

Comments on applications for referral under the COVID-19 Recovery (Fast-track Consenting) Act 2020

This form is for local authorities to provide comments to the Minister for the Environment on an application to refer a project to an expert consenting panel under the COVID-19 Recovery (Fast-track Consenting) Act 2020.

Local authority providing comment	Horizons Regional Council
Contact person (if follow-up is required)	Greg Bevin – Regulatory Manager s 9(2)(a)
	Jasmine Mitchell – Team Leader Consents s 9(2)(a)
	Click or tap here to enter text.

Comment form

Please use the table below to comment on the application.

Project name	Harmony Energy Solar Farm – Marton Project PJ-0000863
General comment – potential benefits	The potential benefits of the project are associated with the provision of jobs created during the construction of and the ongoing operation of the solar farm. The project also identifies an improvement to the ecological values within the local vicinity.
General comment – significant issues	<p>The potential issues associated with the project include:</p> <ul style="list-style-type: none"> a. Effects associated with the ecological impact of the proposal, particularly given the potential for an impact on any loss or modification of wetlands and the ecology throughout the site; and b. Potential effects associated with the construction of the solar farm if inappropriately managed.
Is Fast-track appropriate?	Horizons view on this matter is relatively neutral. From a Regional Council perspective the scale of a project is such that it could be processed via a normal council process.
Environmental compliance history	This company has no compliance history with Horizons Regional Council.
Reports and assessments normally required	<p>The reports expected by the Council for a solar farm of this scale on the proposed site are as detailed below:</p> <ul style="list-style-type: none"> - A comprehensive earthworks and erosion sediment control plan prepared by a suitably qualified and experienced person in accordance with the document titled 'Erosion and Sediment Control Guidelines for the Greater Wellington Region'; - A detailed planning assessment providing a full analysis of the relevant planning instruments; - A detailed assessment identifying any wetlands and streams and their ecological values. The assessment addressing any habitat loss would need to include an assessment against the effects management hierarchy both within the One Plan and National Policy Statement for Freshwater for both works in or around wetlands and any potential culverts. It is expected that any proposed offsetting or compensation would be modelled and calculations provided within this assessment along with identification of offsetting areas;

	<ul style="list-style-type: none"> - An archaeological assessment or management plan for any accidental discovery. This may be included within a construction management plan; - The impact of stormwater runoff from the solar panels on both the quality and quantity of water within the streams and wetlands. This should also include an assessment on the hydraulic capacity of the existing streams to accommodate any water and impacts on downstream properties; - An assessment of the cultural values associated with this land and waterways; and - A set of draft conditions to manage the potential effects;
Iwi and iwi authorities	<p>The site is located with the rohe of Ngāti Apa.</p> <p>The subject site is in close proximity to the area of interest of Ngāti Raukawa.</p>
Relationship agreements under the RMA	n/a
Insert responses to other specific requests in the Minister's letter (if applicable)	N/a
Other considerations	<p>Transpower NZ Limited currently hold a 'global' consent to undertake earthworks within 5m of a waterway, within hill country and erosion management areas and schedule F areas associated with the maintenance and upgrades of transmission towers. There are lines which traverse the site.</p>

Note: All comments, including your name and contact details, will be made available to the public and the applicant either in response to an Official Information Act request or as part of the Ministry's proactive release of information. Please advise if you object to the release of any information contained in your comments, including your name and contact details. You have the right to request access to or to correct any personal information you supply to the Ministry.

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Local authority providing comment	Rangitikei District Council
Contact person (if follow-up is required)	Peter Beggs – Chief Executive s 9(2)(a)
	Johan Cullis – Group Manager Regulatory Services s 9(2)(a)

Comment form

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Project name	Harmony Energy Solar Farm – Marton Project
General comment – potential benefits	<ul style="list-style-type: none"> • Employment opportunities during the construction phase of the solar farm, presuming local persons are employed. • More competitive pricing for power, presuming solar farm reduces pricing of energy supply for local persons (unclear from proposal). • Solar is a form of renewable energy. It is acknowledged that New Zealand's energy needs are increasing, and new/additional energy supply is needed.
General comment – significant issues	<p>The proposed Solar Farm has the potential to generate significant adverse effects on the rural character and amenity of this rural landscape. Marton was established as a service town for the fertile farming region of the Manawatu Plains, an area of low-lying land located on the floodplains of the Manawatu and Rangitikei Rivers. The land surrounding Marton includes some of the most fertile lands in the south-western North Island. This land is largely used for primary production. The rural landscape forms an integral part of Marton's character and identity; represented by pristine, large, open, rural spaces, and a rolling landscape. Views across rural land surrounding Marton are typically uninterrupted, and the topography of this landform is largely flat to rolling, and unmodified. It is considered that the proposed solar farm has the potential to generate significant landscape and visual effects, in the context of the local rural landscape. The proposal would be situated on one of the main roads into Marton township. The Council considers that the Marton community has a significant interest in the loss/alteration of this rural character and amenity that would result from this proposal.</p>

Is Fast-track appropriate?	Rangitikei District Council consider it would be more appropriate that they process the resource consent application, as the Local Authority who have the knowledge and local context of the site, in particular in relation to the rural character and amenity of farmland which surrounds Marton town.
Environmental compliance history	The Rangitikei District Council are not aware that the applicant, or a company owned by the applicant have any environmental regulatory compliance history in the Rangitikei District.
Reports and assessments normally required	<ul style="list-style-type: none"> • Glint and Glare • Noise • Landscape Visual (incl. peer review) • PSI/DSI • Stormwater Assessment • Ecological Assessment • Cultural Impact Assessment (Mana Whenua agreement/support) • Construction Management Plan (including traffic management) • Decommission Plan (if required) • Assessment(s) as required by Clause 3.9 of the NPS-HPL (specified infrastructure pathway), completed by a suitably qualified and experienced person(s).
Iwi and iwi authorities	Te Rūnanga o Ngā Wairiki Ngāti Apa (Ngāti Apa). Furthermore, Ngāti Apa as Mana Whenua are the appropriate persons to confirm iwi and hapu groups, and marae.
Relationship agreements under the RMA	Tūtohunga (MOU between Rangitikei District Council and Tangata Whenua)
Insert responses to other specific requests in the Minister's letter (if applicable)	<ol style="list-style-type: none"> 1. Rangitikei District Council consider it more appropriate that they process the resource consent application, as the Local Authority who have the knowledge and local context of the site, in particular in relation to the characteristics and rural character and amenity of farmland which surrounds Marton. 2. The Rangitikei District Council are not aware that the applicant, or a company owned by the applicant have any environmental regulatory compliance history in the Rangitikei District.
Other considerations	The Rangitikei District Council are currently processing a resource consent for a 42MWp solar farm at the corner of Whales Line and Pukepapa Road (Part Lot 7 A 2790). Furthermore, the Council have been involved in pre-application discussions with a party regarding a Solar Farm proposed on the land parcel legally described as Part Lot 5 DP 9509. If approved, this would result in three Solar Farm's located in close proximity to each other. Rangitikei District Council considers it important that the cumulative effects of the Solar Farms are considered.

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Comments on applications for referral under the COVID-19 Recovery (Fast-track Consenting) Act 2020

This form is for persons requested by the Minister for the Environment to provide comments on an application to refer a project to an expert consenting panel under the COVID-19 Recovery (Fast-track Consenting) Act 2020.

Organisation providing comment	Transpower New Zealand Limited
Contact person (if follow-up is required)	Jo Mooar
	Senior Corporate Counsel
	s 9(2)(a)

Comment form

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Project name	Harmony Energy Solar Farm Marton
General comment	<p>Transpower has been identified as an “other person” for the purpose of section 21(3) of the COVID-19 Recovery (Fast-Track Consenting) Act 2020 (Act). Thank you for the opportunity to provide comments about the Project, and its potential impact on National Grid assets.</p> <p>Transpower supports the application as it “contribut[es] to New Zealand’s efforts to mitigate climate change and transition more quickly to a low emissions economy (in terms of reducing New Zealand’s net emissions of greenhouse gases)” (section 19(d)(vii) of the Act).</p> <p>Transpower is not aware of any reason for the application for referral to be declined. In this regard, we do not consider the Project to be inconsistent with Policy 10 (in particular) of the National Policy Statement on Electricity Transmission (section 23(5)(c) of the Act).</p> <p>The 110kV Bunnythorpe-Whanganui B line traverses the site in two locations, consisting of ~ 4 spans, and towers 82 83, 83A and 84A. The information provided with the referral application states the areas under the spans are “to be retained and/or enhanced (with possible revegetation planting).” Any construction activities and species chosen for planting under the spans, and around the towers, would need to be carefully considered to avoid compromising the transmission line. Transpower would appreciate the opportunity to comment on any conditions to be imposed during the consenting phase, to ensure the Grid is not adversely impacted by construction activities or vegetation planting.</p>

	<p>The applicant proposes to connect the generation to the Grid at Transpower's existing Marton Substation, via a new underground transmission line. The applicant has requested a connection at 33kV. Connection at this voltage creates some complexity and new assets may need to be constructed, as indicated in the referral application.</p> <p>Transpower has had some discussions with the applicant about the connection to the Grid. Transpower operates a Queue Management Framework for managing investigations into generation connections. Like the Opunake project, this Project is near the start of the queue.</p> <p>Once the necessary investigation is complete, we would understand the extent of works that would need to occur at Transpower's existing substation site. In advance of the investigation, we anticipate that an outline plan of works would be required for works within the designation. Regional consents may also be required.</p>
Other considerations	See above.
Insert specific requests for comment	<p>The following questions have been asked of Transpower:</p> <ol style="list-style-type: none"> 1. What additional approvals will the applicant(s) require from Transpower New Zealand Limited to connect to the national electricity grid? <p>The applicant will need to:</p> <ul style="list-style-type: none"> • enter an investigation Services Agreement to fund the costs of Transpower's investigation; • enter a Transpower Works Agreement (TWA) to fund the works identified by the investigation. The TWA would also cover the need to obtain any RMA approvals (eg. outline plan of works and regional consents) and subsequent construction and other works at the substation. <ol style="list-style-type: none"> 2. Will obtaining the above approvals likely impact on project delivery or timing as outlined in the referral application(s)? <p>Provided the services agreement and TWA are entered in a timely manner, we may be in a position to start construction within 2 years (ie. April 2025). We note that start date for the works at the Transpower substation does not prevent construction activities for the solar development, as indicated in the referral application.</p>

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