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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.consent@codc.govt.nz

DETAILS OF SUBMITTER

Full name: Karen Munro

Contact person (if applicable):

Electronic address for service of submitter: munrokaren519@gmail.com

Telephone: 027 454 2021

Postal address (or alternative method of service under [section 352](#) of the Act):
21 Stafford Street, Ranfurly, 9332

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)

See attached letter.

The submission relates to the entire proposal with particular concerns relating to the lack of benefits to the local community, the effects of 24 months construction period (noise, dust, traffic), costs to ratepayers for waste, clean up, fire emergencies, housing for workers on the construction project, effects on water supplies, safe and efficient access to the site, lost of slow growing native species that have ecological significance and are in decline, effectiveness of proposed mitigation planting, risk from wind and hail on panels and resultant damage clean up, lack of water for irrigation of proposed planting, effect on dark skies, contaminants and control on battery and inverter systems.

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.*

I neither support or oppose the development

I consider further information is required, as per comments above as outlined in attached letter.

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

Decline the application in the current form

If the application is approved, more control is required in conditions to cover the matters of concern listed above as outlined in attached letter.

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.”



December 16, 2024

Signature

Date

(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 Chief Executive
Central Otago District Council
PO Box 122
Alexandra 9340
By Email Only: resource.consent@codc.govt.nz
Attention: Adam Vincent

Dear Adam

RC240065 – Submission on Application by Helios OP Ltd to Construct, Operate and Maintain a Solar Farm in the Rural Resource Area at 48 Ranfurly-Naseby Road

Job No 719093

Helio.docx Karen Munro

12/17/2024

The application by Helios OP Ltd to construct, operate and maintain a 300 MWac Solar Farm at 48 Ranfurly-Naseby Road, should not be allowed to go forward, in its present form.

This power is not being created for local use, but for national consumption, as Helios OP Ltd will be power banking on site and only releasing it at peak consumption time. The greatest need for this power production is in the upper North Island, therefore Helios OP Ltd should be constructing it in this part of New Zealand. If it is going from Naseby Substation to Auckland there will be approximately a 30% lost of produced power, plus is our present Cook Strait cable up to handling increased power through put?

I have great concern for the 24 month period of construction, due to noise, and dust, plus the increased heavy traffic, having to travel via Ranfurly. I consider site access should be looked at carefully, as the present application has most vehicles coming and going on Ranfurly-Naseby Road, this road in its present state will not stand up to this heavy traffic daily, the main traffic access should be the Ranfurly Back Road.

At what cost to the Ratepayers will be the disposal of all the packaging that will come with project, or is it Helios OP Ltd responsibility?

What plans have the Maniototo Community Boad put in place to house the 200 worker for the 24 month construction time? If the plan is to house these workers in holiday homes etc, this means our local tourist operators will not have consumers coming to the area, they will suffer lost of income for 24 months, who is financial responsible? This will affect other businesses in the area due to this decline in income.

There is no clear benefit to the people of Maniototo, as most of the work will be undertaken by specialised construction teams, with the uptake of some local people to take on casual work when available, or if needed. Once construction is complete the site will be manned from a distance, with site visits for up keep of plant and site maintenance, therefore we will be left with a shiny solar farm on our landscape

2 Site Description Page 6

2.1 Site description – Location and description

‘The site also contains multiple waterways with poor drainage that are located within the natural depressions of the topography. ‘

My concern is that contaminants from this site will flow on down to the town of Ranfurly and surrounding areas, finally ending up in the Taieri River, as our landscape has multiple drainage channels that come to life with heavy rain. What is being put in place to prevent site run off during a heavy rainfall.

‘Access to the site is from Ranfurly – Naseby Road along the western boundary and Ranfurly Back Road along the eastern boundary. ‘

I would like to see the main three site access to the construction site coming off Ranfurly Back Road, and not off Ranfurly-Naseby Road, because this is the main route into Naseby, therefore by using the Ranfurly Back Road will cause less disruption to the local community commuting between towns. Plus a much safer roading environment.

“The Ecological Impact Assessment (EIA)² appended as Appendix 5 identifies that the site has limited ecological value due to the historical removal of indigenous vegetation and its agricultural use. Shrubs at the site, though in decline, holds high ecological significance in accordance with the Otago Regional Policy Statement, and the National Policy Statement for Indigenous Biodiversity 2023 (NPS-IB). “

My concern is that this vegetation has been slowly growing for a very long time, so to replace any removal at the site will take a long time for plant replacement regrowth.

‘There are two moderately large wetlands on the site (located centrally and in the southwest, hereafter referred to as the central wetland and southwest wetland) which support indigenous wetland vegetation, including species considered at risk.’

My concern is these wetlands are part of the plains drainage and possible pollutants from the construction and production phase could enter this system what is Helio’s plan to prevent this. What systems in the application are in place for ‘Lake Affect ‘ with any airborne waterfowl around these wetlands.

3.1 Operational Solar Farm Components

Solar Panels Page 11

‘The solar farm will consist of approximately 550,810 solar panels, mounted on a tracking system. The panels will be aligned in north and south rows, and the panels will follow the movement of the sun throughout the day.’

My Concern

- 1 These panel at present cannot be recycled, what plans do Helio have in place to deal with any broken panels that arrive on site or get damaged during construction? If they are unable to be recycled where are they being disposed of?
- 2 The north/south alignment is of concern, due to the very strong North-westerly winds that occur on the Maniototo Plains. The Naseby forest has record winds over 100 kph over the years. The Porth Wen Solar Farm in north Anglesey, was badly damaged in 96 kph winds as Storm Darragh past through the area on the 11 December 2024. The land is now covered in shattered panels and the concern over many small particles that now have polluted the landscape. What do Helio have in place for a similar event happening on the above site, and what protocol do they have in place to do a similar clean-up?
- 3 Hail storms, are the proposed panels able to with stand hail storms? There have been a few badly damaged solar farms with hailstones, what is Helio's protocol for deposal of damaged panels? Plus the clean-up if they shatter and scatter particles onto the land?

Cleaning of Panels.

‘Solar panels have a silicon based non-stick surface and are cleaned adequately via rain. ‘

- 1 As we have a very low rainfall, I question if this method will work for Helio, is there a back-up plan if the rainfall isn't enough? If so what is Helios OP Ltd protocol long term on this issue?
- 2 Can Helio guarantee that there will be no pollution from cleaning the panels with rainwater over time, especially towards the end of life of the panels?
- 3 Is there nighttime light reflection from the panels? If yes, this will be an issue for Naseby's night sky accreditation, what measures are to be undertaken to prevent this reflection by Helios OP Ltd.

Inverters Page 12 & 13

Seventy-three (73) inverters will be installed across the site.

‘These prefabricated structures will sit on piles approximately 600 mm above ground level. The underlying ground will comprise compacted soil and stone. As an operational requirement to avoid overheating, this structure will be in a light grey colour palette.’

- 1 What is being put in place for trapping the 'fire water', if an inverter goes on fire? In the application there is only compacted soil and stones. These will not stop any contaminates from entering waterways.
- 2 I see that the inverters are sitting on 600mm piles. What are the piles constructed from?

'The specific make and model of inverter will be confirmed at the detailed design stage.' Page 12

- 3 Very hard to know what pollution would be produced as Helio do not specify what type they plan to use.
- 4 Concern of the sun causing overheating of inverter.
- 5 Smoke plumes from a fire, how toxic will this be and what is Helio's safety protocol to prevent this effecting animals and people. What protocols are in place for this event?

Battery Energy Storage System (BESS) Page 13 & 14

'The BESS will be housed on individual concrete plinths within a metalled compound.'

- 1 In the application it is not clear how many BESS is to be placed on site, 24 or 14. My understanding there was to be 32 BESS units.

If another BESS is determined as the most appropriate during detailed design,

'The battery energy storage area will be finished in gravel and each battery will sit on concrete plinths.' Page 19

- 2 What is being put in place for trapping the 'fire water' if a BESS goes on fire? As the land underneath is to be finished in gravel and the BESS to be placed on concrete plinths. Under their application this fire water will enter the natural water drainage.
- 3 Smoke plume if a BESS goes on fire, what safety protocol do Helio have in place for animals and people?

Substation Page 14 &15

'The substation's exact layout and design is subject to future detailed design.'

'Two 33/220kV 150 megavolt-amperes transformers will be installed on banded foundations. An oil treatment facility will be installed within a separate enclosure onsite to treat stormwater before discharging to land. An enclosure may be required over the capacitor banks if deemed necessary for harmonic mitigation. The capacitor banks will not contain any oil.'

- 1 Who is responsible for the monitoring of the release of any captured stormwater onto the land? Is it CODC, ORC, or Helios OP Ltd, my understanding that the application shows that Helios OP Ltd will monitor this. Is there a proven protocol for this water release?
- 2 What happens if there is an explosion or fire in one of the transformers, and we know this will create a toxic plume? What safety plan is in place to protect the sheep, wildlife, and the residents of Maniototo from the gases and toxic residue of this plume

Site Remediation

In approximately 20-25 years the collection panels will be coming to an end of life, is this the end of the Solar Farm, or do they struggle on for a further ten years to complete the 35 years projected lifespan of the farm. Whatever time frame for this Solar Farm, there will need to be a big clean-up to dismantle the farm. What are the rules for the CODC to demand a Bond, and binding clauses to cover this event. Too many businesses seem to be able to walk away and leave these things for Ratepayers or Tax payers to finance these clean-ups.

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

Conclusion

As Helios OP Ltd don't appear to have had any public consultation with the public of Maniototo, I know of one drop-in session only, and on that day there was another community event which prevented the majority of public attending. Not good enough.

It is considered that the proposal should not be approved without additional information being considered first, and if it is to be approved any decision needs to include robust conditions to ensure the effects of the proposal are effectively avoided, remedied or mitigated. I am happy to respond to questions on this submission.

Yours faithfully

Karen Munro
21 Stafford Street
Ranfurly, 9332

Phone 027 454 2021

Helio.docxKaren Munro

12/17/2024

CC: Helios OTA Op LP
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