

Submission on Notified
Resource Consent
PL241234525

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Submission on Notified Resource Consent

Reference: PL241234525 Submitted: 19 Dec 2024 10:46

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	Lauren Becker
Contact person (if applicable)	Lauren Becker
Electronic address for service of submitter:	laurenbeckerpatearoa@gmail.com
Phone number - day time	021946497
Postal address (or alternative method of service under section 352 of the Act):	26 Becker Road Patearoa RD 4 Ranfurly, Central Otago 9398

Your Application

Please select one regarding the application	I 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:	My submission relates to the entire proposal, with the most significant issues <ul style="list-style-type: none">* noise and vibration* the length of time for landscape mitigation to be effective* risk of fire* risk of contaminants (forever chemicals) in an event of a fire* risk of harm to environment and livestock in an event of a fire* risk to traffic safety from glint and glare* risk of ineffective site remediation at end of project* risk of negative impact on community economy* risk of visual pollution - loosing Night Sky status
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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.

There is also missing information in the application relating to the details of

- * the substation and 220V transmission connections
- * a plume report in case of a fire

I oppose the proposed development.

I consider further information is required to understand the effects of the proposal as outlined under the following headings.

If the application is approved, I consider more control is required in conditions of consent to cover the matters of concern set out in this submission.

I live in Patearoa and will be affected by the proposal, through potential visual and glare effects when I drive near the site, and the lack of effectiveness of landscape planting to mitigate visual effects when viewed from the roads nearby. The potential risk of contaminants leaching into the water supply and environment if there is a fire, along with the long term affects of such a large scale industrial development and the remediation at the end of the project and the potential negative impacts a fire could have to the environment - the livestock, waterways and people who are outside, if there was an event of a fire.

Noise and Vibration

The application refers to the use of galvanized steel piles for installing the proposed 550,810 solar panels and that they are to be driven into the ground by 2.5 to 3 metres. It is not clear how many piles are required for each panel, but even with one per panel the noise from pile driving will be consistent and have a stressful / nuisance effect for people living nearby and visitors to the area.

It is also questioned whether the noise levels during operations will be higher than assessed during the Marshall Day investigation, due to the higher temperatures in the area requiring fan cooling. This could have an unpleasant resonance effect that travels from the site, even if the noise is below the District Plan standard.

These noise effects need to be questioned further.

Landscape Mitigation

The visual and landscape character effects of the proposal as well as the glint and glare effects are heavily reliant on the proposed mitigation planting. This mitigation is not expected to reduce adverse effects until the plants are at mature height, in about five years, according to the Boffa Miskell report.

While irrigation and maintenance are proposed, this is going to be addressed at detailed design once the construction has commenced.

The Boffa Miskell report has selected species that they consider are suited to the harsh climate of the area. The suggest planting at future required spacings, and use of wind shelter. There is no assessment of what the wind shelter will look like or how this will be maintained for

the period it is required to be in place.

The success of planting (especially native species) can be limited in the area proposed due to the harsh climate. Any consent conditions will need to be very robust in terms of site preparation prior to planting, and ongoing plant maintenance and irrigation.

Risk of Fire

The risk of fire in this area is significant, given it is a dry climate that experiences many droughts. Often there are high winds, and given the geographical layout of the Maniototo Basin, fire has the potential to travel fast over a long distance and also the smoke from the fire is likely to sit in the basin.

The applicant has stated that they are consulting with FENZ and offered a consent condition. They have not responded to the FENZ list of requirements in the application documentation with sufficient detail to give confidence that they are familiar with the local conditions and the limits of rural and small urban fire-fighting teams and the shortage of water for many months of the year.

There is no plume report to indicate that if a battery storage container was to go on fire, how far the plume would travel. There is a lack of information surrounding the mitigating factors in which would be taken into consideration if there was a fire. How would this plume affect the environment, livestock and people in our community and the effect on their health.

Risk of contaminants

The application and supporting documents refer to two or more types of lithium ion batteries that may be used to store the generated energy. There is a lack of information in the 'chemistry' of the battery and what metals they have. Many compounds found in these batteries are 'forever' chemicals that could potentially remain in the soil and water supply for generations to come in the event of a fire. The number of batteries on site has the potential to release considerable contamination in the event of a fire and this can place a risk to the quality of our precious ground and surface water, which feed into stock and potable water supplies.

More information is required to address this, as well as measures to contain contaminants in the event of fire. It is also not clear whether a fire at the solar farm would result in air contaminants that could "plume" and adversely affect the health of residents and people in the area.

Glint and Glare

There is a huge concern about the amount of glint and glare such a large scale solar farm would have on the area. Not only to the roads near the proposed site but also to the residents in the township of Ranfurly and surrounding areas such as Kyeburn.

There is no coverage of the effects of how the proposal will comply with the requirements for the Naseby Dark Skies community standards, and whether full moon or bright moonlight will cause glint and glare that detracts from the dark skies that Naseby and the wider region rely on for tourist income.

The comments on glint and glare effects on road users assume that a fleeting effect is safe. The brightness of the glare from sunlight can cause temporary blindness and at 100kph is a safety issue on the State Highway 85 and the adjoining local roads. If the landscape planting does not reach ideal height for five years, this is not going to be effectively mitigated. The glint and glare on our roads would be a traffic hazard.

Site Remediation

The applicant has stated that they are responsible for the clean up and remediation of the site at the end of the 35-year project lifespan (back to its original condition). They also note that the solar panels will need to be replaced in about 20-25 years.

There is no mention of where the development infrastructure will be taken at completion or when components are replaced. The local refuse centres are not large enough to cater for this level of waste, and may not be equipped to deal with the nature of the waste.

This clean up, recycling of infrastructure, or disposal of it needs to be addressed early, and robust consent conditions in place to protect the landowner and others from having to do the clean-up in the event the applicant defaults on the development for any reason. This should include a bond of some sort based on a realistic cost to deal with the waste in 35 years' time.

It is assumed the mitigation planting will remain at the time of remediation.

Community Economy

The development has been proposed to increase jobs in the area however, such a large scale operation would require specialist technicians to build the development - it is likely that there are limited jobs for locals due to specialists required therefore there won't be long term employment. When the build is completed, how is proposed for the operation to be maintained? It is highly

likely that this will be operated remotely. There is also a concern that such a development could decrease the property value in the area.

There is no gain to the local community as the power will also be going to the North Island and stored power 'traded' on the market during peak times to make profit at the expense of a pristine environmental attraction in New Zealand. The potential risk to the environment, live stock and people, not to mention the sustainability of such a large scale operation is not fit for purpose in rural NZ and should be built closer to a place with more infrastructure.

I have grave concerns for this development to progress, the effect not only now, but for future generations to come.

Please upload any documents / photos that are relevant

I seek the following decision from the consent authority.

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

The proposal needs serious reviewing and instructed to provide an incredible amount of supporting information on how the developers propose to mitigate any of the areas of concern raised above.

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:

19/12/2024