



Ref: 220103

2 February 2023

Far North Solar Farm Limited
c/o Williamson Water and Land Advisory
Unit 10 1 Putaki Drive
Kumeu
Auckland 0841

Attention: Laila Alkamil
Email: Laila.Alkamil@wwla.kiwi

Dear Sir/Madam

**APPLICATION FOR RESOURCE CONSENT – SOLAR FARM IN RURAL ZONE,
MOROA ROAD, GREYTOWN
PLANNING APPLICATION NO 220103**

Request for Further Information

I refer to your abovementioned application for Resource Consent.

South Wairarapa District Council has reviewed your application for a 175-megawatt peak solar farm at 415 Moroa Road, Greytown. This includes an assessment against the provisions of the Wairarapa Combined District Plan (WCDP) and the information contained in the Assessment of Effects on the Environment and supporting assessments.

In accordance with section 92 of the Resource Management Act 1991 (RMA), the South Wairarapa District Council requests further information in order to obtain a better understanding of the nature and effects of your proposal, and the ways in which any adverse effects may be mitigated. The information required is as follows:

Assessment of Effects on the Environment

A digital copy of the Assessment of Effects on the Environment at a lower resolution for easier downloads, while ensuring the content of the document, particularly the figures and plans, are legible.

Plans

- Please provide a site plan, easily printable and legible at 1:10,000 at A3 size, that clearly shows details of the proposed farm, including:

- The location and extent of the different arrays and the locations of the proposed inverters for each array
- The location of any buildings or other structures (including temporary buildings and structures for construction and permanent buildings and structures) other than inverters and arrays
- Clear identification of the proposed culvert crossings
- Clear location of screen tree planting

Landscape Mitigation Plan

A copy of the Landscape Mitigation Plan referred to in the AEE (for example, Section 5.4.2, page 17), including a plan showing the proposed location and types of screen planting, supported by document providing details over the proposed planting and its maintenance, prepared by a suitably qualified and experienced landscape architect.

Features Worthy of Conservation

Under Section 2.3.1 of the AEE, last paragraph, reference is made to the site including “some features worthy of conservation” (taken from section 5.0 of the Assessment of Landscape Effects). Could further clarification and description be provided as to the nature and location of such features, the potential effects of the proposal solar farms on these features and their proposed treatment (avoidance or mitigation measures).

Works in Proximity to High Voltage Transmission Lines

In section 3.5 of the AEE, a discussion of the measures proposed to mitigate any effects on the 110kV transmission lines traversing part of the site is provided. Further details on the mitigation measures are sought in relation to dust, maintenance of access to transmission line structures, and machinery working in proximity to lines.

It is stated that all panels and associated structures will be located a minimum of 20m from the centreline of the transmission line. In the Site Plan, two transmission line towers are shown outside the centreline, located close to the arrays to the north. Please clarify.

In addition, please clarify whether any consultation with Transpower has occurred and, if so, the outcomes of such consultation. We would note that any work or activity within the substation designation may require the prior approval of Transpower and/or Powerco under Section 176 of the RMA.

Construction Effects

Clarification whether a Construction Management Plan is proposed to be prepared to manage the potential adverse effects from construction activities (for example, dust generation).

Vehicular Access

Clarification as to the number of access points from public roads: in section 3.6 of the AEE, reference is made to three entrances are to be provided to the site, while five entrances are shown on the Site Plan.

- Please confirm how many and which existing access points would be upgraded and to what level.
- Based on the preliminary design provided with the application, it is unclear whether there is one main access point to the site or if all access points will be used: please clarify. In addition, please provide information on the nature of the vehicles that would be using the access points, particularly construction traffic.
- Please provide the distances between different access points and information on whether all appropriate sightlines can be maintained along the roads to all access points.
- Please confirm if there are any changes to the public roads proposed.

Operational Activities

In section 3.7 of the AEE, reference is made to a consent duration. Can you please clarify whether a consent duration is being sought? If so, what is this duration?

Buildings and Other Structures

Clarification whether the proposal involves the construction or placement of any buildings or other structures such as an office and associated facilities, whether permanent or for construction purposes), and any details of such structures, including their bulk, height, appearance, and location.

Visual simulations

Please provide a visual simulation from the following viewpoints:

- VP4, Moroa Road, in between two sections of site east/west
- VP7, Moroa Road, eastern extent of larger site parcel
- VP8/9, from Moroa Road looking into the site
- Views south from Moroa Road
- A representative view from along the northeastern boundary of the site looking towards an existing dwelling, with the solar farm behind.
- A representative viewpoint at some point along Moroa Road, preferably near the main entrance of the solar farm.

Planning Assessment: Wairarapa Combined District Plan

In section 4.2.1, the assessment against the rules of the Combined District Plan identified that consent is required under Rule 4.5.5(e)(i), with the matter of discretion identified as “avoiding, remedying, or mitigating of any effects deriving from non-compliance with the particular(s) that is not met.” Please clarify which area of non-compliance have been assessed.

Other Consents and Approvals Required

Please clarify whether any resource consents would be required from Greater Wellington Regional Council. If any are required, when is it anticipated they will be applied for?

Glare Effects

Further information sought on how glare effects are to be mitigated: in particular, further clarification is sought in how backtracking will reduce glare, using clearer larger diagrams.

National Policy Statement for Highly Productive Land

- Please provide the LUC Class(es) of the land at the site, supported by a map of local LUC classes overlain with the proposed solar farm.
- Please provide a further evaluation of the proposal against Policy 3.9(2)(j) and (3) of the National Policy Statement for Highly Productive Land regarding the construction of specified infrastructure.

National Policy Statement on Electricity Transmission

Please provide an evaluation of the proposal against the objective and policies of the National Policy Statement on Electricity Transmission.

Wairarapa Combined District Plan Assessment

Please provide an assessment on how the proposal will avoid or mitigate reverse sensitivity effects in accordance with Policy 4.3.5(d).

Advisory Notes

1. Written Approvals

Without the written approval of Transpower New Zealand Limited and Powerco Limited as the requiring authorities of the Greytown Substation, it is likely that these parties will be notified of the resource consent application.

2. Moroa Water Race culverts

An application will need to be made to the South Wairarapa District Council for a Moroa Water Race Bylaw 2007 approval, providing sufficient evidence that the culvert will not constrict flows or cause obstruction to routine maintenance. This will need to be sought and approved to ensure the activity can be lawfully carried out.

You can object to this request for further information in accordance with Section 357 by writing to the Council within 15 working days of receiving this request.

In the meantime, processing of your application has been placed on hold.

If you have any queries regarding your application, or the resource consent process please contact me on 06 306 9611 or email me at james.witham@swdc.govt.nz.

Kind Regards

James Witham
Planning Manager
South Wairarapa District Council

Approved for release by:

Timeline for Further Information

I advise that under Section 92A(3) of the Resource Management Act 1991 (the Act), your application may be considered even if the further information requested is not provided. Please note that the Council may exclude certain time periods relating to the provision of further information under section 88C of the Act.

Pursuant to Section 92A(1) of the Act, *within 15 working days* of the date of this letter (i.e. by **24th February 2023**), you must either:

- (a) provide the further information; or
- (b) agree (in writing) to provide the further information (after which the Council will set a reasonable timeframe); or
- (c) refuse (in writing) to provide the further information.

Upon receipt and assessment of the requested further information, an assessment will be made if the effect of the development is considered to be more than minor and/or if there are any affected parties.

Please note that Section 92A(3) of the Act allows the Council to consider the application under section 104 even if you:

- (a) do not respond to the request; or
- (b) agree to provide the information but do not do so; or
- (c) refuse to provide the information.

Section 104(6) allows Council to decline an application on the grounds it has inadequate information to determine an application. Should you not respond or provide information requested, Council is required (under Section 95C) to publicly notify your application. The deposit for public notification of a resource consent is \$2200.