

Submission on Notified
Resource Consent
PL241235543

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Submission on Notified Resource Consent

Reference PL241235543 **Submitted** 19 Dec 2024 03:43

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

Valuation Number

Applicant

Location of Site

Brief Description of Application

Submissions Close

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.

Important information so you don't lose your data

If you wish to take some time completing this form, we strongly recommend that you **create a [login](#) and log in to your account prior to starting to complete the form**. This gives you the ability to save a draft and return to it later.

If you are a club or organisation, please use an email that is associated with the club rather than your work or personal email.

Logging in before starting to enter information into the form also means you won't lose your information if the form times out, or if you accidentally navigate away from the screen you're working on.

You cannot save your information and return to it later unless you log in before you start the form.

Regardless whether you are logged in, once you have completed and submitted the form, you will receive a copy of your submission to the email address you specify in the form.

Either go to our [Online Services](#) page to create an account (or log in if you already have an account) or continue below to start without logging in.

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	David Charles Brady
Contact person (if applicable)	
Electronic address for service of submitter:	dave@bradysolutions.co.nz
Phone number - day time	021458140
Postal address (or alternative method of service under section 352 of the Act):	PO Box 26, Naseby 9354

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: The whole application.

The submission - include: While I support solar as a potential renewable energy

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

source, I OPPOSE the whole application on the following matters:

1. The scale of the development would change the natural landscape amenity
2. Impact of reflective light on the Naseby Night Sky accreditation
3. The potential cultural impact of the development on the historic character of Naseby and the potential downside to tourism for the Maniototo and Naseby
4. The reduction of high voltage transmission capacity
5. The impact of hazardous materials if there was a fire or discharge into the environment.

While I hold no qualifications in these matters, I am left to rely on the Council to ensure that the potential impact of the development is considered carefully as I did not see sufficient evidence or potential mitigations in the consent applications or responses to the Council’s RFI to convince me that these had been addressed. Attached is a document that provides further argument against the application on these five points.

[Solar Farm DCB 20241219.pdf](#) (95 kb)

I seek the following decision from the consent authority.

Give precise details, including the general nature of any conditions sought The application is declined in full.

Select below - Pursuant to [section 100A](#) of the Act, that I do not request 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.”

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

I am a resident of Naseby and live within the Naseby township. While I support solar as a potential renewable energy source, I OPPOSE the proposal on the following matters:

1. The scale of the development would change the natural landscape amenity
2. Impact of reflective light on the Naseby Night Sky accreditation
3. The potential cultural impact of the development on the historic character of Naseby and the potential downside to tourism for the Maniototo and Naseby
4. The reduction of high voltage transmission capacity
5. The impact of hazardous materials if there was a fire or discharge into the environment.

While I hold no qualifications in these matters, I am left to rely on the Council to ensure that the potential impact of the development is considered carefully as I did not see sufficient evidence or potential mitigations in the consent applications or responses to the Council's RFI to convince me that these had been addressed.

1. SCALE OF THE DEVELOPMENT

The proposed development will cover approximately 667 hectares of pastoral land. This is roughly twice the size of the Ranfurly township. The Ranfurly township is the most significant non-rural feature of the Maniototo at approximately 386 hectares.

From the CODC website – Central Otago – A World of Difference¹ the Council sets out their vision for the Maniototo:

"The Maniototo Story

Imposing mountain ranges edge the wide splendour of the Maniototo Plain. Candid skies of brilliant blue dance across the land. When evening falls, a tantalising magenta sunset slides behind flinty, tussock-clad ranges. ...

... Steeped in nature's rhythms, locals share an enduring bond with this place. The sweeping silent spaces, the loyal guardianship of mountain ranges, the contrasting hues of seasonal changes and the expansive beauty of starry black nights. ..."

If consented and developed, this proposal will be the single largest built form on the Maniototo and will undoubtedly spoil this vision. The Council needs to ensure the character that they highlight will not be lost.

2. REFLECTION IMPACT ON NASEBY DARK SKY

Nowhere in the application or responses to the Council's RFI is there any assessment on the impact of reflection at nighttime on the Dark Sky. I note that the Council recently approved a plan change to protect the Naseby Dark Sky, Plan Change 22. The applicant also proposes no mitigation to any effects on the Dark Sky.

If consented and developed, this proposal will have an unknown impact on the Dark Sky. Without this knowledge the application should be refused.

3. CULTURAL IMPACT OF THE DEVELOPMENT ON THE HISTORIC CHARACTER OF NASEBY AND THE POTENTIAL DOWNSIDE TO TOURISM FOR THE MANIOTOTO AND NASEBY

¹ <https://centralotagonz.com/discover/our-stories/the-maniototo-story/>

Tourism produces 5.5% of Central Otago's GDP². On the CODC website – Central Otago – A World of Difference the opening page states³: *“There are few places in the world which will leave you with a lasting sense of difference. Central Otago is undoubtedly one of them from its landscapes, its seasons, its people, its products and experiences.”*

The application does not address the impact of the development on the township of Naseby nor impact on tourism which is a significant employer in the Maniototo.

On the CODC website – Central Otago – A World of Difference when describing the Maniototo is says⁴: *“If you feel like you are driving through a painting, it's because you are.”* It then goes on to describe the Maniototo. *“The Mānīatoto is one of New Zealand's unparalleled places — a vast, soulful plain fringed by craggy, tussock-clad hills and sturdy mountain ranges. Big blue skies by day become incredible dark skies by night. Naseby residents know this for a fact — they've been taking scientific readings and their night skies are up there with the best.*

Within the weathered and timeless plain and valleys are resourceful, resilient communities, generous in spirit and strengthened by deep, steadfast friendships forged through generations. Looking out for each other is simply a way of life. In this place, land and people shape each other — but nature is always in charge.”

The website page then goes on to describe Naseby: *“Below the Ida Range, tucked away in forestry surroundings, Naseby is quite the charmer. Sometimes described as the ‘jewel of the Maniototo’, the town used to be a major gold mining centre with as many as 5000 diggers working their fingers to the bone in search of riches.*

Take a walking tour of the historic town and admire the perfectly preserved Victorian shops and buildings. There are two museums and two churches from the 1870s, well worth a perusal - their interiors hold a wealth of local treasures and tales. ...

... The night sky viewed from Naseby, is out of this world. Don't forget to look up, you'll be blown away by the pristine clarity of the starry skies. Naseby is on target to become a Night Sky Community in the near future. ...”

What concerns me is that having an industrial site on such size and scale on the key entry to Naseby will deter visitors because it will be perceived as a town of industry not of historic charm. We risk it losing the ‘jewel of the Maniototo’ appearance.

On the CODC website – Central Otago – A World of Difference⁵, it notes that one of the regional values is *“Protecting our rich heritage - Protect and celebrate our rich heritage in landscapes, architecture, flora, fauna and cultural heritage.”*

On the same site, the ‘why’ of the regional identity is stated as: *“We know there are few parts in the world that will leave you with a lasting sense of difference. Central Otago is undoubtedly one of them, from its landscapes, its seasons, its people, its products and experiences. Together we must celebrate it and look after it. To help achieve this, we have based our regional identity around a set of values to help build on its uniqueness and create the kind of place we can be proud of now and into the future. We are all encouraged to embrace these values in our everyday lives.*

² <https://rep.infometrics.co.nz/central-otago-district/tourism/gdp?compare=new-zealand>

³ <https://centralotagonz.com/>

⁴ <https://centralotagonz.com/discover/our-towns-and-communities/ranfurlly-naseby-and-the-maniototo/>

⁵ <https://centralotagonz.com/discover/our-values/>

There will be many influences that could alter this unique region, meaning it is important that we all make wise choices that last beyond our lifetime."

This application appears to me to be in direct conflict with this. It is up to each one of us to protect this world of difference – a life of involvement or generations of regret.

If consented and developed, this proposal will have an unknown impact on the historic perception of historic Naseby, and I am concerned an unintended consequence would be a negative effect on tourism. Without this known the application should be refused.

4. REDUCTION OF HIGH VOLTAGE TRANSMISSION CAPACITY

There is no discussion on the impact of the development on the capacity of the transmission lines on the Naseby to Livingstone lines. These lines were recently upgraded, but the impact of this development is not mentioned.

I am concerned that this development will take up any excess capacity and be a barrier of entry for other smaller scale developments that will have a lesser impact on the Maniototo.

The South Island is a net exporter of energy, and a reduction of capacity will put the region, I believe at risk.

If consented and developed, this proposal will have an unknown impact on the high voltage transmission capacity. Without this known the application should be refused

5. IMPACT OF HAZARDOUS MATERIALS IF THERE WAS A FIRE OR DISCHARGE INTO THE ENVIRONMENT

I am not an expert on the impact of hazardous materials on the environment. However, I am concerned that a release of hazardous materials from fire or spill would be catastrophic for the Maniototo environment, particularly fresh water supplies and on local flora and fauna.

If consented and developed, this proposal will impose an unnecessary risk to the environment. I believe this risk is too great and therefore this application should be refused.

In summary, there is too much to lose if this application for consent is granted. Once the development is built, there is no turning back.