

Submission on Notified Resource Consent PL241232469

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Submission on Notified Resource Consent

Reference PL241232469 **Submitted** 18 Dec 2024 09:52

Notified Submission

SUBMISSION ON NOTIFIED APPLICATION CONCERNING RESOURCE CONSENT

(Form 13)

Section 95A (public) Resource Management Act 1991

To: The Chief Executive
Central Otago District Council
PO Box 122
Alexandra 9340

This is a submission on the following resource consent application:

Resource Consent Number	240065
Valuation Number	2828012800
Applicant	Helios OTA Op LP
Location of Site	48 Ranfurly-Naseby Road, Ranfurly
Brief Description of Application	Land use consent to construct, operate and maintain a 300MWac solar farm
Submissions Close	19 December 2024

Writing a submission

The following will be required during this process:

- Your full name and address, telephone number and email address
- Whether you support or oppose the application for resource consent
- The reason for your submission
- The decision you wish the Council to make, including any conditions sought
- Whether you wish to be heard.

Privacy

The information you provide is official information and is used to help process your application. The information is held and used in accordance with the Local Government Official Information and Meetings Act 1987 and the Privacy Act 2020. This means that your information may be disclosed to other people who request it in accordance with the terms of these Acts. Under the Privacy Act 2020 you have the right to see and correct any personal information that Council may hold about you.

Declaration

By continuing with this application you certify that: The information you provide is true and correct to the best of your knowledge. Yes

Notified Submission

Notes to submitter

1. If you are making a submission to the Environmental Protection Authority, you should use [form 16B](#).

The closing date for serving submissions on the consent authority is the 20th working day after the date on which public or limited notification is given. If the application is subject to limited notification, the consent authority may adopt an earlier closing date for submissions once the consent authority receives responses from all affected persons.

2. You must serve a copy of your submission on the applicant as soon as is reasonably practicable after you have served your submission on the consent authority.
3. If you are a trade competitor, your right to make a submission may be limited by the trade competition provisions in [Part 11A](#) of the Resource Management Act 1991.
4. If you make a request under [section 100A](#) of the Resource Management Act 1991, you must do so in writing no later than 5 working days after the close of submissions and you will be liable to meet the additional costs of the hearings commissioner or commissioners, compared to our hearing panel. Typically these costs range from \$3,000 - \$10,000.
5. Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):
 - it is frivolous or vexatious:
 - it discloses no reasonable or relevant case:
 - it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
 - it contains offensive language:

It is supported only by material that purports to be independent expert evidence, but has been prepared by a

person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

In lodging this submission, your submission, including contact details, become public information and will be available for anyone to view.

DETAILS OF SUBMITTER

Full name	Upper Taieri Wai
Contact person (if applicable)	Renee Weir
Electronic address for service of submitter:	uppertaieriwai@gmail.com
Phone number - day time	0276993422
Postal address (or alternative method of service under section 352 of the Act):	RD 4, Ranfurly

Your Application

Please select one regarding the application	I neither support or oppose
Do you wish to be heard in support of this submission?	Yes - I wish to be heard
Are you a trade competitor for the purposes of section 308B of the Resource Management Act 1991?	I am not
I would consider presenting a joint case if others make a similar submission	Yes

Details of submission

The specific parts of the application that my submission relates to are: Protection of the Water Quality & Wetlands in the area.

The submission - include:

- whether you support or oppose the specific parts of the application or wish to have them amended; and
- the reasons for your views.

We neither support or oppose this application however we would like to see the application have more details around potential affects from catastrophic events and what that means for the environment. Please see attached for specific details.

[Upper Taieri Wai Incorporated - Helios Submission.pdf](#) (245 kb)

I seek the following decision from the consent authority.

Give precise details, including the general nature of any conditions sought

Clarity and modeling of the aquafer network under the proposed solar farm and its interaction with the Taieri River.

A fund held in line with the cost to clean up and recycle the farm at end of life (\$500m?). The credit interest on this fund to be given to the community for ongoing projects around the Maniototo.

Select below - Pursuant to [section 100A](#) of the Act, that you delegate your functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority. "See note 4 (second tab) as you may incur costs relating to this request."

I do not request

Any other comments?

In lodging this submission, I understand that my submission, including contact details, are considered public information, and will be made available and published as part of this process.

Yes

Please sign (click on the words CAPTURE)



Date signed:

18/12/2024

Submission Regarding the Proposed Mānīatoto Plain Solar Farm

This submission addresses the resource consent application by Helios OTA Op LP for the construction and operation of the Mānīatoto Plain Solar Farm at 48 Ranfurly-Naseby Road, Naseby.

As the catchment group here in the Maniototo (Upper Taieri Wai Incorporated) the fund holder of Tiaki Maniototo we have prepared this submission to express our neutral stance on this project. We currently do not have a mandate from our wider members to oppose or support this project, however due to the short turn around the committee members of Upper Taieri Wai feel it is important to ensure that environmental consideration is given throughout this project.

While the project supports New Zealand's renewable energy goals, it is crucial to consider potential environmental impacts, particularly on groundwater and the Taieri River Upper Catchment. Upper Taieri Wai (UTW) is not opposed to solar installations at community and individual levels and sees that there is a place for solar in our community but do have some reservations relating to the scale of this project and the battery storage component. UTW want to ensure that Helios are providing a comprehensive and accurate mitigations to protect the Upper Taieri Catchment.

The Taieri River is fed in part by groundwater traveling through local aquifers, which play a vital role in maintaining its flow, water quality, and ecosystem health. The proposed solar farm site lies within the Rural Resource Area, and its development could influence groundwater dynamics

The aquifers near the proposed site for the Mānīatoto Plain Solar Farm likely serve as critical groundwater reservoirs that flow beneath the Maniototo Plain. These aquifers are part of the interconnected groundwater systems that recharge surface water bodies, including the Taieri River, which is the fourth-longest river in New Zealand with the wetlands and scroll plain being recognised as nationally significant.

In this area, groundwater typically travels through:

1. **Alluvial Gravel Aquifers:** These are shallow aquifers composed of gravels, sands, and silts, often found in river valleys. They can directly recharge rivers like the Taieri, especially during dry seasons when surface flow depends on groundwater contributions.
2. **Deeper Confined Aquifers:** These aquifers may lie beneath layers of clay or impermeable rock and could travel significant distances underground. Such aquifers could also feed into the Taieri River or support nearby springs and wetlands.
3. **Recharge Zones:** Rainfall, irrigation, and other surface water sources recharge these aquifers. Changes to land use, such as the construction of solar farms, can alter recharge rates by compacting soil or modifying drainage patterns.

Impact of the Proposal

The proposed solar farm could intersect with shallow or intermediate aquifers, particularly if excavation, foundation installation, or road building is required or a catastrophic event occurs such as a battery fire. Any disruptions in these aquifers could potentially:

- Affect the flow of groundwater toward the Taieri River.
- Reduce aquifer recharge due to impermeable surfaces (concrete structures) or soil compaction.
- Increase vulnerability to contamination if construction introduces pollutants into the groundwater system.

- Catastrophic events such as fire or earthquake have potential to release toxins from battery storage or other heavy metal components to the ground water.
- If site is left at end of life without all componentry being carefully removed and recycled.

Next Steps

To accurately determine the aquifers' pathways and ensure their protection, Helios should commission a **hydrogeological study**. This study should include:

- Map aquifer systems beneath the proposed site.
- Identify connections between these aquifers and the Taieri River.
- Assess potential changes to groundwater flow or quality.
- Recommend mitigation strategies to minimise disruption or contamination.

This approach would provide a clear understanding of how the aquifers travel under and around the proposed development and ensure that the project aligns with sustainable water management practices for our area.

Otago Regional Council should be engaged and work in partnership with CODC to determine if the study is appropriate and accurate.

Recommended Technical Studies

To address these concerns, the following steps are recommended:

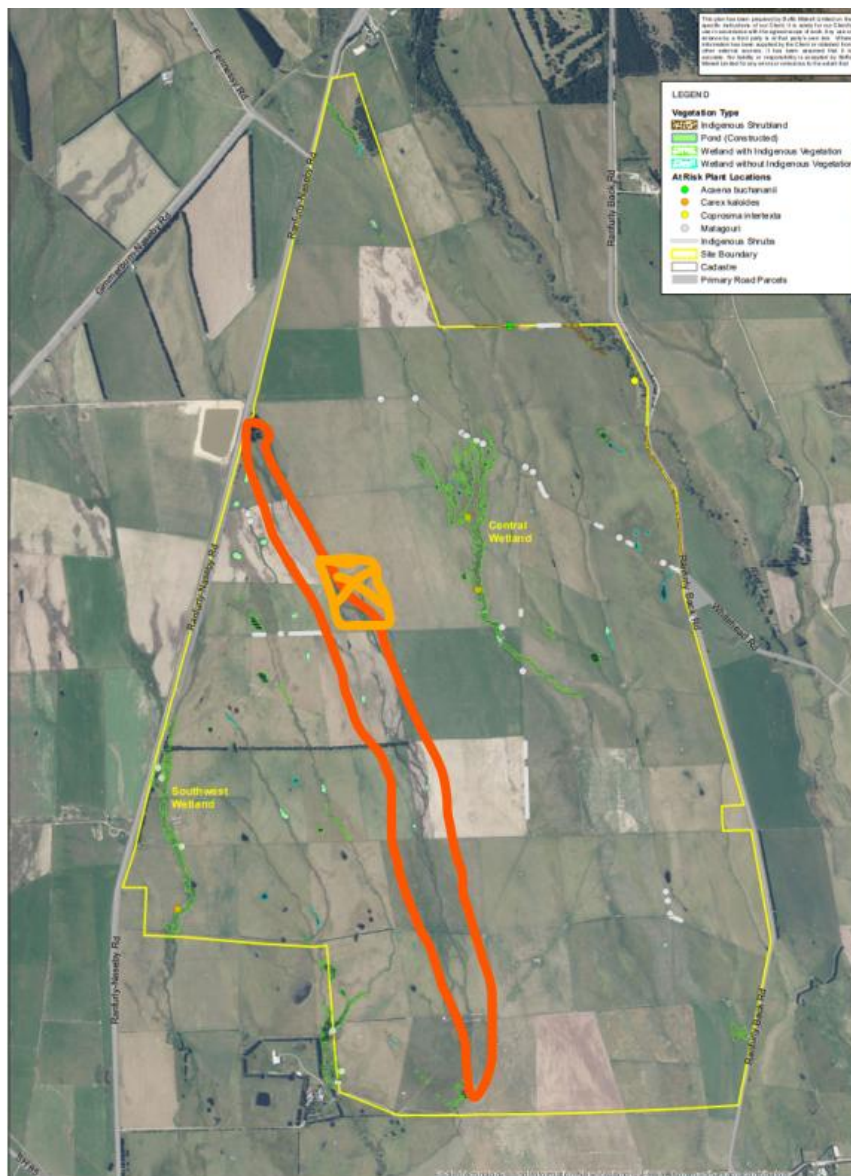
1. **Hydrogeological Mapping**
 - Conduct borehole drilling and water level measurements to map the aquifers' extent, depth, and flow direction.
2. **Recharge and Discharge Analysis**
 - Measure infiltration rates in the area to assess recharge capacity.
 - Monitor springs, wetlands, and the Taieri River to track groundwater contributions.
3. **Water Quality Testing**
 - Test existing groundwater for baseline quality (e.g., pH, dissolved solids, nitrate levels) before construction.
 - Implement regular water quality monitoring during and after construction.
4. **Modelling and Impact Assessment**
 - Develop a groundwater flow model to simulate potential impacts of construction and operation on aquifers and the Taieri River.
 - Evaluate worst-case scenarios, such as accidental chemical spills, battery fires and propose mitigation strategies.

UTW is the fund holder of Tiaki Maniototo a Fresh Water Improvement fund of \$5million from the Ministry for the Environment. TM has a focus around planting and fencing water ways, weed and pest removal with a specific goal of protection and enhancement of the wetlands in the Upper Taieri.

This application mentions that there are wetlands within this area and they discuss mitigation of glare and impact on wetlands through planting natives and setbacks.

Through the life of the TM project the pilot planting site now has plants that are around 50cm high after 3.5 years. Growth rates in the Maniototo are exceptionally slow especially with trees. TM will only plant in areas with irrigation or near a watercourse that flows or remains wet in summer due to the survival rate in dry areas being so low. Mitigation options mentioned within this application may need to be reviewed as to the suitability for this location and access to water, a query for CODC to make.

We can see in image 3.2 not all water ways have been identified you can see a water course in the middle left of the map that is not highlighted (we have shown in dark orange) which is the same area that has been identified for the battery storage (we have shown in light orange). This may need to be queried also.



This submission has not been prepared by subject matter experts but by a group of community members who work voluntarily to help improve the Upper Taieri. UTW does not have a mandate from their members to oppose nor support the project but emphasises the need for a

comprehensive approach to environmental stewardship to balance renewable energy development with the preservation of critical natural resources.

As a catchment group we are concerned that any contamination that reaches aquifers and their flow on effect will fall on us as the group that will be required to lead the clean-up. We do not have access to funding to carry out further restoration works outside of the Tiaki Maniototo project objectives with an end date of June 2026.

If this application is successful, we would recommend that Helios provides a substantial annual contribution or upfront payment (in line with the cost to remove and recycling of the solar farm and batteries as well as a premium to restore the environment to as close to its original state as possible). We do not want to see this fall on to the landowners that are leasing their property to Helios as we do not believe they could financially carry out this work.

We feel this fund needs to be held with the Community Trust of the Maniototo as a bond for the life span of the project and beyond to fund any environmental restoration work should it be required.

If it is not required and the site is left clean and tidy, then the annual interest on this fund could be used towards improvements within the Maniototo, with the total contributions made from Helios returned to them as the work is carried out.

Upper Taieri Wai does believe in property rights and therefore would like to acknowledge the landowners who have chosen to lease their land for this purpose, this is their choice, they will have their reasons, and we hope to continue to have positive interactions with them in the future. Landowners' rights aside, this submission has a sole focus on ensuring that all checks and balances for the environment are taken into account throughout this process by CODC and ask that they engage experts when and where identified throughout this submission process.

Upper Taieri Wai Incorporated - Catchment Group

uppertaieriwai@gmail.com

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