Response ID ANON-URZ4-5FTB-6

Submitted to Fast-track approval applications
Submitted on 2024-05-03 15:53:48

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:

Level 1 Office, 65 Main Road,
Kumeu, Auckland 0810

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 subject site is located at 380 Waipara Flat Road, Waipara. It consists of the following property parcels:

- LOT 2 DP 19025
- LOT 1 DP 320376
- SECS 3-4 SO 17514

 RS 37988 37989 37990

File upload:
2024-04-29-Genesis-WPR_GA-142.15MWp_JA-570_Tr_2P_Tree-parcel.pdf was uploaded

Upload file here:
Waipara Solar Fram.pdf was uploaded

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

Yes

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Title_Search_Combined Northgreen Arable Waipara.pdf was uploaded

Who are the registered legal land owner(s)?

Please write your answer here:

Northgreen Arable 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:

s 9(2)(b)(ii)

Section 2: Project details

What is the project name?

Please write your answer here:
Waipara Solar Farm

What is the project summary?

Please write your answer here:

Waipara Solar Farm is a 143 megawatts-peak photovoltaic solar farm in the Waipara Valley in the Canterbury Region, which, once complete, will provide enough power to support the equivalent of 31,000 homes. The solar farm will provide utility-scale renewable energy generation and will connect to the nearby grid point to supply the National Grid.

What are the project details?

Please write your answer here:

The Waipara Solar farm will directly support the uptake of renewable electricity in the Canterbury Region and will increase the resilience of the National Grid during periods of drought or low hydropower generation. In addition to this, the project will significantly assist with decarbonisation efforts and the drive to electrify the New Zealand energy system.

The Waipara Solar farm will generate an additional 143 MWp of renewable electricity - enough to power approximately 31,000 households. The proposal also includes extensive planting and landscaping over 30ha. The opportunity to enhance the adjacent Weka Creek is a positive landscape outcome. The solar farm will be fully fenced to prevent stock access to the waterway, with low-level and locally appropriate riparian planting providing shade cover and habitat.

The proposal will consist of photovoltaic panels on single axis trackers across approximately 180.2 ha of the site area. 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 in a two-module, portrait format (known as 2P). They pivot from east to west throughout the day, starting at a low angle at the start of the day and tilting up as the sun rises. The panels will sit at 4.1 meters at full tilt in the morning and evening and tilt back to rest at horizontal during the night at 2.4m above ground.

Inverters will be placed around the site in 20-foot shipping containers and will be clustered within specific areas to increase efficiencies and allow for the containers to be screened, and to be a suitable distance from neighbours' homes. The inverters will not be audible to neighbouring properties.

Earthworks are required as part of this proposal, approximately 44,000 m3 is required across the entire site to upgrade site access tracks and construct temporary compounds for construction. All earthworks will be carried out in accordance with best practice erosion and sediment controls in place.

The solar farm will be connected to the National Grid through the Waipara substation. The Applicant will work with Transpower, through a Transpower

investigation process, which will enable the proposed solar farm to connect to the National Grid. It is expected that any fast track application for the solar farm will be expanded to include associated connection works; the expanded application will be ready for an expert panel to consider.

It is also expected that a groundwater take or transfer will be included in a fast track application, in order to provide water to irrigate vegetation planted for screening purposes. Again, an expanded application will be ready for an expert panel to consider.

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 2022. The land acquisition option has been achieved with an OIO Advertising Exemption granted, and the TWA is on track for execution in July 2025 with detailed design expected to commence in November 2024. The OIO investment approval is planned to be submitted by the end of Q2 2024 with approval anticipated in Q3/Q4 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 completion of the development phase. Construction works are planned to commence Q4 2025. Based on the extent of the connection works we would expect Transpower to be in a position to commission the new grid assets by Q1 2027, with solar farm commissioning 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:

Hurunui 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:

Schedule 4 clause 31(3) of the Bill details that a person who has lodged an application for a resource consent or a notice of requirement under the Resource Management Act 1991, in relation to a listed project or a referred project, must withdraw that application or notice of requirement before lodging a consent application or notice of requirement with an expert consenting panel under the Fast Track Approvals Act for the same, or substantially

the same, activity.

A district land use consent application was lodged with Hurunui District Council on 25 March 2024. A request for further information pursuant to section 92 of the Resource Management Act 1991 was received from Hurunui District Council on 18 April 2024. FNSF, as the applicant, is preparing a response to this request for further information.

An application for a regional stormwater consent was lodged with Canterbury Regional Council on 25 March 2024. The application was returned pursuant to section 88 of the Resource Management 1991 on the basis that an ecological impact assessment had not been prepared. FNSF has engaged an ecologist to prepare this assessment, which will be available in due course.

In addition to the request for an ecological assessment, Canterbury Regional Council planners indicated
that they consider the scale of the project to be comparable to 'The Point' project, and as a result, FNSF considers it likely that the Canterbury Regional Council may recommend Ministerial Referral as they did with 'The Point'. Given this, alongside the well progressed nature of the project and upcoming Transpower obligations, the project is well suited to being processed under Schedule 2b of the Fast Track Approvals regime.

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

No

Please explain your answer here:

No other individual is involved

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 commissioning of the Waipara Solar Farm in Q1/Q2 2027.
To that end, FNSF expects to enter the TWA in July 2025. Final OIO investment approval for the project is anticipated to be granted by Q3/Q4 2024. A TWA is needed to ensure the Waipara substation upgrades and related infrastructure required to connect the solar farm to the National Grid are built on the site. Resource consent for the Waipara Solar Farm will need to be granted ahead of the contract going unconditional.

Once Resource Consent has been obtained and the Transpower TWA executed, 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 Waipara Substation 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 Q4 2025.

8. Transpower is expected to complete the substation upgrade build for commissioning in Q1 2027, subject to ordering long lead items by Q3 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:

 Land owner/farmer
 The landowners / occupiers of 247 MacKenzies Road, 249 McKenzies Road and 253 Mackenzies
Road.
 Fire and Emergency New Zealand Ltd
 Transpower New Zealand Ltd
 Ngai Tahu Rūnanga Ngāi Tūāhuriri
 Hurunui District Council
 Canterbury Regional Council
 Mainpower
 NZTA

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:

The site landowner: The owner will be able to continue to graze the land with sheep once the solar farm is completed and requires the additional income to keep the farm economic. The panels should increase grass coverage in his opinion and he is keen to diversify the farm's revenue stream.

Land owners and occupiers in MacKenzie Road: We have met in person with these landowners / occupiers and proposed screening and planting in line with their requests. We have commissioned additional noise reports to address their concerns and provide reassurances that noise from the solar farm will not negatively affect them.

FENZ: We have been dealing with local FENZ brigades for each solar project and have also discussed each project with their national organisation, including Waipara solar farm. We have amended features and internal designs, plant selection and access and water storage in response to FENZ input, and will continue to work with the local brigade as we develop the detailed design for access and internal roading. FENZ has not opposed the responsible development of solar farms in our case.

Mainpower: We have been working with local lines company Mainpower since the project was initiated, and will continue to work with them on issues such as clearances for the lines that cross the site. Mainpower is a critical partner for the design and implementation process of the solar farm.

Transpower: Our application has been accepted under Transpower's Connection Management Framework (CMF). This project will be resourced by Transpower in November 2024 and we remain in close contact with them as the process evolves.

NZTA: The project is adjacent to SH7, but no new access points will be made onto this road from the site. We have worked to avoid the risk of glint and glare by panel positioning and screening with vegetation.

Ngāi Tahu Rūnanga Ngāi Tūāhuriri: We have met with Ngāi Tahu to discuss the project and have been introduced by them to the local Rūnanga, Ngāi Tūāhuriri, to continue engagement. This began at a national energy conference in May 2023 and has continued via email and phone. We were informed by Ngāi Tūāhuriri that they wished to progress engagement under a Memorandum of Agreement to cover matters we had previously raised about how the development could support mana whenua, and to seek feedback on the proposal itself. Despite numerous attempts to further this kōrero, Ngāi Tūāhuriri have not engaged any further.

A community information day to discuss the proposal was advertised in local media and was held in September 2023. Direct invitations to known stakeholders and community members were also distributed. The event was held on site and attended by local MP Stuart Smith, who spoke to the estimated crowd of 60 people, as did FNSF staff. Information, maps and designs were made available in hard copy for attendees to take away. Various media stories have also been published which detail plans and views around the proposal and have informed local communities of progress. The community day allowed personal connections with members of the local community to be made and for concerns to be shared freely and frankly. We have built on these connections and continue to liaise directly with those most affected. This has resulted in consultation on planting and screening and active participation in the process. Plans have been refined in order to accommodate the views of affected community members.

Glenmark Community Committee: FNSF staff presented to the local Committee at a public meeting in October 2023 to inform them of the proposal and answer questions. We have also since sought advice from the Committee around how the project could best support charitable and community activities and have been advised that support of a Community Trust would be appropriate. We expect to advance these discussions as we work our way through the consenting process and towards construction of the solar farm.

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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 Ngāi 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:
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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:

- Potential temporary construction effects in relation to noise and traffic;
- Potential operational effects in relation to noise and traffic;
- Landscape and visual effects;
- Potential stormwater diversion and discharge effects; and
- Cultural effects.

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 Construction Management Plan and Erosion and Sediment Control Plan.

Overall the adverse effects are considered 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 Hurunui District.

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. This can take up to two years to consent, particularly if a consent decision is appealed by submitters, regardless of the merits or otherwise of an appeal.

Given the well progressed nature of the project, access to the fast track process will allow the applicant to continue meeting its obligations to Transpower and other stakeholders, while maintaining greater levels of investment certainty and visibility over processing timeframes.

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 consent-ready, with all the necessary technical assessment prepared, project details confirmed and advanced consultation underway. The pending ecological assessment will be available in time for consideration by an expert panel. 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:

Not Answered

Please explain your answer here:

None of the above

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 proposal will provide electricity generation to meet the demands of approximately 31,000 homes making it a national significant generator of electricity. It is expected that the proposal will reduce carbon emissions from electricity generation in New Zealand (each year) equivalent to removing 11,000 cars from the national fleet. The project aligns with the Government's desire to double renewable electricity generation by 2050 and supports the New Zealand Energy Strategy to transition to a low carbon economy, address strategic challenges in the energy sector, and signal pathways away from fossil fuels. The proposal will also increase the resilience of the National Grid, by diversifying the source of electricity generation across the country.

Will the project:

Please explain your answer here:

Not applicable.

Will the project deliver significant economic benefits?

Yes

Please explain your answer here:

The proposal will provide employment opportunities for approximately 110 full time equivalent staff during the construction of the solar farm (over a 12-18 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.

There are also benefits to the farming activity on the site from the solar installation, with the solar farm expected to increase the stock carrying capacity and grass growth in a marginal, drought prone location.

More broadly, the provision of renewable electricity generation to meet the demands of approximately 31,000 homes provides significant economic benefits for the Waipara Valley as well as a national common good.

The project will result in approximately s 9(2)(b)(ii) of investment, of which a significant portion is likely to be spent with local contractors, as well as benefiting the surrounding hospitality businesses during construction.

Will the project support primary industries, including aquaculture?

No

Please explain your answer here:

It is not a project to support primary industries, but it does have benefits to the land owner/ farmer, as a side effect. The benefits are local, in that marginal grazing land will have additional shade (to grow more grass) and funding to maintain and enhance the farm under and around the solar arrays.

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 underutilised 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. It also directly supports the government's New Zealand Energy Strategy to transition to a low carbon economy, address strategic challenges in the energy sector, and signal pathways away from fossil fuels.

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 in the Canterbury region and provide an alternative energy source, which is important during times when the hydro lakes are at low supply (i.e. during drought conditions). 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 generation.

Will the project address significant environmental issues?

Yes

Please explain your answer here:

The site is currently a marginal drystock farm, due to a lack of sufficient irrigation. The solar farm will deliver a number of important environmental outcomes. The farm will be fully fenced and as part of the development, around 30ha of trees and vegetation will be planted to increase biodiversity and reduce any runoff to the Weka Creek. It should be noted that the gaps between the rows of arrays and between the panels themselves means rain will simply soak into the ground as it currently does. The slopes between the terraces on the site will be planted with native species.

The ability to create extra farm revenue through diversification into solar will allow the landowner to give more attention to pest and weed management. Cropping will not be possible on much of the area, reducing the fertilizer load and, consequently, reducing any potential effects on groundwater quality. The drystock will change from mixed to sheep only, reducing the pugging and silt created by heavy stock.

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 Hurunui 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 includes extensive planting along the Weka Creek which is expected to improve biodiversity values on the site.

Anything else?

Please write your answer here:

Canterbury Regional Council has already indicated that they consider the scale of the project to be comparable to 'The Point' project, and as a result, FNSF considers it likely that the Canterbury Regional Council may recommend Ministerial Referral as they did with 'The Point'. Given this, and considering the advanced position of the project, 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 and is a major reason behind the implementation of the Fast Track Bill itself.

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 notices in relation to any of our 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