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SUBMISSION ON NOTIFIED APPLICATION CONCERNING RESOURCE CONSENT

(Form 13)

Section 95A Resource Management Act 1991

To: The Chief Executive
Central Otago District Council
PO Box 122
Alexandra 9340
resource.consents@codc.govt.nz



DETAILS OF SUBMITTER

Full name: Jill Wolff + Neil Raut

Contact person (if applicable): Jill Wolff

Electronic address for service of submitter: jillywolff@gmail.com

Telephone: 021 316923

Postal address (or alternative method of service under [section 352](#) of the Act):

P.O. Box 86
Naseby 9354

This is a submission on the following resource consent application: RC No: **240065**

Applicant: **Helios OTA Op LP** Valuation No: **2828012800**

Location of Site: **48 Ranfurly-Naseby Road**

Brief Description of Application: **Land Use Consent to Construct, Operate and Maintain a Solar Farm (Maniatoto Plain Solar Farm) being a Renewable Electricity Generation Activity in a Rural Resource Area.**

The specific parts of the application that my submission relates to are:
(give details, attach on separate page if necessary)

Document attached.

This submission is: (attach on separate page if necessary)

Include:

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

Document attached.

I/We seek the following decision from the consent authority:
(give precise details, including the general nature of any conditions sought)

Application for Resource Consent
APP240351084 to be declined.

I ~~support~~/oppose the application ~~OR neither support or oppose~~ (select one)

I wish / ~~do not wish~~ to be heard in support of this submission (select one)

I ~~am~~/am not* a trade competitor for the purposes of [section 308B](#) of the Resource Management Act 1991 (select one)

~~I/We am/am not~~ (select one) directly affected by an effect of the subject matter of the submission that:

(a) adversely affects the environment; and

~~(b) does not relate to trade competition or the effects of trade competition.~~

*Delete this paragraph if you are not a trade competitor.

***I/We will consider presenting a joint case if others make a similar submission**

**Delete this paragraph if not applicable.*

I ~~request~~ do not request (select one), 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 below as you may incur costs relating to this request.*"


Signature _____ Date 18/12/24
(to be signed by submitter or person authorised to sign on behalf of submitter)

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.

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.

The specific parts of the application that my submission relates to are:

1. Positive Contribution of Infrastructure
2. Company risk of longevity of Helio
3. Contribution to NZ goal of 100% renewable generative energy by 2030
4. Night use of power from grid
5. Height concerns
6. 200k transmission line to substation
7. Glint & glare
8. Landscape mitigation
9. Night sky
10. End of life
11. Ongoing maintenance and faults
12. Health & safety
13. Construction time
14. Economic values for community
15. Compatability with other wideranging land use in area

This submission is opposing the construction of a solar farm, as proposed by Helios for the following reasons:

1. Positive Contribution of Infrastructure

We see no positive contributions that this solar farm will bring to the region, longterm. What it will bring is a change to the landscape which is unacceptable for the beautiful Maniototo area.

2. Company risk of longevity of Helio

Helio only started in 2020. If Helio onsold the solar farm, what are the guarantees that a new owner will comply with consent conditions. What risk does this leave the community in. It appears Blackrock have at least 7% ownership and have recently liquidated SolarZero. Whilst this in itself is not a reason to object to this application, I would like to see significant processes put in place to ensure the district is not left with a white elephant.

3. Contribution to NZ goal of 100% renewable generative energy by 2030

Whilst this is a correct statement, it should also have a proviso of "in the right place to provide maximum benefit" with it. Solar based in the top of the north island would have a far greater benefit so why does the application not show comparative solar farm benefits if built elsewhere in NZ. I would suggest its because the benefit is to the solar farm owner, not the NZ population and it is financially more beneficial to build this on the Maniototo. This shows the Government drive for renewable generative energy is being used as an incorrect driver in this application.

4. Night use of power from grid

There is nothing providing guarantees there will be no negative effects to existing power users within the area during the night when the batteries will be replenished from the national grid.

5. **Height concerns**

It is noted that the site office will be 3.6m high, the solar panels will reach 2.8m and the batteries will be 3m high.

Boundary planting of trees will not provide visual mitigation for quite some years, as the application suggests a positive impact will be in greater than 20 years.

This appears to be closer to the decommissioning timeframe than a visual mitigation requirement should be.

6. **200k transmission line to substation**

Need clarification that there will be no option for above ground pylons.

The application notes there will be a 20m high pylon, plus an additional lightning spike taking it to 24m. This has the potential to impact the Maniototo landscape.

7. **Glint & glare**

Whilst the roads affected may be considered minor, any risk to drivers must be taken seriously and questioned as to why it is allowed. On this basis the consent should be declined.

8. **Landscape mitigation**

A lot of emphasis is being put on trees providing visual mitigation. This is a very long term solution, without taking into account the dry and therefore slow growing conditions in the area, A 3m high berm would be a more practical and permanent solution. I object to the application based on the ongoing visual impact whilst driving on the main road into Naseby. This road is used by thousands of tourists, cabbies and permanent residents each year and will impact significantly on first impressions on a very beautiful historic town.

Emphasis in the application is put on Maniototo being famous for the long distance views and perceptions of spaciousness. Short distance views being destroyed by a large solar farm will have everlasting distress for those wanting to appreciate the full Maniototo beauty. We don't want to go from open landscape to energy infrastructure in this beautiful landscape.

9. **Night sky**

Whilst the application states all lighting will be downfacing and a significant portion of the proposed land falls within the Dark Sky Precinct of Naseby, it would be good to see an assessment done to confirm night skies will not be affected.

10. **End of life**

Decommissioning has no detail within the application. Given the scale of equipment to be disposed of there should be detailed processes in place as to how this will be handled and by who, and again, penalties if not completed correctly.

11. **Ongoing maintenance and faults**

Given there will be no onsite staff, what confidence can we have in maintenance and faults being rectified in a timely manner. There needs to be a policy around this, and also around the ability for the community to advise on issues and expect timely responses and correction, with processes and penalties.

12. Health & safety

Independent advice and reviewing other solar installations worldwide it is suggested there are health risks with the various chemicals involved. There is risk of long term contamination and fire. It is concerning to see the statement 'no adverse risk to human health and safety. It is considered less than minor'. I would suggest the regions population would not agree with this, and this alone is cause for opposition of this consent.

It also states that fire extinguishers will be available. Will we all have a key as the entire area will be locked, how does this help until emergency services arrive. A locked environment further creates delays in addressing any faults which may impact the local communities.

Confirmed FENZ processes need to be included in the application, for all potential risk factors. Engagement to date with FENZ has not included risk relating to the BESS storage systems, and in particular lithium battery fires with toxic fumes.

The application states that fire training will be provided for site staff, operators and workers. Not much use if there's no local onsite staff after the 24 month construction period.

13. Construction time

The application continually states construction is expected to take 24 months. Given the extra disruption to the area during this phase it would be good to see penalties put in place if it exceeds 24 months.

There are various areas in the application that state further detail will be available once design is progressed. This appears to provide little in the way of facts and needs to state 'worst case scenario' conditions, so any change will be less than this.

14. Economic values for community

Whilst there will be some economic value during the 24 months commissioning, there is no longtime economic value to the community for something that the community will have to live with in their region.

15. Compatibility with other wide ranging land use in area

To compare a solar farm with the Naseby forest is a step too far for me. Naseby Forest (Ernslaw One Ltd) provides the community and wider community with extensive benefits. There are no long term community benefits with the solar farm.