s 9(2)(f)(ii), s 9(2)(g)(i)

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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	South Taranaki District Council (STDC)
Contact person (if follow-up is required)	Liam Dagg Group Manager Environmental Services, STDC s 9(2)(a) [redacted]

Comment form

Please use the table below to comment on the application.

Project name	Opunake Solar Farm Project
General comment – potential benefits	The South Taranaki District Council (STDC) sees the Opunake Solar Farm Project as a significant advancement in renewable energy alternatives for the district and for New Zealand. We concur with the benefit statements in the project application. This project is a key step in achieving a transition into sustainable and renewable energy options for the region. The project aligns with the aspirational goals of both the Taranaki 2050 Roadmap and Tapuae Roa Economic Development Strategy which have both been developed to the region into a low-emissions economy. STDC notes that the intent is to optimise the use of productive farmland by having dual occupancy of the site. This has been identified within the application as constructing the solar panels at a height that enables continued use of the land below as grazing for stock. STDC sees this as a prime opportunity to set an example for other such solar projects and activities within the district. This project aligns with the climate change and environmental sustainability goals and targets in STDC's Environment and Sustainability Strategy. It is expected that the project will provide considerable employment opportunities in South Taranaki, which will bring people with highly technical knowledge and skill sets to the district, helping to improve the local economy and improving career opportunities for our rangatahi. Promoting employment and supporting investment in our District will also help us to recover from the economic and social impacts of Covid-19. Furthermore, the proposed site is located within reasonable proximity of Opunake and Hawera, two of the biggest towns within the South Taranaki district, which will encourage sustained employment for the towns and wider areas.

General comment – significant issues	Loss of productive farmland if dual occupancy of the site is not undertaken – grazing below the solar panels. Reverse sensitivity effects on sensitive activities (dwellings etc.) within the area, including noise and traffic from construction phase. Wetland and waterbody degradation if protection mechanisms are not implemented. Visual impact from surrounding properties but also a significant change on the South Taranaki landscape Remediation of site after the activity ceases – site will be listed with identified HAIL activity and subject to provisions of NES-CS. Further, is the intent to return the site to productive farmland as it is now or will it be used for a different purpose. Changes to ecological habitats and well-established areas that may impact flora and fauna species within the wider area. Natural Hazards (fault lines, waterbodies, lahar risk)
Is Fast-track appropriate?	Yes. Council believes it is appropriate for the project to go through the fast-track consenting process. It achieves the purpose of the Act, by contributing to New Zealand's efforts to mitigate climate change and transition more quickly to a low-emissions economy. The project meets the criteria specified in section 18 of the Act to have it referred to a consenting panel. As explained in the application, the timeframe for the project to be processed under this Act aligns with manufacturing of the solar panels, allowing the production of power to the Opunake substation to commence sooner.
Environmental compliance history	Harmony Energy NZ #4 Limited does not have any negative environmental regulatory compliance or enforcement history with STDC.
Reports and assessments normally required	Under a normal land-use consent process, the project would be considered a Discretionary Activity by the STDC District Plan. It would require an Assessment of Environmental Effects that is proportionate to its significant scale. Chapter 20 of the STDC District Plan identifies general and specific information required for Large-scale renewable electricity generation activities. Reports and assessments required include: • Cultural Impact Assessment and Archaeological assessment • Landscape and Visual Effects assessment • Ecological assessment on indigenous vegetation, fauna, local catchments and how earthworks may disrupt natural landforms. • Traffic impact assessment report • Acoustic assessment report and provisions for safeguards and contingencies in relation to noise effects and effective reporting and monitoring methods of noise. • Engineering and Geotechnical report • Assessment against NPS-HPL, NPS-FW • Preliminary Site Investigation (PSI) or Detailed Site Investigation (DSI) in some instances.
Iwi and iwi authorities	STDC identifies Taranaki Iwi as the iwi authority for the project area. The project application does identify that consultation with treaty settlement entity Te Kahui o Taranaki has been undertaken on several occasions and that a Cultural Values Assessment shall be supplied from Iwi.

Relationship agreements under the RMA	There are no formal relationship agreements, beyond recurring Iwi Liaison Committee and Huinga a Iwi meetings that provide an opportunity for discussions between parties on projects such as this. Council is committed to developing Mana Whakahono a Rohe agreements if formally initiated by any of the four Iwi Authorities that cover the district. There are statutory acknowledgements and deed of recognition between the Crown and Taranaki Iwi that are relevant to the project site where the solar panels are to be constructed. This includes the Otahi Stream and tributaries as shown on OTS-053-37. The Otahi Stream and an unnamed tributary of the Otahi Stream traverse the project site from north-east to south-west.
Insert responses to other specific requests in the Minister's letter (if applicable)	**1. Are there any reasons that you consider it more appropriate for the project, or part of the project, to proceed through existing Resource Management Act 1991 (RMA) consenting processes rather than the processes in the FTCA?** No, STDC believes the project should be consented under the Covid-19 (Fast-track Consenting) Act 2020. The fast-tracking legislation provides a holistic and integrated framework for the project to be considered. By comparison, the District Plan does not provide a direct pathway for consenting of a project with this scale and complexity, with this due mainly to the number of district plan chapters that have to be considered in both quantifying and assessing the effects. This project would be limited notified if it came to Council as a resource consent, with this due mainly to the impacts on amenity and the breadth of the potential affected party catchment. We consider the fast-track consenting legislation provides an appropriate level of community input. **2. Does the applicant, or a company owned by the applicant, have any environmental regulatory compliance history in your district?** Energy Farms Limited have no environmental regulatory compliance history with STDC.
Other considerations	During the construction phase, dry grass is the highest fire risk and the primary sources of ignition are cigarettes, cutting and welding. This should be addressed in a comprehensive construction management plan, which we anticipate will be a standard condition of any consenting pathway. STDC is in the process of undertaking a Plan Change of the Operative District Plan. One area of focus for the Plan Change is proposed intensification and rezoning of land on the north and north-eastern fringe of the Opunake urban area. It is noted that the site of the proposed Solar Farm project is identified by Taranaki Regional Council's property information map as being Land Use Capability 3 and 6. Therefore, the project is subject to the provisions of the National Policy Statement for Highly Productive Land 2022. There are known fault lines located in and around Opunake. It is recommended that further consideration into these fault lines is undertaken as part of the assessment for an activity of this scale. The Hiringa Energy Green Hydrogen Project that was assessed under the FTCA within the South Taranaki District. It is STDC's expectation that lessons are learnt from this previous consent and changes or improvements on the process will be applied for this and future consents passed through the Act process.

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.

s 9(2)(f)(ii), s 9(2)(g)(i)

Ministry for the Environment
Manatū Mō Te Taiao

Template for written comments from other parties

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

Please use the table below to comment on the application.

Project name	Harmony Energy Solar Farm – Opunake Project (Project)
General comment	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. 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). 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). The applicant proposes to connect the generation to the Grid at Transpower's existing Opunake Substation, via a new underground transmission line. 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. The Project is near the start of the queue, and we anticipate that our investigation into the connection to the Grid could commence in the next few months. Once this 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.
Other considerations	None
Insert specific requests for comment	The following questions have been asked of Transpower: 1. What additional approvals will the applicant(s) require from Transpower New Zealand Limited to connect to the national electricity grid? The applicant will need to: • 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 for the connection to the Grid. 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. 2. Will obtaining the above approvals likely impact on project delivery or timing as outlined in the referral application(s)? Provided the services agreement and TWA are entered in a timely manner, Transpower will likely be in a position to start construction within 2 years. We note the start date for the works at the Transpower substation does not prevent construction activities for the solar development, as indicated in the referral application.

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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	Taranaki Regional Council
Contact person (if follow-up is required)	Leah Miller, Manager – Resource Consents
	s 9(2)(a)

Comment form

Please use the table below to comment on the application.

Project name	Harmony Energy Solar Farm Opunake
General comment – potential benefits	Overall the project could be beneficial for the region.
General comment – significant issues	• concerned about the potential loss of wetland extent, and short term effects of sediment discharge to the wetlands • regardless of their low quality, there is insufficient detail to make any assessment of the impact of the proposed activities on the hydrological function of the wetlands • stock exclusion regulations may apply to the wetlands • the proposed volume of soil disturbance is not significant • works should be undertaken following best practice, and an Erosion and Sediment Control Plan should be provided and approved prior to commencement of works • pole driven installation for the solar panels would result in minimal risk of sediment run-off, however this process is often undertaken by tracked vehicles which could potentially be a large source of sediment mobilisation during wet weather • cut and cover methodology for trenching is reasonably safe, however if pumping of trenches is required to remove groundwater during installation, then it's possible additional consents may be required
Is Fast-track appropriate?	Yes
Environmental compliance history	No known consenting or compliance history in Taranaki
Reports and assessments normally required	• Erosion and Sediment Control Plan (ESCP) • Information to demonstrate whether or not there is a hydrological connection between the proposed activities and the wetlands
Iwi and iwi authorities	Te Kahui o Taranaki Trust (Taranaki iwi)
Relationship agreements under the RMA	None

Insert responses to other specific requests in the Minister's letter (if applicable)	1. Are there any reasons that you consider it more appropriate for the project, or part of the project, to proceed through existing Resource Management Act 1991 (RMA) consenting processes rather than the processes in the FTCA? *No* 2. Does the applicant, or a company owned by the applicant, have any environmental regulatory compliance history in your region? *No*
Other considerations	Need to work in partnership with Te Kahui o Taranaki Trust (Taranaki iwi)

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.