

Submission on Notified
Resource Consent
PL241231747

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Submission on Notified Resource Consent

Reference PL241231747 Submitted 17 Dec 2024 05:48

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 Renee Katie Weir
Contact person (if applicable)
Electronic address for service of submitter: reneeegerard.weir@gmail.com
Phone number - day time 0276993422
Postal address (or alternative method of service under [section 352](#) of the Act): 278 Orangapai Rd, RD 4, Ranfurly

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: All, please see attached submission

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.

As a community member I do not want to see this landscape & environment turned in to an industrial junk yard to benefit the North Island. This is an unspoiled part of NZ and this is what I consider greenwashing. Please see attached submission.

[Submission Against Helios OTA Op LP Solar Farm Proposal.pdf](#) (92 kb)

I seek the following decision from the consent authority.

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

That the council turn down this commercial installation three times the size of the town of Ranfurly and review their district plans to protect our communities.

Conditions:

If this proceeds and consent is granted then I believe the council and Helios need to consider some or all of the following conditions:

Compensation for immediate neighbors, recognising the loss in land value through this process.

Compensation for the whole community - monetary annual donation of a minimum of \$200k to the Community Trust of the Maniototo.

Regular groundwater testing, or funding ORC to carry out

this work or install real time monitors.
Pest control support for neighbors, financial membership in the Maniototo Pest Management Company.
Purchase of dam storage space for access to fire fighting water from the Irrigation Companies - annual fee for this right to hold water in their dams for this reason.
Donations to the local fire and emergency and ambulance services.
Training annually from expert fire and emergency specialists for the local emergency responders.
Provide the fire brigade with protective gear and tanks for working near battery fires.
Second right to space in the grid after the local hydro schemes.
Profit share of 15% to the community.
Provide an opportunity for locals to access solar panels for home or small scale install on farms (economy of scale negotiations and access to expert installers post farm install).
Provide the Maniototo Community Trust or CODC with a bond type payment to be held for removal/recycling for end of life processes of approx. \$500million or other proven value to carry out this work.

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."

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.

I do not request
Yes

Please sign (click on the words CAPTURE)



Date signed:

17/12/2024

Submission Against Helios OTA Op LP Solar Farm Proposal

To the Central Otago District Council,

I submit my opposition to the proposed Helios OTA Op LP solar farm (300 MWac) on Ranfurly-Naseby Road due to its significant ecological, environmental, and social risks. While renewable energy projects are important for sustainability, this proposal raises critical concerns that must be addressed before approval is considered.

I would like to publicly acknowledge those landowners who have been provided with this opportunity during a difficult time in farming. They are good community minded people and have been offered an opportunity to diversify on their farm that was 'too good to turn down'. My submission is not against those landowners or their property rights but against the scale of this project, the international ownership interests, and the lack of consideration for the community surrounding this solar farm.

I am in favour of solar on a smaller scale (community and individual) and without battery storage of this scale. However, I strongly believe that at the proposed scale and with the battery storage in play this needs to be located where the power demand and energy need is, and that is not here in the beautiful Maniototo!

Location

The Maniototo, is renowned for its stark, striking beauty and distinctive landscape. Its uniqueness and appeal arise from several factors:

1. Wide, Open Spaces

The Maniototo is characterised by vast, open plains surrounded by rugged mountain ranges, including the Hawkdun Range, Kakanui Mountains and the Rock and Pillar Range. This creates a sense of expansive freedom and solitude.

2. Grasslands

The region is dominated by golden tussock grasslands that shimmer under the changing light, creating a picturesque and quintessentially Central Otago scenery.

3. Dramatic Skies

The Maniototo is famous for its dramatic, ever-changing skies, from crystal-clear blue days to stormy, brooding clouds and awe-inspiring sunsets. The region's relatively low light pollution also makes it an excellent spot for stargazing and has provided some incredible opportunities for photographing Auroras Australis. The milky way is so prominent here in the Maniototo that when stepping outside at night and looking up you feel like you can touch it and are the only one that can see it as it is so defined.

4. Distinct Seasons

The climate is highly seasonal, offering vibrant contrasts:

- Hot, dry summers that intensify the golden tones of the landscape.
- Crisp, frosty winters where the mountains and paddocks are often dusted with snow.
- Autumns known for stunning foliage, especially in nearby towns like Naseby.
- Spring, bringing bursts of wildflowers and new life.

5. Cultural and Historical Significance

The Maniototo holds a rich history tied to the Otago Gold Rush of the 19th century. Relics of this era, including stone buildings, mining ruins, and old railway tracks, dot the landscape, adding a layer of historical intrigue. Many Maori campsites have been identified in the Maniototo and stories of families moving through the area gathering kai have been shared by local runaka.

6. Rock Formations

- Unique geological features, like the schist tors on the Rock and Pillar Range & volcanoes, contribute to the region's rugged aesthetic. These weathered rock formations often seem otherworldly and are popular among photographers and hikers.

7. Peaceful Rural Charm

- Scattered small settlements, like Ranfurly, St. Bathans, and Naseby, exude a quiet, rural charm, with their historic buildings and relaxed pace of life complementing the surrounding natural beauty.

8. Artistic Inspiration

- The landscape has inspired numerous artists, writers, and filmmakers. It features prominently in the work of New Zealand artists like Grahame Sydney, whose paintings capture the area's serene and haunting beauty. The Maniototo has had a number of period films and currently a period series being filmed here due to the unique and vast open spaces that are uninterrupted by urban or commercial installations.

The Maniototo's combination of natural grandeur, cultural depth, and tranquil isolation makes it a truly special part of New Zealand.

I do not want to see this landscape ruined by a commercial installation that the community does not benefit from!

I have a number of concerns that I will elaborate on further below:

1. Ecological Concerns

Impact on Indigenous Biodiversity

The site includes wetlands and indigenous shrublands, as identified in the National Policy Statement for Indigenous Biodiversity (2023). Wetlands are among New Zealand's most threatened ecosystems, reduced to less than 10% of their historical extent. Their role in supporting biodiversity and providing ecosystem services, such as water filtration and carbon sequestration, is vital. Construction and operation may disrupt wetland hydrology, introduce contaminants to groundwater, and degrade habitats, threatening indigenous vegetation and at-risk species.

With the Maniototo being such an arid and drought prone location plant survival and growth rates are exceptionally low and slow and without access to water almost impossible to keep alive. I don't believe that the mitigations proposed are as effective as the wetlands in their natural state. I would also like to question where these properties will access irrigation water to keep the native mitigation planting that is proposed alive. Looking at the consent map for the ORC I only see bores on one of these properties, do they have rights to irrigate from these?

Rabbit Infestations

Experience from other solar farms has shown that large open spaces beneath solar panels can exacerbate rabbit infestations, leading to soil degradation and vegetation loss. This will compound ecological damage and reduce the site's sustainability. The ability to carry out pest control measures around solar panels and batteries will be problematic and dangerous.

Wetland Rules

As you will be aware the wetland rules have been revoked from the National Policy for Fresh Water by the current government. However, there is a movement within our community to do better than the rules by working as a collective of landowners to manage the regionally significant wetlands of the Upper Taieri Plain. We would expect that this proposal will be held to 'best practice' should it succeed.

How are the underground cables going to work around the wetland areas, how will all the earth works occur around the wetlands? Why is ORC not involved with carrying out their own ecological study of the impacts from this install? Do you think receiving the 'facts' from the interested party is the way to proceed or should other experts be used that are not involved or connected to Helios or other projects of similar scale?

Weather Patterns

The weather here in the Maniototo is extremely variable, high winds, high snow fall and hot dry days.

The Maniototo is a particularly dry area and in the summer can have conditions similar to a desert.

Research in desert environments (like those in the southwestern U.S.) has shown temperature increases of 2–3°C above solar farms compared to nearby natural areas. These changes are more pronounced during calm wind conditions when heat is less easily dispersed.

Lifting the surrounding air temp by 2-3°C during an already hot summer day of 31°C will have extreme detrimental effects to the surrounding land and would affect the life within the area being set aside for “wetlands”.

The panel install is replacing the ability for the grass to carry out its natural processes through reduced evapotranspiration, a cooling process where plants release water vapor into the air.

Solar panels absorb more sunlight than natural ground surfaces like sand or vegetation. This absorbed energy converts into heat, increasing the air temperature above and around the panels.

At night, solar panels release stored heat more slowly than the natural ground, potentially causing localized warming during nighttime.

2. Environmental Hazards

Fire Risk and Toxic Plumes

The proposal's reliance on lithium-based battery energy storage systems (BESS) introduces significant fire risks. Fires in lithium-ion batteries can release toxic fumes, including hydrogen fluoride, which is harmful to humans, livestock, and the environment. The rural volunteer fire brigade lacks the resources and training to manage such high-risk incidents effectively.

It is not so much about putting out the fire at the solar farm but in the surrounding environment. There is a forest that wraps around the town of Naseby, pastoral land that has tussock land and then the nationally significant wetland of the Upper Taieri that would all be at risk.

Inadequate access to water further compounds the fire hazard. The Maniototo is a drought prone area and as we saw with the Falls Dam last summer when the Dam was empty. Dam storage is often low during the summer periods and therefore ability to access water is low.

Contamination of the Water Table

The site's proximity to waterways and a shallow water table (~7 m depth) poses contamination risks from potential lead, cadmium, or other heavy metals leaching from panels or batteries. Groundwater contamination would impact local ecosystems, agriculture, and human health.

End-of-Life Waste Management

Solar panels and batteries contain materials that require specialised recycling and disposal. Current legislation does not mandate comprehensive end-of-life management for large-scale solar infrastructure, leaving the community vulnerable to environmental and financial burdens once the infrastructure becomes obsolete. I would have great concerns for those farmers and the cost of tidying up such a large scale installment. If a bond could be held for this type of work I would feel more comfortable, however companies in the solar game are renowned for liquidating prior to clean up and leaving millions of dollars of mess for small communities and the farms they sit on.

3. Community Impact

Visual and Tourism Concerns

The site is located along the Central Otago Touring Route, a scenic area with growing tourist activity. Glare from the panels, despite claims of minimal impact, may pose risks to drivers and detract from the region's visual appeal. The Naseby Dark Sky status could also be jeopardised, affecting tourism focused on stargazing.

Displacement of Established Energy Projects

This project may take transmission line capacity away from the Manawa Energy Patearoa and Paerau hydro schemes. These schemes have established partnerships with the local Maniototo Irrigation Company, providing long-term benefits to the agricultural economy. This partnership provides access to water for irrigation of over 10,000ha of land in the Maniototo, if this was jeopardised and Manawa was not making sufficient profit to justify operating in this community the cost for farmers to continue to maintain the infrastructure for water delivery on a \$200m asset would be put at risk affecting the economy of the Maniototo and New Zealand.

The ability for battery storage to take power from the grid when prices are low and then sell back when they peak will affect the profit from smaller generators such as the Manawa Scheme.

Minimal Community Benefits

The project offers little tangible benefit to the local community beyond financial gains for the landowners leasing the sites. Long-term employment opportunities are minimal, and the energy generated is not needed in the South Island, with significant transmission losses expected if sent to the North Island.

Transparency Concerns

The lease value should be disclosed to ensure fairness and public trust. If lease payments far exceed market rates, it raises ethical concerns about the integrity of the process and the ability for the landowners to really ask the questions that we are stating within these submissions against the project. Have the landowners been given a golden carrot that they just rightfully

can't see past? Additionally, the staggered application to the District and Regional Councils appears to sidestep comprehensive review, undermining informed decision-making.

In their application they talk of the consent already issued to Energy Bay Limited for a smaller solar farm across the road. This company is not listed on the NZ companies office and therefore there is concern that this consent is now waiting for this proposal to proceed to enable ongoing land parcels to be added to this already exceptionally large scale proposal. Where does it end? Is this the land that NZ is willing to sacrifice for powering the North Island and is Central Otago District Council willing to roll over and let this slice of paradise be taken.

One of the landowners will not see the installation from their home, the other will have enough to purchase in a different location to avoid the view should they wish. Yet the neighbours and a considerable number of other residents in the community will see this daily out their windows, I will see this 20km away daily. The scale is an issue!

4. Timing and Equity Issues

The timing of the submission process, so close to the holiday season, limits the ability of the community to prepare informed submissions. This imbalance is exacerbated by Helios' potential legal resources compared to those of the local community, putting residents at a disadvantage in defending their interests.

I would have liked more time to read the application in more depth but was only made aware of the application a week ago. I would have felt more neutral about the proposal if those making the application had given us an opportunity to hear their view and for us to ask them the difficult questions or the potential good from this project. At this point I only see benefit for the North Island power needs, the landowners that the panels will sit on and the pockets of those involved in Helios.

5. Legislative Gaps

I believe New Zealand's regulations for large-scale solar farms have not kept pace with technological advancements. Decision-making frameworks and environmental safeguards require urgent updates to ensure projects of this scale are implemented responsibly.

Conditions

If this proceeds and consent is granted then I believe the council and Helios need to consider some or all of the following conditions:

- Compensation for immediate neighbours, recognising the loss in land value through this process.
- Compensation for the whole community - monetary annual donation of a minimum of \$200k to the Community Trust of the Maniototo.
- Regular groundwater testing, or funding ORC to carry out this work or install real time monitors.

- Pest control support for neighbours, financial membership in the Maniototo Pest Management Company.
- Purchase of dam storage space for access to fire fighting water from the Irrigation Companies - annual fee for this right to hold water in their dams for this reason.
- Donations to the local fire and emergency and ambulance services.
- Training annually from expert fire and emergency specialists for the local emergency responders.
- Provide the fire brigade with protective gear and tanks for working near battery fires.
- Second right to space in the grid after the local hydro schemes.
- Profit share of 15% to the community.
- Provide an opportunity for locals to access solar panels for home or small scale install on farms (economy of scale negotiations and access to expert installers post farm install).
- Provide the Maniototo Community Trust or CODC with a bond type payment to be held for removal/recycling for end of life processes of approx. \$500million or other proven value to carry out this work.

Conclusion

While renewable energy is essential to combat NZ's energy concerns, this project presents numerous unresolved environmental, ecological, and social issues for the Maniototo Community. These concerns necessitate a more thorough review, community consultation, and robust regulatory oversight. I strongly urge the council to decline this application or require substantial revisions to mitigate its adverse impacts and consideration for the future prosperity and ecological values of the Maniototo and the Taieri River. The power is not needed in the south, these farms should be positioned in the North Island where the shortage is.