Response ID ANON-URZ4-5FSA-4

Submitted to Fast-track approval applications Submitted on 2024-04-26 19:24:08

Submitter details

Is this application for section 2a or 2b?

2B

1 Submitter name

Individual or organisation name: Far North Solar Farm Ltd

2 Contact person

Contact person name: Richard Homewood

3 What is your job title

Job title: Managing Director

4 What is your contact email address?

Email: s_9(2)(a)

5 What is your phone number?

Phone number: s 9(2)(a)

6 What is your postal address?

Postal address:

s 9(2)(a)

7 Is your address for service different from your postal address?

No

Organisation:

Contact person:

Phone number:

Email address:

Job title:

Please enter your service address:

Section 1: Project location

Site address or location

Add the address or describe the location:

Legal description is Lot 3 DP 75206.

The site is located between the hydro canal from Lake Ohau to the Ohau A power station and the Ohau river. The site is currently being cleared of wilding pines to provide for dryland cropping, although given the lack of available irrigation it is highly unproductive farmland. The site sits adjacent to the Ohau A power station.

File upload:

Transpower timeline Describe the staging of the project including the nature and timing of the staging.xlsx was uploaded

Upload file here:

Genesis_OHAU A_JA 575Wp_280MWp_260424-Layout plan.pdf was uploaded

Do you have a current copy of the relevant Record(s) of Title?

Yes

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Who are the registered legal land owner(s)?

Please write your answer here:

Douglas Robert McIntrye, Waitaki Trustees (Golden Acres Limited)

Detail the nature of the applicant's legal interest (if any) in the land on which the project will occur

Please write your answer here:

Applicant has a 30 + 30 year lease signed with the landowner. The acquisition has been approved by the OIO and the interest will go unconditional on grant of Resource Consent

Section 2: Project details

What is the project name?

Please write your answer here: Ohau A Solar Farm

What is the project summary?

Please write your answer here:

Oahu A is a 278 megawatt-peak photovoltaic solar farm in the Mackenzie Basin which, when complete, will provide enough power to support the equivalent of 52,000 homes. The facility will connect to the adjacent Ohau A Transpower grid point.

What are the project details?

Please write your answer here:

The Ohau A solar farm is one of the largest solar farms so far announced for development in New Zealand. It will complement the current hydro power station already connected into the Ohau A Grid Injection Point (GIP), and will increase the resilience of the National Grid during periods of drought or low hydropower generation, whilst also significantly assisting decarbonisation efforts.

I The Project will:

Generate 280MWp of additional electricity for a catchment area of 52,000 households.

Create 240 local jobs during construction.

Directly contribute to NZ's transition to a low emissions economy and national emissions reductions targets. The clean energy produced by the project will achieve CO2 savings equivalent to effectively removing 18,528 cars from the national fleet.

The site is currently covered in wilding pines and is being cleared by the landowner for dryland cropping. The site does not have access to irrigation and is highly unproductive and overrun by rabbits. Development of the land for renewable energy generation, in conjunction with an intended ecological restoration and pest management plan, would provide a more sustainable long-term use of the site and deliver a net ecological gain for the receiving area.

Alongside pest management, the project will include revegetation of steep slopes covering approximately 35ha with native lowland species endemic to the Mackenzie District. It is anticipated that the 35ha restoration area will be developed alongside the Department of Conservation, and will benefit from the experiences gained through the Ecological Enhancement Plan (EEP) developed for 'The Point' Solar Farm, another solar project being developed by FNSF nearby.

The proposal is to construct and operate a utility-scale solar farm, consisting of photovoltaic panels across approximately 281 ha of the site area.

I This includes the solar arrays and associated structures (i.e. medium voltage substations, inverters, main control room, data room and staff office).

□ Existing site access tracks will be upgraded, or new tracks constructed to service the panels.

The panels will be mounted on a fixed tilt with a tilted angle of 30 degrees facing true north, mounting structure through the mounting legs which will be secured by screw piles or driven piles in the topsoil. The panels are mounted with string configuration having 28 or 14 modules per strings and in portrait format (2P) and 28 or 14-panel long tables. The pitch distance between the panel tables is 6.5m

Inverters will be placed over the site in 20-foot shipping containers and will be clustered within specific parts of the site to increase efficiencies and allow for the containers to be screened from view.

I Minimal earthworks are required as part of this proposal, approximately 2,500 m3 is required across the entire site to upgrade site access tracks and construct temporary compounds for construction.

The solar farm will be connected to the National Grid through the Ohau A grid injection point (GIP). FNSF is working with Transpower, through a Transpower investigation process, to connect into the existing GIP through the creation of two new bays. It is expected that any fast-track application for the solar farm will include the GIP upgrade and associated connection works.

It is also expected that any fast-track application for the solar farm will include a subdivision to separate the solar farm from the existing title, which includes 60ha currently used for a combination of carbon farming and a quarry, both of which are expected to remain operational.

Describe the staging of the project, including the nature and timing of the staging

Please write your answer here:

The project will be delivered in two phases: development and construction. Each of these phases and the key milestones are detailed below: Development

There are 4 key milestones for the development phase:

- 1. Land Acquisition Option
- 2. Resource Consent
- 3. Transpower Works Agreement (TWA)
- 4. OIO Approval

Initial development of the project first commenced in 2021. The land acquisition option has been achieved with an OIO Advertising Exemption granted, and the TWA is on track for execution in November 2024. The OIO investment approval is planned to be submitted by the end of Q2 2024 with approval anticipated in Q3 2024. This will leave resource consent as the only outstanding milestones in the development phase of the project. Once all the development milestones have been achieved, the project will move into the construction phase.

Construction

Construction can be broadly divided into the following phases/activities:

- 1. Complete land acquisition on 30 + 30 year lease
- 2. Award construction contract
- 3. Commence detailed design
- 4. Order long lead items
- 5. Commence construction
- 6. Commissioning

Items 1 to 4 are expected to take place over a six-month timeframe from the completion of the development phase. Construction works are planned to commence Q1 2025. Transpower has scheduled the commissioning of the new connection assets for Q1 2027. Solar farm commissioning is planned for Q1/Q2 2027.

What are the details of the regime under which approval is being sought?

Please write your answer here:

Resource Management Act 1991

If you seeking approval under the Resource Management Act, who are the relevant local authorities?

Please write your answer here:

Mackenzie District Council Canterbury Regional Council

What applications have you already made for approvals on the same or a similar project?

Please write your answer here:

No resource consent application has been lodged for this project; however, given the joint conclusions reached by Mackenzie District Council and Environment Canterbury in regards to FNSF's 'The Point' solar farm project, which is of similar scale and within the same district, any application for resource consent is likely to result in a request for Ministerial referral from both councils.

Is approval required for the project by someone other than the applicant?

No

Please explain your answer here:

The applicant is project developer

If the approval(s) are granted, when do you anticipate construction activities will begin, and be completed?

Please write your answer here:

FNSF plans to complete the commissioning of the Ohau A Solar Farm in Q1/Q2 2027.

To that end, FNSF expects to enter the TWA in November 2024. Final OIO investment approval for the project is anticipated to be granted by Q3 2024. A TWA is needed to ensure the Ohau A GIP upgrades and related infrastructure required to connect the solar farm to the National Grid are built on the site. Resource consent for the Ohau A Solar Farm will need to be granted ahead of the contract going unconditional.

Once Resource Consent has been obtained, FNSF will take the following next steps:

1. Present the project as Ready to Build (RTB) to JV partner Aquila Clean Energy APAC as per the Framework Agreement between the parties.

2. Take up the 30 + 30 year lease agreement on the property.

3. Contract the detailed design contract with the selected construction contractor (EPC). This will include site testing and detailed design and is expected to take six months to complete.

4. Initiate debt procurement for the project.

5. Work with Transpower on procurement of long lead time items for the Ohau A GIP upgrade, as well as the solar farm switchgear.

6. Place orders for plants, fencing and other materials required for early site works.

7. The above items are anticipated to take in the order of six months with site works commencing Q2 2025.

8. Transpower is scheduled to complete the GIP build for commissioning in Q1 2027, subject to ordering long lead items by Q1 2025.

9. FNSF plans to complete commissioning in Q1/Q2 2027.

Section 3: Consultation

Who are the persons affected by the project?

Please write your answer here:

- Mackenzie District Council
- Canterbury Regional Council
- 🛛 Te Runanga o Ngāi Tahu
- Department of Conservation
- $\hfill\square$ Fire and Emergency New Zealand Ltd
- I Transpower New Zealand Ltd
- I Meridian Energy

Detail all consultation undertaken with the persons referred to above. Include a statement explaining how engagement has informed the project.

Please write your answer here:

Consultation has been limited to precursory discussions with stakeholders as the project has worked through preliminary design and feasibility. The concept, including location and size, has been raised with Te Rūnanga o Ngāi Tahu, and more specifically with Rūnanga groups Arowhenua and Waihau.

FNSF has also consulted with Forest and Bird and the Department of Conservation on the project.

Consultation with Transpower has been more detailed as their input is the critical first step in assessing the viability of the project.

The Ohau A Solar Farm project is now in a position to commence detailed consultation with potentially affected parties and a communications and engagement plan has been developed to support this. FNSF has also engaged a specialist iwi engagement practitioner to facilitate the consultation process from a cultural perspective.

FNSF intends to continue to build on efforts to facilitate successful long-term relationships and outcomes with Rūnanga groups in Te Manahuna Mackenzie. We hope to collaborate with Mana whenua through the design of an ecological restoration area of approximately 35ha on the site, including site visits. Through this Mahi the project's design will be informed by Rūnanga views on the type of vegetation used in the restoration, as well as sourcing, planting and maintaining the new areas. FNSF will seek a Cultural Impact Assessment from Rūnanga on the project and work with them to accommodate any concerns. All design and layout documents will be shared. It is hoped that through this early engagement, meaningful relationships can be formed that will lead to increased employment and business opportunities through the creation of the solar farm.

FNSF has established a close working relationship with the Department of Conservation in relation to the Mackenzie area through the development of 'The Point' solar farm site nearby. Engagement with DoC on Ohau A will inform the project by:

□ Sharing all site plans and designs for comment will allow the incorporation of feedback into detailed design.

□ Site visits with ecology experts will assess the restoration potential of the site - including how the site, or parts of it, can be used for intensive conservation purposes such as invertebrate sanctuaries and breeding colonies.

□ Workshop with DoC and iwi to finalise ecological restoration area designs.

Identify DoC projects which can be financially supported by the project on-site, or nearby. Collaborate to ensure effective results are achieved to ensure ongoing benefit.

The input of DoC specialists will actively inform the design of the ecological restoration that is intended and we expect the Department to remain active partners in the project throughout construction and once completed.

Engagement with Fire and Emergency NZ will seek to inform how the physical layout of the solar farm can be best designed to ensure its safe ongoing operation. This will likely include, but not be limited to, such things as the number and placement of water tanks around the site and the placement of inverters and other electrical design. FENZ will also be consulted on the ecological restoration plans to ensure fire safety considerations are integrated into the final design.

Consultation will also occur directly with affected parties in close proximity to the development. Depending on the level of effect the development might have on them, mitigation options will be discussed and any agreed solutions will be built into conditions attached to development. FNSF will also engage the wider community through a combination of media activity and in-person information events designed to provide information about the project and seek feedback which can then be used to inform aspects of the project's design.

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Describe any processes already undertaken under the Public Works Act 1981 in relation to the land or any part of the land on which the project will occur:

Please write your answer here:

Not applicable.

Section 4: Iwi authorities and Treaty settlements

What treaty settlements apply to the geographical location of the project?

Please write your answer here:

The project site is located within the rohe of Te Runanga o Ngai Tahu. No statutory acknowledgement areas are known to apply on or adjacent to the site.

Are there any Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019 principles or provisions that are relevant to the project?

No

If yes, what are they?:

Are there any identified parcels of Māori land within the project area, marae, and identified wāhi tapu?

No

If yes, what are they?:

Is the project proposed on any land returned under a Treaty settlement or any identified Māori land described in the ineligibility criteria?

No

Has the applicant has secured the relevant landowners' consent?

Yes

Is the project proposed in any customary marine title area, protected customary rights area, or aquaculture settlement area declared under s 12 of the Māori Commercial Aquaculture Claims Settlement Act 2004 or identified within an individual iwi settlement? No

If yes, what are they?:

Has there been an assessment of any effects of the activity on the exercise of a protected customary right?

No

If yes, please explain:

Upload your assessment if necessary: No file uploaded

Section 5: Adverse effects

What are the anticipated and known adverse effects of the project on the environment?

Please describe:

Construction of the proposed solar farm has the potential to give rise to a limited range of adverse effects, including:

D Potential temporary construction effects in relation to noise and traffic;

 $\hfill\square$ Potential operational effects in relation to noise and traffic;

□ Landscape and visual effects;

D Potential stormwater diversion and discharge effects; and

Cultural effects.

It is expected that adverse effects on the receiving environment can be appropriately managed through resource consent conditions requiring initiatives such as the screening of the site with vegetation, the implementation of a range of environmental management plans such as a Construction Management Plan, Lizard Management Plan, Avian Management Plan and Invertebrate Management Plan.

Overall the adverse effects are anticipated to be less than minor.

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Section 6: National policy statements and national environmental standards

What is the general assessment of the project in relation to any relevant national policy statement (including the New Zealand Coastal Policy Statement) and national environmental standard?

Please write your answer here:

The project is directly supported by the single objective of the National Policy Statement for Renewable Energy Generation 2011, in relation to providing a resilient and renewable source of electricity generation in the Mackenzie Basin.

The proposal is consistent with all relevant National Environmental Standards.

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Section 7: Eligibility

Will access to the fast-track process enable the project to be processed in a more timely and cost-efficient way than under normal processes?

Yes

Please explain your answer here:

The process of consenting a large-scale solar farm in New Zealand under the RMA is often very challenging. The consenting process in relation to this type of development is often slow, costly and complex and can take up to two years to achieve, particularly if a consent decision is appealed by submitters, which is becoming more and more of a certainty in relation to solar farms, regardless of the merits or otherwise of an appeal.

Given the joint conclusion reached by Mackenzie District Council and Canterbury Regional Council in regards to FNSF's 'The Point' project, it is likely that they would both also recommend that a project of the scale and significance of the 'Ohau A' Solar Farm be referred for Ministerial call-in under the RMA if the project is not otherwise able to utilise the fast-track process.

What is the impact referring this project will have on the efficient operation of the fast-track process?

Please write your answer here:

The project is significantly advanced in the connection works with Transpower, and the solar farm design is well defined. Additionally, we anticipate all the necessary environmental technical assessments will be completed ahead by the close of Q2 2024. Therefore, the project is not expected to have any impact on the efficient operation of the fast-track process. The creation of new renewable energy generation infrastructure is a key element of the country's plan to reduce emissions and reach climate change targets. The project also directly supports target nine of the Government Targets recently approved by Cabinet - to reduce net greenhouse gas emissions. The project will provide significant regional and national benefit through the creation of new renewable electricity and is therefore consistent with the intention of the fast-track decision-making process for infrastructure and development projects.

Has the project been identified as a priority project in a:

Central government plan or strategy

Please explain your answer here:

The creation of new renewable energy generation infrastructure is a key element of the country's plan to reduce emissions and reach climate change targets. The project also directly supports target nine of the Government Targets recently approved by Cabinet - to reduce net greenhouse gas emissions. The project will provide significant regional and national benefit through the creation of new renewable electricity and is therefore consistent with the intention of the fast-track decision-making process for infrastructure and development projects.

Will the project deliver regionally or nationally significant infrastructure?

National significant infrastructure

Please explain your answer here:

Between now and 2050, demand for power is expected to rise by 68%, making the creation of new renewable energy generation a matter of urgency to enable NZ to transition to a low emissions economy. The Ohau A solar farm will be one of the largest currently planned for development in New Zealand. The proposal will provide electricity generation to meet the demands of approximately 52,000 homes making it a nationally significant generator of electricity. It is expected that the proposal will reduce carbon emissions from electricity generation in New Zealand (each year) equivalent to effectively removing 18,528 cars from the national fleet. The project aligns with the Government's desire to double renewable electricity generation by 2050.

The proposal will provide a unique opportunity to generate power during the day, therefore allowing hydro lakes to store more water during the day to increase capacity at night. This will increase the resilience and function of the National Grid throughout the country

Will the project:

Please explain your answer here:

Will the project deliver significant economic benefits?

Yes

Please explain your answer here:

The proposal will provide employment opportunities for approximately 220 full time equivalent staff during the construction (over an 18-24 month period).

There will also be significant employment opportunities in relation to the proposed planting and ongoing maintenance of the screening and ecological enhancement areas and pest control efforts.

More broadly, the provision of renewable electricity generation to meet the demands of approximately 52,000 homes provides significant economic benefits for both the Mackenzie district and its surrounds.

The project will result in approximately 400 million NZD of investment, of which a significant portion is likely to be spent with local contractors, as well as benefiting the surrounding hospitality businesses.

Will the project support primary industries, including aquaculture?

No

Please explain your answer here:

Will the project support development of natural resources, including minerals and petroleum?

Yes

Please explain your answer here:

The proposal will generate significant renewable electricity from solar energy, a natural resource critically under utilised in New Zealand for energy generation purposes. Between now and 2050, demand for power is expected to rise by 68% and in order to meet that demand, whilst also reaching emissions reductions targets, renewable energy generation will need to expand on a large scale.

Will the project support climate change mitigation, including the reduction or removal of greenhouse gas emissions?

Yes

Please explain your answer here:

The proposal directly supports the uptake of zero-carbon renewable electricity generation and supports New Zealand's greenhouse gas emissions reduction targets, in line with target Nine - Reduced net greenhouse gas emissions - of the Government Targets approved by Cabinet. Specifically, the project will remove the equivalent of 18,528 cars from the road via avoided emissions.

More broadly, the proposal provides security and resilience to the national electricity network by generating power during the day. This helps allow the hydro lakes to store more water for use at night which will consequently reduce the reliance on gas and coal electricity generation to meet the generation shortfall in times of need.

Will the project support adaptation, resilience, and recovery from natural hazards?

Yes

Please explain your answer here:

The project will increase the resilience of the National Grid by providing additional electricity generation capacity through solar energy. This will complement the existing hydro schemes and provide an alternative energy source, which is important during times when the hydro lakes are at low supply (i.e. during dry winters). More extreme and frequent weather events are expected in the future as a result of climate change meaning a heightened risk of severe drought affecting the performance of hydro lakes. The current alternative to a shortage of production from the hydro system in New Zealand is from fossil fuel generated electricity. If the country can build more solar, it will lower the need to rely on high greenhouse gas emitting fossil fuels such as gas and coal.

Will the project address significant environmental issues?

Yes

Please explain your answer here:

The site is currently highly degraded land and without development, it is likely to remain a degraded state. The proposal will include the removal of wilding pines (a national conservation goal) and extensive native planting across approximately 35ha will occur, which will increase biodiversity values on the site and provide important habitat for indigenous fauna. In addition to this, the project will include predator proof zones, and will support breeding programs for a range of endemic species. The project will be working closely with mana whenua and the Department of Conservation to achieve meaningful and significant environmental gains and improvements to the site area.

The proposal also provides the environmental benefit of creating renewable energy generation to displace current fossil fuel use for the same purpose. By displacing 'dirty' energy with 'clean' energy the project has a positive impact on efforts to fight climate change by reducing carbon emissions.

Is the project consistent with local or regional planning documents, including spatial strategies?

Yes

Please explain your answer here:

The Canterbury Regional Policy Statement, Canterbury Land and Water Regional Plan and Mackenzie District Plan contain provisions that support and encourage renewable electricity generation activities, while ensuring that adverse effects on the receiving environment are appropriately managed and mitigated. The relevant planning documents also promote the restoration, preservation and maintenance of indigenous vegetation and biodiversity values. The proposal is consistent with these provisions, in terms of increasing the supply of renewable electricity and improving biodiversity values on the site.

Anything else?

Please write your answer here:

The Ohau A solar farm shares many features and benefits of 'The Point' solar farm. Given the position that was reached by Canterbury Regional Council and Mackenzie District Council on 'The Point' project, we believe the only viable avenue for processing of the Ohau A solar farm consent lies with its inclusion in schedule 2b of the Fast Track bill. Considering the very advanced position of the project in the Transpower design contract as well as the tight timelines for construction of the new grid assets, any fast track approval for the project will have a significant impact on the country's likelihood of reaching net zero.

The current RMA consenting process means that any opposition to the development of a solar farm, regardless of merit, can result in substantial time delays and add significant costs to the development. Opposition is generally led by those in close proximity to solar developments, or by groups who have an interest nearby, who simply prefer the status quo and use environmental or cultural claims of adverse effects to advance their opposition in an attempt to halt development. There is seldom expert evidence to support these claims. It is our experience that even when professional, factual evidence is provided by the proponent to rebut these claims, local consent authorities lack the confidence and national policy direction to make decisions and instead seek to allow the process to progress to higher consenting authorities such as the Environment Court. This adds considerable time and cost to achieving consents for the exact type of activity that is so clearly supported by Government policy.

Does the project includes an activity which would make it ineligible?

No

If yes, please explain:

Section 8: Climate change and natural hazards

Will the project be affected by climate change and natural hazards?

No

If yes, please explain:

Section 9: Track record

Please add a summary of all compliance and/or enforcement actions taken against the applicant by any entity with enforcement powers under the Acts referred to in the Bill, and the outcome of those actions.

Please write your answer here:

FNSF has no history of abatement notes in relation to any of our other solar farm developments across the country. We have gained all necessary consents and OIO approvals for our other sites, which are being developed in accordance with best practice environmental and social management measures.

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Declaration

Do you acknowledge your submission will be published on environment.govt.nz if required

Yes

By typing your name in the field below you are electronically signing this application form and certifying the information given in this application is true and correct.

Please write your name here: Richard Homewood

Important notes