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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: Stephen Grant Goodlass

Contact person (if applicable):

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

Telephone: 0210724572

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

Poolburn

RD2 Oturehua

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)
Please see attached document

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.*
-
-
-

Please see attached document

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

Refuse consent on the basis of the current resource consent 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:

(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.*”



19/12/2024

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 LP to Construct, Operate and Maintain a Solar Farm in the Rural Resource Area at 48 Ranfurly-Naseby Road

This letter is provided in support of the attached completed submission form referencing the above project.

Overview

The quality of this resource consent is dubious at best and makes it difficult to remain objective about the application.

I object to consent being granted on the basis that the application is sparse in detail, factually incorrect and possibly seeks to mislead.

Helios make the following statement in the resource consent application making the statement “Helios is a Kiwi company established in early 2020 when the founders recognised the potential for grid-scale solar developments to make a positive contribution to the existing New Zealand energy mix.”. Yes, Helios Otago is registered as a NZ business but would be described as a shell company for its international parent. Helios Otago have applied for and received an “Exemption from the farm land offer criterion” which, as I understand it, is basically an instrument for overseas investment in NZ. In purporting to be a NZ company, Helios are misleading the public at the very least it would seem. Helios are positioning themselves to take advantage of the spot price market for the maximisation of profit for its investors and this comes at no benefit for the local community.

Later in the consent application, assertions like the following are made
“**EIT-EN-03 – Energy use.** Development is located and designed to facilitate the efficient use of energy and to reduce demand if possible, minimising the contribution that Otago

makes to total greenhouse gas emissions". Is this an attempt to greenwash? It is my understanding from the consent application that the solar farm will hook into the Transpower high tension lines and hence the power is not used in region at all? Other similar statements talk about energy security for the region, yet again, the power is not intended for the local market.

The beauty of solar is that it can be co-located to the area of need if the solar characteristics of that area are amenable. Energy loss in transmission is a given and depends on the voltage and lines that it is travelling over. Sending this power to the North Island results in power loss and a need for infrastructure maintenance and improvement. To be able to send the electricity north and still be profitable illustrates a key issue with energy production and use within NZ whereby most consumption is in the north island while most production is in the South Island.

Solar in the South Island, unless for local consumption, is nonsensical due to the distance of the location from the equator and hence sun angle. Panels produce maximum power when they are 90 degrees to the sun. The further south you move the more difficult it becomes to angle panels to achieve optimal results. Couple this with total daylight hours across the seasons and it's clear that solar used in the north island should be located in the north island.

It's unclear to me as a member of the public whether the economic benefits to the region of such a development is a consideration. However, I will make statement about it. In the short term there will be some benefit to local business with the need for accommodation, food, equipment hire or purchase, mechanical and engineering assistance. There may be a labour component as well during construction but with mix of absolute specialist at one end and basic labour at the other end there will be little opportunity provided to the local economy. Longer term there will be some caretaking but it's not clear if those person(s) will be from the local community. Given the international investment component of Helios, it's clear that the bulk of the profits will exit NZ. It would seem, on the face of it, that this is a case of international energy trading in NZ with little benefit to the country at all despite the representations that Helios make in their application.

It would seem that the positioning of an industrial scale facility in the Maniototo, rather than collocating it to the point of consumption, really seeks to mitigate the risk of death should there be a fire or leakage into groundwater due to the relatively small local population. Aligned with that is the probable low cost for the lease of land.

I address my particular concerns below.

Light

Naseby is a dark sky community. There is no statement in the consent application as to how the solar panels will be arranged over night and whether high reflectivity of Moonlight could affect this designation?

Noise

Some aspects of noise are detailed, however there are significant issues around being able to assess impacts as follows

1. Given there is no decision as to which type of BESS, then it's unclear what type of inverters will be used and thus no way to be able to find out what their noise generation characteristics are.
2. Similarly there is no description of the type of transformer(s) and how they will be cooled. Therefore, no way to assess what sort of noise they will generate.
3. Of most concern, there is no consideration given to the generation of noise due to wind e.g. whistling, as wind passes through the structures, along with amplification. This would be VERY significant and impossible to mitigate on an installation of this size.

Screening

As it stands, the information about screening fails to take into account the characteristics of our local environment and how long it takes for trees to grow to a size that would provide suitable screening. I'm also concerned to read that the intention is to use evergreen conifers. I know the local landscape already has these, but there has been significant effort and money expended to remove the wilding variety from Central Otago. Why would this be considered a reasonable screening option other than its relatively fast growing?

BESS

It's unreasonable for CODC to grant consent given there is no definitive information provided about the BESS. Without knowing the type of battery there can be no assessment for environmental hazards, nor consideration of noise from the inverters the units will need. Of great concern is that the 32 Tesla batteries are considered a starting point for the site. Is this a battery storage facility initially disguised as a solar generator?

Maintenance

Illustrative of the rather sketchy quality of the consent application, there is a statement that the inverters have a 20yr lifespan and will need to be replaced within the lifetime of the project on a like for like basis. This is factually incorrect because the same model is unlikely to be available. Therefore, are there provisions for making sure that any replacement equipment meets any minimum environmental considerations should this project be given consent?

Decommissioning

There is scarce information available to assess the future cleanup for the site with respect to funding it. NZ has a really bad legacy with companies not making good on their obligations or going cap in hand to the government for assistance. Recent examples are Tiwai Point with ouvea stored in Maitai at significant risk to residents and onsite land contamination.

Conclusion

In writing this submission, I increasingly felt frustrated that this was a waste of my time having to wade through such a weak consent application. There are so many critical aspects that are not detailed or lack detail that I cannot see how CODC would even consider granting consent as there is no way to assess the effects of such an installation. At another level, given that the solar farm provides no ongoing significant benefit to the region, it should be rejected.