

Response ID ANON-URZ4-5FGK-2

Submitted to Fast-track approval applications
Submitted on 2024-05-03 12:51:59

Submitter details

Is this application for section 2a or 2b?

2B

1 Submitter name

Individual or organisation name:
Twizel Solar Farm Ltd

2 Contact person

Contact person name:
Steve Rademaker

3 What is your job title

Job title:
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:

c/- The Advisory Group
Level 9
55 Shortland Street
Auckland Central
Auckland 1010

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

Yes

Organisation:
Stradegey Planning Ltd

Contact person:
Claire Price

Phone number:
s 9(2)(a)

Email address:
s 9(2)(a)

Job title:
Associate Planner

Please enter your service address:

PO Box 239,
Napier 4140

Section 1: Project location

Site address or location

Add the address or describe the location:

The site comprises land at 2411 - 2413 Twizel-Omarama Road, Omarama.

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Location_Plan_Twizel.pdf was uploaded

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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 McIntyre, Waitaki Trustees (Golden Acres) Ltd

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:

The project has secured land tenure via an option for lease for a long term period in excess of 25 years.

Section 2: Project details

What is the project name?

Please write your answer here:

Twizel Solar Farm

What is the project summary?

Please write your answer here:

The Twizel Solar Farm Ltd project involves the establishment, operation and maintenance of a ~604ha solar farm, supplying renewable electricity directly to the National Grid, over land at 2411 - 2413 Twizel-Omarama Road, Omarama, and includes ancillary activities such as earthworks and grid connection to Transpower's existing high voltage network which traverses the site. The solar farm will have a generation output of up to 300MW, which is equivalent to supplying ~100,000 households, and is therefore a priority project when considering the Government's 2050 vision for a highly renewable, sustainable and efficient energy system.

What are the project details?

Please write your answer here:

The purpose of the Twizel Solar Farm is to generate renewable energy from the sun using solar technology and to efficiently supply this to the National Grid. The objective is to have the solar farm completed and operational by Q3 2027.

- The proposed solar farm requires approvals for the structures, facilities and ancillary activities described below:
- Site compound(s) (a level metalled area),
- Solar panels and single axis tracking system,
- Power Conversion Units (PCUs),
- Electrical equipment including cabling above and below ground through the site and grid connection infrastructure to the National Grid,
- The use of existing vehicle accesses on State Highway 8, for construction and long term operational access,
- New internal roads,
- Earthworks across the site to enable the installation and construction of the solar farm as described above.

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

Please write your answer here:

The Twizel Solar Farm will be developed and operational within an estimated timeframe of 18 months from procurement of funding for the project.

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

Please write your answer here:

Resource Management Act 1991, and the Wildlife Act 1953

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

Please write your answer here:

Waitaki District Council
Environment Canterbury Regional Council

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

Please write your answer here:

None

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

No

Please explain your answer here:

N/A - the landowner's approval has been obtained.

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

Please write your answer here:

- o detailed design Q2 2025
- o procurement Q4 2025
- o funding Q1 2026
- o site works commencement. Q1 2026
- o completion Q3 2027

Section 3: Consultation

Who are the persons affected by the project?

Please write your answer here:

relevant local authorities
o No consultation carried out yet.

relevant iwi authorities
o There has been no engagement with Te Rūnanga o Ngāi Tahu yet.

relevant Treaty settlement entities
o There has been no engagement with Te Rūnanga o Ngāi Tahu yet.

protected customary rights groups
o N/A

customary marine title groups
o N/A

applicant groups under the Marine and Coastal (Takutai Moana) Act 2011
o N/A

ngā hapū o Ngāti Porou
o N/A

any person with a registered interest in land that may need to be acquired under the Public Works Act 1981.
o N/A

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:

No consultation has been carried yet.

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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:

N/A

Section 4: Iwi authorities and Treaty settlements

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

Please write your answer here:

Ngāi Tahu Claims Settlement Act 1998 (NTCSA)

The NTCSA was passed to achieve settlement of historical Ngāi Tahu claims against the Crown. Amongst other things, the Act identifies taonga species and establishes tōpuni, statutory acknowledgements and nohoanga sites (temporary campsites). These instruments recognise the special association of Ngāi Tahu with these areas and species as one mechanism for improving the effectiveness of Ngāi Tahu participation in the resource management process.

The site is not within or adjacent to a Statutory Acknowledgement Area listed in the Deed.

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:

- Potential effects on landscape values;
- Potential effects on cultural values;

- Potential effects on ecological values
- Potential effects rural amenity (visual, noise, rural character)
- Potential effects from glint and glare on local road network, adjacent properties, and the Pukaki-Twizel Airport
- Potential effects on increased traffic on local road network during construction and operation of the solar farm
- Potential effects from construction activities (noise, traffic)
- Potential effects from earthworks including dust, erosion and sediment generation.

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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:

National Policy Statement for Renewable Electricity Generation (NPS REG)

The objective of NPS REG is to recognise the national significance of renewable electricity generation activities by providing for the development, operation, maintenance and upgrading of new and existing renewable electricity generation activities, so that the proportion of New Zealand's electricity generated from renewable energy sources meets or exceeds the New Zealand Government's national target for renewable electricity generation.

Policy A of the document directs decision makers to recognise and provide for the national significance of renewable electricity generation activities, including the national, regional and local benefits. These benefits include:

- maintaining or increasing electricity generation capacity while avoiding, reducing or displacing greenhouse gas emissions;
- security of electricity supply and diversifying the type and location of electricity generation.
- using renewable rather than finite natural resources;
- the reversibility of the adverse effects on the environment.
- avoiding reliance on imported fuels.

All of the benefits listed in Policy A would be realised by the proposed solar farm.

Significant development of renewable electricity generation activities is required if New Zealand is to meet its target for the generation of electricity from renewable resources (Policy B). This project will assist in meeting that target.

Decision makers must have particular regard to the practical constraints associated with the development of new renewable generation activities (Policy C1). Sites for solar farms must fit a number of functional and operational factors, as well as achieving a successful lease over the site, certainty of environmental approvals and access to the National Grid. The site has been chosen because it avoids significant natural areas, significant landscape areas, high risk natural hazards, has access to good local road networks - all to lessen the potential effects on the environment.

The Twizel site utilises areas of an existing dairy farm and avoids the areas of Outstanding Natural Landscape identified on the larger site area. The solar farm can connect to the National Grid efficiently as Transpower's high voltage overhead line traverses the site area and connection will be directly on site. No electrical infrastructure beyond the site is required to access the National Grid.

Measures will be incorporated into the design and operation of the solar farm to avoid, mitigate and remedy actual and potential adverse effects on the environment.

National Policy Statement for Highly Productive Land (NPS HPL)

The objective of the NPS HPL is to protect highly productive land for use in land-based primary production, now and in the future. The site is zoned Rural Scenic and is LUC 6 land and so is not considered to be highly productive land. The NPS HPL therefore does not apply to the project.

National Policy Statement for Indigenous Biodiversity

The site is not within an identified significant natural area, and the current land use is a dairy farm so there are unlikely to be any significant terrestrial ecological values. However, terrestrial ecological values will be confirmed through an ecological values assessment of the site determining the relevance of the NPS IB for the project.

National Policy Statement for Freshwater Management (NPS FM)

The NPS-FM gives direction on freshwater quantity and quality matters, and activities within, and in close proximity of inland natural wetlands.

The site is likely to have tributaries that run to the Wairepo Creek; it is unknown if these are considered to be 'rivers' under the NPS FM. It is also unknown if any natural inland wetlands are located within the site or in proximity. A site specific ecological and hydrological assessment is to be carried out as part of the project, the outcome of which will determine the relevance of the NPS FM and the NES FM (see below).

National Environmental Standard Freshwater Management 2020 (NES-FM)

Part 3 of these regulations set out 'standards for other activities that relate to freshwater and Subparts 1, 2 and 3 would be relevant to this project if the site contains a 'river' or natural inland wetland.

The solar farm will be designed and managed to avoid adverse effects on any natural inland wetlands if these features are found to be located on the site.

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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 Fast Track Approvals process will enable the project to be considered in a more timely and cost efficient way, as both the regional and land use consent applications are considered together by the same panel. The shorter timeframe offered through the Fast Track Approvals Bill will result in the delivery of a renewable energy infrastructure project sooner than can be achieved under the Resource Management Act regime, which potentially requires limited or full public notification. An appeal to the Environment Court could delay implementation of this project by at least 12 months.

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

Please write your answer here:

The referral of the Twizel Solar Farm project is would not change the efficiency anticipated for the operation of the fast-track process.

Further, the project is optimally located as it will connect to Transpower's existing high voltage transmission lines which traverse the site, and the design and management will be founded on environmental and cultural assessments, as well as technical and operational requirements. Gaining approvals enables the operator to immediately commence the implementation of those consents, with construction occurring ideally by the first quarter of 2026.

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

Central government plan or strategy

Please explain your answer here:

The Twizel Solar Farm is a priority project when considering the Government's 2050 vision for a highly renewable, sustainable and efficient energy system that is accessible and affordable, secure and reliable, and supports New Zealanders' wellbeing (clause 17(3)(a) and (b) of the Fast track Approvals Bill).

Will the project deliver regionally or nationally significant infrastructure?

National significant infrastructure

Please explain your answer here:

The Twizel Solar Farm project is an infrastructure project that generates and contributes renewable electricity to the National Grid and will provide significant national and regional benefits, including the following:

- The proposed solar farm will generate up to 300MW of electricity, which is equivalent to supplying 100,000 households, supplied directly to the national grid.
- New Zealand currently relies heavily on hydroelectric generation. During low rainfall periods other energy sources are required, predominately coming from fossil fuels, which contribute to greenhouse gas emissions.
- New Zealand's energy supply must diversify to maintain a secure and resilient energy supply. Solar energy offers a reliable and scalable source of renewable electricity that can complement existing renewable energy sources, providing a diversified energy portfolio.
- Transpowers' existing overhead transmission lines transverse the site, so direct connection can be made from the solar farm to the National Grid and minimise potential transmission losses. The direct connection on site to the National Grid also means that no works or electrical corridors are required beyond the site, removing the need for a new transmission line connection between the site and grid infrastructure.
- Emerging national level policy on renewable energy emphasises the vital need for more renewable generation to electrify and decarbonise the New Zealand economy – which would provide significant national and regional benefits. In a consultation document released by Ministry of Business, Innovation and Employment (MBIE), it is stated:

Renewable electricity generation needs to increase by an estimated 50 per cent to 70 per cent by 2035, and increase by 170 per cent by 2050. This requires maintaining the existing renewable generation and an average annual increase in generation capacity of around 400 to 500 megawatts (MW) per year until 2050.

- To that end, the generation of renewable energy from the Twizel Solar Farm would be 60- 75% contribution to the average annual increase and therefore a significant benefit when considered at this national scale.

Will the project:

Please explain your answer here:

Will the project deliver significant economic benefits?

Yes

Please explain your answer here:

It will contribute to the reliable supply of electricity, which delivers economic benefits locally, regionally and nationally (clause 17(3)(d)). It will contribute to employment, training and upskilling, and the flow on socio-economic effects to the local community during the construction and operational period of the solar farm.

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 Twizel Solar Farm will support the reduction of New Zealand's greenhouse gas emissions by harnessing the energy from the sun using solar technology (clause 17(3)(f), (g) and (i)). Further, the solar farm will support sheep grazing (agrivoltaics). At the end of the life of the solar farm the infrastructure can be removed, the land returned to pasture, and the potential capacity for primary production activities is available for use.

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

Yes

Please explain your answer here:

The Twizel Solar Farm will support the reduction of New Zealand's greenhouse gas emissions by harnessing the energy from the sun using solar technology (clause 17(3)(f), (g) and (i)). Further, the solar farm will support sheep grazing (agrivoltaics). At the end of the life of the solar farm the infrastructure can be removed, the land returned to pasture, and the potential capacity for primary production activities is available for use.

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

No

Please explain your answer here:

Will the project address significant environmental issues?

Yes

Please explain your answer here:

The Twizel Solar Farm will support the reduction of New Zealand's greenhouse gas emissions by harnessing the energy from the sun using solar technology (clause 17(3)(f), (g) and (i)). Further, the solar farm will support sheep grazing (agrivoltaics). At the end of the life of the solar farm the infrastructure can be removed, the land returned to pasture, and the potential capacity for primary production activities is available for use.

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

Yes

Please explain your answer here:

- The project provides a renewable energy generation facility that can significantly contribute to New Zealand's supply of renewable electricity, while reducing dependency on fossil fuels.
- The project presents an alternative land use to the existing dairy farm activity at the site.
- The site and proximity to Transpower infrastructure minimises losses in transmission from the solar farm to the National Grid, and adds diversity to the type and scale of renewable energy development in the locality.
- The location and design of the solar farm will avoid any adverse effects on significant natural and physical resources and cultural values, and where this is not practicable, the design and management shall remedy or mitigate effects.
- An engagement and consultation strategy will be developed to enable consultation with iwi groups who are manawhenua over the area in order to gain an understanding of cultural values of the site and surrounds.
- Construction and operational traffic effects are to be assessed, with the aim to reuse the existing access onto State Highway 8, ensuring this is adequately located and designed.
- Rural amenity effects (noise, visual, glint and glare) to be assessed, in the context the Operative District Plan directs that a range of activities are anticipated in the rural areas.
- Landscape values of the site are to be assessed, and conclusions made as to the potential to absorb change and determine how the solar farm can best fit into the landscape and what mitigation measures are required.
- Ecological values are to be assessed and effects from the project determined, and measures are incorporated to the design and management of the solar farm to avoid, remedy or mitigate adverse effects on freshwater habitats, ecological connectivity and hydrology.

Anything else?

Please write your answer here:

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:

- The applicant has no track record within New Zealand.
- However, Twizel Solar Farm is being developed by a team of experienced infrastructure, development and corporate project finance professionals with experience delivering utility scale renewable energy projects in Australia. The team has a proven track record of delivering to the market over 800MW of operational solar generation. The team achieved all the necessary approvals required to construct, commission and operate the projects listed below.

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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:

Claire Price

Important notes