Response ID ANON-URZ4-5FAT-5

Submitted to Fast-track approval applications
Submitted on 2024-04-15 17:34:25

Submitter details

Is this application for section 2a or 2b?

2A

1 Submitter name

Individual or organisation name:
Far North Solar Farm Ltd

2 Contact person

Contact person name:
Richard Homewood

3 What is your job title

Job title:
Managing Director

4 What is your contact email address?

Email:
s 9(2)(a)

5 What is your phone number?

Phone number:
s 9(2)(a)

6 What is your postal address?

Postal address:

s 9(2)(a)

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

No

Organisation:

Contact person:

Phone number:

Email address:

Job title:

Please enter your service address:

Section 1: Project location

Site address or location

Add the address or describe the location:

Legal description is Section 3 SO 384036
The site is located on the northern shore of Lake Benmore on a parcel of land between the Pukaki River and the Ohau C hydro canal. The closest settlement is Twizel which is approximately 11km from the site.

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

Yes

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Who are the registered legal land owner(s)?

Please write your answer here:

Douglas Robert McIntrye, Waitaki Trustees (Golden Acres Limited)

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

Please write your answer here:

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

Section 2: Project details

What is the project name?

Please write your answer here:
The Point Solar Farm

What is the project summary?

Please write your answer here:

The Point is a 420 megawatts-peak photovoltaic solar farm in the Mackenzie Basin which when complete will provide enough power to support the equivalent of 100,000 homes. The solar farm will be for utility-scale renewable energy generation and will be connected into the BENMORE-ISLINGTON line substation for supply into the National Grid. In addition to this, an area of 89ha has been set aside as an ecological restoration area. The entire site will be protected with predator-proof fencing and will include sanctuaries able to act as breeding facilities for endangered native invertebrates.

What are the project details?

Please write your answer here:

The Point is the largest solar farm so far announced for development in New Zealand. It will complement the current hydro-schemes already in the Ohau district and increase the resilience of the national electricity grid during periods of drought or low hydropower generation, whilst also significantly assisting decarbonisation efforts.

The Point will:

 Generate 420MWp of additional electricity for a catchment area of 100,000 households.
 Create 330 local jobs during construction.
 Directly contribute to NZ's transition to a low emissions economy and achieving national emissions reductions targets.

The site is currently used as dairy support and described by Wildlands' Ecologists as "ecologically depauperate." Without development, it is likely to remain in a degraded state. An area of 89ha will be restored in accordance with a proposed Ecological Enhancement Plan (EEP), which is currently being created in collaboration with the Department of Conservation and is intended to generate a net gain for ecology at the site. The EEP represents the largest private restoration project ever undertaken in the Mackenzie Basin.

The proposal is to construct and operate a utility-scale solar farm, consisting of photovoltaic panels on single axis trackers across approximately 670 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 single, portrait format (known as 1P). 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 1.5-2.2 m tall.

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

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

The solar farm will be connected to the National Grid through a Grid Injection Point (GIP). The Applicant is working with Transpower, through a Transpower investigation process, to design a new GIP and make any necessary changes to the existing BEN-ISL A transmission line, 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 from the original consent application to include the GIP and associated connection works.

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

Development of the project first commenced in 2021. The land acquisition option and OIO approval have both been achieved and the TWA is on track for execution in May 2024. This will leave resource consent as the only outstanding milestone 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 6 month timeframe from completion of the development phase. Construction works are planned to commence Q4 2024. Transpower has scheduled commissioning of the new GIP for Q3 2026. Solar farm commissioning is planned for Q4 2026.

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

Please write your answer here:

Resource Management Act 1991

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

Please write your answer here:

Mackenzie District Council
Canterbury Regional Council

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

Please write your answer here:

A resource consent application was lodged with Mackenzie District Council on 30 June 2023. A resource consent application was lodged with Canterbury Regional Council on 4 September 2023.

Both resource consent applications were jointly publicly notified on 29 November 2023. Submissions closed on 1 February 2024.

“Following further assessment of the project, Canterbury Regional Council and Mackenzie District processing and senior planners have all reached consensus that the application should be decided at a National, rather than council level and recommended that the project be referred for Ministerial processing.”

Following the joint recommendation from councils, both applications were subsequently suspended for processing under section 91A(1) on 27 March 2024, to enable FNSF to present its applications for inclusion in Part A of Schedule 2 of the Bill.

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

No

Please explain your answer here:

N/A

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 Point in Q4 2026.

To that end, FNSF expects to enter the TWA in May 2024. A TWA is needed to ensure the GIP and related infrastructure required to connect the solar farm to the National Grid is built on the site. Resource Consent for The Point will need to be granted ahead of the contract going unconditional. OIO approval for the project was granted in April 2024.

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

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

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

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

4. Initiate debt procurement for the project.

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

6. Place orders for plants, fencing and other materials as per the Ecological Enhancement Plan.

7. The above items are anticipated to take in the order of six months with site works commencing Q4 2024 to Q1 2025.

8. Transpower is scheduled to complete the GIP build for commissioning in Q3 2026, subject to ordering long lead items by Q3/Q4 2024.

9. FNSF plans to complete commissioning in Q4 2026.

Section 3: Consultation

Who are the persons affected by the project?

Please write your answer here:

- Mackenzie District Council
- Canterbury Regional Council
- Te Runanga o Ngāi Tahu
- Department of Conservation
- Fire and Emergency New Zealand Ltd
- Transpower New Zealand Ltd

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 hui was held with Te Rūnanga o Ngāi Tahu to introduce FNSF and the project. Ngāi Tahu duly advised the project to engage at a Rūnanga level and facilitated personal introductions to Arowhenua, Waihao and Moeraki Rūnanga groups who claim mana whenua status in the area.

Engagement with the various Rūnanga groups has been ongoing since May 2023 and has included virtual hui, site visits and the sharing of all professional and environmental reports and plans associated with the development. Rūnanga raised a number of cultural concerns regarding the proposal and FNSF has now engaged a specialist Cultural Consultant to assist with ongoing engagement efforts to ensure these are appropriately managed. FNSF's intent is to continue to build on efforts to facilitate successful long term relationships and outcomes with Rūnanga groups in Te Manahuna Mackenzie. We hope to collaborate with them through the construction process and roll out of the Ecological Enhancement Plan (EEP), including seed sourcing from locally owned nurseries.

FNSF has been engaged in constructive dialogue with the Department of Conservation since April 2023. All plans including the Assessment of Ecological Effects have been shared with the Department and a site tour with a team of DoC experts took place in October 2023. A further workshop was held at DoC offices in Christchurch in February 2024. FNSF is actively working in collaboration with DoC to create reserves for invertebrates inside the solar farm boundary, as well as on the detail for the larger 89 ha EEP.

Engagement with Rūnanga and DoC has resulted in modifications to the EEP and to planned approaches to visual mitigation plans for the solar farm. The input of DoC specialists is actively informing the design of the ecological restoration that is intended and we expect the Department to remain active partners in the project throughout construction and once completed.

Engagement with Fire and Emergency NZ and Transpower remains ongoing and is expected to increase once consent for the project is gained. Input from both agencies has informed the layout and design of the solar farm itself, such as the number and placement of water tanks around the site and the placement of inverters and other electrical design. FENZ will also be consulted on the EEP to ensure fire safety considerations are integrated into the final EEP design.

A site visit with Mackenzie District Council and Canterbury Regional Council specialists was held on 2 February 2024. Various post-lodgement discussions with the two councils have also been held to discuss progress on the application and proposal specifics. Engagement through the council consenting process has led to both Mackenzie District Council and Canterbury Regional Council jointly recommending that the consenting process be referred for ministerial processing.

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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, Lizard Management Plan, Avian Management Plan and Robust Grasshopper Management 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 Mackenzie Basin.

The proposal is consistent with all relevant National Environmental Standards.

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Section 7: Eligibility

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

Yes

Please explain your answer here:

The process of consenting a large-scale solar farm in New Zealand under the RMA is often very challenging. The consenting process in relation to this type of development is often slow, costly and complex. 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.

Both Mackenzie District Council and Canterbury Regional Council have officially acknowledged that a project of this scale should not go through standard council processing channels and have themselves requested the project be considered for the fast-track process.

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

Please write your answer here:

The project is consent-ready, with all the necessary technical assessment prepared and project details confirmed. 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:

Other

Please explain your answer here:

No, however, on assessment, Canterbury Regional Council and Mackenzie District Council have jointly recommended that due to the national significance of the project, it should be called in for Ministerial processing.

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 proposed solar farm is the largest currently publicly announced in New Zealand. The proposal will provide electricity generation to meet the demands of approximately 100,000 homes making it a nationally significant generator of electricity. It is expected that the proposal will reduce carbon emissions from electricity generation in New Zealand (each year) equivalent to removing 45,000 cars from the national fleet. The project aligns with the government's desire to double renewable electricity generation by 2050.

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

The proposal also includes significant local expenditure on civil and electrical subcontractors, creating economic opportunity in regional New Zealand as well as amongst local hospitality providers.

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 330 full time equivalent staff during the construction of the solar farm (over an 18-24 month period). There will also be significant employment opportunities in relation to the proposed planting and ongoing maintenance of the screening and ecological enhancement areas.

More broadly, the provision of renewable electricity generation to meet the demands of approximately 100,000 homes provides significant economic benefits for both the Mackenzie district and its surrounds.

The project will result in approximately 600 million NZD of investment, of which a significant portion is likely to be spent with local contractors, as well as benefiting the surrounding hospitality businesses during construction. The Point has also received official support from the South Canterbury Chamber of Commerce.

Will the project support primary industries, including aquaculture?

Not Answered

Please explain your answer here:

Not Applicable

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

Yes

Please explain your answer here:

The proposal will generate significant renewable electricity from solar energy, a natural resource critically under utilised in New Zealand for energy generation purposes.

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.

More broadly, the proposal will help reduce the reliance on gas and coal electricity generation to meet the current generation shortfall in times of need.

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

Yes

Please explain your answer here:

The project will increase the resilience of the National Grid by providing additional electricity generation capacity through solar energy. This will complement the existing hydro schemes and provide an alternative energy source, which is important during times when the hydro lakes are at low supply (i.e. during 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 used as part of a dairy farming unit and is intensively grazed and cultivated. Without development, it is likely to remain within a farming system and in a degraded state. An 89 ha area that surrounds the solar farm site will be restored in accordance with a proposed Ecological Enhancement Plan, which is currently being created in collaboration with DoC and is intended to generate a net gain for ecology at the site.

The proposed 89 ha ecological enhancement area, that will be planted in native vegetation to represent the original outwash plain that would have been present on the site historically, has been described by DoC as the largest private ecological restoration project ever proposed within the Mackenzie basin. This ecological enhancement area will provide vital habitat for 'Threatened' and 'At Risk' species and fauna, and will be protected with predator-proof fencing and managed in perpetuity. The project also aims to establish and fund an invertebrate 'sanctuary' within the farm area that will be managed by DoC.

By removing intensive dairy farming operations from the site, the proposal will result in the immediate cessation of all Nitrogen inputs from cows and fertilisers going onto the land. Excess nitrogen runoff is known to have negative impacts on water quality so by removing these inputs the project will have an immediate benefit on water quality in adjacent water systems. The site area will be lightly grazed periodically by sheep to manage exotic weed growth.

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

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

Yes

Please explain your answer here:

The Canterbury Regional Policy Statement, Canterbury Land and Water Regional Plan and Mackenzie District Plan contain provisions that support and encourage renewable electricity generation activities, while ensuring that adverse effects on the receiving environment are appropriately managed and mitigated. The relevant planning documents also promote the restoration, preservation and maintenance of indigenous vegetation and biodiversity values. This proposal directly benefits indigenous biodiversity values in the form of the ecological enhancement area that is planned.

Anything else?

Please write your answer here:

Without resource consent certainty, the ongoing costs of maintaining the site lease rights, s 9(2)(b)(ii) on top of EPC selection and debt procurement process, the project will become untenable. This certainty cannot be achieved via the timeframe of the normal consenting process, particularly in light of the recent recommendations from Mackenzie District Council and Environment Canterbury.

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

No

If yes, please explain:

Section 8: Climate change and natural hazards

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

No

If yes, please explain:

Section 9: Track record

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

Please write your answer here:

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

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Declaration

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

Yes

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

Please write your name here:
Richard Homewood

Important notes