



South Wairarapa District Council

Attention: James Witham
james.witham@swdc.govt.nz

1 March 2023

WWLA0589

Dear James

Resource Consent Application 415 Moroa Road, Greytown (Planning Application No. 220103) – Response to Further Information Request

This letter provides a response to your letter dated 2 February 2023 which requested further information pursuant to section 92(1) of the Resource Management Act 1991 (RMA). The requests are presented in *blue* italics, followed by our responses.

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.

A copy of the compressed application documentation can be found here:

https://www.dropbox.com/s/ra1tzuvrjfluajv/WWLA_FINAL%20AEE_Greytown%20Solar%20Farm%20Final%20for%20Lodgement-compressed.pdf?dl=0

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 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*

Please see the updated site plan and sections in **Appendix A**.

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.

A Landscape Mitigation Plan was provided as Figure 2a in the Landscape and Visual Assessment provided with the application (reattached as **Appendix B** for ease of reference). The plan

provided with the application is not specifically labelled as Landscape Mitigation Plan however this plan shows the proposed planting, including spacing and grading. It is suggested that the provision of a planting maintenance plan be prepared and submitted to Council for certification as a condition of consent.

For further information on the proposed screen planting, refer to the memo in **Appendix C**.

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).

The Landscape and Visual Assessment references “features worthy of conservation” as a landscape guideline criteria in order to assess site’s current landscape value. As described in Section 6.3 of the Landscape and Visual Assessment, the site is described as inhabiting expansive and pastoral landscape, which is structured by shelterbelts. The wider landscape is described as a grid pattern, with drainage ditches and shelter belts creating a distinctive patchwork. Combined, these characteristics contribute to there being features worthy of conservation as identified in the Landscape and Visual Assessment.

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.

As noted in Section 3.5 of the AEE, no works will be carried out within the 20 m of the centreline of the transmission lines. On that basis, there will be no machinery operating in proximity to the transmission lines and no earthworks will be undertaken within the 20 m setback. For this reason, no specific mitigation measures, with respect to dust and operation of machinery, are considered necessary given the separation distance provided.

Access to the transmission lines and support structures for Transpower will be maintained at all times and no solar panels or structures will be placed within the 20 m setback corridor. The site plan has been updated to reflect this (refer to **Appendix A**).

Furthermore, we note that the Applicant is in contract with Transpower regarding the connection of the solar farm to the National Grid and therefore Transpower is fully aware of the proposal.

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).

Given the proposal involves minimal earthworks and will adhere to NZECP:34 regulations, we anticipate the Construction Management Plan will have a limited scope and will include details regarding:

- Details of the proposed works, including earthworks;
- Construction traffic management protocols; and
- Protocols for working in proximity to high voltage transmission lines and structures.

A construction management plan will be prepared once a contractor has been appointed. It is suggested that a condition of consent be included that this is submitted to Council for certification prior to works commencing.

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 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.*

Five accessways will be constructed on the site – this is shown on the updated site plan (refer to **Appendix A**). Of these five, two accessways already exist but are not up to the required specifications as outlined in Appendix 5 of the WCDP.

All proposed accessways on the site will be used for the construction and operation of the solar farm. Construction traffic will involve small trucks and diggers / excavators. Operational traffic will be very limited and consist of staff arriving in small vans to the site.

The distance between the proposed accessways vary between 10-20 m. The proposed accessways will be constructed or upgraded in accordance with the specifications in Appendix 5 of the WCDP, including ensuring all appropriate sightlines are maintained.

No changes are proposed to the public roads.

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?

An unlimited consent duration is sought pursuant to section 9 of the Resource Management Act 1991.

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.

The proposal involves a staff office and SCADA (data) room, that is required for the operation of the solar farm. This will be provided in the form of a 40 ft container and will be located by the switch yard (refer to the site plan in **Appendix A**). Water tanks will also be located across the site for irrigation and firefighting supply. No other buildings or structures are proposed as part of the construction or operation of the site.

Visual simulations

Please provide photos 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.*

Photos will be provided in due course, following our site visit with Mr Schofield on 6 March 2023.

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.

The proposed solar panels will be located approximately 12 m from the road boundary, and therefore will not be able to comply with the relevant setback requirements for unsealed roads under Standard 4.5.2 (c)(ii). The proposal complies with all other relevant zone standards.

Standard 4.5.2 (c)(ii) refers to Policies 4.3.2(d) and 4.3.5(c) of the WCDP.

Policy 4.3.2(d) states the following:

Maintain and enhance the amenity values, including natural character, of the differing Rural character areas through appropriate controls over subdivision and the bulk, location and nature of activities and buildings, to ensure activities and buildings are consistent with the rural character, including an appropriate scale, density and level of environmental effects.

Policy 4.3.5(c) states the following:

Manage the establishment and operation of a range of other activities in the Rural Zone, such that their adverse effects on the environment are appropriately avoided, remedied or mitigated.

Section 5 of the AEE assesses landscape and visual effects of the proposal, including effects on natural character and visual amenity. As noted in the application, effects on rural character and amenity values are assessed as being less than minor with the proposed screening in place. On that basis, we consider the application adequately addresses the relevant areas of non-compliance.

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?

No resource consents are required from Greater Wellington Regional Council. As noted in the application, approval is being sought currently from the Wellington Water and Land Team in relation to the proposed crosses over the water races, in accordance with Rule 2.3.20 of the Moroa Water Race Bylaw 2007.

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.

For further information on glint and glare effects and mitigation, please refer to the memo provided in **Appendix D**.

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.*

Based on the information provided by the Manaaki Whenua Landcare Research Institute¹, the entire site has a Land Use Classification (LUC) of Class 4. For further information, refer to the LUC map in **Appendix E**. A LUC of Class 4 describes soil that is arable but with significant limitations for arable use or cultivation, very limited crop types and suitable for occasional cropping, pastoralism, tree crops and forestry. On that basis, the site is not considered to be highly productive under the National Policy Statement for Highly Productive Land (NPS-HPL).

Policy 3.9(2)(j) and (3) therefore do not apply to the proposal.

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.

The National Policy Statement for Electricity Transmission (NPS-ET) is for activities on existing electricity transmission lines. As noted previously, no structures or activities are taking place

¹ https://ourenvironment.scinfo.org.nz/maps-and-tools/app/Land%20Capability/Iri_luc_main

within 20 m of the transmission lines on the site. Furthermore, the NPS-ET does not apply to the construction of electricity generation and therefore is not relevant to this application.

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).

A solar farm is not a sensitive activity and therefore will not constrain any future rural activities, or other permitted activities, from establishing in the future. Therefore Policy 4.3.5(d) is not relevant to this application.

Conclusion

We trust that there is now sufficient information available for you to continue processing the application. Please do not hesitate to contact Laila Alkamil on 027 266 8405 if you require further clarification of any aspects of this letter.

Yours sincerely,



Laila Alkamil

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