Response ID ANON-URZ4-5FKP-B

Submitted to Fast-track approval applications
Submitted on 2024-05-03 18:48:00

Submitter details

Is this application for section 2a or 2b?

2B

1 Submitter name

Individual or organisation name:
Energy Farms Limited

2 Contact person

Contact person name:
Todd Wilson

3 What is your job title

Job title:
CEO

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:

L4/110 Carlton Gore Road, Newmarket, Auckland 1023, New Zealand

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 solar farm will be spread over the three below titles:
1. RT 882894 - Lot 2 DP 534826, Lot 1 DP 57001, Lot 8 DP 124237, Lot 2 DP 136685, Lot 1 DP 174502, Lot 2 DP349526, Lot 2 and 4 DP 540283.
2. RT 780965 - Lot 3 DP 510283.
3. NA107A/598 - Lot 2 DP 174502.

176 Prictor Road Wellsford, 246 Prictor Road Wellsford, 10 Clague Road Wellsford

The attached plan shows the location and layout.

File upload:
Attachment 1 Site location and layout (compressed).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:

10 Clague Road Wellsford – Andrew Scott Barter and Kim Therese Barter
176 and 246 Prictor Road Wellsford – Cannell 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:

Energy Farms have sale and purchase agreements in place for 176 Prictor Road Wellsford, 246 Prictor Road Wellsford, 10 Clague Road Wellsford

Section 2: Project details

What is the project name?

Please write your answer here:
Wellsford Solar Farm

What is the project summary?

Please write your answer here:

To establish and operate a solar farm. The farm will have an approximate project area of 120ha, will consist of approximately 149,000 panels, and will produce around 162,000 MWh of energy per year. The farm will be connected to Transpower's Wellsford substation, which is located approximately 3km from the subject site at 96 School Road.

What are the project details?

Please write your answer here:

Energy Farms Limited is a New Zealand renewable generation company that has currently committed to developing seven solar farms across New Zealand. This is one of three solar farms that they are currently progressing through the fast-track consenting process (along with the Marton and Opunake solar farms).

The Wellsford site was identified based on an ideal combination of solar resource, land area availability, ability to connect into the grid, and the ability to achieve a low impact design. The project supports the New Zealand governments strategy of 100% renewable energy generation by 2035, and a net zero carbon future by 2050.

Located on a site with an area of 219.0869ha, the preliminary design includes an approximate project area of 120ha, consists of approximately 149,000 bifacial solar panels, and will produce approximately 162,000 MWh energy per year. This is enough to power 23,172 homes and will remove up to 110,014 tonnes of carbon emissions per year.

The solar panels will not be static - they will be able to shift to maximise the solar resource. They will be attached to metallic tracking systems arranged in rows. A small motor located at the end of each row will facilitate the rotation of the panels. The panels will have a maximum height of approximately 2.35m when in a horizontal position, which will increase to approximately 4.8m when fully tilted. A security fence will be established around the project area. A comprehensive landscape plan will be provided by Simon Cocker Landscape Architecture, with the intent being to visually screen (where possible) and integrate the solar farm within the surrounding landscape.

The panels will be connected to approximately 11 inverter stations located across the site via underground cabling. Each inverter will have an approximate area of 30m2 (i.e. a forty foot container). The inverters will be connected to an on-site substation via underground cabling. The substation will consist of a range of typical electrical infrastructure and will serve as the interconnection point for the solar farm into the Transpower network.

A battery storage facility will also be established near the substation area. The facility will consist of up to seven Tesla megapack battery storage units

located within an enclosed building, and will provide the ability to store electricity generated by the solar farm with a controlled and optimised release back into the grid. In terms of the interconnection, the solar farm will be connected to Transpower's Wellsford substation located approximately 3km from the site at 96 School Road. There are existing 110kV lines that traverse Lot 2 DP 174502 that connect with the substation.

The applicant has a sale and purchase agreement in place for this property.
The purchase of this property will allow the applicant to establish a connection to the existing 110 kV lines that traverse the site, subsequently allowing a connection into the Transport substation.

In terms of construction, the existing site profile will largely be retained, with earthworks primarily limited to the formation of internal access roads, pads for the inverters and substation, and the trenching required to lay the cables that will connect the various aspects of the solar farm. Some existing culverts may need to be upgraded, and new culverts installed to facilitate internal access within the site.

It is intended that agricultural use of the land will continue in conjunction with the solar farm. This is likely to be in the form of grazing sheep, although there are a range of options available. This will be achieved via a design that provides space between rows and under panels.

Beca have undertaken preliminary engineering, ecological and contaminated soils assessments, while Simon Cocker provided landscape feedback that informed the preliminary design and layout of the solar farm. This ensured that associated effects were avoided and minimised through design where possible. The intent was to work with the natural characteristics and features of the site as much as practicable, minimising potential adverse impacts and creating opportunities for protection and enhancement. The preliminary solar farm site layout plan produced by Beca is enclosed with this application.

Detailed ecological (Beca), engineering (Beca), contaminated soils (Beca), landscape (Simon Cocker Landscape Architecture), acoustic (Marshall Day), archaeological (Geometria), traffic (Hawthorn Geddes), economic (Urban Economics) and rural productivity (Strettons) assessments will accompany the application if referred, addressing those effects that could not be avoided through design.

The engineering, archaeological, acoustic, traffic and economic assessments can be made available with this application. While the others are yet to be completed, the relevant experts have provided feedback that informs the assessments provided in this application.

The completion of the final technical reports could facilitate a reduction to the project area, number of panels, and subsequent output detailed above. This will be clarified when possible.

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

Please write your answer here:

The intent is to construct the solar farm as a single stage, although this will be governed by weather/site conditions and the ability to complete the required earthworks. This may necessitate work over two construction seasons.

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

Please write your answer here:

The Resource Management Act 1991.

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

Please write your answer here:

Auckland Council.

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

Please write your answer here:

An application was previously made for referral of the project under the repealed Covid-19 Fast Track process. The project received positive support from officials but they ran out of time to complete their assessment before the close off date for the Minister to make decision on referral.

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

No

Please explain your answer here:

As the applicant has a sale and purchase agreement in place for the properties, if resource consent is granted then it will be the owner of the properties, and will be able to proceed with that status.

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

Please write your answer here:

Detailed Design complete by November 2024
Funding complete by February 2025

Procurement complete by May 2025
Construction commenced by March 2025
Completion by Jun 2026.

Section 3: Consultation

Who are the persons affected by the project?

Please write your answer here:

Auckland Council.
Ngati Whatua
Ngati Manuhiri
Te Kawerau a Maki
Te Uri o Hau

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:

Initial contact was made with Auckland Transport on 28 January 2022. A senior development planner made contact on 1 February 2022. The encroachment application was lodged with Auckland Transport in February 2023. Consultation with Auckland Transport is ongoing.

Pre-application meetings have been held with Auckland Council.

Iwi Authority Consultation Undertaken

Ngati Whatua
Initial email seeking input/consultation sent 27/01/2022. Email response received 28/01/2022 deferring to Te Uri o Hau for further comment.

Ngati Manuhiri
Initial email seeking input/consultation sent 27/01/2022. Letter of engagement received on 14/02/2022. Engagement accepted on 22/02/2022. Follow up initiated in February 2023. The Ngati Manuhiri response suggests they now want to defer to Te Uri o Hau. Correspondence is ongoing.

Te Kawerau a Maki

Initial email seeking input/consultation sent 27/01/2022. Email response received 27/01/2022 deferring to Ngati Manuhiri and Te Uri o Hau.

Te Uri o Hau

Initial email seeking input/consultation sent 01/02/2022. Email response received on 18/02/2022 deferring to Ngati Manuhiri.

The engagement has been positive, providing support for the project - and not raising any "red flags" beyond the usually anticipated matters needing to be addressed in solar farm applications.

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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:

The project site falls within the area of interest covered by Treaty settlements with the following three iwi/groups:
a. Te Uri o Hau
b. Ngāti Manuhiri
c. Te Kawerau ā Maki.

The Te Uri o Hau Claims Settlement Act 2002 gave effect to certain provisions of the deed of settlement signed by Te Uri o Hau and the Crown on 13 December 2000 and an amendment deed signed in 2003.

The Ngāti Manuhiri Claims Settlement Act 2012 gave effect to certain provisions of the deed of settlement signed by Ngāti Manuhiri and the Crown on 21 May 2011. Deeds to amend the settlement deed were signed in February and June 2012.

Te Kawerau ā Maki Claims Settlement Act 2015 gave effect to certain provisions of the deed of settlement signed on 22 February 2014. Amendment deeds were signed in August 2015 and October 2019.

In terms of principles, the Crown offers acknowledgements and an apology as part of Treaty settlement redress to atone for historical wrongs, restore honour, and begin the process of healing.

In the settlement with Te Uri o Hau the Crown apologises to the ancestors of Te Uri o Hau and to their descendants for the breaches of Te Tiriti o Waitangi/the Treaty of Waitangi and its principles, which are acknowledged in the text of the settlement. The Crown unreservedly apologises and profoundly regrets that its actions, in failing to preserve sufficient lands for Te Uri o Hau, have had pervasive and enduring consequences, resulting in Te Uri o Hau losing control over the majority of their lands.

In the settlement with Ngāti Manuhiri, the Crown states it profoundly regrets its breaches of the Treaty of Waitangi and its principles which left Ngāti Manuhiri with few landholdings by 1865. The Crown says it is deeply sorry for its failure to protect the remaining lands of Ngāti Manuhiri, the loss of which had devastating consequences for the cultural, spiritual, economic, and physical wellbeing of Ngāti Manuhiri that continue to be felt today. The Crown also unreservedly apologises for not having honoured its obligations to Ngāti Manuhiri under the Treaty of Waitangi. It also expresses the desire to build a new relationship with Ngāti Manuhiri based on the Treaty of Waitangi and its principles, so that Ngāti Manuhiri and the Crown can work together to revitalise Ngāti Manuhiri.

As part of the settlement with Te Kawerau ā Maki, the Crown unreservedly apologises to Te Kawerau ā Maki, their ancestors and descendants, for not having honoured its obligations to them under the Treaty of Waitangi. The Crown states it seeks through the apology and the settlement to atone for its wrongs and lift the burden of grievance so that the process of healing can begin. The Crown says it hopes to form a new relationship with the people of Te Kawerau ā Maki based on mutual trust, co-operation, and respect for the Treaty of Waitangi and its principles.

Affording respect to the views of each iwi on resource management matters and enabling meaningful participation as Treaty partners in resource management decision-making within their areas of interest are important ways in which the Crown can give effect to these acknowledgements and apologies.

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:

All effects are expected to be minor only, or less.

Landscape, natural character and visual amenity:
The proposal will seek avoid and mitigate adverse effects by developing a design that recognises, protects, and enhances existing topographical, vegetative and hydrological patterns as much as practicably possible. It is anticipated that adverse effects on landscape and natural character values associated with the wider environment will be avoided or mitigated to a minor level. This will be achieved by:
• Adapting the design of the solar farm to accommodate the topography across the site to limit the area and volume of required earthworks. The undulating topography will also assist with fragmenting the development into different visual catchments, reducing its apparent scale.
• Recognising the ecological significance and landscape value associated with the areas of native bush, wetlands, and stream corridors/ riparian areas on the site. These features have/will be incorporated within the design, while enhancement is anticipated via a comprehensive landscape design and ecological management/enhancement plan.
• Undertaking a comprehensive landscape design to assist with reducing the visibility of the solar farm, while also strengthening existing landscape patterns.
• Undertaking a comprehensive ecological management/enhancement plan.

It is likely that the adverse visual amenity effects on some residents/neighbours will be considered by the Council as being at least minor (but are not expected to be significant). All effects are considered to be acceptable, with appropriate mitigation available. However, this presents a risk of limited notification, at least to those parties.

Ecological values:
Beca completed an initial ecological constraints assessment, which informed the preliminary design/layout of the solar farm.
There are a range of ecological features across the site with a range of ecological values from high to low. Much of the site (about 95%) is currently grazed farmland, but it is intersected by intermittent and perennial stream features (some with associated vegetated riparian margin); some areas that are 'natural wetlands' (as defined under the NESFW); and an area designated as Significant Ecological Area (SEA) under the AUP. The key ecological features of note are:
• A perennial stream intersecting the property and another perennial stream on the northern boundary of the property.
• Two separate areas of native vegetation classified as terrestrial SEA, as well as some scattered vegetation remnants.
• Some areas of 'natural wetland' generally aligned with the riverine and stream systems

The initial field work was completed prior to, and subsequently informed the current solar farm plans. This has ensured that key high value ecological features are avoided in the first instance, and not included in the design footprint. The design and construction methodologies will also look to minimise, remedy and mitigate the effects where they have not been able to be avoided; and to enhance values where possible.

Key actions to avoid and minimise effects, and potential mitigations and enhancements that will be considered are:
• Avoiding and minimising native vegetation clearance where practicably possible.
• Avoiding impacts on areas of 'natural wetlands', and setting further management and mitigations for any earthworks that may be necessary within 100m of them.
• Minimising impacts on watercourses by practically avoiding reclamation of intermitted and perennial stream systems, making sure design of any culvert crossings are able to meet appropriate fish passage and conveyance guidelines.
• Putting in place a range of construction-phase mitigations and management plans, including consideration of timing of works to minimise impacts on avifauna breeding, bat roost habitat, further survey and relocation of native aquatic and terrestrial fauna species if considered likely to be found in development areas.
• Consideration of enhancement of riparian margin, existing areas of degraded 'natural wetland' and also consideration of restriction of stock access to high value vegetation/ stream areas will also be considered as enhancement package for the works.

Based on the implementation of the above actions, the ecological effects of the proposal will be less than minor.

Stormwater management and flood hazards:

The Beca civil report details how stormwater from the proposed solar farm will be managed, acknowledging the flood hazards located on and in proximity to the site.

With respect to flood hazards, these have been avoided in the layout of the solar farm.

In terms of stormwater management, the land below the panels will be retained in pasture to allow the ongoing agricultural use of the land. This will limit any impacts on the volume of runoff, the peak discharge or the time to peak.

Beca conclude that the installation of the panels should not have any a significant impact on stormwater runoff (discharge volumes or rates) and that attenuation is therefore not required, provided adequate vegetative cover is maintained below the panels. Adaptive management approaches are also available should there be changes to how stormwater runoff is conveyed through the site following the construction of the solar farm (flows concentrating and causing local channelisation). The adaptive management measures would involve placing rip-rap and/or re-vegetating affected areas. Attenuation areas are also available.

On this basis, any adverse effects associated with the management of stormwater and the associated impact on flood hazards will be avoided, remedied or mitigated to be less than minor.

Productive rural values:

The subject site is located in the Rural Production Zone under the AUP. The overall intent of the zone is to provide for the use and development of land for rural production activities. Notwithstanding the overall intent, the Rural Production Zone is an appropriate location for the proposed solar farm due to:
• The permitted activity status afforded to the proposed activity in this zone, with consent only required as a restricted discretionary activity due to non-compliance with two of the general permitted activity performance standards. These are general, not activity specific.
• The large area of land required to facilitate the development.
• The need for quality, unrestricted access to the solar resource.

While an appropriate zone/location, adverse effects on productive rural values will be appropriately avoided or mitigated for the following reasons:
• The majority of the site will be retained in pasture, including the area below the panels. This will ensure that the life supporting capacity of the soil is retained, and that productive rural activities can occur in conjunction with the solar farm.
• The applicant intends to graze the land in conjunction with the solar farm. The subject site will therefore continue to facilitate productive rural activities.
• Should the solar farm activity cease, the land can easily be re-utilised to facilitate a range of productive rural activities.
• The solar farm is not sensitive to any existing productive rural activities occurring, or potential productive rural activities that could be reasonably expected to establish on land within the surrounding area.

Heritage values:

Geometria has completed an archaeological assessment for this site. The report concludes that there are no archaeological sites recorded on the property, while no archaeological material or surface features that may represent past anthropogenic activity were uncovered during the site inspection. Geometria has therefore concluded that an archaeological authority is not required from Heritage New Zealand.
The proposal will have negligible adverse effects on heritage values.

Acoustic amenity:
The proposed solar farm (operation and construction) will comply with the relevant noise limits from the AUP.

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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 Energy Generation 2011 (NPS-REG):

The NPS-REG includes a single objective and eight policies that are intended to enable the sustainable management of renewable energy generation under the RMA. The single objective and policies A - C are directly relevant to this application and will be addressed in detail in any consent application. The following summarises the general intent of the relevant objective and policies, and provides comment on how the proposal aligns with that intent.

• Providing for the development of renewable energy generation activities such that the proportion of New Zealand's electricity generated from renewable energy sources increases to a level that meets/exceeds the Governments national target: The proposal will facilitate one of New Zealand's first utility scale solar farms and will directly contribute to meeting the Government's specified targets (100% renewable generation by 2035 and a net zero carbon future by 2050).
• Recognise the benefits and provide for the national significance of renewable energy generation: There are a range of benefits associated with the proposal that should be recognised, in addition to assisting meeting Government guidelines. These include the creation of jobs for the local economy, continuation of agricultural use in conjunction with the solar farm, increased generation capacity and security of supply for the District, reduced costs of electricity where that electricity is deployed, along with ecological restoration.
• Maintaining generation while increasing the use of renewable over finite resources, and reducing reliance on imported fuels to generate electricity: The proposal will contribute to the use of renewable resources to generate electricity, which will directly contribute to reducing reliance on imported fuels. The solar farm will produce enough electricity to power 23,172 homes, and will remove p to 110,014 tonnes of carbon emissions per year.
• Acknowledging that meeting the Governments targets will require significant development of renewable energy generation activities: This project represents a significant renewable energy development.
• The need to locate activities where the renewable energy resource is available: The site has been identified based on the ideal combination of solar resource, land area availability, the ability to connect to the network, and the ability to achieve a low impact design.

The proposal is entirely consistent with, and supported by, the NPS-REG.

National Environmental Standard and National Policy Statement for Fresh Water (NES-FW and NPS-FW):

The NPS-FW provides local authorities with direction on how they should manage freshwater under the RMA. It does not contain any rules, but rather consists of a single objective and 15 policies. The NES-FW regulates activities that pose a risk to the health of freshwater and freshwater ecosystems. Both pieces of legislation came into effect in September 2020.

It is noted that there are different standards that apply to 'specified infrastructure' under the NES-FW. The definition for specified infrastructure includes regionally significant infrastructure identified as such in a regional policy statement or regional plan. While it could be argued that the proposed solar

farm represents regionally significant infrastructure, the AUP does not include any specific definition. For the purpose of the NES-FW and NPS-FW, the proposed solar farm is therefore progressed as non-specified infrastructure on a precautionary basis.

The proposal will require consent under the NES-FW as there will be earthworks and vegetation removal undertaken within 10m, and stormwater diversion within 100m of wetlands. Any actual or potential adverse effects will be addressed through recognising the wetlands in the design/layout of the solar farm (ensuring that they are retained), ensuring that the methods for managing stormwater do not alter the hydrology of the wetlands to an extent that it would result in adverse effects, and through the implementation of comprehensive management plans during the construction phase of the project. These measures will also ensure that the proposal is consistent with the policy framework of the NPS-FW, with the single objective and policies 3, 5, 9 and 15 being of most relevance to this proposal.

National Policy Statement for Highly Productive Land (NPS-HPL):

The NPS-HPL is a relevant consideration given that the site is zoned Rural - Rural Production under the Auckland Unitary Plan, and some of the the soils have a LUC class of 3. This results in portions of the site being classified as 'highly productive land'.

Point 3.9 'Protecting highly productive land from inappropriate use and development' of the NPS-HPL is directly relevant to this application. It directs Council's to avoid inappropriate use or development of highly productive land. Subpoint 2 includes a list of what is considered an appropriate use, noting that the measures outlined in subpoint 3 must also be applied.

While subpoint 2 does not specify 'solar farms' as an appropriate use, it does provide for the maintenance, operation, upgrade and expansion of 'specified infrastructure'. While it is not clear if intentional, this excludes the construction of specified infrastructure.

The definition for specified infrastructure includes infrastructure that is recognised as regionally or nationally significant in a regional policy statement. While it could be argued that the solar farm is regionally significant infrastructure (noting that 'electricity generation activities that feed into the local or national grid' are considered regionally significant in other regions that have a definition for regionally significant infrastructure), the Horizon Regional Policy Statement does not include any specific definition. For the purpose of the NPS-HPL, the solar farm is therefore progressed as non-specified infrastructure on a precautionary basis.

While the proposal does not directly align with the direction provided under point 3.9 of the NPS-HPL, the proposed solar farm is considered an appropriate use of highly productive land and aligns with the general intent of the NPS-HPL for the following reasons:

• Only a portion of the site is considered highly productive land under the NPS-HPL.

• There will be no permanent or irreversible loss of highly productive land as a result of the development. Most of the site will be retained in pasture, including the area below the panels. Should the solar farm activity cease, all land on the site can be easily repurposed for productive rural activities. This ensures that the life supporting capacity of the soil is retained, and that the proposal does not facilitate a change in land use that means that the land can not be used for productive activities in conjunction with the solar farm or in the scenario that the solar farm ceases to exist.

• The applicant will continue to utilise the land for productive purposes in conjunction with the proposed solar farm. This is likely to be in the form of grazing sheep, although there are a range of options available. This will be facilitated by a design that provides space between rows and under panels. This means that, while the proposal will facilitate a new land use on the site, the nature and specific design of the solar farm allows for the ongoing use of the land for productive activities.

• The solar farm is not sensitive to any existing productive rural activities occurring, or potential productive rural activities that could be reasonably expected to establish on land within the surrounding area.

• The NPS-REG specifically provides for the development of renewable energy generation activities. It requires decision makers to have regard to the associated benefits, practical implications and constraints associated with development, and the need for significant renewable energy development to meet government targets.

National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health Regulations (NES-SC):

An initial constraints assessment undertaken by Beca identified a number of HAIL activities on the site. Given that the proposal will involve earthworks and a change in land use, the NES-SC is relevant and has been considered in the context of this proposal.

To manage any associated adverse effects, it is anticipated that the conditions of any consent will require that further investigations are undertaken by a SQEP to delineate health risk and management controls, that a Contaminate Soils Management Plan is submitted for approval, along with other standard conditions. The implementation of conditions to this effect will ensure that there are no adverse effects on human health, in accordance with the intent of the NESSC.

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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:

Based on the current feedback in respect of landscape matters, it is likely that Auckland Council will limited notify the application to adjoining neighbours. T he major time gains for this project under the fast track process will therefore be the avoidance of the standard notification process, with potential appeals. Avoiding this process could save the applicant up to 12-22 months in processing timeframes, bringing the various benefits associated with the proposal forward by the same timeframe.

If the application was to progress through the standard consenting process and was limited notified, there have been examples of neighbours of infrastructure projects seeking to disrupt a consent process by submitting and appealing, simply to secure their own "compensation" (as they are not receiving any financial compensation compared to their neighbour, whether that be through a sale price or lease/license agreement). Any environmental concerns that adjacent neighbours might have can be appropriately identified through the fast-track EPA comment process.

Notwithstanding the above comments on notification, Councils across the country are also experiencing longer than usual processing timeframes. It is expected that the timeframes afforded under the RMA would be automatically doubled by Auckland Council upon lodgement. There are also trickle down delays in terms of Council engaging and obtaining the required input from various internal/external experts, noting that the industry is experiencing delays in general. Recent experience has seen Auckland Council taking some 14 months to make a notification decision for a simple application for an electronic billboard, and almost 2 years (and counting) to process an application to vary an existing water take consent. A recent acceptance letter from Auckland Council for an application lodged at Te Arai North outlined that we should expect delays of at least five weeks during the initial processing of the consent, with a comment that timeframes may be automatically doubled for complex/large applications.

Utilising the fast track process will also create considerable certainty for the applicant in terms of consenting timeframes (given that any appeals are on points of law only).

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

Please write your answer here:

This project is not complex, and will be able to be allocated and resolved by a new Panel swiftly, and without a significant drain on resources. While the applicant wishes to proceed as quickly as possible, it would be happy to liaise with the EPA as to when in first period of implementation it would best assist the EPA/ Panels in their resourcing, so as to ensure that the fast track process proceeds efficiently and effectively.

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

Central government plan or strategy

Please explain your answer here:

Yes, in the sense that National's current policy is to:

"Turbo-charge new renewable power projects including SOLAR, wind and geothermal by requiring decisions on resource consents to be issued in one year and consents to last for 35 years."

Allowing access to the fast track by listing in schedule 2A is supported by this policy.

Will the project deliver regionally or nationally significant infrastructure?

National significant infrastructure

Please explain your answer here:

Solar farms are part of the National infrastructure for electricity generation. Every solar farm contributes to that infrastructure (just like every part of the national grid is of national importance).

Will the project:

contribute to a well-functioning urban environment

Please explain your answer here:

A sustainable and reliable supply of electricity is a key ingredient for well-functioning urban environments. The proposed solar farm will produce approximately 162,000 MWh of energy per year, which is enough power approximately 23,172 homes. That electricity is produced in a sustainable manner from a reliable resource. This will increase the resilience of the communities that are served by the solar farm.

The solar farm is also proposed in an appropriate location that will not detract from the functioning of the nearby urban environment. Agricultural use will continue on the site in conjunction with the proposed solar farm, ensuring that productive values are retained as much as practicably possible.

Will the project deliver significant economic benefits?

Yes

Please explain your answer here:

The proposed solar farm is a major piece of 'infrastructure' that will inherently contribute to the improvement of economic, employment and environmental outcomes (as detailed above).
Importantly, with respect to environmental outcomes, the proposal represents a shift away from the use of finite to renewable resources to meet the increasing demand for electricity. This is a shift that is encouraged with a top-down approach from central government, and is reflective of the overall sustainable management ethos of the RMA.

A shift away from using fossil fuels to produce electricity will reduce emissions, which in turn will improve public health. This has a flow on effect on productivity in that people take fewer sick days/children take fewer sick days/workplaces have fewer absences, therefore increasing productivity.

A reliable energy source also facilitates the ongoing operation of businesses at times where other electricity sources may be interrupted. This in turn increases productivity.

Will the project support primary industries, including aquaculture?

Yes

Please explain your answer here:

The land will continue to be able to be put to productive primary use, eg through sheep grazing, and to the project will support primary industry in that sense.

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

No

Please explain your answer here:

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

Yes

Please explain your answer here:

The solar farm will directly contribute to New Zealand's efforts to mitigate climate change and transition more quickly to a low emissions economy.

The ongoing use of finite resources, particularly the burning of fossil fuels, to produce power has a clearly negative impact with respect to climate change. As the climate continues to warm as a result of these activities, our environment, economy and society become more susceptible to the various risks posed by natural hazards.

By actively encouraging New Zealand's transition to a low emissions economy (removing up to 110,014 T of carbon emissions), the proposed solar farm contributes to lowering the risk posed by natural hazards whose frequency and severity are being increased by climate change.
The solar farm will also contribute to an enhanced, diversified and varied electricity supply for the areas that it serves.

Noting that natural hazards are unavoidable and can have direct impacts on the provision of electricity, an enhanced, diversified and varied supply will directly strengthen environmental, economic and social resilience.

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

Yes

Please explain your answer here:

Given the location of the site, coastal inundation does not present a risk to the solar farm.
There are some flood hazards that apply to the site. The hazards were mapped and assessed by Beca as part of its initial investigations. The layout of the solar farm has therefore been designed cognisant of, and responds directly to the identified hazards, with the obvious intent being to minimise the potential impact on the operation of the solar farm.

Notwithstanding the above, the solar farm is relatively resilient to the impacts of flooding. The angle can be altered to increase the height of the solar panels from the ground and any flood hazards. This means that the farm can respond to natural hazards as they occur. If damaged, the panels can be easily repaired or replaced. The inverters and substation have also been located so to avoid impact from natural hazards, while the cabling that interconnects the various aspects of the solar farm will be underground, and therefore not susceptible to flooding.

Will the project address significant environmental issues?

Yes

Please explain your answer here:

As outlined above, the solar farm will generate approximately 162,000 MWh of energy per year. This will remove up to 110,014 T of carbon emissions that would have otherwise been generated by burning coal. This is an important environmental outcome for New Zealand, as signaled by the Governments strategies of 100% renewable electricity generation by 2035 and a net zero carbon future by 2050. These strategies are enforced through the NPS-REG,

with the policy direction permeating through other national, regional and district planning documents.

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

Yes

Please explain your answer here:

The project is generally supported by the Unitary Plan's objectives and policies, as well as its "base" activity status. If it were not for works close to wetlands, and stormwater triggers, then the activity would most likely be a restricted discretionary one only.

Anything else?

Please write your answer here:

If not included in Schedule 2A, consideration is sought for Schedule 2B.

Various ecological, soil, geotechincal, traffic, landscape, economic, civil and other reports are available and can be provided on request. Please let us know if that would be of assistance.

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:

Given the location of the site, coastal inundation does not present a risk to the solar farm.
There are some flood hazards that apply to the site. The hazards were mapped and assessed by Beca as part of its initial investigations. The layout of the solar farm has therefore been designed cognisant of, and responds directly to the identified hazards, with the obvious intent being to minimise the potential impact on the operation of the solar farm.

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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:

None

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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:
James Gardner-Hopkins

Important notes