



27 June 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 Laila

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

Further information request – following the close of submissions

You will be aware that submissions on your application closed on 6 June 2023. I understand we have both received copies of all the submissions, where 46 submissions have been received to date. Please call me on 021 424 175 or email me if you think this is not the case.

Submitters raised a number of issues about the proposal which are of particular interest to us. Following my review of the submissions I am requesting the following further information from you. This is to help me better understand your proposed activity, its effect on the environment, and the ways any adverse effects on the environment might be mitigated.

Requested information

1. Effects on electricity transmission lines (Transpower assets)

Submitters have raised concerns regarding the access to transmission lines, the heights of shelter belts, the safe separation of mechanical plan during the construction phase and other construction effects. It is noted that a submitter (Transpower) has recommended conditions be imposed on this application. The limitations set out in those conditions on shelterbelts may be incompatible with the landscape mitigation strategy. The outcome of any consultation with Transpower, including any agreed and offered conditions should be provided. Please provide information on how these effects on transmission lines can be managed.

Note: The AEE does not include an assessment of the proposal against the National Policy Statement on Electricity Transmission (principally the objective and Policy 10), please provide this.

2. Glint and glare on State Highway 2 users

Submitters have identified that the proposed grade of planting for the shelterbelts intended to screen views of the solar farm from State Highway 2 will allow drivers to view the solar panels in the short term, and until the *Cryptomeria japonica* shelterbelt, attains a suitable height. This will have an effect on users of the SH2 network through glint/glare during this time. Please provide information on how these effects can be managed.

3. Effect on aircraft operations

Submitters have identified that the panels pose a risk to aircraft use on nearby sites as a climb out obstruction and through glint and glare creating sun strike for aircraft pilots. Whilst the report entitled ‘*Glint and Glare Considerations for FNSF Solar Farms*’ prepared by Renewable Energy Group addresses aircraft briefly in the summary noting that “The panels have been re-orientated to minimise the effect.” This appears to be a generic comment and it is unclear whether this has been factored into the design and layout of the solar farm. Please provide information on how the effects on aircraft use including potential obstructions and glint and glare can be managed.

4. End of life

Submitters have raised concerns regarding the end of life disposal of the panels. The AEE notes:

The panels themselves are warranted for 30 years with an expected lifespan in excess of the consent duration. At the end of the consented period, the solar farm is decommissioned and all materials are removed for recycling.

Please provide more information regarding the process of decommissioning and what protocols can be adopted to ensure that actual and potential effects of discharges of contaminated material can be suitably managed.

Note: at section 1.4 the AEE notes that an ‘unlimited duration’ is sought as the application is for a land use consent under section 9 of the Resource Management Act 1991. This is not consistent with section 3.7 that implies a ‘consented period’ and that this is less than 30 years. Please clarify whether a specified duration is sought.

5. Soil and water contamination from panel run-off and breakdown

Submitters have raised concern that over time the panels will breakdown and discharge contaminated material to land and water. Submissions also identify risk associated with panel damage releasing contaminated material. Please provide information on how, if any, adverse effects can be managed.

6. Noise effects during construction and operational phase

A number of submitters have raised concerns regarding the noise effects that may be generated during the construction phase and within the operational phase of the solar farm. It is noted that the AEE asserts that: “The proposed construction works will comply with the New Zealand Standard NZS 6803:1999...” and ‘Operational noise effects are minimal and will not be noticeable from the boundary of the site...Average maximum sound pressure at 1m distance was measured at 62dBA.’ Noting the permitted standard which excludes mobile sources associated with primary production at the notional boundary is:

Daytime	7.00am – 7.00pm	55dBA L10
Nighttime	7.00pm – 7.00am	45dBA L10
	9.00pm – 7.00am	75dBA L10

Please provide an acoustic assessment, prepared by a suitably qualified person to confirm that both during the construction and operational phase of the activity adverse noise effects will be managed to within acceptable limits, with reference to the permitted standards. Submissions have noted that there are already other noise generating activities that may contribute to noise effects, and the proposal may generate a cumulative effect or exacerbated noise effects on amenity by the introduction of the panels themselves.

7. Heating effects

Submitters have raised concerns that panels will generate localised changes to temperature as a 'heat island'. Please provide information on how, if any, adverse heating effects can be managed.

8. Highly Productive Land

Submitters have raised concerns that the solar farm will diminish the productive capacity of the land by establishing a use on the land that is not 'land-based primary production'¹ and 'primary production'² activities. It is noted that essential parts of the solar farm proposal being the substation and switchyard and also part of the 'Extended Plot Area' are located on land identified as LUC 2 on the soil maps. An assessment in respect of the National Policy Statement for Highly Productive Land 2022 has been included in the AEE that states that there are 'functional and operational requirements for it to be located on the subject site'. Please provide further details on this functional and operational need assessment.

Providing the information

Three upcoming points in the consent process are important in relation to this information request. I understand that you have made a request for the application to be processed on a direct referral pathway, this request has not been determined at this time. The below is framed on a standard processing pathway and would need to change if direct referral is confirmed.

Planner's report to the hearing commissioners (section 42A report)

First, I will need to make a full assessment of your proposal in my report to the hearing commissioners.³ The purpose of the report is to help them make a decision on your application. Without complete information about your proposal, I may not be able to support it. The question of whether requested information has been made available is also a matter that the commissioners are required to have regard to when they make their decision, and they can refuse consent in cases where there is inadequate information.⁴

My report must be completed and made available to you, to all submitters who wish to be heard, and the commissioners on or 15 working days before the scheduled date for the hearing. If you intend to provide the requested information, I will need to receive it in sufficient time to act on it in my report.

Deadline for the provision of information before the hearing

¹ 'land-based primary production' refer National Policy Statement for Highly Productive Land 2022 – where this term is defined and 'means production, from agricultural, pastoral, horticultural, or forestry activities, that is reliant on the soil resource of the land.'

² 'primary production' refer Wairarapa Combined District Plan 2011 – where this term is defined to mean 'the use of land and accessory buildings (e.g. greenhouses) for the raising, growing and breeding of animals or vegetative matter and crops, including horticulture, plantation forestry, agriculture, viticulture, floriculture, racing stables, and outdoor (extensive) pig farming, as well as winemaking, flower packing, and other primary processing activities, but excludes top soil stripping, intensive farming activities, and mineral extraction and processing.'

³ Section 42A of the RMA

⁴ Section 104(6) and (7) of the RMA

Second, the Resource Management Act 1991 (the RMA) requires that any information requested of applicants be made available to us no later than 10 days before the hearing.⁵

Deadline for circulation of evidence before the hearing

Third, you will be required to make all your evidence available to us, so we can make it available to submitters and the hearings panel / commissioners, 10 days before the hearing.⁶

Requesting more time

We will not be suspending your application or waiving or extending our processing timeframes while you prepare and supply this information.

However, if you decide that you will require more time, you can suspend the processing at any time within the 130 working days.⁷ As a consequence of suspending processing, the dates for the hearing and prior exchange of evidence will most likely be delayed. If you consider it will be helpful to suspend the process, please make a request to me in writing.

Next steps

Once you have provided the further information, I will review what you have provided to make sure it adequately addresses all of the points of my request.

As you will be aware, the hearing for your application has not been scheduled at this time.

Timeframes that will need to be met by both you and Council leading up to the hearing are:

- At least 15 working days before the hearing we will send you a copy of the planning officer's recommendation report, as well as any other expert evidence.
- At least 10 working days before the hearing you must provide us with all the briefs of evidence, including legal submissions, that you intend to present to support your application at the hearing.
- At least five working days before the hearing submitters must provide to us briefs of any expert evidence they are calling.

If you have any queries, please contact me on 021 424 175 and quote the application number above.

Yours sincerely,



Nick Pollard
Consultant Planner

⁵ Section 92(3A) of the RMA

⁶ Section 103B of the RMA

⁷ Section 91A of the RMA