

Response ID ANON-URZ4-5FTH-C

Submitted to Fast-track approval applications  
Submitted on 2024-05-03 15:49:14

Submitter details

Is this application for section 2a or 2b?

2B

1 Submitter name

Individual or organisation name:  
Nova Energy Limited (Nova)

2 Contact person

Contact person name:  
Chris Pye

3 What is your job title

Job title:  
Projects and Development Manager

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:

The site is located on the eastern side of State Highway 8 (SH8) and the Twizel township, situated between the Twizel and Ōhau Rivers.

Link to location in Google Maps (property title area shown in red):

<https://www.google.com/maps/d/u/0/edit?mid=1uZOqecjpvLqVqVaE3ueox2il1NQAzwE&usp=sharing>

File upload:

Twizel solar project location\_image from Google Maps link.png was uploaded

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

Yes

upload file:

489342\_Title\_Search\_Copy\_22 Apr 2024.pdf was uploaded

Who are the registered legal land owner(s)?

Please write your answer here:

TGL Farms 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:

TGL Farms Limited (landowner) is a related company of Nova (the applicant). Both TGL Farms Limited and Nova Energy Limited are wholly owned subsidiaries of The Todd Corporation Limited.

Land access rights will be granted to Nova, likely via registered lease interest, to enable development of the project as contemplated by this application.

## Section 2: Project details

What is the project name?

Please write your answer here:

The project's working title is Twizel Solar. This may be re-named in consultation with stakeholders.

What is the project summary?

Please write your answer here:

The project at Twizel includes the consenting, construction and operation of a grid scale solar photovoltaic electricity generation plant, connected to the National Grid at the Transpower Twizel substation. The project will generate 480 – 580 gigawatt hours (GWh) of renewable electricity per annum.

What are the project details?

Please write your answer here:

The project site was selected as it possesses ideal pre-conditions for solar development such as high solar resource, proximity to existing transmission infrastructure (Twizel substation), suitable topography to minimise earthworks, large scale land development area within a General Rural Zone and is generally screened from public view.

The proposed plant will have a capacity of 250 to 300 megawatts (MW) and will consist of ground mount direct current (DC) solar panels on tracking arrays (which follow the sun angle from east to west) connected to central inverters for conversion to high voltage 33kV alternating current (AC). Transmission circuits will be connected to the 220kV National Grid via power transformers located at the Transpower Twizel substation, via a short (approximately 350m) transmission easement across neighbouring land.

The development of this project involves the consenting phase (concept design, stakeholder initial engagement, technical and environmental assessments, application development and processing), this is followed by the planning phase (detailed design, financing and procurement). The construction phase then commences and, once commissioned, the project enters the operational phase.

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

Please write your answer here:

The project is planned for execution in a single stage over an approximate two-year period, commencing in 2027. To enable this approval via a fast-track consent processing pathway is required by the end of 2026 at the latest.

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

Please write your answer here:

Resource Management Act 1991

This project is proposed for listing in Part B of schedule 2

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

Please write your answer here:

Mackenzie District Council and 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?

Yes

Please explain your answer here:

The project will require approval from Transpower NZ Limited for the installation of equipment within the Twizel Substation and works to enable connection to the National Grid.

The project will also require approval from Meridian Energy Limited for a transmission line easement across Meridian's land for Nova to access the Transpower substation. Nova has been consulting with Meridian to progress agreements.

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

Please write your answer here:

If approval is granted and consent is obtained by the end of 2026, the construction and commissioning can commence in 2027 and will take 18-24 months to complete. Assuming this start date, the solar plant is expected to be operational by 2029.

### Section 3: Consultation

Who are the persons affected by the project?

Please write your answer here:

The following persons may be affected by the project:

Te Rūnanga o Arowhenua

Te Rūnanga o Waihao

Te Rūnanga o Moeraki

Transpower NZ Limited

Department of Conservation

Road Metal Holdings Limited

Meridian Energy Limited

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:

Nova has engaged with multiple project stakeholders since project commencement, including those listed as potentially affected persons. Nova will continue engagement with stakeholders throughout project development, execution and operation.

Te Rūnanga o Arowhenua, Te Rūnanga o Waihao and Te Rūnanga o Moeraki

Nova has consulted with rūnanga as mana whenua in Te Manahuna/Mackenzie District since the commencement of the project mid-2022. Nova is committed to ongoing consultation and sharing of project information with rūnanga to ensure this project meets mana whenua expectations and values.

Transpower NZ Limited

Transpower has been consulted regularly on the project through the grid connection process and as a stakeholder of the project. Consultation will continue throughout the development.

Department of Conservation (neighbour)

The Department of Conservation (DOC) was engaged at a local (Twizel) office level at the commencement of the project. This engagement provided context on the local environment and the interests of DOC on the shared boundaries of Nova's property. Consultation will continue as the consent application is developed and will consider technical and environmental management information as part of the assessment of effects.

Meridian Energy Limited (neighbour)

Consultation with Meridian Energy began following purchase of the project site in mid-2022. Meridian Energy own the land that lies between Transpower's Twizel Substation and the project site. Consultation has been ongoing predominantly to understand any potential effects of the proposed solar plant and determine substation access arrangements. Consultation will continue as Nova develops its consent application.

Road Metal Holdings Limited (neighbour)

Consultation with Road Metal Holdings began following purchase of the project site in mid-2022. Ongoing consultation and has provided Nova with an understanding of Road Metal's development interests and any potential effects of our proposed solar farm development.

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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:

We note that the land is within the rohe of Ngāi Tahu and so is generally within the scope of the treaty settlement with Ngāi Tahu. However, we are not aware of specific treaty settlement provisions that apply to the land within the settlement. The site is within the rohe of Te Rūnanga o Arowhenua, Te Rūnanga o Waihao and Te Rūnanga o Moeraki as mana whenua. We have undertaken engagement with these rūnanga and plan to continue engagement as the development progresses.

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:

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## Section 5: Adverse effects

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

Please describe:

The potential anticipated adverse environmental effects of the project are listed below, including an explanatory note for each. These effects will be subject to a comprehensive assessment of environmental effects which is ongoing presently.

### Cultural effects

Nova is working with rūnanga to understand and manage any cultural effects of the project.

### Landscape and visual effects

The site location is mostly screened from public view however we are yet to complete full landscape and visual assessments, including glint and glare studies. It is important to note that the project is located within the Mackenzie District Council boundary and an Outstanding Natural Landscape (ONL) exists across most of the district. Potential adverse effects on the ONL will be an important consideration.

### Ecological effects

Ecological studies have been undertaken across the site to understand the habitat along with the location and distribution of indigenous biodiversity. These studies will inform the project design to reduce any adverse environmental effects. The NPS-IB does not apply to the development, operation, maintenance or upgrade of renewable electricity generation assets and activities and electricity transmission network assets and activities.

### Earthwork effects

Earthworks for the development are not extensive as the site topography is generally flat and construction predominantly requires ramming of support piles for solar equipment. The site will require forming of basic roads and access tracks as well as trenching to bury underground electrical services. These works and their effects such as dust, erosion and sediment runoff will be managed via council approved plans, as part of consent conditions.

### Traffic effects

The site is accessed via an existing entranceway on State Highway 8 and traffic for construction and operation will generally avoid local roading networks. Once operational the project will generate minimal traffic movements. A full integrated transport assessment will be undertaken to understand and reduce the level of adverse effects.

### Archaeological effects

Nova has undertaken a preliminary site assessment that does not indicate the presence of potential archaeological sites however Nova will commission an archaeological technical study as part of the project assessment of environmental effects, to understand and manage any adverse archaeological effects.

### Noise effects

An acoustic assessment of effects will be undertaken as part of project assessment of environmental effects, based on Nova's experience with a similar scale solar generation project we do not expect any significant adverse noise effects.

### Stormwater effects

A technical study of stormwater effects and any controls required will be incorporated into civil engineering designs and plans for the consent application/s. Stormwater runoff can be easily managed and is not expected to result in any significant adverse effects.

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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 National Policy Statements (NPS) and National Environmental Standards (NES) that may apply to the proposed project are listed below with a brief commentary on general assessment.

#### NPS – REG (Renewable electricity generation)

This policy statement directly aligns with the proposed project, as noted in the policy objective, to “recognise the national significance of renewable electricity generation activities by providing for the development...of new...renewable electricity generation activities...that meets or exceeds the New Zealand Government’s national target for renewable electricity generation”.

More specifically the project is consistent with the following policies of the NPS-REG:

Policy A: The project will provide benefits that are consistent with all parts of the policy.

Policy B: Part c): development of the project will assist with meeting or exceeding the Government’s targets for electricity generation from renewable sources.

Policy C1: The project:

will be located in an area where renewable energy resources are available;

is proposed for a location that is logistically and technically practical for the development, upgrading, operating and maintaining renewable electricity generation activity; and

is proposed for a location with sufficient nearby infrastructure and where connection can be made to the National Grid.

Policy C2: Any environmental effects can be offset using measures of environmental compensation or measures that benefit the local environment and community.

#### NPS – IB (Indigenous biodiversity)

Whilst this policy statement “is an essential part of our response to biodiversity decline in Aotearoa” the NPS IB does not apply to the development of renewable electricity generation assets [section 1.3 (3)] therefore this policy statement recognises the significance of this proposed renewable electricity generation project, in conjunction with the importance of indigenous biodiversity.

#### NPS – FW (Freshwater management) and NES-F (Freshwater)

The project is not expected to directly impact freshwater values however one small wetland area has been identified on the site and this has been excluded from development. The NPS-FW and NES-F have been included to provide guidance on the management of wetland areas.

#### NPS – ET (on Electricity transmission) and NES-ET (Electricity transmission activities)

The NPS-ET and the NES-ET do not apply to the project site however they have been included for consideration for the activities on Transpower’s Twizel substation to enable the grid connection, if applicable. The project will align with the provisions of the NPS-ET and NES-ET.

#### NES-CS (Contaminated soils)

Initial assessments of prior activities on the project site have not indicated any land areas where the NES-CS would apply. However, the NES-CS has been included as a potential requirement if contaminated areas are identified during detailed technical assessment.

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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:

Nova considers that the future application and associated assessment of environmental effects will support streamlined processing via the fast-track process to enable construction and operation of this large-scale renewable electricity generation project within the proposed project timeframes.

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

Please write your answer here:

Referring this project aligns with the intent and efficient operation of the fast-track process to enable nationally and regionally significant projects, in particular, increasing the supply of renewable electricity generation for New Zealand's transition to a low emissions economy.

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

Other

Please explain your answer here:

This project has not been directly identified as a priority project however it aligns with central government objectives by developing large-scale renewable electricity generation to increase the supply of renewable electricity generation for New Zealand's transition to a low emissions economy.

Will the project deliver regionally or nationally significant infrastructure?

National significant infrastructure

Please explain your answer here:

At the proposed scale of 250 - 300 MW, the solar plant will represent both regionally and nationally significant infrastructure.

Will the project:

Please explain your answer here:

It will not do any of the above.

Will the project deliver significant economic benefits?

Yes

Please explain your answer here:

The project is expected to require capital investment in the order of **s 9(2)(b)(iii)** with approximately **s 9(2)(b)(ii)** spent in NZ. The project is expected to generate approximately 480 – 580 GWh per annum with an annual product value in the range of **s 9(2)(b)(ii)**, assuming a spot price of **s 9(2)(b)(ii)** MWh.

Will the project support primary industries, including aquaculture?

Not Answered

Please explain your answer here:

Yes, it is expected that the project will continue to enable existing use (cropping and sheep grazing) within the land parcel.

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

Yes

Please explain your answer here:

The project will capture the high solar irradiation resource in the Mackenzie Basin, converting this energy into emissions-free electricity.

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

Yes

Please explain your answer here:

As a large-scale renewable electricity project it will make a positive contribution to decarbonisation of New Zealand's energy sector, assisting New Zealand's transition to a low emissions economy.

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

Yes

Please explain your answer here:

The project potentially provides minor support to adaptation, resilience and recovery from natural hazards through diversity of electricity generation technologies within the South Island.

Will the project address significant environmental issues?

Yes

Please explain your answer here:

As a large-scale renewable electricity project it will make a positive contribution to decarbonisation of New Zealand's energy sector, assisting New Zealand's transition to a low emissions economy.

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

Yes

Please explain your answer here:

We believe the project is consistent with local and regional planning / spatial strategies.

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:

Nova is committed to developing projects in a compliant manner, always striving to meet or exceed consented baselines. It establishes comprehensive protocols and policies to ensure its staff, contractors and other personnel are acutely aware of its regulatory and legal obligations. There has been one instance Nova is aware of (from review of its records) where an abatement notice was issued, however work was undertaken in response to ensure compliance. Nova engages collaboratively with local authorities and other stakeholders to ensure compliance at all levels for its projects.

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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:

Adam Tapsell

Important notes