

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	The Marton Solar Farm – Energy Farms Limited
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>The referral application proposes to connect the generation to Transpower’s Marton Substation, via Transpower’s existing 110kV Bunnythorpe-Whanganui Aline. This line traverses Lot 4 and 5 DP 10517. The referral application states that a conditional sale and purchase is in place for this Lot.</p> <p>In practice, a connection cannot occur directly to the 110kV line. A new 110kV grid injection point (ie substation) would first be required.</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. This Project is not currently in the queue.</p> <p>Any future investigation would consider the appropriate means of connecting to the Grid. It would need to identify the appropriate location for any grid injection point, engineering design and other matters, and acquisition of necessary property rights and environmental approvals.</p>

	<p>The 110kV line which traverses the site could not be compromised by the development and would need to be protected.</p> <p>Transpower does 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), provided appropriate protection of the existing line occurs through any consent process.</p> <p>Please let us know if you require any further detailed information.</p>
Other considerations	N/A.
[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? The applicant will need to: <ul style="list-style-type: none"> • lodge a complete application to enter the queue management framework (QMF) that meets Transpower's application criteria; • 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; and • obtain generating commissioning approval from the System Operator, which is required before generation can occur. 2. Will obtaining the above approvals likely impact on project delivery or timing as outlined in the referral application(s)? Assuming an application to enter Transpower's QMF was made and accepted next week, occurred next week, it would likely be at least 3 years before any generation could be connected to the Grid.

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	Horizons Regional Council – Regulatory Team
Contact person (if follow-up is required)	Greg Bevin- Regulatory Manager s 9(2)(a)
	Jasmine Mitchell – Team Leader Consents s 9(2)(a)

Comment form

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Project name	Marton Solar Farm Project PJ 0000860
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 proposal identifies the infrastructure will also provide for renewable energy.
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 the ecology throughout the site; b. Potential effects on the existing flood retention dam located on the site; c. 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 consents required from Horizons Regional Council are of a scale such that it could be processed via a normal regional 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 along with an assessment of the effects on these values as a result of the proposed development including the proposed culverts;

	<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; - An assessment from a suitably qualified and experienced person of the impact of stormwater runoff from the solar panels on both the quality and quantity of water within the streams. This should also include an assessment on the hydraulic capacity of the existing streams to accommodate any changes in water quantity and an assessment of the impact on water quality. This report would need to address the impact on the capacity and operation of the existing retention dam; - An ongoing stormwater management plan which includes measures to manage runoff from the site and its impact on the existing retention dam. It is expected this includes measures for pasture management across the site including within existing ponding areas identified under the existing designation and proposed stormwater retention area and any mitigation measures to address any increases in stormwater runoff; and - 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)	<p>The Applicant has correctly identified a flood detention structure which is managed by Horizons Regional Council for the management of an unnamed tributary of the Tutaenui Stream for flood retention purposes.</p> <p>The dam is located on the corner of Read Road and Wellington Road with a ponding area behind the dam on the subject property. Access needs to be maintained to both the dam and ponding area. It is expected that a report is prepared by a suitably qualified person which assesses the existing stormwater runoff and predicted stormwater runoff post development.</p> <p>If the above assessment identifies there is no change to the proposed operation of the retention dam and ponding is not impacted then written approval from Horizons Regional Council – River Management may not be required. If there is an impact on the designation then it may be that the written approval from Horizons Regional council – River Management may be required.</p>
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 and have been identified on the site plan.</p>

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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	Marton Solar Farm – Energy Farms Limited
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 along one of the main roads into Marton township, from State Highway 1 to the southern entrance to Marton (Wellington Road). 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 (it is noted the western corner of the site is located within the Ohakea Height Restrictions RNZAF Base designation – D142). • 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). • Assessment of the effects on the 'Tutaenui Dam W1' located in the eastern corner of the site, at the intersection of Wellington Road and Reads Road. The dam is designated (D7) under the Rangitikei District Plan, and Horizons Regional Council are the Requiring Authority. The purpose of the dam is for 'Soil Conservation and River Control'.
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	Tūtokinga (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. Lastly, Rangitikei District Council have already provided comments to the Minister in relation to a proposed Solar Farm (Harmony Energy Solar Farm) located at the

	corner of Pukepapa Road and Whales Line (Lot 1 DP 310560 and Lot 6A Application Plan 1550 Pt Secs 1-3 5 Rangitikei Agricultural Reserve) which has also been applied for through the COVID-19 Recovery (Fast Track Consenting) Act. If approved, this would result in four Solar Farms located in close proximity to each other in a currently pristine rural environment on highly productive land. Rangitikei District Council considers it important that the cumulative effects of the Solar Farms are considered.
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