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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: ERIC DOUGLAS SWINBOURN

Contact person (if applicable):

Electronic address for service of submitter: theoldgaragenaseby@xtia.co.nz

Telephone: 03 444 9996

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

P.O. Box 33 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.**



Despite the application being over 480 pages it is vague. e.g. BESS could be Tesla Megapack or Power Electronics FS 4390K or any other suitable BESS. What will it be and what chemistry.

The number of inverters could be 73, 74 or 80 depending on which part of the application you are reading. They will probably need to be replaced within the life of the plant although they say that the workforce will be only 1/2 full time jobs after construction.

Inadequate.

They state that the traffic flow will be 24 trips per day (15 heavy and 9 light) at the peak of construction. How are the 200-250 workers getting to work and home each day.

The figures don't stack up given that they have to get 550,810 panels on site in addition to several hundred thousand steel piles and frame work, 5819 tracker motors, 25,044 ccmtrs of gravel, 9274 cubic meters of thermal sand, over 70 container sized inverters, hundreds of kilometers of cabling, unknown amount of concrete, unknown amount of fencing, large quantity of trees and plants, large collection of machinery, considerable quantity of building materials, numerous portable buildings for construction base etc. For example 200 to 250 workers will create about 4000 litres of sewerage per day or one full sucker truck. How many water tankers for dust suppression per day.

Disagree with their figures.

The Glint and Glare effect is minimized in this report. What about the possible strobe effect to passing traffic of glare through trees
No mention of the effect of reflected

light on the dark skies quality. After many years of trying to be recognised as a Park Skies Community and several years to get an outside lighting ordinance incorporated into the District plan this is of great importance to the community.

Inadequate.

There mention of potential BESS runaway or fire. 300,000 litres of water will not come close to controlling a large Lithium Ion battery in a runaway situation.

There is no Plume report and no evacuation reference.

Although there are many of these installations in existence it would seem that fires are becoming more commonplace with an installation igniting somewhere in the world every few months. This cannot be ignored.

Inadequate.

The noise effects are minimized and there is no Construction Noise and Vibration Management Plan because of projected compliance with District Plan noise limits. Who will monitor and police this and how regularly.

Tell the people living nearby in a quiet environment that up to 70Db all day and peak noises exceeding 100Db is a minor effect.

Disagree.

Visual. This much loved, admired, and photographed area will be changed adversely for a couple of generations. There will be no hiding 660 hectares of shiny black panels. They state that it's visual effects will

change the landscape but will have minor adverse effects initially reducing to less than minor. Try telling that to those of us who will have to drive past 4 kilometers of panels regularly instead of our now pleasant rural views or the visitors approaching on state highway 85 looking for the lovely historic town of Naseby.
Disagree.

The effect of 200 transient workers in an otherwise small, stable close knit community. They only state the possible, unquantifiable positive spin offs but don't acknowledge any negative effects on our community which we know are only too real.
Disagree.

Decommissioning. They state that the land will be returned to its original condition and that all material will be recycled or disposed of appropriately. What will be recycled where, what will be disposed of and where. How long will this take and how many people. Who will guarantee this.

Inadequate.

Finally, what are the benefits to the Maniototo. The negatives are all too clear.

Community division

Noise pollution

Traffic volume increase

Light pollution.

Spoilt visual amenity

Increased fire risk.

Increased risk of contamination of soil & groundwater.

Peoples perception of Maniototo - a world of difference.

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

(give details, attach on separate page if necessary)

There are so many parts of this application that don't add up or give cause for concern that they are listed separately.

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 oppose the application in its entirety. It is too vague, inaccurate and inappropriate. The Maniototo does not need additional generation and the scale of it will adversely effect the community.

I/~~We~~ seek the following decision from the consent authority:

(give precise details, including the general nature of any conditions sought)

To reject this application.

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:~~

- ~~adversely affects the environment; and~~
- ~~does not relate to trade competition or the effects of trade competition.~~

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

~~*If/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."

E D Swinbourn

Signature

(to be signed by submitter or person authorised to sign on behalf of submitter)

12-12-2024

Date

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.