

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) s 9(2)(a)

Comment form

Please use the table below to comment on the application.

Project name	The Opunake Solar Farm
General comment – potential benefits	<p>The South Taranaki District Council (STDC) sees The Opunake Solar Farm 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.</p> <p>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.</p> <p>This project aligns with the climate change and environmental sustainability goals and targets in STDC's Environment and Sustainability Strategy.</p> <p>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.</p> <p>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.</p>

<p>General comment – significant issues</p>	<p>Loss of productive farmland if dual occupancy of the site is not undertaken – grazing below the solar panels.</p> <p>Reverse sensitivity effects on sensitive activities (dwellings etc.) within the area, including noise and traffic from construction phase.</p> <p>Wetland and waterbody degradation if protection mechanisms are not implemented.</p> <p>Visual impact from surrounding properties but also a significant change on the South Taranaki landscape</p> <p>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.</p> <p>Changes to ecological habitats and well-established areas that may impact flora and fauna species within the wider area.</p> <p>Natural Hazards (fault lines, waterbodies, lahar risk)</p>
<p>Is Fast-track appropriate?</p>	<p>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.</p>
<p>Environmental compliance history</p>	<p>Energy Farms Limited does not have any negative environmental regulatory compliance or enforcement history with STDC.</p>
<p>Reports and assessments normally required</p>	<p>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:</p> <ul style="list-style-type: none"> • Cultural Impact Assessment and Archaeological assessment • Landscape and Visual Effects assessment – to be undertaken in respect of surrounding properties AND the South Taranaki landscape as a whole. • 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 • Preliminary Site Investigation (PSI) or Detailed Site Investigation (DSI) in some instances.
<p>Iwi and iwi authorities</p>	<p>STDC identifies Taranaki Iwi as the iwi authority for the project area.</p> <p>The project application does identify that consultation with treaty settlement entity Te Kahui o Taranaki has been sought on several occasions.</p>

<p>Relationship agreements under the RMA</p>	<p>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.</p> <p>There are no identified statutory acknowledgements between the Crown and Taranaki Iwi that are relevant to the Kina Road project site where the solar panels are to be located.</p>
<p>Insert responses to other specific requests in the Minister's letter (if applicable)</p>	<p>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?</p> <p>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.</p> <p>2. Does the applicant, or a company owned by the applicant, have any environmental regulatory compliance history in your district?</p> <p>Energy Farms Limited have no environmental regulatory compliance history with STDC.</p>
<p>Other considerations</p>	<p>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.</p> <p>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 2 and 3. Therefore, the project is subject to the provisions of the National Policy Statement for Highly Productive Land 2022.</p> <p>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.</p> <p>The Hiringa Energy Green Hydrogen Project 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.</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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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 Opunake 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>Transpower supports the application as it “<i>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)</i>” (section 19(d)(vii) of the Act).</p> <p>Transpower is not aware of any reason for the application to be declined.</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).</p> <p>The applicant proposes to connect the generation to Transpower’s Opunake Substation, via an upgrade to a Powerco 110kV line.</p> <p>Transpower has had some discussions with the applicant and PowerCo about the connection to the Grid. Transpower operates a Queue Management Framework for managing investigations into generation connections. This PowerCo connection is in the queue.</p>

	Please let us know if you require any further detailed information.
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"> • 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)? The PowerCo connection is towards the back of Transpower's QMF. It could be at least 3 years before any generation could be connected to the Grid via an upgraded PowerCo line.

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