important to note that due to the constant and fast paced nature of solar technology advancements, along with the economics of supply and availability of products, the layout and equipment used in the solar farm will be determined at the detailed design and procurement phase and cannot be specified in detail at the consenting stage.

The proposal is therefore based on the details being an indicative design envelope, particularly in relation to the type and dimensions of solar panels and ancillary equipment, to allow for variations to occur in equipment selection in the final design.

An overview of the key infrastructure and ancillary buildings proposed for the solar farm that will form the basis of this design envelope is detailed below.

2.3 Solar arrays

The solar arrays will consist of monocrystalline photovoltaic solar panels. The number of panels has not yet been finalised but will be in the order of approximately 300,000 (more or less). The solar panels will most likely be installed on a single-axis tracking system running north to south, supported by piles. The tracking system will allow the panels to track the sun's movement over the course of the day, starting by facing east at an inclination of approximately 60 degrees from horizontal, gradually tilting to be approximately 60 degrees from horizontal facing west at the end of the day.

The alternative of fixed-tilt mounts on pile-drive supports could be used for the site or part of the site. The layout and mounting approach for the solar panels will be confirmed as the conceptual design is developed. The final constructed layout will be optimised during detailed design.

The panel rows are expected to be separated by around 2m - 6m (or more if fixed-tilt mounts are used) to enable maintenance access and prevent shading. The actual separation distance will depend on final layout and design and may vary with geotechnical and technological constraints. At maximum tilt (60 degrees) the maximum height of the panel will be up to 4.5m above ground level depending on the details of final design and the lowest point around 0.6m above ground level.

Whilst the grazing of cattle and any other larger stock would cease in the project area, the development would support sheep grazing under and around the solar panels, subject to feasibility assessments. Sheep farming and solar farming are complementary activities, in that the solar panels provide shade for sheep, do not disrupt pasture growth and are set high enough above the ground to avoid interference by the stock. Sheep also provide control of pasture and reduce the need for mowing / spraying around and between solar panels. Many



of FRV's other solar farms around the world have sheep grazing within them, including New Zealand's largest solar farm in Lauriston, Canterbury.

Figure 1: Example images of solar arrays (Lauriston Solar Farm)



Figure 2: Representative example of a single axis tracker solar panel array



2.4 Inverters

The proposal will either utilise string inverters or central inverters. Inverters are used to convert electricity generated by solar panels from Direct Current (DC) to the usable Alternating Current (AC). A final decision on the technology and arrangement will be made during detailed design, to ensure that the most appropriate and up-to-date technology is selected.

Central inverters are large inverter units, which gather energy from many solar modules. Central inverters are similar in size and shape to a shipping container (approximately 6m (l) x 3m (w) x 2.4m (h)). Central inverters would be located throughout the site placed on gravel hardstand with concrete plinth foundations to support their weight. The inverters have an intelligent cooling system incorporated into them.

String inverters collect energy from a much smaller number of modules and are generally installed at the end of the panel rows. The power from these string inverter units feed through Smart Transformer Stations (STS units). These STS units are similar in size and appearance to the Central inverters and would be located throughout the farm in the same way.

Figure 3: Representative example of a central inverter unit



Figure 4: Representative example of a Smart Transformer Station (STS) unit



Figure 5: Representative example of String Inverters



2.5 Cabling

It is anticipated that string cabling would be used at the rear of the panels to link the rows of panels together. These cables would then be diverted into trenches, running perpendicular along the end of each row, carrying electricity to the inverters. Underground cabling would also link the inverters to the BESS and substation. The cable trenches will likely range in size from 300mm wide to 1.3m wide and range in depth from 0.4m to 1.0m.

2.6 Substation

A new substation is proposed to be located centrally within the site adjacent to the existing 220kV National Grid transmission lines that pass through the site. The indicative location is shown on the Indicative Solar Development Plan. The proposed substation would house 33kV switchgear, metering, protection and communication infrastructure and auxiliary equipment. The substation will likely be located within its own separate new lot so that the substation can be owned and operated by Transpower. The land on which the substation is located will be elevated above the flood levels on a compacted aggregate hard stand area if deemed required by FRV engineers.

The substation components would generally be under 6m in height, with gantries of approximately 23m in height. The substation and National Grid connection design and layout will be developed in consultation with Transpower.

The key components of substation and grid connection are;

- Most components would be under 6m - 7m in height.
- The gantry / gantries would be up to 23m in height (to match the height of the existing lines).
- The substation will contain a 220kVa and 33MVA Transformer (110KV).

Figure 6: Example of a new substation for a solar farm connection (Walla Walla Substation, Australia)



2.7 Battery Energy Storage System (BESS)

The proposal includes provision for a BESS with a capacity of up to 190MW which may be constructed after the solar farm has been constructed and is operating. The BESS would be located on a compacted aggregate hardstand area adjacent to the substation.

The number and layout of the battery modules will depend on the technology chosen and confirmed during detailed design of the BESS. It is estimated that the BESS would contain approximately 150 individual battery units and 60 Medium Voltage Power Stations (MVPS), both having a similar appearance to a shipping container. The BESS would utilise either lithium-ion or lithium iron phosphate batteries with inbuilt automatic cooling systems and multi-level fire protection and aerosol suppression systems.

Figure 7: Representative example of a BESS next to a substation



2.8 Ancillary buildings

The project will include operation and maintenance (O&M) buildings for staff and equipment and storage buildings for replacement parts and other equipment located within a metalled yard area. These buildings will most likely be located central to the site adjacent to the substation and BESS. The buildings would likely be similar to metal farm sheds and will likely have a maximum height of some 7m – 8m.

2.9 Vehicle access, parking, loading and manoeuvring

It is anticipated that at least two new vehicle access points will be formed to the site. These new vehicle access points will be from Calico Line and Colemans Road. Relatively substantial upgrades of Colemans Road and the intersection of State Highway 1 (SH1) and Colemans Road would be required to facilitate construction access. Therefore, the primary site access will be from Calico Line (an existing heavy vehicle bypass route) with the possible provision of a secondary site access from Colemans Road.



To facilitate safe access to the site (primarily for construction) road upgrades within the legal road reserve areas of State Highway 1 and / or Colemans Road and / or Calico Line may be necessary. The anticipated possible road and intersection upgrades may include:

- Right turn bay on Calico Line, and / or
- Widening of Colemans Road, and / or
- Upgrade to the intersection of State Highway 1 / Colemans Road.

A metalled yard area sufficient for staff parking and loading will be provided adjacent to the operations and maintenance buildings. This area will provide sufficient space for parking and manoeuvring for the anticipated 4 - 6 operational long-term staff.

Compacted aggregate access tracks will be created throughout the solar farm. These tracks will provide access around the solar farm for operation and maintenance purposes. These tracks will be located over existing farm tracks where compatible with the final layout. It is possible that new culverts will be required to facilitate access over the watercourses located within the site. Tracks within the site will be between 3m and 6m in width.

2.10 Hazardous substances

Components of the project include the use and storage of hazardous substances such as oil in transformers and inverters, lithium-ion batteries and Ethyl Glycol coolant in batteries.

The components of the solar farm that will utilise these substances are standard equipment manufactured to strict industry standards to ensure oil and other substances are able to be safely contained. Transformers include specifically designed bunds incorporated into their design.

3.0 Site Context

3.1 Site description

In accordance with section 13(4)(d) of the FTAA, the below section provides a description of the site and its surrounding context.

The wider site encompasses approximately 507 hectares of land across four rural properties held in multiple titles situated on the north eastern fringe of Marton (refer to Figure 8 below for site location).

The site is bound by Tūtaenui Road to the west and Calico Line to the south, and the western end of Colemans Road to the north. Both Calico Line and Colemans Road connect to State Highway 1 (SH1), which is located to the east of the site. The site is located on flat rural land to the north-east of Marton. The land currently comprises various operational farms used for both cropping and grazing and associated dwellings, and has the 220kV National Grid pylons and transmission lines traversing through the site in a generally north-west to south-eastern direction.

Buildings are present within the site, including dwellings, ancillary buildings and farm sheds, which are generally clustered around the dwellings. Other rural structures associated with rural operations, such as smaller farm sheds, fencing and water troughs are situated throughout the site.

The site sits on a plateau west of the Rangitikei River. It is relatively flat with a gentle fall from north to south. The highest point is at the north-eastern boundary at 190m, falling to 165m at the south-western boundary. There are small undulations across the site forming natural drainage channels. The site is dominated by cropping and dry stock grazing.

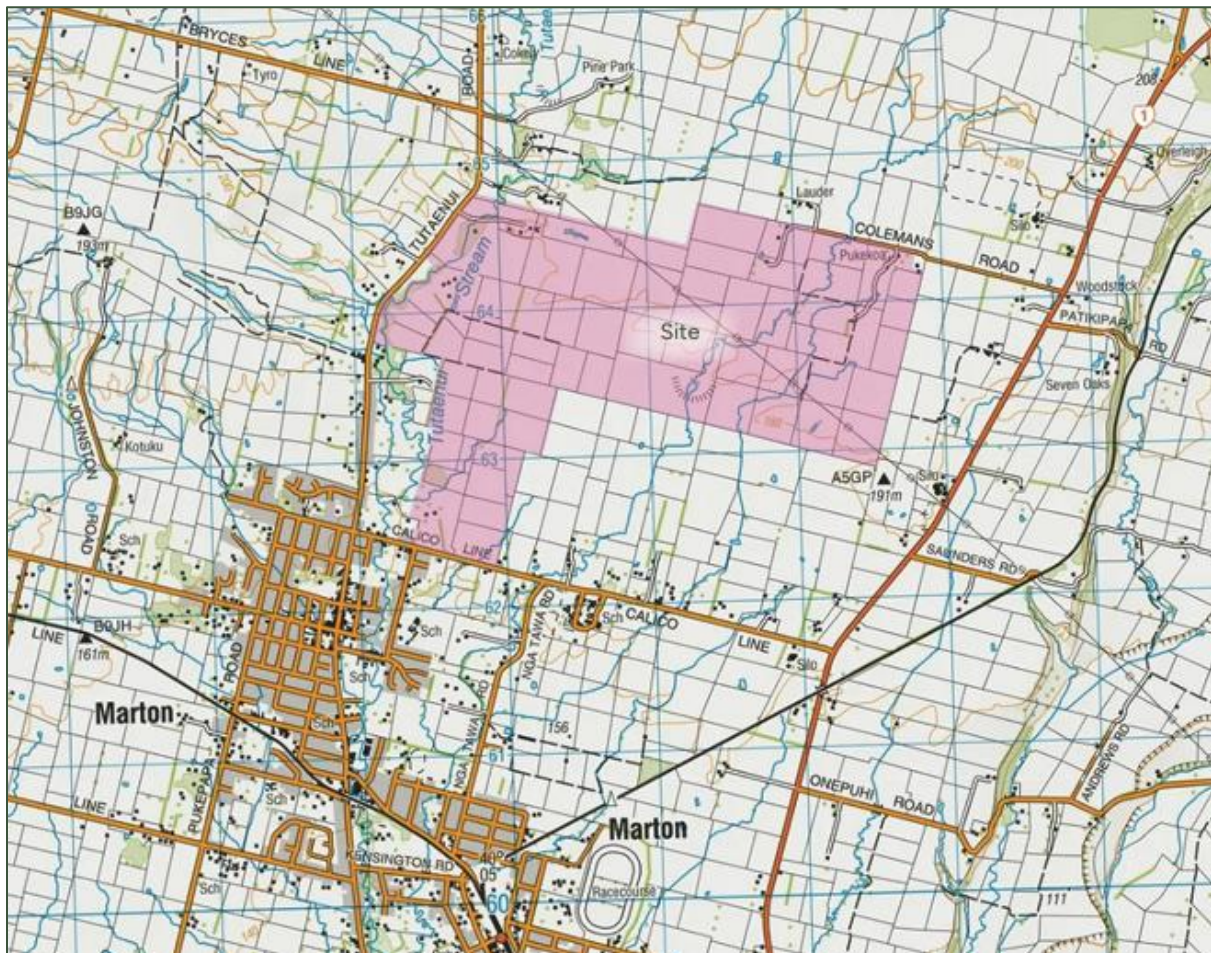


Historically, the site has been subject to extensive drainage activities, with most small gullies and swales now containing tile drainage.

The Tūtaenui Stream flows through the site in a more or less north to south direction, near to the western boundary of the site, with the Foley Stream flowing through the middle of the site, also in a southerly direction. The stream's tributary channels appear to be ephemeral or intermittent, meaning they only flow in direct response to rainfall, or cease to flow for some periods over the course of a year. The soils have poor drainage so often result in boggy muddy paddocks following wet periods.

The vegetation within the site comprises exotic pasture grass cover, crops, exotic shelterbelts, exotic shrubland, native bush and mixed exotic / native trees. There are also a small number of individual cabbage trees scattered through the site. Riparian vegetation is largely absent along the Foley Stream, with only small areas of shading vegetation, primarily comprising of exotic tree species. The Tūtaenui Stream supports larger areas of well-established trees, particularly in the north western corner of the site, which is dominated by a variety of native species.

Figure 8: Location Map



Wetland habitat comprising a variety of obligate wetland and facultative wetland herbaceous species are scattered throughout the site, primarily within the low points, likely associated with blocked or poorly performing tile drains. Thirteen natural inland wetlands have been identified within the site. All but one of these wetlands are dominated by exotic species, are



highly degraded and of overall low quality. There are nine artificial ponds located within the site used for water abstraction and / or for duck shooting.

The Tūtaenui Stream poses a flood risk to Marton. The Tūtaenui Catchment Control Scheme (TCCS) was established in 1976 (completed in 1985) to control flooding and manage the stream channels within the catchment. The scheme currently consists of eighteen detention dams, stopbanks, grade control structures, a spillway and drainage channels. Detention dam E4 is located within the site along the Foley Stream.

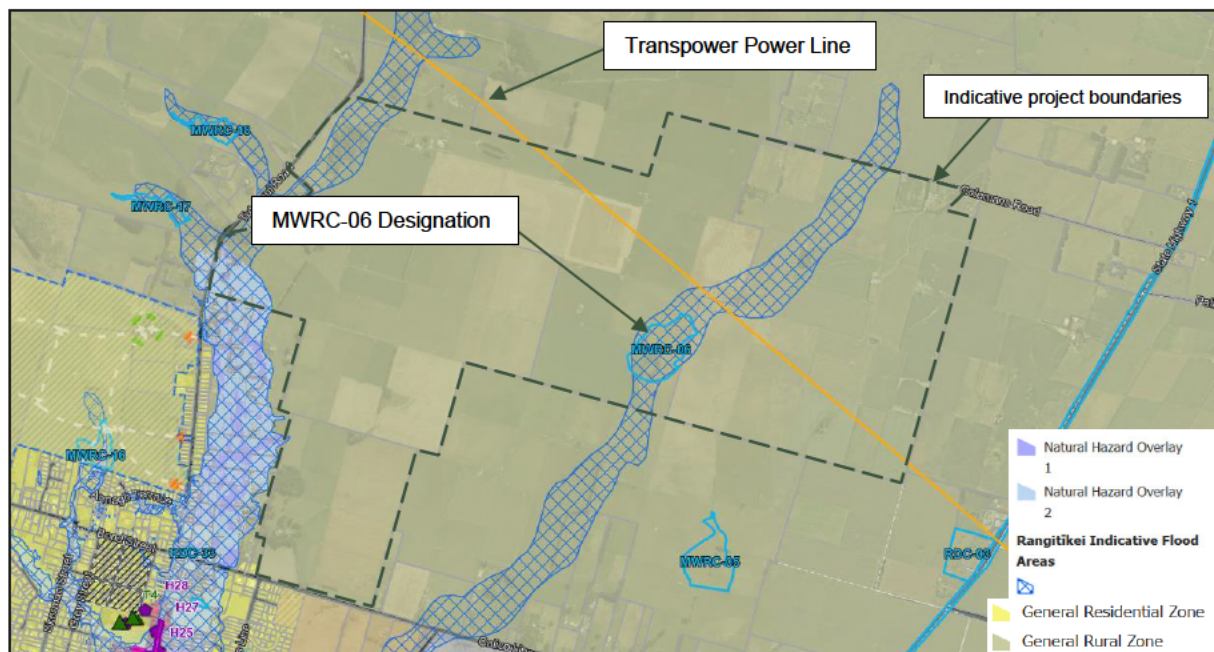
The site comprises Land Use Capability (LUC) Class 3 soils in terms of the Landcare Research New Zealand Soil Classification System. The soil is identified as Pallic, typified by weak structure and high-density subsurface horizons (Manaaki Whenua Landcare Research, 2023). The soil is characterised as having poor drainage through clay soils / Marton silt loam. The site has low erosion susceptibility.

3.1.1 District Plan Context

The site is zoned General Rural under the Rangitikei District Plan (RDP) and is subject to the following overlays and notations (refer below planning map extract):

- Designation: Manawātū-Wanganui Regional Council Designation relating to the Tūtaenui Dam E4 (reference number: MWRC-06).
- Hazard and Risks Overlays:
 - Indicative Flood Hazard
 - Natural Hazard Overlay 1
 - Natural Hazard Overlay 2.
- Feature: Transpower Power Line (220kV).

Figure 9: Rangitikei District Plan zoning, overlays and notation map



The General Rural Zone is characterised as being predominantly for primary production activities and those activities that support primary production activities (including associated



rural industry and activities that require a rural location). As depicted in **Figure 9** above, the site is near the northern fringe of Marton's General Residential Zone.

Designation MWRC-06 relates to the Tūtaenui Dam E4 and which forms part of the TCCS that is aimed at providing flood protection to land near Marton. The designation will be unaffected by the project (no development will be undertaken within the designation).

There are various hazard and risk overlays over parts of the site, which relate to the Tūtaenui and Foley Streams that traverse through the site. These are summarised below:

- Indicative Flood Overlay identifies areas potentially affected by flooding.
- Natural Hazard Overlay 1 identifies land that is at high risk of inundation from flood events with a 0.5% AEP (1 in 200 years) event where flood waters will be deeper than 0.5m above ground level (with a maximum water velocity of greater than 1.0m/s excluding freeboard).
- Natural Hazard Overlay 2 identifies land that is at high risk of inundation from flood events with a 0.5% AEP (1 in 200 years) event where flood waters will be no deeper than 0.5m above ground level (with a maximum water velocity of greater than 1.0m/s excluding freeboard).

3.1.2 Regional Plan Context

The site is situated within the Manawatū Region, and is located in the Coastal Rangitikei Surface Water Management Zone (sub-zone Tūtaenui), Rangitikei Groundwater Management Zone and the Coastal Rangitikei Target Water Management Subarea under the Horizons Regional One Plan (One Plan). The site has Flood Control Drainage values associated with the watercourse which traverses through the western portion of the site, and has a lowland mixed life supporting capacity which covers the entire site.

3.1.3 Records of Title

The addresses, legal descriptions and landowner details for the properties within project site are provided below:

- **240 Tūtaenui Road** - Lot 2 DP 3350 and Lot 2 DP 87115 (RoT WN52C/886), Lot 1 DP 87829 (RoT WN55B/290) and Lot 1 DP 3391 (RoT WN238/290) – s 9(2)(a)
- **119 and 178 Colemans Road** - Lot 2 DP 87829 (RoT WN55B/291), Lot 2 DP 500699 (RoT 745484), Lot 1 A 2030 (RoT WN159/209) and Lot 2 A 2030 (RoT WN148/95) – s 9(2)(a)
- **206 Tūtaenui Road** - Part Block XXXVII Rangitikei District and Lot 1 DP 69932 (RoT WN37B/456) – s 9(2)(a)
- **65 Calico Line** - Part Application Plan 312 (RoT WN24A/227) – s 9(2)(a)



Figure 10: Properties within the site



Copies of the record of titles are provided in **Appendix C**. These records of title are subject to several interests, which are not expected to affect the ability for the project to be implemented.

FRV have secured Agreement to Lease with all landowners to enable the establishment and operation of the project, including the associated subdivision resulting from the long-term lease arrangement of the land.

The landowners for the properties within the development area have signed an Agreement to Lease which includes the negotiated and agreed terms of a Deed of Lease to be entered into should all pre-conditions be met to the sole satisfaction of FRV.

All commercial and legal terms of the Agreement to Lease are confidential and commercially sensitive.

The Agreement to Lease provides FRV, among other things, rights of access to the property to undertake preliminary works prior to construction. It also grants FRV with an option to lease the land on the agreed Deed of Lease terms.

3.1.4 Legal Interests

The existing legal interests registered on the properties within the development area and any possible implications to the project are summarised below.



Table 2: Legal Interests

Title	Landowner Details	Instrument Number	Instrument Description	Type	Comment
745484	s 9(2)(a)	9252409.6	Mortgage to Bank of NZ	Mortgage	Not reviewed, assume standard registered bank mortgage – FRV confirmed Mortgagee Consent provided for entry into Agreement to Lease.
		9267926.1	Mortgage to Charles McRae Simpson and to Jill Elizabeth Simpson in Shares	Mortgage (personal)	Private mortgage - on standard Memorandum 2007/4237 terms with amendments relating to interest rate changes and repayment terms only. Requirement for Mortgagee consent to Lease.
		13378828.1	Caveat by FRV Services New Zealand Ltd	FRV Caveat	To protect interest provided by Agreement to Lease.
WN55B/291	s 9(2)(a)	5069983.2	Appurtenant hereto is a right of way	Appurtenant Right	Beneficial memorial – land has an appurtenant right of way over adjoining land; provides legal access and does not burden this specific property.
		11579039.4	Mortgage to Bank of New Zealand	Mortgage	Not reviewed, however assume standard registered bank mortgage – FRV confirmed Mortgagee Consent provided for entry into Agreement to Lease.
		13378828.1	Caveat by FRV Services New Zealand Ltd	FRV Caveat	To protect interest provided by Agreement to Lease.
WN148/95	s 9(2)(a)	9252409.6	Mortgage to Bank of New Zealand	Mortgage	Not reviewed, assume standard registered bank mortgage– FRV confirmed Mortgagee Consent provided for entry into Agreement to Lease.
		9267926.1	Mortgage to Charles McRae	Mortgage (personal)	Private mortgage - on standard Memorandum 2007/4237 terms with



Title	Landowner Details	Instrument Number	Instrument Description	Type	Comment
			Simpson and to Jill Elizabeth Simpson in Shares		amendments relating to interest rate changes and repayment terms only. Requirement for Mortgagee consent to Lease.
		13378828.1	Caveat by FRV Services New Zealand Ltd	FRV Caveat	To protect interest provided by Agreement to Lease.
WN159/209	s 9(2)(a)	9252409.6	Mortgage to Bank of New Zealand	Mortgage	Not reviewed, assume standard registered bank mortgage – FRV confirmed Mortgagee Consent provided for entry into Agreement to Lease.
		9267926.1	Mortgage to Charles McRae Simpson and to Jill Elizabeth Simpson in Shares	Mortgage (personal)	Private mortgage - on standard Memorandum 2007/4237 terms with amendments relating to interest rate changes and repayment terms only. Requirement for Mortgagee consent to Lease.
		13378828.1	Caveat by FRV Services New Zealand Ltd	FRV Caveat	To protect interest provided by Agreement to Lease.
WN24A/227	s 9(2)(a)	B837956.3	Mortgage to Andrew Cressett Corser	Mortgage (personal)	Document not available on LandOnline or reviewed - mortgagee is one of the landowners. FRV to advise if requirement for Mortgagee consent to Lease.
		13511361.1	Caveat by FRV Services NZ Ltd	FRV Caveat	Not reviewed.
WN37B/456	s 9(2)(a)	7847994.4	Mortgage to ANZ National Bank Ltd	Mortgage	Not reviewed, however assume standard registered bank mortgage – FRV confirmed Mortgagee Consent provided for entry into Agreement to Lease.



Title	Landowner Details	Instrument Number	Instrument Description	Type	Comment
		13378828.2	Caveat by FRV Services New Zealand Ltd	FRV Caveat	To protect interest provided by Agreement to Lease
WN52C/886	s 9(2)(a)	s241(2)	Subject to s241(2) Resource Management Act 1991	s241(2) RMA	Statutory memorial only – land subject to s241(2) RMA (enforcement orders capable of registration); does not impose land-use restrictions or constrain development unless an Environment Court enforcement order is made and registered.
		11169894.3	Mortgage to ANZ Bank NZ Ltd	Mortgage	Not reviewed, assume standard registered bank mortgage – FRV confirmed Mortgagee Consent provided for entry into Agreement to Lease.
		13378828.3	Caveat by FRV Services New Zealand Ltd	FRV Caveat	To protect interest provided by Agreement to Lease.
WN55B/290	s 9(2)(a)	5069983.2	Subject to a right of way over part marked A on DP 87829	Easement	Easement Certificate (DP 87829) creating a perpetual right of way over Lot 1 DP 87829 in favour of Lot 2 DP 87829; ROW allows pedestrian, vehicle and machinery access for all purposes connected with dominant land use; no restrictions on land use or structures beyond requirement not to obstruct the ROW and to share formation and maintenance costs—potential physical layout constraint only.
		5069997.2	Subject to an electricity supply right over part marked D on DP 90381	Easement	Easement Certificate (DP 90381) creating reciprocal rights of way, electricity supply and water supply easements between Lots 1 & 2 DP 90381 (and electricity supply benefiting Lot 1



Title	Landowner Details	Instrument Number	Instrument Description	Type	Comment
					DP 87829); perpetual easements allowing vehicle access and underground services in defined corridors; no land-use or building prohibitions, but solar layout must avoid obstructing ROWs or service easements and allow ongoing access and maintenance.
		11169894.3	Mortgage to ANZ Bank NZ Ltd	Mortgage	Not reviewed, assume standard registered bank mortgage – FRV confirmed Mortgagee Consent provided for entry into Agreement to Lease.
		13378828.3	Caveat by FRV Services New Zealand Ltd	FRV Caveat	To protect interest provided by Agreement to Lease
WN238/290	s 9(2)(a)	11169894.3	Mortgage to Bank of New Zealand	Mortgage	Not reviewed, assume standard registered bank mortgage– FRV confirmed Mortgagee Consent provided for entry into Agreement to Lease.
		13378828.3	Caveat by FRV Services New Zealand Ltd	FRV Caveat	To protect interest provided by Agreement to Lease.

3.2 Existing resource consents applying to the land

Based on a review of the property files for the site provided by the Rangitikei District Council, there are no active or unimplemented district consents applying to the site. In terms of regional consents, the following apply to the land:

- Land use consent (106064) and discharge permit (106065): Region wide consent for Transpower New Zealand Limited transmission tower maintenance and access. The resource consent expires on 1 July 2027.
- Discharge permit (106388): Region wide consent for Transpower New Zealand Limited to undertake wet abrasive blasting on transmission towers. The resource consent expires on 1 July 2047.



The above information has been provided by the Horizons Regional Council. Their records show that there is a regional consent applying to the site, which relates to the construction of the detention dam embankment from 1978. It is believed that this resource consent relates to the Tūtaenui Dam E4 situated on Lot 1 DP 3391.

None of the above resource consents affect the ability to implement the project, and there are no competing resource consents applying to the land to which the project is proposed.

3.3 Surrounding environment

The surrounding environment is located within a predominantly rural landscape with an established mix of pastoral land uses on the north-eastern edge of Marton. Marton is a small rural service town located in the Rangitikei District of the Manawātū-Whanganui Region, approximately 40 kilometres northwest of Palmerston North. The township serves as a local service and residential centre for the surrounding predominantly rural and agricultural area and had an approximate population of just over 1,000 residents at the 2023 census. The North Island Main Trunk railway cuts through the centre of the town and the town is located on the western periphery of State Highway 1, both of which contribute to the towns historic and ongoing role as a transport and rural service hub.

The surrounding topography is characterised by generally flat to gently undulating terrain with a gradual fall from north to south. Localised variations in topography occur to the north-west, where the land rises slightly, while to the east the land slopes down toward State Highway 1.

The surrounding environment primarily comprises of pastoral farmland interspersed with shelterbelts, mature exotic and native trees, and scattered rural dwellings set within spacious allotments. Electricity transmission infrastructure is a notable feature within the wider landscape, with pylons traversing the area and reinforcing the established infrastructure context.

To the north and east, the landscape retains a strong rural character, with large open paddocks and low-density rural-residential development. To the south, pastoral land extends to Calico Line, with scattered dwellings and established planting, as well as the Nga Tawa Diocesan School set within a landscaped setting.

To the west and south-west, the character transitions toward the edge of the Marton township, with a greater concentration of residential development, including dwellings along Tūtaenui Road and Calico Line. These properties are generally separated from the site by distance, vegetation, or landform, with mature trees and shelterbelts contributing to visual screening. The Tūtaenui Stream forms part of the western boundary and is characterised by a vegetated riparian corridor.

There are four public water bores adjacent to the site to the north-west and south-east of the boundary. Three of the four bores have recorded depths of between 11m and 20m. The fourth is a deeper bore at 96m.

There have been two other solar farms consented within the south-western fringe of Marton, approximately 5 km south of the project location, as follows:

- Harmony Energy Solar Farm (Marton): 120 ha solar farm located at 417 Pukepapa Road and 196, 198 and 122 Whales Line. The solar farm was approved by an expert panel through the Covid-19 Recovery (Fast Track Consenting) Act 2020. The solar farm has capacity to generate electricity for approximately 15,000 homes annually.



- Far North Solar Farm (Marton): 37 ha solar farm located at 326 Whales Line. The solar farm has capacity to generate electricity for approximately 5,700 homes annually.

3.4 Treaty settlements applying to the project area

Section 7(1)(a) of the FTAA requires all persons performing and exercising functions, powers, and duties under the FTAA to act in a manner that is consistent with the obligations arising under existing Treaty settlements.

FRV has been engaging with Te Rūnanga o Ngā Wairiki Ngāti Apa about the project. Te Rūnanga o Ngā Wairiki Ngāti Apa has advised FRV that they are the only iwi authority and hapū and Treaty settlement entities for the project. In addition, Rangitikei District Council (Fran Pere – Mana Whenua Strategic Adviser) has advised FRV that they are “engaged with the right iwi representatives”. This has guided FRV’s consideration of the Treaty settlements.

3.4.1 Ngāti Apa (North Island) Claims Settlement Act 2010

The Ngāti Apa (North Island) Claims Settlement Act 2010 (NACSA) provides formal acknowledgement of the Crown’s past breaches of the Treaty of Waitangi. It provides cultural and financial and commercial redress, seeks to restore relationships between Ngāti Apa and the Crown, and achieves a full and final legal settlement of historical claims by Ngāti Apa (North Island). The NACSA delivers cultural redress through statutory acknowledgements and protocols which seek to restore Ngāti Apa’s connection to their traditional lands, alongside financial and commercial redress to support economic development.

This NACSA is relevant to the application site as it relates to the Crown’s acknowledgement of the statement of association made by Ngāti Apa (North Island) of their cultural, spiritual, historical, and traditional association with the Rangitikei River including the Tūtaenui Stream which is a tributary of the Rangitikei River.

In regard to resource consent applications, the provision of the NACSA require consent authorities to have regard to the statutory areas within the statutory acknowledgement, in deciding under section 95E of the RMA, whether the trustees of Te Rūnanga o Ngā Wairiki Ngāti Apa are affected persons in relation to an activity within, adjacent to, or directly affecting the statutory area for which an application for resource consent has been made.

This NACSA is considered relevant to the project area as the project site is situated within the area of interest to Te Rūnanga o Ngā Wairiki Ngāti Apa, and the Tūtaenui Stream traverses through the western edge of the project area and is a tributary catchment of the Rangitikei River.

3.4.2 Rangitāne o Manawatu Claims Settlement Act 2016

The Rangitāne o Manawatu Claims Settlement Act 2016 (RMCSA) is grounded in acknowledging the Crown’s historical breaches of the Treaty of Waitangi. It provides cultural and financial and commercial redress, seeks to restore relationships between Rangitāne o Manawatu and the Crown, and achieves a full and final legal settlement of historical claims made by Rangitāne o Manawatu. The RMCSA delivers cultural redress through statutory acknowledgements and protocols which seek to restore Rangitāne o Manawatu’s connection to their traditional lands, alongside financial and commercial redress to support economic development.

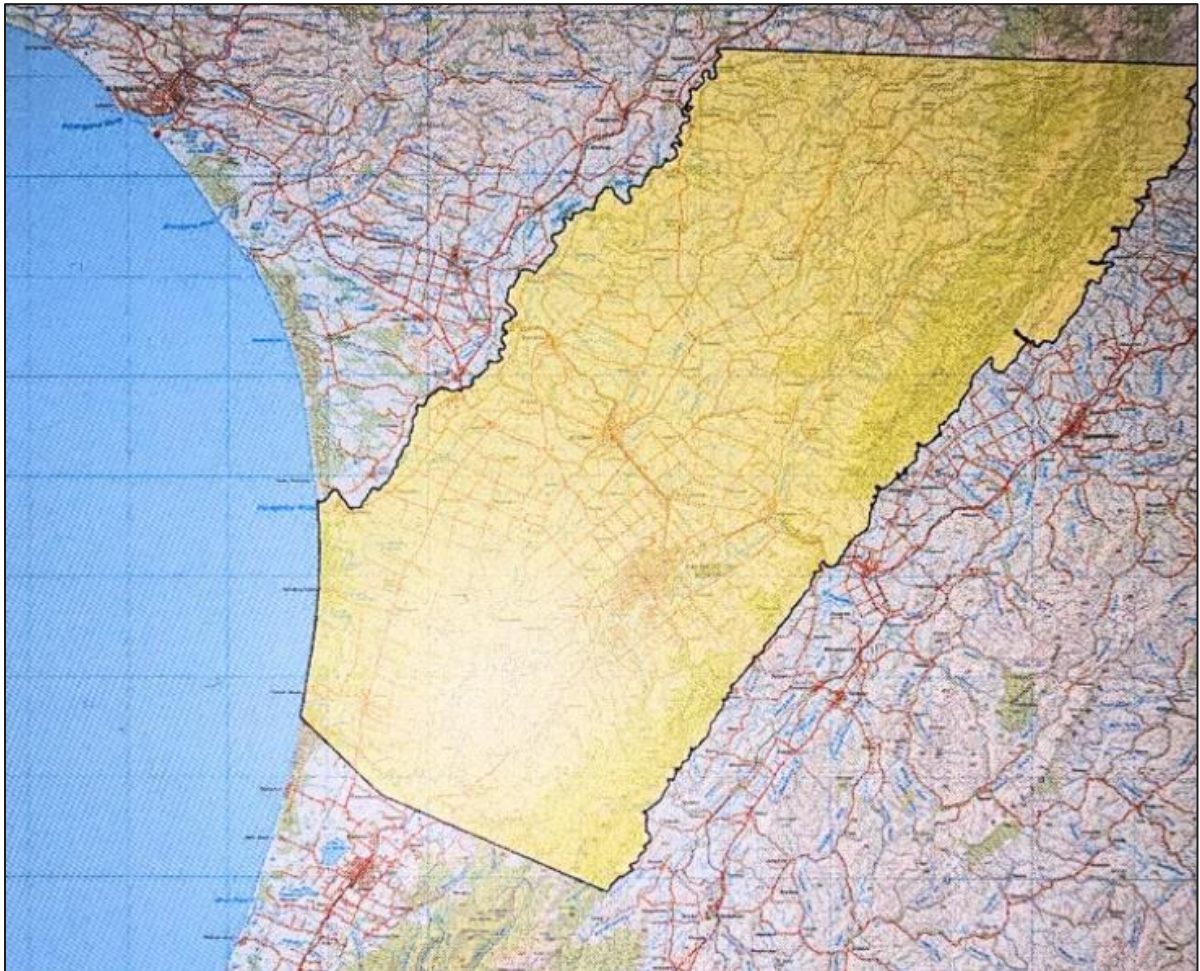
The RMCSA identifies that the Rangitāne o Manawatu have a statutory acknowledgement to the Rangitikei River and identifies the boundary of the area of interest of Rangitāne o



Manawatu as running along the banks of the Rangitikei River (see below map for extent of area of interest in yellow).

Given that the area of interest does not include Marton or the project site, it is considered that the NMCSA is not relevant to the project. This is consistent with the advice of Te Rūnanga o Ngā Wairiki Ngāti Apa provided through initial engagement that they are the only iwi authorities and hapū and Treaty settlement entity for the project. Rangitikei District Council (Fran Pere – Mana Whenua Strategic Adviser) has also advised FRV that they are “engaged with the right iwi representatives”.

Figure 11: Map identifying area of interest of Rangitāne o Manawatu



4.0 Proposed Approvals Required

In accordance with sections 13(2)(d), 13(3) and 13(4)(t) of the FTAA, the below sets out the likely approvals required under the Resource Management Act 1991 (RMA), and other potential approvals to enable the project.

4.1 Resource Management Act 1991

The project would otherwise require resource consents to be applied for under sections 88, 104, 104B and 241 of the RMA. A list of the likely resource consents required is provided below, and it is noted that these requirements will be finalised through the FTAA substantive application process, should the project be referred.



No prohibited activities are required to be sought for the project.

4.1.1 Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011

The following resource consents may be required:

- Soil disturbance of 'piece of land' with no detailed site investigation provided that may not comply with the following permitted activity standards – **Discretionary Activity** (Regulation 11):
 - The volume of the disturbance of the soil of the piece of land may be more than 25 m³ per 500 m²;
 - The volume of soil to be taken away from the site per year may exceed 5 m³ per 500 m²;
 - The duration of the activity may be longer than 2 months.
- Subdividing a piece of land with no detailed site investigation provided – **Discretionary Activity** (Regulation 11).

4.1.2 Resource Management (National Environmental Standards for Freshwater) Regulations 2020

The following resource consents may be required:

- Vegetation clearance within, or within a 10 m setback from, a natural inland wetland for the purpose of constructing specified infrastructure – **Discretionary Activity** (Regulation 45).
- Earthworks or land disturbance within, or within a 10 m setback from, a natural inland wetland for the purpose of constructing specified infrastructure - **Discretionary Activity** (Regulation 45).
- Earthworks or land disturbance outside a 10 m, but within a 100 m, setback from a natural inland wetland for the purpose of constructing specified infrastructure that results, or is likely to result, in the complete or partial drainage of all or part of a natural inland wetland - **Discretionary Activity** (Regulation 45).
- The taking, use, damming, or diversion of water within, or within a 100 m setback from, a natural inland wetland for the purpose of constructing specified infrastructure that changes, or is likely to change, the water level range or hydrological function of the wetland - **Discretionary Activity** (Regulation 45).
- The discharge of water into water within, or within a 100 m setback from, a natural inland wetland for the purpose of constructing specified infrastructure where the discharge enters the wetland and changes, or is likely to change, the water level range or hydrological function of the wetland - **Discretionary Activity** (Regulation 45).



4.1.3 Horizons One Plan

The following regional level resource consents may be required:

- Large-scale land disturbance exceeding an area of 2,500m² per property per 12-month period which does not comply with the following standards
 - **Discretionary Activity** (Rule LF-LAND-R8):
 - Land disturbance within 5m of a permanently flowing bed of a river or not permanently flowing bed of a river that has an active bed width greater than 5m (LF-LAND-R6);
 - Vegetation clearance within 5m of a permanently flowing bed of a river or not permanently flowing bed of a river that has an active bed width greater than 5m (LF-LAND-R5).
- Discharge of clean fill material which does not meet the following standards
 - **Discretionary Activity** (Rule LF-LW-R38):
 - Rate of cleanfill material discharge exceeding a volume of 2,500m³ per property per 12-month period (LF-LW-R29);
 - Cleanfill material discharged within land exceeding a slope of 20 degrees (LF-LW-R29).
- Discharges of stormwater to surface water or land which do not comply with the following standards – **Restricted Discretionary Activity** (Rule LF-LW-27):
 - Industrial or trade premises (substation and / or BESS) where hazardous substances stored or used may be entrained by the stormwater (LF-LW-R26(1));
 - New hardstand areas due to being discharges from contaminated land and discharges that may cause flooding or overland flow to natural water bodies in storms less than a 10% AEP flood event (LF-LW-R26(5)).
- Works in, on, under or adjacent to a river or artificial watercourse with a RP-SCHED2 Value of Flood Control and Drainage (Tūtaenui Stream) – **Discretionary Activity** (LF-AWBD-R68).

4.1.4 Rangitikei District Plan

The following district level resource consents may be required:

- Construction and operation of substation and associated overhead lines conveying electricity greater than 110 kV – **Restricted Discretionary Activity** (Rule NR-R1).
- Construction and operation of a new renewable energy generation activity in the General Rural Zone – **Discretionary Activity** (Rule REG-2).
- Buildings and structures not complying with the General Rural Zone standards which are within the minimum 15m setback from wetlands and therefore infringe GRUZ-S8 – **Restricted Discretionary Activity** (Rule GRUZ-R1).
- Earthworks in the General Rural Zone that do not comply with the following – **Restricted Discretionary Activity** (Rule EW-R2):
 - Within 10m of a wetland identified in Schedule E of the Horizons Regional Council One Plan (EW-S1);
 - May cause an increase in the depth, frequency or severity of flooding effects to neighbouring properties (EW-S2).



- Construction of new vehicle access to Colemans Road and Calico Line not complying with the minimum separation distances – **Restricted Discretionary Activity** (Rule TR-R2).
- Road upgrades to Calico Line and / or Colemans Road and / or State Highway 1 may be undertaken which are not otherwise provided for – **Discretionary Activity** (Rule TR-R2):
- Storage and use of hazardous substances exceeding the permitted volume of oil – **Restricted Discretionary Activity** (Rule HAZ-R1).
- Development and subdivision within Natural Hazard Overlay 1 – **Restricted Discretionary Activity** (Rule NH-R5).
- Subdivision to implement the agreements to lease – **Discretionary Activity** (Rule SUB-R1).

4.1.5 Other rules

The application also seeks any other resource consent approvals which may be necessary to implement the project, but which are not detailed above.

4.2 No other approvals required

Based on the preliminary investigations of the proposal, it is considered that no approvals under the Wildlife Act 1953 and / or the Heritage New Zealand Pouhere Taonga Act 2014 will be required to facilitate the project.

5.0 Appropriateness of Fast-track Approvals Process for Project

The FTAA has established an approvals framework which differs from the Resource Management Act. Sections 22(1)(a) and 22(2)(a) of the FTAA directs the matters that the Minister can consider when assessing a project's eligibility for referral. These matters are assessed below, and determine that there are sufficient grounds for the Minister to refer the Project to use the fast-track approvals process.

5.1 National or regional significance of project (s22(1)(a))

Section 22(1)(a) of the FTAA directs the Minister to consider whether the project is an infrastructure or development project that would have significant regional or national benefits.

This matter is addressed in the report "Economic Assessment of Proposed Solar Farm in Marton, Rangitikei for Fast-track Referral" (Economics Memo) prepared by Insight Economics. The economic evidence presented in this report confirms that the proposal delivers significant and enduring benefits at both a regional and national level.

The project is for a utility-scale solar farm which will provide a substantial addition to New Zealand's renewable generation capacity. The Horizons Regional Policy Statement defines an energy generating facility that generates 1MW as being of regional significance. The proposed solar farm will generate some 220 MWac of electricity, significantly exceeding this threshold for regional significance. The project will materially increase renewable electricity generation capacity, and based on current estimates, would represent a substantial increase in the total national solar output relative to 2024 levels, while supplying electricity to approximately 57,000 homes annually.



In addition to increasing supply, the solar farm will increase New Zealand's electricity diversity and resiliency by providing a clean and climate resilient energy source. Solar farms provide a reliable source of energy, ensuring greater domestic electricity security. New solar generation enhances system flexibility and resilience by complementing existing hydro and wind generation, effectively saving water in hydro lakes for deployment during evening peaks and winter periods, and reducing system exposure to gas supply and hydrology risks.

The project brings additional competition in the wholesale electricity market through the introduction of significant low-marginal-cost generation, placing downward pressure on wholesale prices and moderating the rate of local retail electricity price growth over time.

The project will also contribute to decreasing reliance on fossil fuels and will work towards lowering New Zealand's CO₂ emissions, which will contribute towards New Zealand's emissions reduction targets. The project is anticipated to displace approximately 195,000 tonnes of CO₂-equivalent emissions per year (approximately 8.9% of New Zealand's total annual electricity generation emissions from gas), making a meaningful contribution toward New Zealand's emissions reduction targets under the Emissions Reduction Plan 2026-2030.

The project makes efficient use of existing national transmission infrastructure traversing the site and is being delivered by an experienced international developer with a proven pipeline of utility-scale solar and electricity storage projects.

Significant economic benefits will also accrue at both regional and national levels. As outlined in the Economics Assessment Report, over the estimated 18 to 24-month build period, it is projected to support approximately:

- \$69 million in GDP;
- \$35 million in wages and salaries; and
- 435 FTE-years of employment in total.

This is equivalent to an average of approximately 218 to 290 full-time positions sustained at any given time across the construction programme, including all upstream supply-chain employment. Reflecting the typical construction profile for utility-scale solar projects, the on-site workforce is expected to peak at approximately 250 FTE during the 4 to 6-month installation phase.

Once operational, the solar farm would sustain approximately 4 to 6 permanent on-site FTEs, supplemented by contracted services for vegetation management, panel cleaning, electrical testing, and civil maintenance. Including indirect supply-chain effects, ongoing onsite activity is estimated to support approximately:

- 10 FTEs annually;
- \$1.1 million in annual wages and salaries; and
- \$3.0 million in annual GDP.

Adding more renewable electricity into New Zealand's economy helps the country retain its global position as a producer of premium, low-carbon primary products such as meat and dairy, which are sectors that underpin the economy of the Manawatū-Wanganui Region and much of the country.

Overall, it is considered that the project warrants referral through the Fast-track approvals process, as it is for an infrastructure project which will generate significant national and regional benefits.



5.2 Benefits of the Fast-track Approvals Act (2024) for project (s22(1)(b))

Section 22(1)(b)(i) and (i) of the FTAA directs the Minister to consider whether referring the project to the fast-track approvals process would:

(i) would facilitate the project, including by enabling it to be processed in a more timely and cost-effective way than under normal processes; and

(ii) is unlikely to materially affect the efficient operation of the fast-track approvals process.

Given the large scale of the proposed solar farm, it is highly likely that a resource consent application under the standard RMA process would be publicly notified. This would almost certainly result in a hearing, creating a risk of appeals to the Environment Court. In addition, the Council can place consent processing on hold or extend statutory timeframes due to special circumstances or requests for further information, which could further delay a final decision and push out the delivery of this nationally significant infrastructure.

In contrast, the FTAA provides greater certainty and enables a timelier decision-making process than the standard RMA framework.

As a result, it is anticipated that obtaining the necessary resource consents under the standard RMA process could add approximately two additional years to the overall project timeframe when compared to the FTAA process.

The FTAA process is also considered to be more cost-effective. The standard RMA process would likely require extensive expert briefs of evidence and attendance at Council and Environment Court hearings, in addition to the technical assessments prepared at the application stage. These requirements would substantially increase consent-related costs. Furthermore, the indirect costs associated with prolonged timeframes arising from notification, hearings, and appeals would likely be avoided through the use of the FTAA process.

The project is unlikely to materially affect the efficient operation of the FTAA process. It involves a renewable electricity generation project of national and regional significance, is not novel nor overly complex, and aligns strongly with national direction as well as relevant regional and district planning frameworks. Several solar farms have successfully progressed through the FTAA process, and the issues are well understood. Importantly, the project will not result in any significant adverse environmental effects.

Based on the above assessment, it is considered that the FTAA process is the most appropriate, timely and cost-effective process to facilitate the implementation of the project for the benefit of the Manawātū-Whanganui Region and the country.

5.3 Minister considerations (s22(2))

Section 22(2)(a) of the FTAA outlines what matters the Minister may consider when assessing a referral application. These matters, where relevant, are assessed below.

(i) has been identified as a priority project in a central government, local government, or sector plan or strategy (for example, in a general policy statement or spatial strategy), or a central government infrastructure priority list:

Whilst the proposal is not explicitly listed as a priority project by central government, local government, or sector plan or strategy, it will align with the Government's Energy Package through providing a significant contribution to increasing New Zealand's renewable electricity supply. The National Policy Statement for Renewable Electricity Generation (NPS-REG) also



strongly supports solar as a priority by requiring Councils to recognise the national significance of renewable energy, including solar, in their planning documents.

The provision of the proposed large-scale solar farm will support efforts to reduce New Zealand's reliance on fossil fuels and, in turn, contribute to a reduction in greenhouse gas emissions. The New Zealand Government's publication *At a glance: New Zealand's Energy Package* dated October 2025 highlights the opportunity that the fast-track approvals process has in supercharging New Zealand's renewable energy supply.

(ii) will deliver new regionally or nationally significant infrastructure or enable the continued functioning of existing regionally or nationally significant infrastructure:

The project will deliver new regionally and nationally significant renewable energy infrastructure, which will contribute to the Government's objective to increase New Zealand's supply of renewable electricity.

(iii) will increase the supply of housing, address housing needs, or contribute to a well-functioning urban environment (within the meaning of policy 1 of the National Policy Statement on Urban Development 2020):

The project will contribute to a well-functioning urban environment as whilst the project is situated within a rural area and no urban development is proposed, the project will facilitate reliable and affordable electricity supply to power households, businesses and urban infrastructure. By increasing the supply of domestically generated renewable electricity, the project will support the ongoing functioning of urban environments in the context of dwindling domestic gas supply and contribute towards reducing New Zealand's greenhouse gas emissions.

(iv) will deliver significant economic benefits:

The project will deliver significant economic benefits, as discussed in the Economic Assessment Report and Section 5.1 above.

(vii) will support climate change mitigation, including the reduction or removal of greenhouse gas emissions:

The project will support climate change mitigation, as it will contribute to increasing New Zealand's renewable energy supply network and reducing the country's reliance on fossil fuels, in turn contributing to a reduction in greenhouse gas emissions.

(viii) will support climate change adaptation, reduce risks arising from natural hazards, or support recovery from events caused by natural hazards:

The project will support wider climate change mitigation, including the reduction or removal of greenhouse gas emissions and increase in sustainable energy supply.

(ix) will address significant environmental issues:

The project will assist with addressing the significant environmental issue of providing affordable renewable energy for communities and the economy while contributing to lowering New Zealand's greenhouse gas emissions.

(x) is consistent with local or regional planning documents, including spatial strategies:

The project will be consistent with the local and regional planning documents, including relevant spatial strategies, for the following reasons:

Horizons Regional Policy Statement and Regional One Plan

The Horizons Regional Policy Statement and Regional One Plan provide a framework that recognises the regional importance of infrastructure and renewable electricity generation



(REG), while requiring adverse environmental effects to be appropriately managed. The project aligns with this framework in several key respects.

The framework relating to REG and infrastructure recognises the national and regional significance of renewable electricity generation activities, particularly those generating more than 1 MW. The framework acknowledges that these activities may give rise to minor adverse environmental effects, but seeks that any more than minor effects are avoided, remedied or mitigated, while balancing the functional, operational or technical constraints of these activities. The project gives direct effect to this policy direction by delivering a utility-scale renewable electricity development which will make a significant contribution to the regional and national energy supply. As outlined in this report, the design of the project is being informed by an integrated effects management approach, which prioritises avoidance where practicable, and otherwise proffers mitigation measurements to ensure that adverse effects are appropriately managed.

In relation to land disturbance, vegetation clearance and stormwater management, the framework seeks to avoid, remedy or mitigate adverse effects such as erosion, sedimentation and degradation of water quality. The project is consistent with this framework, as the design and construction methodology will ensure that adverse effects on receiving environments will be avoided where practicable, or otherwise appropriately managed.

The framework relating to natural hazards seeks to avoid or mitigate adverse effects on people, property, infrastructure and community wellbeing, including risks associated with flooding. The project responds directly to this direction through a design-led approach that avoids high-risk flood areas where practicable, maintains flood conveyance and storage, and ensures that infrastructure is located and designed to be resilient to natural hazard risks.

Overall, the project is consistent with the regional policy framework, which enables regionally significant renewable energy infrastructure while appropriately avoiding, remedying or mitigating adverse effects on the environment.

Rangitikei District Plan (RDP)

The Rangitikei District Plan provides a framework which seeks to enable renewable electricity generation activities while ensuring that adverse effects on the environment are appropriately avoided, remedied or mitigated, having regard to the functional and locational requirements of such infrastructure. The project aligns with this direction, as it represents a large-scale solar farm that requires proximity to the National Grid and sufficient contiguous land to be technically and economically viable. The design of the project is being informed by an integrated effects management approach, which prioritises avoidance where practicable, and otherwise proffers mitigation measurements to ensure that adverse effects are appropriately managed.

The district plan also recognises the relationship of tangata whenua with their lands, water, sites and taonga, and encourages their involvement in decision-making processes. The project is consistent with this direction, with FRV having undertaken, and continuing to undertake, meaningful engagement with mana whenua to inform the project design and implementation. Te Rūnanga o Ngā Wairiki Ngāti Apa has confirmed supports in principle for the proposed FRV solar farm.

In relation to transport, the district plan seeks to provide for safe and efficient transport networks. The project responds to this by incorporating appropriate access arrangements and, where required, upgrades to the surrounding road network to safely accommodate construction traffic. With these measures in place, the proposal will maintain the safety and efficiency of the local transport network.



The natural hazards framework directs that development avoids or mitigates risks to people, property and infrastructure, including through avoiding high-risk flood hazard areas and ensuring that development does not compromise existing flood mitigation infrastructure. The project is consistent with this direction through a design approach that avoids areas subject to the highest flood risk (including Natural Hazard Overlays 1 and 2), maintains flood conveyance and storage, and ensures that infrastructure such as substations and hazardous substance storage areas are appropriately located and designed. In addition, the project will be designed to avoid adverse effects on the function of existing flood control infrastructure, including detention dams and waterways located in the site.

The hazardous substances provisions seek to ensure that hazardous substances are managed and contained in a manner that avoids or mitigates risks to human health and the environment. The project will align with this framework through careful design of hazardous substances within equipment.

The subdivision framework seeks to ensure that subdivision is appropriately serviced, avoids adverse effects on natural hazards, infrastructure and the environment, and limits the fragmentation of rural land, particularly versatile soils. The proposed subdivision is limited in extent and is required to enable the establishment and operation of specified infrastructure through long-term lease arrangements. It does not result in inappropriate fragmentation of rural land (in the context that it will enable the project), manages natural hazard risks through the overall site design, and provides for safe and efficient access. In addition, the project maintains rural productivity through the ability to continue grazing across much of the site and avoids reverse sensitivity effects.

Finally, the General Rural Zone framework seeks to retain a predominance of primary production, maintain rural character and protect open space values. The project is located outside of any identified outstanding natural features or landscapes and has been designed to maintain rural character where practicable through low-profile infrastructure, appropriate setbacks, and perimeter planting. The ability to continue grazing within the site, together with the largely reversible nature of the development, ensures that the productive capacity and to a degree the openness of the rural environment are largely retained, both during and after the operational life of the project.

Overall, the project is in line with the wider intent of the objectives and policies of the Rangitikei District Plan, as it enables large-scale renewable energy infrastructure while appropriately managing adverse effects on the environment and generally maintains the key values of the rural environment.

Community Spatial Plan / Pae Tawhiti Rangitikei Beyond

Pae Tawhiti Rangitikei Beyond (PTRB) is the district's community spatial plan, adopted in 2023, which sets out the long-term vision for growth, land use and infrastructure across the Rangitikei District. The plan promotes a resilient and well-functioning district, including a revitalised and compact Marton town centre, improved transportation networks, upgraded and resilient infrastructure, a strong local economy, and the protection and enhancement of natural and community assets.

The project aligns with this strategic direction, particularly in relation to infrastructure provision and climate outcomes. PTRB supports the development of resilient and future-focused infrastructure and recognises the importance of transitioning to a low-emissions economy. The proposed solar farm directly contributes to these outcomes by significantly increasing the supply of renewable electricity within the district, supporting energy resilience, and reducing reliance on fossil fuel-based generation. In doing so, it reinforces the role of the district in contributing to national decarbonisation objectives and supports the long-term sustainability of local communities.



PTRB also identifies areas for future urban growth in Marton, including land within the southern portion of the wider project area. However, the landowner has communicated their unwillingness for this land to be developed for urban growth and subsequently that land (at 65 Calico Line) has been excluded from proposed residential rezoning through Proposed Plan Change 3 – Urban Growth. In this context, the project does not compromise identified growth areas and remains consistent with the current spatial planning framework.

Overall, the project is consistent with the intent of PTRB, as it supports resilient infrastructure, contributes to a low-emissions future, and does not constrain planned urban development outcomes.

6.0 Assessment of anticipated and known adverse effects and the significance of these effects

Section 13(4)(h) of the FTAA requires that a referral application includes a description of the anticipated and known adverse effects of the project on the environment and the significance of those adverse effects. The proposed solar farm is anticipated to give rise to localised adverse effects on the environment that can be appropriately avoided, remedied or mitigated.

For each identified effect, the residual significance of the effect has been assessed with mitigation measures in place, using the following qualitative scale:

- Very Low Significance
- Low Significance
- Low-Moderate Significance
- Moderate Significance
- Moderate-High Significance
- High Significance
- Very High Significance.

For the purposes of RMA effects ratings, an adverse effects rating of Low - Moderate corresponds to a 'minor' adverse effects rating. An adverse effects rating of 'Low' or 'Very Low' corresponds to a 'less than minor' adverse effects rating. Significant adverse effects is represented by a 'High' – 'Very High' or 'Very High' rating.

6.1 Landscape and visual effects

A Preliminary Assessment of Landscape Effects has been prepared, which identifies and evaluates the anticipated landscape and visual effects of the proposal in accordance with NZILA Guidelines, and has informed the below assessment.

The site and its immediate surrounds form an attractive rural landscape characterised by open pastoral land, shelterbelts, scattered rural buildings and existing infrastructure, but it does not contain features of regional significance. Accordingly, the receiving environment is assessed as having a moderate landscape value and a moderate sensitivity to change.

The assessment identifies that, prior to the establishment of mitigation planting, the proposal will result in anticipated adverse physical landscape effects of Moderate-High significance and adverse visual effects of Low-Moderate significance, arising from the scale of solar arrays and construction activity in an open pastoral landscape.



Anticipated effects following the establishment of mitigation planting include a progressive reduction in both the extent and intensity of adverse effects over time. In the medium and long terms, the operational solar farm is anticipated to result in adverse physical landscape effects of Moderate significance, reflecting the change from pastoral to infrastructural land use within the development areas. However, the wider landscape effects will be moderated by boundary setbacks, retention of pastoral buffers, the relatively low height and horizontal form of solar arrays, and mitigation planting designed to reflect existing shelterbelt and vegetation patterns.

Perceptual and visual effects are anticipated to reduce from Low-Moderate significance in the short term to Low or negligible significance in the medium and long terms, with views generally partial or filtered, skylines remaining uninterrupted, and no views of the development from State Highway 1. Adverse effects on associative landscape values and on natural character are anticipated to be Low in significance, acknowledging the possible continuation of rural activity through sheep grazing beneath panels and the absence of direct physical modification to watercourses.

Assessment from representative viewpoints confirms that visual effects are generally limited. In the short term, the significance of adverse visual effects range from Negligible to Low-Moderate, with only two viewpoints experiencing Low-Moderate effects, while the majority are assessed as Low or Very Low. In the medium to long term, as mitigation planting establishes, visual effects reduce to Low, Very low or Negligible across all viewpoints.

The proposed solar farm development is considered to result in adverse effects of Low significance on the natural character of both the Tūtaenui Stream, Foley Stream and the two unnamed streams.

Overall, the Preliminary Assessment of Landscape Effects concludes that the proposal will result in adverse landscape effects of Moderate significance in the short term, reducing to a Low-Moderate significance in the medium and long terms.

6.2 Rural character and amenity effects

The site is located within the General Rural Zone and is currently used for sheep and cattle grazing and arable cropping. The surrounding landscape is characterised by open pastoral farmland with areas of bush and shelterbelts, rural roads, scattered dwellings and dispersed farm buildings. The General Rural Zone primarily provides for rural production while allowing other activities where they are appropriately managed and do not undermine rural character or productive capacity.

The proposal will introduce solar arrays, inverters, transformers, a BESS, a substation and ancillary buildings to the site. This will result in a change from a pastoral-only landscape to one that includes visible solar infrastructure. However, grazing can be retained across the site, with solar panels elevated to allow ongoing sheep grazing beneath and between the arrays, maintaining the site's long-term rural production function.

It is anticipated that all solar infrastructure will be set back a minimum of 10 metres from all boundaries, creating a clear buffer to adjoining properties. Landowner exclusion areas have been incorporated into the layout to avoid sensitive locations and retain existing farming operational areas. The site perimeter includes areas of existing bush and shelterbelts, which will be retained wherever practicable and supplemented with new perimeter and riparian planting. This planting will further filter views, soften the appearance of the arrays and reinforce existing rural landscape patterns over time.

While the introduction of solar infrastructure represents a temporary departure from the existing pastoral landscape, the flat landform limits skyline and long-range visibility. The



low-profile design of the arrays, combined with boundary setbacks, exclusion areas and comprehensive perimeter planting, ensures visual effects are largely contained within the site and its immediate surrounds.

Overall, when considering the retention of grazing, flat landform, low-profile infrastructure, proposed setbacks, landowner exclusion areas and perimeter planting, adverse effects on rural character and amenity are anticipated to be no more than Low in significance.

6.3 Glint and glare effects

Glint and glare effects relate to the reflection of sunlight from solar panels and may be experienced by both stationary and moving observers. Solar panels are designed to absorb, rather than reflect, solar radiation and therefore have low reflectivity; however, short-duration reflections can occur under specific sun angles and viewing conditions and are a known characteristic of solar farm developments.

Known adverse effects relating to solar farms include the potential for low-intensity, short-duration reflections from the solar arrays under specific sun-to-panel and panel-to-viewer alignments. The flat topography, low-profile panel design, regular array orientation and mid-block siting of the proposal limit the likelihood of reflections being directed toward off-site receptors.

Anticipated adverse effects relate to intermittent reflections that may be perceived by nearby receptors, including motorists on surrounding rural roads and occupants of neighbouring properties. These effects are anticipated to be mitigated by boundary setbacks, landowner exclusion areas and proposed boundary and landscape planting, as well as existing shelterbelts and roadside vegetation.

No airfields are located nearby and glint or glare effects on aviation activities are not anticipated. Traffic volumes on surrounding rural roads are low, and the likelihood of glare resulting in driver distraction or safety effects is minimal.

Overall, while glint and glare are recognised potential effects of solar farms, the design and siting of the proposal mean that any adverse effects are anticipated to be low in intensity, short in duration and limited in extent. The glint and glare effects of the proposal are therefore anticipated to be acceptable and no more than Low in significance.

6.4 Traffic effects

A Transport Technical Memorandum has been prepared, which considers the anticipated and known adverse traffic and transport effects of the proposal. The site is bounded by State Highway 1 to the east and Calico Line, Tūtaenui Road and Colemans Road. Traffic effects differ markedly between the construction and operational phases.

6.4.1 Construction phase

The key potential transport effects will occur during construction and are temporary in nature. Construction activity is anticipated to generate approximately 80 to 200 vehicle movements per day during peak periods, including up to 100 heavy commercial vehicle (HCV) movements per day. These movements represent an increase over existing traffic volumes, particularly on Calico Line, which currently operates as, and is engineered to, function as a heavy vehicle bypass.

Known adverse effects include increased construction traffic volumes, additional turning movements at the main site access, and temporary effects on road safety, amenity and pavement condition. The preliminary transport assessment identifies that, prior to mitigation, road safety effects at the primary access and amenity effects for nearby sensitive receptors



on Calico Line have the potential to reach Moderate significance, reflecting increased HCV turning movements and proximity to sensitive land uses.

Anticipated adverse effects include short-term disruption associated with over-dimension vehicle deliveries, temporary amenity effects for nearby sensitive receivers, and increased parking demand associated with the construction workforce. The Preliminary Transport Assessment identifies that these effects can be mitigated through:

- Use of Calico Line as the primary construction access route
- Construction of a right-turn bay on Calico Line at the primary site access
- Preparation and implementation of a Construction Traffic Management Plan
- Provision of on-site parking and workforce transport management
- Haul-route restrictions to avoid constrained local roads
- Pre- and post-construction road dilapidation surveys

The Preliminary Transport Assessment concludes that, with these measures in place, construction-phase traffic and transport effects are reduced to Low or Very Low significance.

6.4.2 Operational phase

Once operational, the solar farm will generate very low traffic volumes, limited to approximately 4–6 staff vehicle movements per day. The Preliminary Transport Assessment concludes that these movements are assessed as having a Very Low adverse effect on the surrounding road network, being negligible in comparison to existing traffic volumes and resulting in no adverse effects on road safety, network efficiency or amenity.

The Preliminary Transport Assessment also considers the potential for permanent road upgrades on Calico Line and Colemans Road to accommodate construction-phase traffic, including HCV movements. These will be designed and constructed in accordance with applicable design standards which address engineering and safety requirements, including appropriate sight-distance, alignment, pavement and drainage standards. The Calico Line right-turn bay would result in a small increase in sealed road area, and an improvement in turning safety and traffic efficiency, with no material change to traffic volumes, speeds, or route choice patterns. Any permanent works on Colemans Road would remain within the existing road footprint and would not alter the road's function or classification. Overall, the Preliminary Transport Assessment adverse transport effects associated with these permanent road upgrades are Low in significance.

6.4.3 Conclusion

Overall, with the above measures in place, all anticipated construction-phase and operational-phase transport effects, including those initially assessed as Moderate, are reduced to Low or Very Low significance as reported in the Preliminary Transport Assessment.

6.5 Ecology effects

An Ecology Technical Memorandum has been prepared to assess the ecological effects of the project. The site comprises predominantly modified agricultural land used for grazing and cropping; these areas are generally of low ecological value. Higher ecological values are associated with the Tūtaenui Stream, adjoining riparian vegetation, artificial ponds and the confirmed presence of long-tailed bats.



The project design is anticipated to avoid most higher-value ecological features, including wetlands, artificial ponds, native vegetation, mixed treeland, exotic shrubland and the majority of exotic trees. Three exotic shelterbelts are proposed for removal, with most infrastructure located within pasture and cropped areas of low ecological value.

Anticipated adverse effects relating to terrestrial vegetation are limited largely to pasture disturbance and minor removal of exotic trees, with pasture expected to be reinstated following construction. Sediment runoff and minor aquatic habitat disturbance associated with construction and any required culverts will be managed through erosion and sediment controls, timing of earthworks, fish salvage where required, and fish-passage-compliant culvert design. Watercourse buffers of 5m–20m, along with riparian planting, will provide longer-term benefits through improved shading, bank stability and water quality.

Wetlands will be avoided where practicable. Indirect hydrological effects are expected to be minimal due to limited landform change, retention of pervious surfaces beneath panels and reinstatement of disturbed areas. With appropriate sediment controls, risks to wetland function are anticipated to be low.

Fauna related effects include potential temporary disturbance to birds during vegetation clearance, low risk of bird strike during operation, and effects on long-tailed bats (which are confirmed to be present on site) associated with shelterbelt removal, lighting and panel infrastructure. These will be addressed through pre-construction bird nesting surveys, bird and bat monitoring, implementation of bat roost protocols, a Bat Management Plan, lighting controls and adaptive management. Effects on skinks and geckos are considered unlikely given the lack of suitable habitat and no native skinks and geckos being detected, with an incidental discovery protocol proposed.

Overall, with mitigation in place, the Ecology Technical Memorandum concludes that adverse ecological effects are expected to be Low or Very Low, with bat-related effects assessed as Low - Moderate. The project also has potential for positive ecological outcomes through riparian restoration, reduced land-use intensity and enhanced landscape connectivity.

6.6 Stormwater and flooding effects

A Flooding Technical Memorandum has been prepared to assess the stormwater and flooding effects of the project. Parts of the site are subject to inundation in a 0.5% AEP flood event associated with the Tūtaenui Stream and ephemeral tributaries. The project layout has been informed by preliminary hydraulic modelling and generally avoids development within all modelled high-risk flood-affected areas. This approach avoids loss of floodplain storage, maintains flood conveyance, and ensures there is no increase in flood risk to neighbouring or downstream properties. With avoidance implemented, the residual significance of flood effects is anticipated to be Very Low.

Flooding effects in relation to the substation and battery energy storage system (BESS) are a known risk, given the presence of oil (a hazardous substance) in transformers and the sensitivity of this infrastructure to stormwater and flood ingress. These effects will be mitigated through siting the facilities outside the 0.5% AEP flood risk areas, designing hardstand areas to avoid reducing flood-carrying capacity, and incorporating bunding and stormwater treatment or soakage to manage runoff and contain spills. With these measures in place, the likelihood of contaminant mobilisation or infrastructure compromise is low, and the residual significance is anticipated to be Low.

The project does not propose to change the location of flow path inflows or outflows at the site boundary, and development within high-risk hazard zones is avoided. Solar panel arrays, inverters and Smart Transformer Stations (STS) units will be elevated, spaced, and



installed over permeable ground, allowing rainfall to continue to infiltrate in a manner similar to the existing pastoral land use. As these elements do not create a substantive increase in effective impervious area or materially alter runoff pathways, volumes or velocities, they are not expected to trigger a regional stormwater discharge consent. Stormwater effects are primarily associated with hardstand areas such as the substation, BESS and access tracks, which will be addressed through detailed design to ensure flood-carrying capacity of nearby waterways, including the Tūtaenui Stream, is not compromised. With the design mitigation measures in place, the residual significance of stormwater and hydrology effects is anticipated to be Low to Low-Moderate.

Detention Dam E4 is a critical component of the TCCS and is located within the site. The project will completely avoid the dam, its designation, and the associated ponding area, with no works proposed that would alter inflows, spillway capacity, storage volume, or access for inspection, maintenance, and repairs. On this basis, and consistent with Horizons Regional Council's preliminary feedback, the residual significance of effects on Dam E4 and the wider flood control scheme is anticipated to be Very Low to Low, subject to confirmation at detailed design that catchment boundaries and inflow conditions are not materially altered.

The need for culverts at watercourse crossings is an anticipated effect, as access across the site may require localised stream crossings. To mitigate potential effects on flood conveyance or upstream ponding, any culverts will be sized for at least the 0.5% AEP flood event, designed to maintain existing channel capacity and flow paths, and set at invert levels consistent with existing stream beds. With these design measures in place, the residual significance of culvert-related effects are anticipated to be Moderate-Low.

A small segment of Calico Line and Colemans Road is identified within the Indicative Flood Hazard Area under the Rangitikei District Plan GIS Maps, associated with the Tūtaenui Stream floodplain. Any permanent road upgrades associated with the project would be designed to ensure that flood conveyance, overland flow paths and flood storage are not adversely affected. Any associated changes to roadside kerbing, drainage or outlets will be designed and constructed in accordance with the relevant road-controlling authority standards to ensure that stormwater runoff is appropriately managed.

Overall, with avoidance of flood-prone areas and implementation of appropriate stormwater management and design measures, the Flooding Technical Memorandum concludes that adverse effects of the proposed solar farm are anticipated to be localised and of Low to Very Low residual significance.

6.7 Rural productivity effects

The site contains LUC Class 3 soils, meaning the National Policy Statement for Highly Productive Land 2022 (NPS-HPL) may be relevant. However, as the Manawatū–Whanganui Regional Policy Statement does not currently include operative maps of highly productive land prepared in accordance with the NPS-HPL, and the proposal involves a resource consent application for subdivision, use and development on LUC 3 land for an activity other than rural lifestyle, it meets the exclusion set out in clause 3.5(7)(b)(iii) of the NPS-HPL. Accordingly, the land is not treated as highly productive land and the policy framework under the NPS-HPL is not determinative for the project.

Notwithstanding the above, the effects on rural productivity have been considered. A known adverse effect is a change from a pastoral-only landscape to one containing solar infrastructure. This effect will be mitigated by retaining grazing across most of the site, with panels elevated and spaced to enable ongoing sheep grazing beneath and between array tables if agrivoltaics is undertaken. The solar farm has a low-impact footprint, involves minimal soil disturbance, and does not permanently sterilise the vast majority of the land.



Excluding the substation and possibly the BESS, solar infrastructure can be removed at the end of the operational life, allowing the land to be returned to full pastoral use if desired.

The subdivision associated with the project is required to enable the establishment and operation of specified infrastructure and to secure a long-term lease arrangement. While subdivision titles are not automatically reversed at decommissioning, the land use effects of the project are largely reversible, with grazing retained across most of the site and solar infrastructure (excluding the substation) capable of removal at end of life. The subdivision enables management of the solar farm while retaining the balance land for rural production and does not give rise to reverse sensitivity effects.

With the retention of grazing, avoidance of permanent soil degradation, and the reversible nature of most infrastructure, any reduction in productive capacity is anticipated to be limited and localised. With mitigation in place, the residual significance of rural productivity effects is anticipated to be Low, and the proposal is considered consistent with the outcomes sought by the NPS-HPL.

6.8 Noise and vibration effects

The site adjoins rural properties that either contain existing dwellings or may accommodate future dwellings as permitted activities.

Operational noise varies by equipment type. String inverters generate relatively low noise from small cooling fans and low sound power outputs, while central inverters / STS units contain larger transformers and forced-air cooling systems, resulting in higher continuous sound levels and a greater potential for tonal characteristics. The BESS is the dominant noise source, as it comprises multiple battery units and power conversion systems operating simultaneously, each with active cooling, producing a high cumulative sound output, particularly during night-time operation.

To manage these source-specific noise risks, minimum setback distances will be incorporated into the layout (≥ 20 m for string inverters; ≥ 90 m for central inverters / STS units; and ≥ 750 – 900 m for the BESS). These distances are derived from conservative preliminary acoustic calculations using manufacturer sound power data, assuming worst-case simultaneous operation, no acoustic screening and compliance with Rangitikei District Plan night-time limits at the notional boundary.

Construction noise is an anticipated but temporary effect, particularly during activities such as piling. These effects will be managed through standard construction noise controls, including limiting high-noise activities to daytime hours, maintaining separation distances, staging works, and implementing temporary screening where required. A Construction Noise and Vibration Management Plan will be prepared and implemented. With mitigation in place, the residual significance of construction noise effects is assessed as Low.

Overall, by incorporating conservative boundary setbacks, centralising higher-noise infrastructure and applying standard construction noise management practices, adverse noise effects on adjoining sensitive receivers are expected to be of Low residual significance.

6.9 Hazardous substances effects

The Rangitikei Solar Farm will involve the storage and use of hazardous substances associated with standard utility-scale solar and battery infrastructure. These substances comprise mineral insulating oil within transformers, inverters and the substation, lithium-ion or lithium-iron-phosphate batteries within the BESS, and ethylene glycol coolant used for BESS thermal management.



Due to the scale of the proposal, the cumulative volume of transformer oil and coolant may exceed permitted activity thresholds in the Rangitikei District Plan. The substances will be contained entirely within purpose-designed plant and equipment manufactured to relevant international and industry standards.

Known adverse effects relate to the presence of hazardous substances on the site at volumes possibly exceeding permitted activity thresholds, which introduces an anticipated risk of environmental contamination or harm to human health in the event of accidental equipment failure, fire or uncontrolled release. These risks arise from the scale of the development rather than the nature of the substances, which are standard for this type of infrastructure.

Anticipated adverse effects include the potential for oil or coolant spills during operation or emergency scenarios, and the potential release of hazardous materials from batteries under abnormal operating conditions. Without mitigation, such events could result in contamination of land or water, or risks to on-site personnel and emergency responders.

These effects will be avoided or mitigated through project design and operational controls, including the use of sealed and containerised equipment, secondary containment and bunding sized to exceed stored volumes, controlled drainage, fire protection systems, spill response measures, and the preparation and implementation of an Emergency Response Management Plan covering hazardous substances, battery safety, staff training and end-of-life management.

With these measures in place, the likelihood of hazardous substance release is low, and any consequences can be effectively contained and managed. The residual adverse effects associated with hazardous substances are therefore anticipated to be Low in significance.

6.10 Land disturbance effects

The proposal will involve earthworks and land disturbance that may trigger consent requirements relating to earthworks near wetlands, large-scale land disturbance, and the importation and discharge of cleanfill material. These triggers reflect the potential for sediment generation, effects on wetlands and watercourses, and changes to flood behaviour if earthworks are not appropriately managed.

Earthworks will be predominantly shallow and dispersed, associated with internal access tracks and cable trenching, with more intensive works confined to small areas for the BESS, substation and ancillary buildings. Anticipated adverse effects include temporary sediment runoff to drains and wetlands during construction and dust generation during dry and windy conditions. These effects will be avoided or mitigated through the implementation of a detailed Erosion and Sediment Control Plan (ESCP) and Construction Management Plan (CMP), providing for year-round construction, including winter works, appropriate controls, stabilisation timeframes and inspection requirements, with additional measures for works near wetlands and drains.

The proposal may require the importation of cleanfill material at volumes exceeding permitted activity thresholds. Effects will be managed by ensuring all cleanfill meets the definition of cleanfill, is sourced and managed in accordance with A Guide to the Management of Cleanfills (MfE, 2002), is managed in accordance with ESCP and CMP protocols, is not placed in sensitive habitats or on steep slopes, and is staged and stabilised to ensure long-term physical stability.

Earthworks will maintain appropriate setbacks from the Tūtaenui Stream, and works within low-value wetlands will be minimised and carefully managed to protect wetland hydrology.



Any associated road upgrades will also be constructed and earthworked in accordance with the ESCP and CMP, including appropriate sediment retention, stabilisation and runoff management measures, to ensure that potential stormwater, sediment and waterway effects arising from road works are appropriately avoided, remedied or mitigated.

With the implementation of the ESCP and CMP, appropriate setbacks, and cleanfill management measures, it is considered that the adverse effects of earthworks will be temporary and no more than Low in significance.

6.11 Cultural effects

The project area lies within the rohe of Ngā Wairiki Ngāti Apa and is subject to the Ngāti Apa Claims Settlement Act 2010. The site does not contain current Māori owned land, recorded wāhi tapu or sites of significance, and no other statutory acknowledgements apply within the project footprint. The nearest marae, Nga Hau e Wha Marae, is located approximately 2 km south of the site, within the Marton township.

Engagement with Te Rūnanga o Ngā Wairiki Ngāti Apa has been ongoing since early 2026 through a programme of meetings, and feedback to date has informed the project approach. Te Rūnanga o Ngā Wairiki Ngāti Apa has confirmed it supports in principle the proposed FRV solar farm and acknowledge the economic benefits the project would deliver.

The preliminary archaeological assessment has identified a very low probability of encountering Māori archaeological material due to the absence of known historic artefacts on the site. Nevertheless, accidental discovery protocols will be implemented to ensure that any unexpected taonga or archaeological remains are appropriately protected and managed.

The Tūtaenui Stream and its tributaries are recognised for their importance to wai, mauri and life-supporting capacity, and for their role in wider catchment health. The project will maintain appropriate setbacks from these waterbodies and implement robust erosion and sediment control measures to ensure that water quality, mauri and associated cultural values are protected during construction and operation.

Having regard to the ongoing engagement underway, as well as the proposed management measures in place, adverse effects on cultural values are anticipated to be acceptable.

6.12 Soil contamination effects

Several small, discrete areas within the site (approximately 1,200 m² in total) have been identified as HAIL areas due to historic or current land uses. The solar farm infrastructure can generally be located to avoid these HAIL areas, meaning limited soil disturbance is currently anticipated to be required within these parts of the site. However, in the event that more extensive soil disturbance is required, soil sampling will be undertaken to inform appropriate management.

Anticipated adverse effects may arise if detailed design or construction requires earthworks within a HAIL area (such as trenching, piling or roading). In such circumstances, disturbed soil could expose workers or others to contaminants or allow contaminants to be mobilised, resulting in potential risks to human health.

These anticipated adverse effects will be mitigated by minimising the extent of soil disturbance required within the identified HAIL areas. If soil disturbance is proposed within a HAIL area, soil sampling will be undertaken and a Site Management Plan prepared by a Suitably Qualified and Experienced Practitioner will be implemented to manage excavation, handling, storage and disposal of soils and to protect construction workers, the public and the environment.



With these measures in place, any potential risks to human health associated with contaminated soils are well understood and can be effectively managed. Accordingly, known and anticipated adverse effects associated with the disturbance of potentially contaminated soils are Low in significance.

6.13 Subdivision effects

6.13.1 Subdivision to facilitate the long-term lease

The proposal includes subdivision to give effect to lease arrangements exceeding 35 years and to create balance and utility lots aligned with the operational footprint of the solar farm. Known effects include changes to land tenure and ownership patterns. These effects will be mitigated through the proposed title configuration, which consolidates the solar farm within a large balance lot containing no dwellings, retains existing dwellings within clearly defined lifestyle lots, and provides appropriate access arrangements. Where necessary, consent notices can be imposed on new titles to manage reverse sensitivity risks and to inform future owners of nearby solar generation and rural activities. With these measures in place, the residual effects of the subdivision to facilitate the lease are anticipated to be Low in significance.

6.13.2 Subdivision of flood prone land

Parts of the subdivision occur within areas prone to flood risk (Natural Hazard Overlay 1) and therefore trigger consent and require assessment. Anticipated effects include the potential for development to occur within the subdivided land in a manner that increases risks associated with flood hazards. As assessed above, the proposed solar facility will be designed in a manner that avoids flood-prone areas within the site and implements appropriate stormwater management and design measures for new hardstand surfaces formed, such that adverse subdivision effects relating to flood risk will be Low in residual significance.

6.13.3 Subdivision of potentially contaminated land

The proposed subdivision is required to give effect to a long-term lease arrangement for the solar farm and, as a result, technically triggers assessment under the NES-CS where the small parts of the site identified on the HAIL is being subdivided. This trigger is procedural in nature, as the subdivision itself does not involve soil disturbance, alter land use, or enable activities that would increase exposure to contaminated soils.

Potential contaminated-land effects associated with soil disturbance and human health have already been assessed under the land-use component of the proposal, with infrastructure designed to avoid HAIL areas and clear controls proposed should disturbance ever be required. Any future soil disturbance or a change in use would remain subject to the NES-CS. In this context, the subdivision does not result in unsafe land and does not generate additional adverse effects. The residual effects associated with the NES-CS subdivision trigger are therefore anticipated to be Very Low in significance.

6.14 Archaeological effects

There are no recorded archaeological sites within the development footprint based on a review of the New Zealand Archaeological Association (NZAA) ArchSite database, Heritage New Zealand Pouhere Taonga records, Rangitikei District Plan heritage schedules, historic plan and aerial photograph research, and a site walkover survey of the project area by an experienced archaeologist.



Several locations containing 19th-century farm structures or areas of archaeological potential have been identified. However, these areas are located within retained land parcels and are excluded from the solar farm footprint.

An Accidental Discovery Protocol will be implemented to manage the unlikely event that unrecorded archaeological material is encountered during works. With avoidance of identified areas and implementation of standard protocols, the residual significance of archaeological effects is anticipated to be Very Low.

6.15 Summary of adverse effects

Overall, from the consideration of the anticipated and known adverse effects of the project on the environment and the significance of those adverse effects, it is concluded that the proposal results in residual effects that are no more than Low - Moderate in significance, or minor and acceptable in RMA terms.

A summary of anticipated and known adverse effects of the project and the significance of those adverse effects is provided in Table 3 below.

Table 3: Anticipated and known adverse effects of the project and their significance

Category of effect	Anticipated and known adverse effects	Anticipated mitigation measures	Residual significance of anticipated adverse effect following mitigation
Landscape and visual	Anticipated: Site is an attractive rural pastoral landscape of moderate landscape value and moderate sensitivity; development results in a change from pastoral to infrastructural land use and introduction of built form into an open rural landscape. Anticipated: Short-term Moderate-High physical landscape effects and Moderate-Low visual effects prior to planting due to array scale and construction activity; medium-long term Moderate physical landscape effects and Low-Negligible visual effects as planting establishes; Low effects on associative values, natural character and streams.	Minimum 10m-20m boundary setbacks; large peripheral areas retained as pasture (including Calico Line frontage); mid-block siting of solar arrays, BESS and substation; low-height, horizontal array form; retention of all native and most exotic vegetation; avoidance of watercourse setbacks (5m–20 m); perimeter, mid-block, riparian and substation planting using native shrubs and native / exotic trees reflecting existing shelterbelts; continued sheep grazing beneath panels.	Moderate (short term), reducing to Low-Moderate in the medium and long term.
Rural character and amenity	Anticipated: Perceived change from pastoral-only landscape to a predominantly solar (infrastructure) landscape.	Retention of grazing; low-profile arrays; flat landform; 10m - 20m boundary setbacks; landowner exclusion areas; retention of some shelterbelts; perimeter, mid-block and riparian planting	Low-Moderate
Glint and glare	Known (in principle): Solar panels can produce glint and glare under certain conditions. Anticipated adverse effects associated with glare to	Panel orientation and low reflectivity; flat topography; mid-block siting; setbacks; exclusion areas; existing and proposed vegetation planting.	Low



Category of effect	Anticipated and known adverse effects	Anticipated mitigation measures	Residual significance of anticipated adverse effect following mitigation
	surrounding properties and roads resulting from the sun reflecting off solar arrays.		
Construction traffic	Anticipated: Temporary increases in traffic volumes, including HCVs; turning movements at site access; short-term amenity and road safety effects (potentially Moderate without mitigation).	Primary access via Calico Line; right-turn bay; Construction Traffic Management Plan; on-site parking; haul-route restrictions.	Low-Very Low
Operational traffic	Anticipated: Very low operational traffic generation (approximately 4–6 vehicle movements per day).	No specific mitigation required beyond normal operation.	Very Low
Ecology	Known: Presence of long-tailed bats; identification of higher-value aquatic features. Anticipated: Temporary vegetation disturbance; minor aquatic effects during construction; potential disturbance to birds and bats.	Avoidance of high-value habitats; reinstatement of pasture; erosion and sediment controls; riparian buffers and planting; nesting surveys; Bat Management Plan; implementation of bat roosting protocols; lighting controls; monitoring and adaptive management.	Low-Moderate for bat-related effects; Low-Very Low for all other effects;
Natural hazards and flooding	Known: Parts of the site are flood-prone; hazardous substances at substation/BESS are sensitive to flooding. Anticipated: Potential downstream flooding, effects to habitats if culverts not appropriately designed.	Avoidance of high-risk flood areas; bunding and spill containment; elevated and permeable panel design; stormwater management for hardstand areas; avoidance of Detention Dam E4; stormwater management measures (as needed); appropriately designed culverts.	Low-Very Low
Rural productivity	Anticipated: Change from pastoral-only use to possible dual pastoral/solar use; small localised loss of usable area around infrastructure.	Retention of grazing where possible; elevated and spaced panels; minimal soil disturbance; reversibility of most infrastructure; subdivision design avoiding reverse sensitivity.	Low
Noise and vibration	Anticipated: Operational noise from inverters and BESS; temporary construction noise and vibration.	Conservative equipment setbacks; centralisation of higher-noise infrastructure; Construction Noise and Vibration Management Plan; daytime construction controls.	Low
Hazardous substance	Known: Storage of transformer oil, batteries and coolant above permitted thresholds. Anticipated: Risk of spills or abnormal events during operation or emergencies.	Sealed and containerised plant; secondary containment and bunding; controlled drainage; fire protection systems; spill response measures; Emergency Response Management Plan and training.	Low
Land disturbance	Anticipated: Temporary sediment runoff, dust generation, and potential effects near wetlands and drains during construction.	Erosion and Sediment Control Plan; Construction Management Plan; staged works and stabilisation; wetland and stream setbacks; clean fill management.	Low



Category of effect	Anticipated and known adverse effects	Anticipated mitigation measures	Residual significance of anticipated adverse effect following mitigation
Cultural	Anticipated: Potential effects on cultural values associated with waterbodies and whenua if works are not appropriately managed.	Ongoing mana whenua engagement; setbacks from waterways; erosion and sediment controls; Accidental Discovery Protocol.	Acceptable
Soil contamination	Anticipated: Potential exposure risks only if soil disturbance occurs within HAIL areas.	Avoidance of HAIL areas; SQEP-led investigation; Site Management Plan if disturbance is required.	Low
Subdivision–long-term lease	Anticipated: Changes to land tenure and title configuration to facilitate operation of the solar farm.	Consolidation of solar farm within a balance lot; retention of rural dwellings; access arrangements; consent notices to manage reverse sensitivity.	Low
Subdivision–flood-prone land	Anticipated: Potential for flood-risk exposure if subdivision enables inappropriate development.	Layout and design avoiding flood-prone areas; stormwater and hazard-responsive design.	Low
Subdivision of potentially contaminated land (NES-CS)	Anticipated: Procedural NES-CS trigger only; no disturbance or exposure enabled by subdivision.	Continued avoidance of HAIL areas; future disturbance remains subject to NES-CS controls	Very Low
Archaeological	Anticipated: Very low likelihood of encountering unknown archaeological material.	Avoidance of areas of potential value within landowner retention areas; Accidental Discovery Protocol.	Very Low

7.0 Likely affected persons

Section 13(4)(j) of the FTAA requires that the applicant provide a list of persons and groups who are considered likely to be affected by the project. The likely persons / groups affected by the project are listed below.

- **Relevant local authorities**
 - Horizons Regional Council
 - Rangitikei District Council
- **Iwi authorities and groups**
 - Ngā Wairiki Ngāti Apa Charitable Trust
 - Te Rūnanga o Ngā Wairiki Ngāti Apa
- **Other persons and groups considered**
 - Owners and residents of surrounding properties - due to their proximity to the project area and likelihood of perceived amenity values being impacted by the solar farm development. Refer to **Appendix D** for a list and map of surrounding properties in which the owners and occupiers are considered to be likely affected persons.
 - Transpower New Zealand Limited – given that the solar farm will connect to the National Grid network which traverses through the project area.
 - Fire and Emergency New Zealand - in relation to the establishment of large-scale infrastructure which poses a fire risk.



- Waka Kotahi NZ Transport Agency - due the need for construction vehicles to access the site from local roads which intersects with State Highway 1 and potential intersection upgrades to access the site from Colemans Road (if required).
- Department of Conservation – due to the presence of native fauna and flora within the project area.
- Heritage New Zealand Pouhere Taonga – due to the presence of archaeological sites within the wider project area.

7.1 Consultation undertaken with likely affected persons

Section 14(4)(k) of the FTAA requires that a summary of any other consultation undertaken on the project with persons and groups identified as likely to be affected by the project is provided, and how the consultation has informed the project. A summary of consultation undertaken and how this has informed the project is provided below:

Te Rūnanga o Ngā Wairiki Ngāti Apa – FRV have consulted with Te Rūnanga o Ngā Wairiki Ngāti Apa since early 2026, building on an existing relationship held between FRV staff and Te Rūnanga o Ngā Wairiki Ngāti Apa from prior projects. FRV have met with Te Rūnanga o Ngā Wairiki Ngāti Apa eight times, four of which involved face to face meetings. FRV are committed to undertaking meaningful engagement with mana whenua throughout the project lifecycle, and are in the process of developing an Engagement Agreement to establish principles and processes to guide meaningful, genuine and long-term relationships with parties.

Te Rūnanga o Ngā Wairiki Ngāti Apa has confirmed in a letter date 7th May 2026 support in principle for the proposed solar farm and its desire to have a long-term relationship with FRV and the solar farm. Te Rūnanga o Ngā Wairiki Ngāti Apa has acknowledge the economic benefits the project will deliver.

Horizons Regional Council – A series of initial meetings have been held with Horizons Regional Council to discuss the project. This includes:

- Pre-application meeting with Horizons Regional Council (13 March 2026):
This meeting focused on identifying key regional consenting matters at an early stage to inform site design for the Rangitikei Solar Farm. Discussion centred on stormwater and flood management, particularly ensuring land disturbance and hardstand areas (notably the substation and BESS) do not reduce flood-carrying capacity or adversely affect waterways. Potential consent triggers around land disturbance, cleanfill placement, wetlands setbacks, contaminated land (HAIL areas), and erosion and sediment control were discussed, and it was broadly agreed that the solar panels are generally low risk and unlikely to require stormwater discharge consent.
- Pre-application meeting with Horizons Regional Council Rivers Team (18 March 2026):
This meeting concentrated on flood risk, dam and waterway management, and downstream effects, noting the site's location within a higher flood-risk area. Key matters included avoiding increased inflows to dams, maintaining access for waterway and dam maintenance, and managing stormwater from impervious areas so effects remain less than minor. Council indicated that modelling would likely be required for the substation, BESS, and access tracks, highlighted capacity constraints in the Tūtaenui Stream, and discussed riparian planting, access corridors, and spillway information as design considerations.



Rangitikei District Council – A series initial meetings have been held with the Rangitikei District Council to discuss the project. This includes:

- Initial meeting with Rangitikei District Council Planning Department (27 March 2026)

This meeting focused on informing the Council about the project and identifying possible key regional consenting matters at an early stage to inform site design for the Rangitikei Solar Farm. Discussions centred on the generality of the effects matters the Council understands about solar farms, including landscape, flooding, construction management, access and productive land. The District Plan context for the project and possible consenting triggers at a high level were discussed. The approaches the Council takes for fast-track applications was also discussed with general agreement about the use of an external consultant to manage the process for the Council if the project is referred. The inclusion of part of the site within the Community Spatial Plan / Pae Tawhiti Rangitikei Beyond was advised and possible implications discussed. It was agreed to follow this matter up specifically with the Councils Strategy Manager. RFV committed to continuing to update the Council about progress, and decisions about consenting pathways. The Council provided the details of the key officers to contact directly about specific technical matters as a follow up to the meeting.

- Discussions with Rangitikei District Council Strategy Manager (including TEAMS meeting on 5 February 2026)

A meeting was undertaken with Tiffany Gower, Strategy Manager at the Council, to discuss the implications of the proposed residential plan change on the proposed solar farm. The extent of the proposed growth area was discussed with confirmation that the impending residential growth plan change would not include the full extent of the residential growth area shown over the site or adjoining the site in Pae Tawhiti Rangitikei Beyond (conditional on the Council decision and adoption of the recommended plan change for notification). A small area of the site fronting to Calico Line was confirmed as being recommended to be rezoned for residential purposes. It was advised that landowner for this area had not engaged with the Council on the plan change, but if the landowner concerned were to request that their land be excluded from the plan change then the recommended rezoning would be removed. This action was subsequently implemented and follow up discussions with Council confirmed the site would be excluded from inclusion in the plan change for rezoning. The intended rezoning of the land adjacent the site on the southern side of Calico Line for residential purposes was also confirmed. The Council subsequently advised on 14 April 2026 that Proposed Plan Change 3 has been adopted for public notification excluding the land concerned within the site (i.e. the land is not shown in the planning maps for the Plan Change as being proposed to be rezoned).

- TEAMS meeting with Rangitikei District Council engineers (1 April 2026)

A meeting with Rob Smith (Council Development Manager) and Darryn Black (Council Roding Manager) was undertaken to discuss the anticipated access arrangement for the project and the possible road upgrades that may be required to facilitated safe and convenient access. The transport analysis and assessment completed to date for the project was presented and discussed, including the possibility of upgrades being required for Colemans Road and / or intersection upgrades being required SH1 / Colemans Road intersection and / or localised widening being required for Calico Line to provide safe construction access. FRV confirmed its preferred access approach was primary access from Calico Road with the possibility of secondary access from Colemans Road due to the prohibitive costs associated with upgrades to Colemans Road and / or SH1 / Colemans Road



intersection. A number of matters were discussed, including the cycleway and walkway project along the southern side of Calico Line (including watermain replacements) was commencing soon, possible temporary mitigation approaches, use of TMPs as mitigation, expected vehicle volumes and relative increases of traffic on Calico Line, limited benefits to Council associated with Colemans Road upgrade, possible constraints to permanent speed reductions along Calico Line, possible pavement impacts and desire for pre and post pavement assessments and clarifications about the fast-track referral notification process. The Council indicated its initial view is that the preference for access would be Colemans Road, but understand the possible constraints, and would be interested to have more detail about barriers and cost assumptions to understand why it is the least preferred option. It was agreed to provide more detail about the transport analysis completed as this is finalised for the Referral application and to meet again once the concept design has been progressed.

- Meeting with Mayor – Andy Watson (7 May 2026)

FRV met with Mayor Watson in his office to introduce the project, communicate the economic and energy security / affordability benefits and discuss the mitigations for any potential adverse effects. Mayor Watson was supportive in principle and requested additional supplementary information to better understand the project, its benefits and its potential impacts. Mayor Watson highlighted some key community members who FRV should engage with to better understand the local expertise available. There was discussion about how the district can best support the project in terms of accommodation, food, transportation, materials and other ancillary needs for such a large construction workforce.

Transpower New Zealand Limited – FRV has been engaging with Transpower regarding this project since mid 2024. The project has moved through the Transpower queue and is now progressing through the Investigation Stage. FRV and Transpower staff have been meeting regularly to refine and progress the feasibility assessment of the connection concept.

7.2 Response to notification of project to parties

Section 13(4)(ka) of the FTAA requires that a summary of how any responses to a notice given under section 11(1)(b) have informed the project. Notice was given to the following parties pursuant to section 11(1)(b) of the FTAA:

- Horizons Regional Council
- Rangitikei District Council
- Ngā Wairiki Ngāti Apa Charitable Trust
- Te Rūnanga o Ngā Wairiki Ngāti Apa

Responses were received from the Horizons Regional Council, Rangitikei District Council and Te Rūnanga o Ngā Wairiki Ngāti Apa, copies of which are provided in **Appendix E**. A summary of the written feedback and how this has informed the project is provided below.

Horizons Regional Council

The matters raised focused on environmental effects management, particularly in relation to flooding, hydrology, freshwater ecosystems, ecology, erosion and sediment control, and contaminated land. Key areas of interest included maintaining flood storage and conveyance, protecting wetland extent and ecological values, ensuring fish passage, and



confirming the classification of waterways, and guidance around potential resource consent triggers was provided by the Council.

A table summarising the feedback and how this has informed the project is provided in **Appendix F**. The matters raised are being addressed through a suite of technical assessments, including hydrological, ecological and geotechnical investigations, which will inform the project design and substantiate the effects assessment at the Substantive application stage. The project will be designed to avoid high-risk areas where practicable, including flood hazard areas, wetlands and critical infrastructure such as the Tūtaenui Dam E4, and will maintain access to flood control assets. Where effects avoidance is not practicable, appropriate mitigation measures and management plans (including erosion and sediment control, ecological management and construction methodologies) will be implemented. A precautionary approach to consenting under the NES-F and NES-CS has been taken and FRV are committed to undertaking engagement with Horizons Regional Council through the consent process. Overall, the matters raised are technical in nature and capable of being appropriately addressed through design and detailed assessment, supporting the suitability of the project for the fast-track approvals process.

Rangitikei District Council

The matters raised primarily relates to ensuring that the project appropriately addresses potential effects on rural productivity and highly productive land, future urban growth, transport infrastructure, and community outcomes. Key themes include clarification of economic benefits, management of impacts on rural productive land, integration with the Pae Tawhiti Rangitikei Beyond spatial framework, and the design and management of construction traffic and access arrangements.

A table summarising the feedback and how this has informed the project is provided in **Appendix F**. The matters raised are being addressed through a suite of technical assessments, which will inform a design-led approach to managing effects, which will inform the project design and substantiate the effects assessment at the substantive application stage. The project is not anticipated to constrain the identified growth patterns, will appropriately manage transport and infrastructure effects, and will retain rural productivity through low-impact design and continued grazing. Engagement with iwi and the wider community is ongoing, and key matters will be further refined through detailed design and management plans as part of the Substantive application. Collectively, the responses demonstrate that the issues raised by Council can be appropriately addressed and do not preclude referral of the project.

Te Rūnanga o Ngā Wairiki Ngāti Apa

Te Rūnanga o Ngā Wairiki Ngāti Apa have provided in principle support for the project to progress through the Fast-track approvals process, and acknowledged the meaningful and positive engagement that is occurring between FRV and their Rūnanga. FRV are committed to continuing to develop an ongoing and meaningful relationship with Te Rūnanga o Ngā Wairiki Ngāti Apa through this project.

Others

Written notification of the project was not provided to the Department of Conservation or Heritage New Zealand as the ecological surveys and the archaeological assessment completed indicates approvals will not be required under the Wildlife Act 1953 (Wildlife Permit) and / or the Heritage New Zealand Pouhere Taonga Act 2014 (Archaeological Authority). FRV intends to consult with the Department of Conservation and Heritage New Zealand as part of the substantive application process.



8.0 Assessment of statutory documents

Schedule 5, section 2(1)(a) of the FTAA requires that an assessment of the project against the relevant provisions and requirements of the following statutory documents:

- a) Any relevant national policy statement; and
- b) Any relevant national environmental standards; and
- c) If relevant, the New Zealand Coastal Policy Statement.

An assessment of the project against the relevant national policy statements and national environmental standards is provided in the below sections. The New Zealand Coastal Policy Statement is not relevant to the project, as the site is located outside of the coastal environment.

8.1 National policy statements

The national policy statements relevant to the project are:

- National Policy Statement for Renewable Electricity Generation
- National Policy for Highly Productive Land
- National Policy Statement for Freshwater Management

The National Policy Statement for Natural Hazards is not relevant to the project as infrastructure activities are excluded from the application of this national policy statement. The National Policy Statement for Indigenous Biodiversity is not considered relevant to the project as renewable electricity generation assets and activities are excluded from the application of this national policy statement.

8.1.1 National Policy Statements for Renewable Electricity Generation

The National Policy Statement for Renewable Electricity Generation (NPS-REG) provides a clear and directive national policy to recognise and provide for the benefits of renewable electricity generation and to enable such activities while managing adverse effects. The NPS-REG has been recently strengthened in late 2025 to ensure greater clarity and direction for decision makes, and now captures both renewable electricity generation (REG) activities themselves and ancillary activities (i.e. vegetation clearance and tree trimming, earthworks / land disturbance, construction / maintenance / repair / upgrading of access tracks, power supply and telecommunication cabinets and devices).

At its core, the NPS-REG seeks to ensure that the national significance of renewable electricity generation is recognised, that increased renewable electricity generation and output is enabled, and that adverse effects are appropriately managed while having regard to the functional and operational needs of such activities.

The project is strongly aligned with the objectives and policy framework of the NES-REG, as it will provide a substantial increase in New Zealand's renewable electricity generation capacity and will make a meaningful contribution to national electricity supply, resilience and emissions reduction targets. The site's proximity to the National Grid and its physical characteristics establish a clear operational and locational need for a solar farm to be located in this area, consistent with policy C. The scale and output of the project represent a significant cumulative gain in renewable electricity generation capacity, directly responding to policies A, B and F which requires that such increases are recognised and enabled.

Adverse effects have been appropriately addressed through a design-led approach that prioritises avoidance where practicable and otherwise provides targeted mitigation



measures, consistent with the national directive in policy C, to manage effects without undermining the ability to develop renewable electricity generation. Reverse sensitivity effects are minimised through the layout and subdivision approach consistent with policy D, and meaningful engagement with mana whenua is ongoing and will continue through the next stages of the project, consistent with policy E.

In terms of section 6 matters of national importance, freshwater features within the site will be protected through setbacks, avoidance and biodiversity enhancement measures, consistent with other relevant national and regional policy directions.

Overall, the project is not only consistent with but actively promotes the objectives and policies of the NPS-REG, giving effects to its enabling intent.

8.1.2 National Policy Statement Highly Productive Land

The National Policy Statement for Highly Productive Land (NPS-HPL) seeks to protect highly productive land for use in land-based primary production, both for current and future generations. Clause 1.3 of the NPS-HPL defines 'highly productive land' as:

Highly productive land means land that has been mapped in accordance with clause 3.4 and is included in an operative regional policy statement as required by clause 3.5 (but see clause 3.5(7) for what is treated as highly productive land before the maps are included in an operative regional policy statement and clause 3.5(6) for when land is rezoned and therefore ceases to be highly productive land).

The operative Regional Policy Statement for the Manawātū – Whanganui Region does not currently contain region-wide maps of highly productive land, therefore the interim provisions in clause 3.5(7) apply. The item definition of 'highly productive land' applies to land zoned general rural or rural production at the commencement date and has a land use capability (LUC) 1, 2 or 3., but excludes land subject to a resource consent application lodged at or after the commencement date for subdivision, use or development of LUC 3 land for any activity other than rural lifestyle.

The site is zoned General Rural under the Rangitikei District Plan and comprises of LUC 3 soils as shown in **Figure 12** below. The indicative site extent is shown as a dashed line.

Figure 12: Land Use Capability Maps (source: Landcare Research)



The site will be subject to a resource consent application for subdivision, use and development for an activity that is not rural lifestyle as the project is for the establishment, operation and maintenance of a solar farm which is 'specified infrastructure' under the NPS-HPL. The subdivision component relates to the establishment of a long-term lease (lease in excess of 35 years) over the parts of the site where the solar farm is proposed. The balance land not required for the solar farm operation (land to be retained by landowners) will be held in separate records of title as appropriate. Accordingly, the proposal is considered to meet the exclusion to being considered 'highly productive land' under Clause 3.5(7)(b)(iii), and the NPS-HPL is not a relevant consideration to the project.

However, should the resulting creation of smaller rural lots (areas of land to be retained by landowners) be considered 'rural lifestyle' subdivision and land use, there is considered to be a pathway for the project to be consistent with the outcomes sought under the NPS-HPL, as discussed below.

Policies 7 and 8 of the NPS-HPL directs that subdivision and non-primary production use of highly productive land is avoided unless specific exceptions apply, including where the subdivision and use is for the construction and operation of specified infrastructure and there is a functional or operational need for the subdivision and use. The project aligns with this exception, as the use of the land is for the construction and operation of a utility-scale solar farm, which is specified infrastructure, and there is an operational need for the solar farm to be established in this location to enable a connection to the National Grid. The subdivision is required to give effect to a long-term lease arrangement that will enable the establishment and ongoing operation of specified infrastructure, and such the subdivision is necessary to secure the land tenure arrangements required for the scale and lifespan of the project.

In addition, the NPS-HPL requires that any subdivision and use avoid, or otherwise mitigate, the cumulative loss of productive land and avoids or mitigates reverse sensitivity effects on surrounding primary production activities. These outcomes are achieved by the project design and land use approach. The productive capacity of the land is largely retained through the ability to continue grazing within and around the solar arrays, and the low-impact and largely reversible nature of the infrastructure means that, aside from limited areas such as the substation and potentially the BESS, the land can be returned to full primary production at the end of the solar farm's operational life. This ensures that any loss of productive capacity is temporary and localised rather than permanent or cumulative.

The subdivision also does not introduce reverse sensitivity effects. The solar farm is compatible with the surrounding rural production environment and does not constrain existing or future primary production activities on adjoining land.

Accordingly, it is considered that the project is consistent with the NPS-HPL.

8.1.3 National Policy Statement for Freshwater Management

The National Policy Statement for Freshwater Management (NPS-FW) seeks to protect the health and wellbeing of freshwater environments, including wetlands and streams, and directs that the loss or degradation of wetlands and streams are avoided.

The Ecology Technical Memorandum confirms the presence of natural inland wetlands, as well as modified and artificial watercourses, within the site. Consistent with the NPS-FW, the project has been designed to avoid direct disturbance to wetlands and to prevent any loss of wetland extent. No works are proposed within stream beds, except for limited culverts if required for internal access crossings, which will be designed to maintain hydrological function and ecological connectivity. Potential adverse effects on freshwater values during construction and operation will be appropriately managed through standard erosion and sediment controls, setbacks, and construction management practices. Importantly, the



project represents a transition to a less intensive land use, which will reduce nutrient runoff and sediment inputs compared to the existing farming regime. In addition, the project will deliver positive ecological outcomes through riparian enhancement planting, removal of exotic vegetation, pest management, and the establishment of buffer areas and ecological corridors. These measures will improve habitat quality, water quality, and habitat connectivity over time.

Overall, the design and management approach ensures that adverse effects on freshwater values are avoided or minimised, while delivering net ecological benefits, and is therefore consistent with the direction of the NPS-FW.

8.1.4 National Policy Statement for Urban Development

The National Policy Statement for Urban Development (NPS-UD) seeks to enable well-functioning urban environments that support the social, economic, and cultural wellbeing of communities, whilst also contributing to reductions in greenhouse gas emissions. While the project is located in a rural area and does not provide for urban development directly, it will support these outcomes by strengthening the underlying energy infrastructure that urban environments rely on.

As outlined in the Economic Assessment Report, the project will increase the supply of domestically generated renewable electricity, improving the reliability, affordability and resilience of electricity supply to households, businesses and critical urban infrastructure. In doing so, it directly supports the ongoing functioning and growth of urban environments. In addition, by increasing renewable generation and reducing reliance on fossil fuel-based electricity, the project contributes to reducing New Zealand's greenhouse gas emissions, which is an outcome recognised and supported by the NPS-UD.

Accordingly, while indirect in nature, the project meaningfully advances the objectives of the NPS-UD and is consistent with its policy intent.

8.2 National environmental standards

8.2.1 Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011

The Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations (NES-CS) manages risks to human health arising from land use and subdivision on sites where hazardous activities or industries (HAIL) may have resulted in soil contamination.

The Preliminary Site Investigation (PSI) has identified discrete areas of the site which are likely to have had HAIL activities occur on them, including historic livestock dip or spray race operations and storage of fuels and chemicals. Most of these areas are located within land that will be retained by landowners, and the use of this land will remain unchanged, thereby posing no increased risk to human health. Within the solar farm development area, a potential former sheep dip has been identified, and on the precautionary basis that any soil disturbance will occur within this HAIL area, measures will be implemented as part of the construction works to ensure that the land disturbance is undertaken in a manner which protects human health.

Overall, it is considered that the project aligns with the NES-CS.



8.2.2 Resource Management (National Environmental Standards for Freshwater) Regulations 2020

The Resource Management (National Environmental Standards for Freshwater) Regulations (NES-F) manage activities that may adversely affected freshwater ecosystems, including by protecting natural inland wetlands, controlling infilling of rivers and streams, and ensuring the maintenance of fish passage.

The Ecology Technical Memorandum identifies several natural inland wetlands and other freshwater features within the site. On a precautionary basis, it has been identified that resource consents may be required under the NES-F given the presence of natural inland wetlands and streams within the solar development area

It is however anticipated the design approach for the project will avoid disturbance within wetlands and loss of wetland extent within the site, and no works or structures within streams are proposed, other than culverts for access tracks. It is therefore likely depending on design that no resource consents will be required under the NES-F.

Management measures will be used during construction and the operation of the solar farm to manage adverse effects on freshwater values. As outlined in the Ecology Technical Memorandum, the project will improve the site's ecological values, through the land use change to a less intensive use resulting in decreased nutrient discharges to waterways, potential enhancement through planting along waterways, exotic vegetation removal, potential pest animal control, and enhanced connectivity of natural areas in a landscape context through buffer implementation and corridor plantings.

It is considered that the project aligns with the NES-F, as it will maintain and to a degree enhance the ecological value of the site's freshwater features.

9.0 Closure

Overall, it is considered that there are sufficient grounds from a statutory planning perspective to warrant a successful referral of the project under the FTAA.





Appendix A FTAA Checklist

Statutory Planning Report

Fast-track Referral Application - Rangitīkei Solar Farm

FRV Services New Zealand Limited⁹

SLR Project No.: 810.032031.00001

11 May 2026



Appendix B Indicative Layout Plan

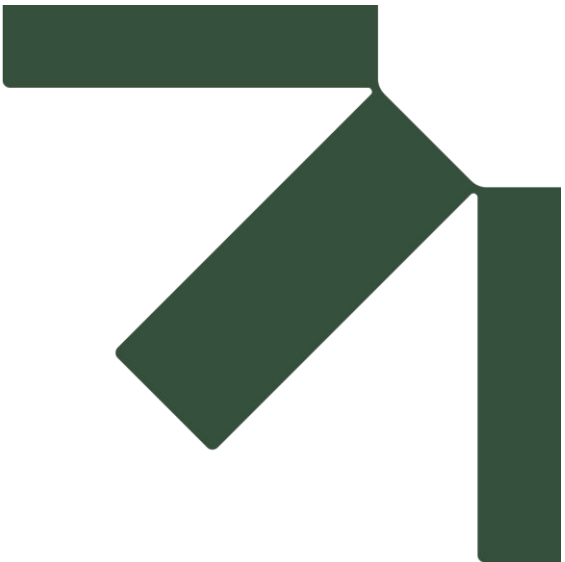
Statutory Planning Report

Fast-track Referral Application - Rangitīkei Solar Farm

FRV Services New Zealand Limited

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Appendix C Records of Title

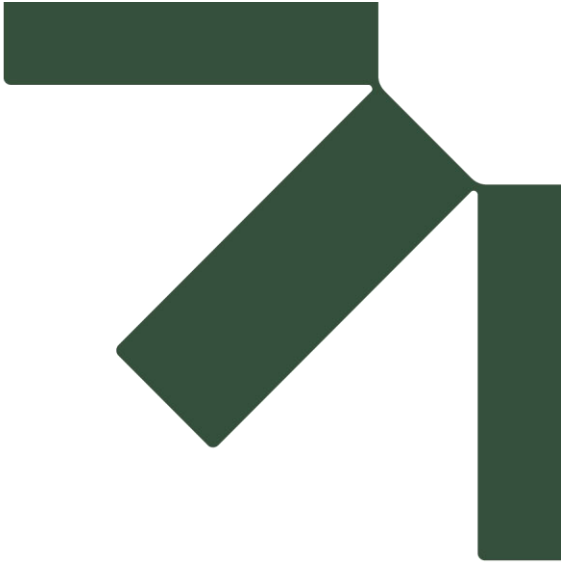
Statutory Planning Report

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Appendix D Likely Adjacent and Affected Persons

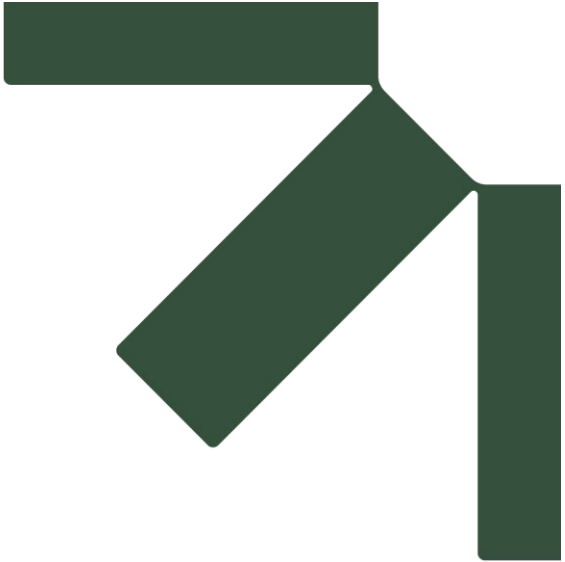
Statutory Planning Report

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Appendix E Responses to s11(1)(b) Notification

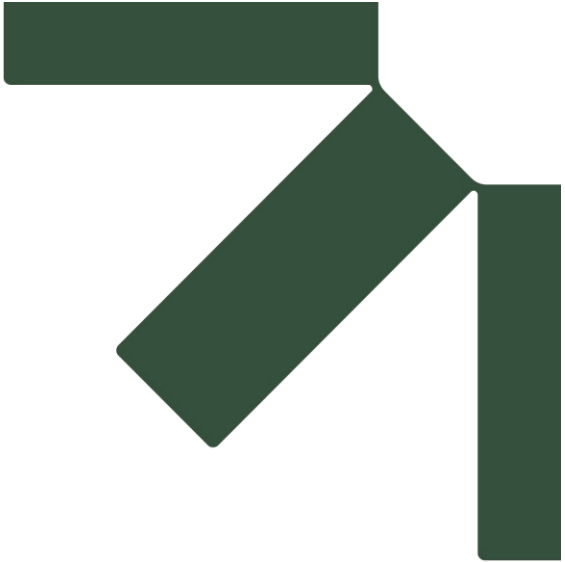
Statutory Planning Report

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Appendix F Summary Table of s11(1)(b) Responses

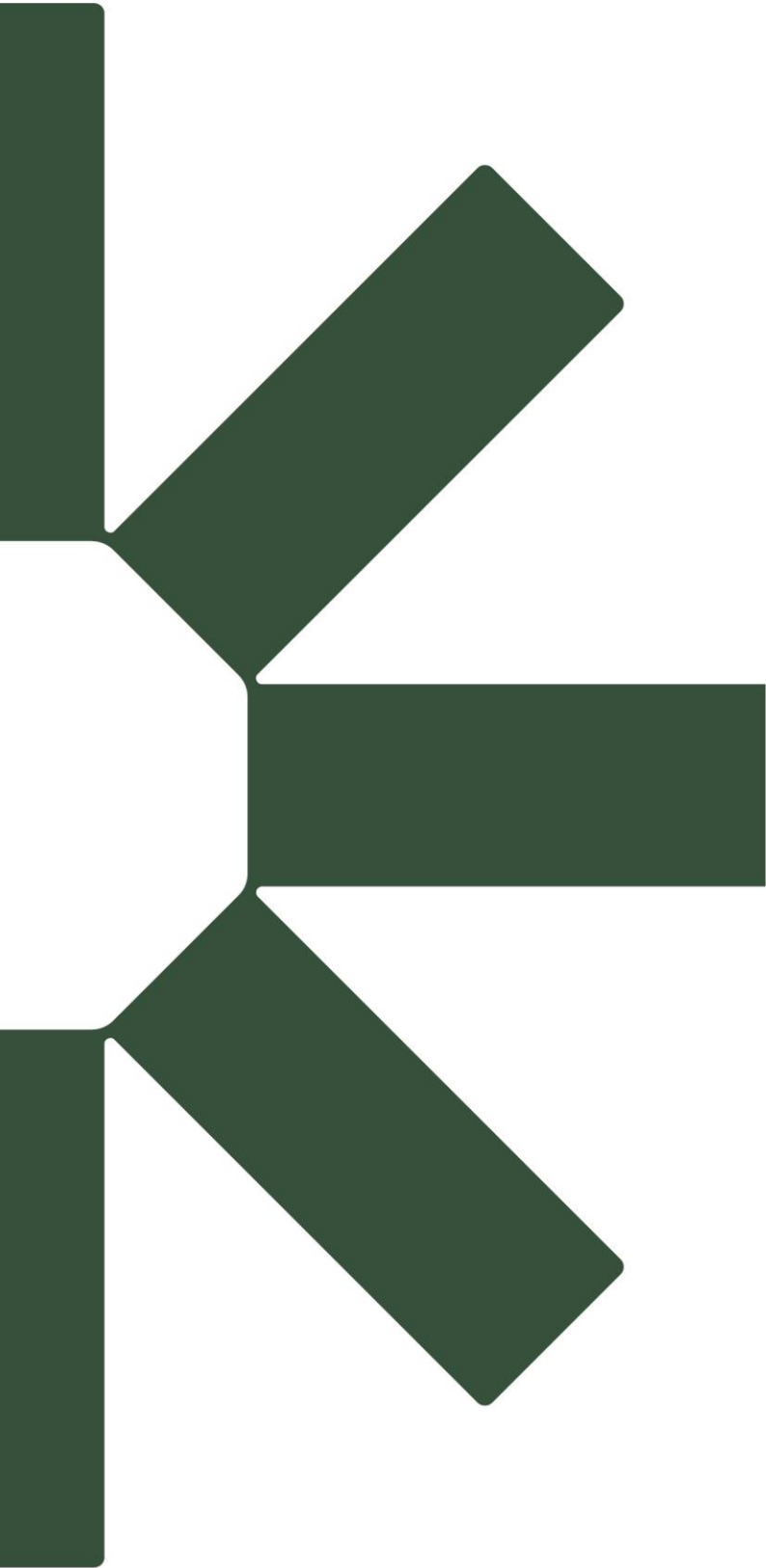
Statutory Planning Report

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