


Feedback Details

Feedback ID	* FDB00104P3R9
Title	* Minister for Energy (entered on Minister's behalf by MBIE Energy Markets Branch)
Regarding	 <a href="#">Invitation to Comment - The Grampians Solar Project</a>
Comments	<p>Helios proposes a large-scale solar farm, with significant battery storage that will contribute to system flexibility. The proposed 300 megawatt peak capacity of the solar farm is very large for New Zealand. The proposed 100 megawatt hour battery will significantly increase the energy system benefits of the solar generation, enabling load shifting to improve security of supply and produce power at times with high wholesale prices.</p> <p>This project will deliver new regionally or nationally significant infrastructure, as per s2(2)(a)(i) of the FTAA, in the form of large-scale energy generation and storage.</p>

## Your written comments on a project under the Fast Track Approvals Act 2024

<b>Project name</b>	Grampians Solar Farm Project
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Before the due date, for assistance on how to respond or about this template or with using the portal, please email [contact@fasttrack.govt.nz](mailto:contact@fasttrack.govt.nz) or phone 0800 FASTRK (0800 327 875).

All sections of this form with an asterisk (\*) must be completed.

1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
<b>Organisation name (if relevant)</b>	Mackenzie District Council		
<b>*First name</b>	Julie-Anne		
<b>*Last name</b>	Shanks		
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<b>*Contact phone number</b>	s 9(2)(a)	<b>Alternative</b>	(03) 685 9010
<b>*Email</b>	s 9(2)(a)		

2. Please provide your comments on this application
If you need more space, please attach additional pages. Please include your name, page numbers and the project name on the additional pages.

Note: All comments will be made available to the public and the applicant when the Ministry for the Environment proactively releases advice provided to the Minister for the Environment.

1. Any applications that have been lodged with the Council that would be a competing application or applications if a substantive application for the project were lodged. If no such applications exist, please also confirm this in writing.

Mackenzie District Council (MDC) does not hold a record of any competing applications (per the definition in the Fast Track Approval Act 2024 (FTAA)) in the same project area.

2. In relation to projects seeking approval of a resource consent under section 42(4)(a) of the Act, whether there any existing resource consents issued where sections 124C(1)(c) or 165ZI of the Resource Management Act 1991 (RMA) could apply, if the project were to be applied

**for as a resource consent under the RMA. If no such consents exist, please also confirm this in writing.**

In accordance with section 30(3)(b) of FTAA, the MDC can confirm that there are no existing resource consents of that kind.

**3. Are there any reasons it would be more appropriate for the project to proceed through existing RMA processes rather than the processes under the Act?**

MDC considers that the Grampians Solar Farm project is a large renewable energy generation project of regional and national significance. The receiving environment forms part of Te Manahuna/the Mackenzie Basin and is identified as an Outstanding Natural Landscape and there would be genuine public interest in this proposal. MDC recently processed another solar farm application (Balmoral Farms) that was appealed to the Environment Court before being withdrawn. If the Grampians Solar Farm project application were processed by MDC, there is at least the possibility that whatever decision is made by MDC on that application could also be appealed. For this reason, it would be more efficient for this matter to proceed through the Fast Track process with MDC providing expert input to that process.

MDC advises that Te Rūnanga o Ngāi Tahu has a significant interest in Te Manahuna/the Mackenzie Basin and that local runanga retain the ability to make comment on the substantive application pursuant to section 53(2)(b) and (d). MDC considers that should the matter be processed under the Fast Track system that the ability to provide input as cultural advisors remain available to Te Rūnanga o Ngāi Tahu.

MDC advises that the Department of Conservation also has a significant interest in Te Manahuna/the Mackenzie Basin and it would be advisable to allow them to provide comments as a relevant portfolio Minister pursuant to section 53(2)(j). MDC considers that should the matter be processed under the Fast Track system that the ability to provide input remain available to the Department of Conservation.

MDC also seeks that any costs incurred by MDC to engage experts or Counsel to provide feedback to the Fast Track Panel be paid for by the applicant. This would normally be the case if MDC processed the consent application in the first instance. It should not be expected that the rate payer pay for these costs.

**4. Does the applicant or a company owned by the applicant, have any environmental regulatory compliance history in your council's area?**

MDC does not hold any records regarding the compliance history of 'Helios CAN Op LP' or 'Jeffrey Schlichting' and can confirm that no enforcement action has been taken against either 'Helios CAN Op LP' or 'Jeffrey Schlichting'.

**5. Does the project, from council's perspective, involve any activity classified as a prohibited activity under the RMA?**

Based on the information received, we do not believe that anything with the proposal is a prohibited activity under the RMA. The Mackenzie District Council will be able to confirm if the proposal involves any prohibited activity once a substantive application is available, and an assessment can be made against the Mackenzie District Plan.

## **6. Would the project have any significant adverse effects on the environment?**

Based on the information received, MDC are unable to determine if the proposal would result in any significant adverse effects. It is noted that an assessment against the Mackenzie District Plan has not been asked for as part of this request. MDC will need to reassess the proposal in terms of its compliance with the Mackenzie District Plan and the potential effects of the proposal once a substantive application is available.

MDC notes that:

- The project site is located within the Mackenzie Basin Outstanding Natural Landscape (under the Mackenzie District Plan) and is a Regionally Significant Landscape identified in the Canterbury Regional Policy Statement (CRPS). While the full landscape/ visual assessment is not yet available, MDC notes that there are a number of mitigation measures proposed by the applicant's landscape expert. Further information would be needed to assess the proposals effects on Outstanding Natural Landscape Values of Te Manahuna/the Mackenzie Basin.
- The ecological information attached to the application states that areas of significant indigenous vegetation and significant habitat of indigenous biodiversity have been identified and excluded from the proposal area. These reports will need to be peer reviewed to ensure that the proposal is not adversely affecting any significant indigenous biodiversity values and habitat. Further information regarding the proposal, values present, construction methodology and any proposed mitigation/ management is required to better understand any potential effects on ecological values and the significance of these effects.
- The incorrect use of species for planting (particularly shelterbelt planting) has the potential to exacerbate wilding pine spread within Te Manahuna/the Mackenzie Basin. Further detail regarding planting species is required to understand effects relating to wilding pine management in Te Manahuna/the Mackenzie Basin.

1 April 2025



Ilana Miller  
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Environmental Protection Authority

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Kia ora Ilana,

Thank you for your letter received 10 March 2025 regarding the Grampians Solar Farm project from Helios CAN Op LP.

Please find our response to the specific questions raised in the letter.

***1. any applications that have been lodged with the Council that would be a competing application or applications if a substantive application for the project were lodged. If no such applications exist, please also confirm this in writing.***

The CRC does not hold a record of any competing applications (per the definition in the Fast Track Approval Act 2024 (FTAA)) in the same project area which have been approved.

***2. in relation to projects seeking approval of a resource consent under section 42(4)(a) of the Act, whether there are any existing resource consents issued where sections 124C(1)(c) or 165ZI of the Resource Management Act 1991 (RMA) could apply, if the project were to be applied for as a resource consent under the RMA. If no such consents exist, please also confirm this in writing.***

In accordance with section 30(3)(b) of FTAA, the CRC can confirm that there are no existing resource consents of that kind.

***3. are there any reasons it would be more appropriate for the project to proceed through existing RMA processes rather than the processes under the Act?***

The CRC has not identified any specific reasoning as to why it would be more appropriate for this application to proceed under existing RMA processes in terms of regional consenting matters. However, we acknowledge that due to the size and

complexity of the proposal there will be a need for district consenting and authorisations under other legislation. The CRC does not have a view as to whether it is more appropriate to proceed under the FTAA regarding district consent requirements or approvals under any other act (e.g. Wildlife Act 1953). The CRC recommends that advice from the District Council and relevant administering agencies is sought regarding the appropriateness of the project proceeding under the FTAA, rather than the RMA.

**4. *does the applicant or a company owned by the applicant, have any environmental regulatory compliance history in your council's area?***

The CRC does not hold any records regarding the compliance history of 'Helios CAN Op LP' or 'Jeffrey Schlichting' and can confirm that no enforcement action has been taken against either 'Helios CAN Op LP' or 'Jeffrey Schlichting', dating back to July 2019.

**5. *does the project, from council's perspective, involve any activity classified as a prohibited activity under the RMA?***

Based on the information received, we do not believe that anything proposed is prohibited. The CRC will be able to confirm if the proposal involves any prohibited activity once a substantive application is available.

**6. *would the project have any significant adverse effects on the environment?***

Based on the information received, we are unable to determine if the proposal would result in any significant adverse effects. The CRC will need to reassess the proposal and its potential effect once a substantive application is available.

The CRC notes that:

- The project site is located within the Mackenzie Basin Outstanding Natural Landscape (Mackenzie District Plan) and a Regionally Significant Landscape identified in the Canterbury Regional Policy Statement (**CRPS**). While the full landscape/ visual assessment is not yet available, the CRC notes that there are a number of mitigation measures proposed by the applicant's expert. Further information would be needed to assess the proposals effects on Outstanding Natural Landscape Values.
- Construction activities have the potential to adversely affect waterbodies and indigenous biodiversity. Further detail regarding the proposal, construction methodology, and any proposed mitigation/ management is required to better understand these effects and their significance.

- Construction and operational phase stormwater have the potential to adversely affect waterbodies and indigenous biodiversity. Further detail regarding the construction methodology and any proposed mitigation or on-going management is required to better understand these effects and their significance.
- The incorrect use of species for planting (particularly shelterbelt planting) has the potential to exacerbate wilding pine spread within the Mackenzie Basin. Further detail regarding planting species is required to understand effects relating to wilding pine management in the Mackenzie Basin.
- The ecological information attached to the application states that areas of significant indigenous vegetation and habitat have been identified and excluded from the proposal area. These reports will need to be reviewed to ensure that the proposal is not adversely affecting any significant indigenous biodiversity values and habitat. Further information regarding the proposal, values present, construction methodology and any proposed mitigation/management is required to better understand any potential effects on ecological values and the significance of these effects.
- There is an existing resource consent within the project area held by Transpower New Zealand, being:
  - Land Use Consent CRC110792 – To excavate, erect and use a structure over the bed of a waterway, and to excavate natural material over an unconfined or semi-confined aquifer. This consent is related to transmission towers 78, 83, 85, 122, 148, 150, 152, 154, 156, 158, 163, 395 and 966. This consent has an expiry of 12 August 2046.

The transmission lines over the project area are critical and nationally significant infrastructure. Any use of the area below the transmission lines should not result in Transpower being unable to exercise their resource consent or operate and/ or maintain their infrastructure. We understand from the information provided by the applicant that Transpower have been engaged with regarding the proposal.

***7. further information on whether you consider the project and its benefits to be regionally significant and whether it is consistent with the Canterbury Regional Policy Statement.***

The CRC considers that if the project were to go ahead, it is likely that the solar farm would be considered ‘regionally significant infrastructure’ under the Canterbury Regional Policy Statement (**CRPS**). However, it should be noted that:

- the National Grid runs through the site and is also considered to be regionally significant infrastructure, and critical infrastructure under the CRPS. Any benefits of

the proposed activity will need to be considered in the context of its potential effects (if any) on that existing critical infrastructure.

- The information provided to date is limited. While it indicates that the project would meet the definition of 'regionally significant infrastructure' in the CRPS, given the limited information, the CRC is unable to determine with certainty if the project and its benefits are regionally significant.
- A full assessment of the proposal against the CRPS, based on the information available, is detailed in Appendix 1 to this letter.

Nāku iti noa, nā



Dr Stefanie Rixecker  
Chief Executive



## Appendix 1: Consistency with Canterbury Regional Policy Statement (CRPS)

### Relevant definitions in the CRPS:

Definition	Relevant to Helios Proposal
<p><b>Critical Infrastructure</b>  <i>Infrastructure necessary to provide services which, if interrupted, would have a serious effect on the communities within the Region or a wider population, and which would require immediate reinstatement. This includes any structures that support, protect or form part of critical infrastructure. Critical infrastructure includes:</i></p> <ol style="list-style-type: none"> <li>1. <i>regionally significant airports</i></li> <li>2. <i>regionally significant ports</i></li> <li>3. <i>gas storage and distribution facilities</i></li> <li>4. <i>electricity substations, networks, and distribution installations, including the electricity distribution network</i></li> <li>5. <i>supply and treatment of water for public supply</i></li> <li>6. <i>storm water and sewage disposal systems</i></li> <li>7. <i>telecommunications installations and networks</i></li> <li>8. <i>strategic road and rail networks (as defined in the Regional Land Transport Strategy)</i></li> <li>9. <i>petroleum storage and supply facilities</i></li> <li>10. <i>public healthcare institutions including hospitals and medical centres</i></li> <li>11. <i>fire stations, police stations, ambulance stations, emergency coordination facilities.</i></li> </ol>	<p>The proposed Helios proposal would not qualify as 'Critical Infrastructure' under the CRPS.</p>
<p><b>Ecological Health</b>  <i>Refers to the condition of an ecosystem and its ability to function normally supporting the life- forms and processes naturally associated with it.</i></p>	<p>Discharges, works within waterways and changes to habitat/ wetlands (including enhancement) can affect (positive or negative) the ecological health of ecosystems.</p>
<p><b>Ecosystem</b></p>	<p>Discharges, works within waterways and changes to habitat/ wetlands (including</p>

<p><i>A system of interacting terrestrial or aquatic living organisms within their natural and physical environment. In Section 2 of the Resource Management Act, ecosystems and their constituent parts are part of the environment and include people and communities. In Chapter 9 – Ecosystems and indigenous biodiversity, “ecosystems” are limited to natural ecosystems that do not include people and communities.</i></p>	<p>enhancement) can affect (positive or negative) ecosystems.</p>
<p><b>Electricity transmission network</b>  <i>The electricity transmission network/ electricity transmission activities/ assets/ infrastructure/ resources/ system, all being part of the national grid of transmission lines and cables (aerial, underground and undersea, including the high-voltage direct current link), stations and sub-stations and other works used to connect grid injection points and grid exit points to convey electricity throughout the North and South Islands of New Zealand.</i></p>	<p>The Helios proposal would not fall under this definition.</p>
<p><b>Endemic</b>  <i>Taxa that are naturally restricted to within a certain area.</i></p>	<p>Further detail would be needed to determine if specific policies relating to ‘endemic’ taxa would be relevant to the proposal.</p>
<p><b>Essential Structures</b>  <i>Structures that support or form part of:</i></p> <ol style="list-style-type: none"> <li>1. ...;</li> <li>4. <i>an energy generation, supply or transmission facility or network;</i></li> <li>5. ...; or</li> <li>9. <i>the infrastructure forming parts of other network utilities. This includes any structures that support essential infrastructure.</i></li> </ol>	<p>The Helios proposal would qualify as ‘energy generation, supply or transmission facility or network’. The supporting infrastructure (related to the proposal that wouldn’t fall under clause (4) of the definition would be captured by clause (9) of the definition (e.g. access tracks).</p>
<p><b>Hazardous activity or industry</b>  <i>An activity or industry that appears on the Hazardous Activity and Industry List (HAIL) 2004. The HAIL is published as Schedule A in the Contaminated Land Management Guidelines - Ministry for the Environment (2004) updated September 2007.</i></p>	<p>The HAIL includes:</p> <p><i>B – Electrical and electronic works, power generation and transmission</i></p> <ol style="list-style-type: none"> <li>1. <i>Batteries including the commercial assembling, disassembling, manufacturing or recycling of batteries (but excluding retail battery stores)</i></li> </ol>

	<p>2. <i>Electrical transformers including the manufacturing, repairing or disposing of electrical transformers or other heavy electrical equipment</i></p> <p>3. ...</p> <p>4. <i>Power stations, substations or switchyards</i></p> <p>Therefore, the Helios proposal would include a HAIL activity.</p>
<p><b>Originally rare</b></p> <p><i>In relation to terrestrial ecosystems, “originally” means the ecosystem type was present when Māori arrived, and still exists today. “Rare” means the total extent of each originally rare ecosystem type is less than 0.5 percent of New Zealand’s total area – that is, less than 134,000 hectares. A published list of originally rare terrestrial ecosystem types has been compiled by Landcare Research and is available from that organisation.</i></p>	<p>Further detail would be needed to determine if specific policies relating to ‘originally rare’ ecosystems would be relevant to the proposal.</p>
<p><b>Primary production</b></p> <p><i>The production (but not processing) of primary products including agricultural, horticultural, pastoral, aquacultural, and forestry products and includes the use of land and auxiliary buildings for these purposes.</i></p>	<p>Currently the site is used for primary production.</p>
<p><b>Regionally significant infrastructure</b></p> <p><i>Regionally significant infrastructure is:</i></p> <p>1. ...</p> <p>6. <i>National, regional and local renewable electricity generation activities of any scale</i></p> <p>7. <i>The electricity transmission network</i></p> <p>8. ....</p> <p>14. <i>Electricity distribution network</i></p>	<p>The Helios proposed would be considered to be regionally significant infrastructure.</p>

15. Infrastructure defined as ‘strategic infrastructure’ in this regional policy statement. Note: For the avoidance of doubt, this infrastructure is also referred to as ‘infrastructure that is regionally significant’.	
<b>Renewable Electricity Generation</b> <i>The generation of electricity from solar, wind, hydro electricity, geothermal, biomass, tidal, wave, or ocean current energy sources.</i>	The Helios Proposal is renewable energy generation.
<b>Renewable electricity generation activities</b> <i>The construction, operation and maintenance of structures associated with renewable electricity generation. This includes small and community-scale distributed generation activities, the system of electricity conveyance required to convey electricity to the distribution network and/or the national grid, and electricity storage technologies associated with renewable electricity.</i>	This definition would be relevant to the Helios proposal.
<b>Riparian zone</b> <i>In relation to a river or lake the riparian zone is the area of land within their beds and adjacent to the beds where direct interaction occurs between aquatic and terrestrial ecosystems. The riparian zone includes the banks of a river and the margin of a lake. Wetlands and islands may also be part of the riparian zone.</i>	Helios are proposing works within the riparian zones of waterways (unnamed) identified in the ecological assessment.
<b>Threatened species</b> <i>A species facing a very high risk of extinction in the wild and includes nationally critical, nationally endangered and nationally vulnerable species as identified in the New Zealand Threat Classification Systems lists.</i>	While ecological assessments are not available yet, given the nature of the Mackenzie Basin it is likely that the wider project site could contain ‘threatened species’ which would be captured by this definition.
<b>Versatile Soils</b> <i>Land classified as Land Use Capability I or II in the New Zealand Land Resource Inventory.</i>	The site is identified as Land Use Capability III in the New Zealand Land Resource Inventory.

### Objective and Policy Assessment:

Objective/ Policy	Assessment
Chapter 5 – Land Use and Infrastructure	

**Objective 5.2.1****Location, Design and Function of Development (Entire Region)**

Development is located and designed so that it functions in a way that:

1. achieves consolidated, well designed and sustainable growth in and around existing urban areas as the primary focus for accommodating the region's growth; and
2. enables people and communities, including future generations, to provide for their social, economic and cultural well-being and health and safety; and which:
  - a. maintains, and where appropriate, enhances the overall quality of the natural environment of the Canterbury region, including its coastal environment, outstanding natural features and landscapes, and natural values;
  - b. provides sufficient housing choice to meet the region's housing needs;
  - c. encourages sustainable economic development by enabling business activities in appropriate locations;
  - d. minimises energy use and/or improves energy efficiency;
  - e. enables rural activities that support the rural environment including primary production;
  - f. is compatible with, and will result in the continued safe, efficient and effective use of regionally significant infrastructure;
  - g. avoids adverse effects on significant natural and physical resources including regionally significant infrastructure, and where avoidance is impracticable,

- The Helios proposal is located within an Outstanding Natural Landscape. The wider Helios site is also likely to contain natural values. (5.2.1.2.a)
- The proposal is taking place on rural land, meaning that the ability to undertake rural activities on the same site is diminished, due to the presence of the structures. (5.2.1.2.e)
- The proposal is compatible with regionally significant infrastructure, insofar as it is a generation activity located in the path of existing transmission lines meaning the generation can efficiently connect to the network (i.e. not a need to the electricity to be conveyed over a long distance to reach the network). Based on the information provided by the applicant, Transpower have been engaged with regarding the proposal. However further detail (and confirmation from Transpower) would be needed to determine impacts on the safe, efficient, and effective use of regionally significant infrastructure (for example, access, maintenance and operation of the transmission lines). (5.2.1.2.f)
- Based on the information provided, the proposal does appear to seek to avoid effects on significant natural resources such as wetlands biodiversity/ freshwater, through the use of buffers. However, further information would be needed to determine the values present on the site and if the mitigation/ avoidance proposed is suitable. As above, further detail (and confirmation from Transpower) would be needed to determine impacts on regionally significant infrastructure (Transmission lines). (5.2.1.2.g)
- There doesn't appear to be a conflict of activities, unless the use of rural land, for non-rural use is considered to be a conflict. (5.2.1.2.i)

<p>remedies or mitigates those effects on those resources and infrastructure;</p> <ul style="list-style-type: none"> <li>h. facilitates the establishment of papakāinga and marae; and</li> <li>i. avoids conflicts between incompatible activities.</li> </ul>	<p>The Helios proposal is not entirely inconsistent with Objective 5.2.1 based on information provided at this point. If developed, the Helios facility itself would be considered regionally significant infrastructure. However, further information is needed to determine if the proposal is consistent with this objective.</p>
<p><b>Objective 5.2.2</b>  <b>Integration of Land-use and regionally significant infrastructure (Wider Region)</b>  In relation to the integration of land use and regionally significant infrastructure:</p> <ol style="list-style-type: none"> <li>1. To recognise the benefits of enabling people and communities to provide for their social, economic and cultural well-being and health and safety and to provide for infrastructure that is regionally significant to the extent that it promotes sustainable management in accordance with the RMA.</li> <li>2. To achieve patterns and sequencing of land-use with regionally significant infrastructure in the wider region so that: <ol style="list-style-type: none"> <li>a. development does not result in adverse effects on the operation, use and development of regionally significant infrastructure</li> <li>b. adverse effects resulting from the development or operation of regionally significant infrastructure are avoided, remedied or mitigated as fully as practicable.</li> <li>c. there is increased sustainability, efficiency and liveability.</li> </ol> </li> </ol>	<p>The Helios proposal is likely to meet objective 5.2.2.1 as if constructed, the Helios proposal would be considered to be regionally significant infrastructure once built and provide benefits relating to social and economic well-being and health and safety in the context of improving energy supply and security within the region and wider. However, a more detailed proposal is needed to determine if this ‘promotes sustainable management in accordance with the RMA’ as per Objective 5.2.2.1.</p> <p>As noted above in response to Objective 5.2.1:</p> <ul style="list-style-type: none"> <li>- The Helios proposal would be considered to be regionally significant infrastructure once built. (5.2.2.2.b)</li> <li>- The proposal site is beneath existing regionally significant infrastructure being the national grid transmission lines. While the information provided by the applicant indicates that Transpower have been engaged with regarding the proposal, More formal comment from Transpower would need to be obtained to determine the effects of the Helios proposal on the National Grid. (5.2.2.2.a)</li> <li>- Further information from Helios is required to determine effects resulting from the proposal. (5.2.2.2.b)</li> <li>- Solar energy generation is a renewable energy resource, meaning that it is considered to be sustainable in the long term (provided it is situated in a suitable place), the generation activities will occur within close proximity to the National Grid,</li> </ul>

	<p>and likely to result in increased security of energy supply. (5.2.2.2.c)</p> <p>The Helios proposal is not entirely inconsistent with Objective 5.2.2 based on information provided at this point. If developed, the Helios facility itself would be considered regionally significant infrastructure. However, further information is needed to determine if the proposal is consistent with this objective.</p>
<p><b>Policy 5.3.2</b>  <b>Development Conditions (Wider Region)</b>  To enable development including regionally significant infrastructure which:</p> <ol style="list-style-type: none"> <li>1. ensure that adverse effects are avoided, remedied or mitigated, including where these would compromise or foreclose : <ol style="list-style-type: none"> <li>a. existing or consented regionally significant infrastructure;</li> <li>b. options for accommodating the consolidated growth and development of existing urban areas;</li> <li>c. the productivity of the region's soil resources, without regard to the need to make appropriate use of soil which is valued for existing or foreseeable future primary production, or through further fragmentation of rural land;</li> <li>d. the protection of sources of water for community supplies;</li> <li>e. significant natural and physical resources;</li> </ol> </li> <li>2. avoid or mitigate: <ol style="list-style-type: none"> <li>a. natural and other hazards, or land uses that would likely result in increases in the frequency and/or severity of hazards;</li> </ol> </li> </ol>	<p>It is noted that:</p> <ul style="list-style-type: none"> <li>- The development, operation, or decommissioning of specified infrastructure (including regionally significant infrastructure) is listed as an appropriate use of Highly Productive Land under the National Policy Statement for Highly Productive Land.</li> <li>- The proposed activity is unlikely to compromise the productivity of the site's soil resources. The proposal states that decommissioning will occur at the end of the 35 year life cycle of the project, with the ability to return the land fully to agricultural use if that is the desired outcome.</li> </ul> <p>However, similar to the assessment for Objective 5.2.1 and 5.2.1, further information is needed to:</p> <ul style="list-style-type: none"> <li>- Assess the effects the proposal and if the proposal appropriately avoids, remedies or mitigates effects, including effects on significant natural and physical resources.</li> <li>- Determine the effect on existing regionally significant infrastructure (being the National Grid).</li> <li>- Effects on productivity of the regions soil resources as the proposal is located within existing improved pasture, currently used for rural activities.</li> </ul> <p>The Helios proposal is not entirely inconsistent with Policy 5.3.2 based on information provided at this point. If developed, the Helios facility itself would be considered regionally significant</p>

<ul style="list-style-type: none"> <li>b. reverse sensitivity effects and conflicts between incompatible activities, including identified mineral extraction areas; and</li> </ul> <p>3. integrate with:</p> <ul style="list-style-type: none"> <li>a. the efficient and effective provision, maintenance or upgrade of infrastructure; and</li> <li>b. transport networks, connections and modes so as to provide for the sustainable and efficient movement of people, goods and services, and a logical, permeable and safe transport system.</li> </ul>	<p>infrastructure. However, further information is needed to determine if the proposal is consistent with this policy.</p>
<p><b>Policy 5.3.9</b>  <b>Regionally significant infrastructure (Wider Region)</b>  In relation to regionally significant infrastructure (including transport hubs):</p> <ul style="list-style-type: none"> <li>1. avoid development which constrains the ability of this infrastructure to be developed and used without time or other operational constraints that may arise from adverse effects relating to reverse sensitivity or safety;</li> <li>2. provide for the continuation of existing infrastructure, including its maintenance and operation, without prejudice to any future decision that may be required for the ongoing operation or expansion of that infrastructure; and</li> <li>3. provide for the expansion of existing infrastructure and development of new infrastructure, while: <ul style="list-style-type: none"> <li>a. recognising the logistical, technical or operational constraints of this infrastructure and any need to locate activities where a natural or physical resource base exists;</li> <li>b. avoiding any adverse effects on significant natural and physical resources and cultural values and where this is</li> </ul> </li> </ul>	<p>As noted above in Policy 5.3.2, further information is needed to determine the effects on existing regionally significant infrastructure (National Grid).</p> <p>The site appears to be an appropriate place of solar energy generation, with respect to solar access (where a resource is located). However, to determine site appropriateness, further information is needed on the values present at the site, and steps taken to avoid, remedy or mitigate any effects. This includes effects relating to:</p> <ul style="list-style-type: none"> <li>- the preservation of the natural character of wetlands, and rivers and their margins, and the protection of them from inappropriate subdivision, use and development.</li> <li>- The protection of outstanding natural landscapes from inappropriate subdivision, use and development.</li> <li>- The protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna.</li> <li>- The relationship of Maori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga.</li> </ul>



<p>not practicable, remedying or mitigating them, and appropriately controlling other adverse effects on the environment; and</p> <p>c. when determining any proposal within a sensitive environment (including any environment the subject of section 6 of the RMA), requiring that alternative sites, routes, methods and design of all components and associated structures are considered so that the proposal satisfies sections 5(2)(a) – (c) as fully as is practicable.</p>	<ul style="list-style-type: none"> <li>- The management of significant risks from natural hazards, meaning that a hazards (including flooding) assessment should be undertaken.</li> </ul>
<p><b>Policy 5.3.12</b>  <b>Rural production (Wider Region)</b>  Maintain and enhance natural and physical resources contributing to Canterbury’s overall rural productive economy in areas which are valued for existing or foreseeable future primary production, by:</p> <ol style="list-style-type: none"> <li>1. avoiding development, and/or fragmentation which; <ol style="list-style-type: none"> <li>a. forecloses the ability to make appropriate use of that land for primary production; and/or</li> <li>b. results in reverse sensitivity effects that limit or precludes primary production.</li> </ol> </li> <li>2. enabling tourism, employment and recreational development in rural areas, provided that it: <ol style="list-style-type: none"> <li>a. is consistent and compatible with rural character, activities, and an open rural environment;</li> <li>b. has a direct relationship with or is dependent upon rural activities, rural resources or raw material inputs sourced from within the rural area;</li> <li>c. is not likely to result in proliferation of employment (including that associated with industrial activities) that</li> </ol> </li> </ol>	<p>As noted above, the site is located within existing rural land and improved pasture. The applicant does propose to still run sheep on the site; however, this may not be in a manner which would be considered ‘efficient’ in terms of rural land use (stocking). Further detail would need to be provided in relation to availability of rural land, particularly improved pasture within the Mackenzie Basin, and if the use of this site for solar energy generation will impact the rural productive economy (fragmentation of rural land, appropriate use). It is recognised that in the information provided, the solar generation infrastructure has a lifecycle of 35-years, and that upon expiry of the lease, the land could be returned the current agricultural use.</p> <p>It is not considered based on the available information that the proposed activity would likely have significant cumulative adverse effects on water quality and quantity.</p> <p>Further information is needed to determine if the proposal is consistent with this policy.</p>

<p>is not linked to activities or raw material inputs sourced from within the rural areas; and</p> <p>d. is of a scale that would not compromise the primary focus for accommodating growth in consolidate, well designed and more sustainable development patterns. and;</p> <p>3. ensuring that rural land use intensification does not contribute to significant cumulative adverse effects on water quality and quantity.</p>	
<p><b>Policy 5.3.13</b>  <b>Spread of Wilding Trees</b>  Avoid, or minimise as far as practicable, the risk of wilding tree spread, through the location of planting, design of planting, species selection and management once planting has occurred.</p>	<p>The proposal includes the planting of shelterbelts. Provided the species selected for this (or any planting throughout the site) are species with a very low wilding risk the proposal would be consistent with this policy.</p>
<p><b>Chapter 7 – Freshwater</b></p>	
<p><b>Objective 7.2.3</b>  <b>Protection of intrinsic value of waterbodies and their riparian Zones</b>  The overall quality of freshwater in the region is maintained or improved, and the life supporting capacity, ecosystem processes and indigenous species and their associated fresh water ecosystems are safeguarded.</p>	<p>The proposal has been designed to have setbacks from waterways and wetlands and the applicant is proposing enhancement (native planting), which would have benefits to the intrinsic values of these waterbodies.</p> <p>The proposal will result in construction and operational phase stormwater discharges. While it is likely that construction phase discharges and potential effects of this can be managed through erosion and sediment control plans, spill and refuelling protocols and site management, to determine consistency with this objective, further information would be needed to determine the effects of any operational stormwater discharges from the site.</p>
<p><b>Policy 7.3.1</b>  <b>Adverse effects of activities on the natural character of freshwater</b></p>	<p>The proposal has been designed to have setbacks from waterways and wetlands and the applicant is proposing enhancement (native planting), which should help to preserve the natural character of freshwater bodies and their margins.</p>

<p>To identify the natural character values of fresh water bodies and their margins in the region and to:</p> <ol style="list-style-type: none"> <li>1. preserve natural character values where there is a high state of natural character;</li> <li>2. natural character values where they are modified but highly valued; and</li> <li>3. improve natural character values where they have been degraded to unacceptable levels;</li> </ol> <p>unless modification of the natural character values of a fresh water body is provided for as part of an integrated solution to water management in a catchment in accordance with Policy 7.3.9, which addresses remedying and mitigating adverse effects on the environment and its natural character values</p>	<p>However, the proposal will result in discharges which may cause adverse effects on the water bodies natural character. To determine consistency with this policy, further information would be needed to determine the effects of any discharges from the site.</p>
<p><b>Policy 7.3.3</b>  <b>Enhancing fresh water environments and biodiversity</b>  To promote, and where appropriate require the protection, restoration and improvement of lakes, rivers, wetlands and their riparian zones and associated Ngāi Tahu values, and to:</p> <ol style="list-style-type: none"> <li>1. identify and protect areas of significant indigenous vegetation and significant habitats, sites of significant cultural value, wetlands, lakes and lagoons/Hapūa, and other outstanding water bodies; and</li> <li>2. require the maintenance and promote the enhancement of indigenous biodiversity, inland basin ecosystems and riparian zones; and</li> <li>3. promote, facilitate or undertake pest control.</li> </ol>	<p>Based on advice available, the applicant has indicated that they have undertaken an ecological assessment to identify areas of significant indigenous vegetation and significant habitats and wetlands.</p> <p>This ecological assessment has then influenced the site layout and design, including proposing setbacks from waterways, wetlands and indigenous biodiversity. The applicant is also proposing enhancement (native planting), and restoration of these environments with the intent that this improves/ promotes their associated biodiversity. The applicant has also proposed buffers from freshwater values (including wetlands).</p> <p>To fully determine consistency with this policy, a copy of the full ecological assessment, and further detail on proposed mitigations (including the suitability of proposed mitigations to protect values) and methodology is required.</p>

**Policy 7.3.6****Fresh water quality**

In relation to water quality:

1. to establish and implement minimum water quality standards for surface water and groundwater resources in the region, which are appropriate for each water body considering:
  - a. the values associated with maintaining life supporting capacity, ecosystem processes and indigenous species including their associated ecosystems, and natural character of the water body;
  - b. any current and reasonably foreseeable requirement to use the water for individual, marae or community drinking water or stockwater supplies, customary uses or contact recreation;
  - c. the cultural significance of the fresh water body and any conditions or restrictions on the discharge of contaminants that may be necessary or appropriate to protect those values; and
  - d. any other current or reasonably foreseeable values or uses; and
2. to manage activities which may affect water quality (including land uses), singularly or cumulatively, to maintain water quality at or above the minimum standard set for that water body; and
3. where water quality is below the minimum water quality standard set for that water body, to avoid any additional allocation of water for abstraction from that water body and any additional discharge of contaminants to that water body, where any further abstraction or discharges, either singularly

Further detail on the proposed discharges relating to the proposed activity (temporary construction phase and operational phase), as well as and further detail on proposed mitigations and methodology will need to be provided to assess effects on water quality.

<p>or cumulatively, may further adversely affect the water quality in that water body:</p> <ol style="list-style-type: none"> <li>until the water quality standards for that water body are met; or</li> <li>unless the activities are undertaken as part of an integrated solution to water management in the catchment in accordance with Policy 7.3.9, which provides for the redress of water quality within that water body within a specified timeframe.</li> </ol>	
<p><b>Policy 7.3.7</b>  <b>Water quality and land uses</b>  To avoid, remedy or mitigate adverse effects of changes in land uses on the quality of fresh water (surface or ground) by:</p> <ol style="list-style-type: none"> <li>identifying catchments where water quality may be adversely affected, either singularly or cumulatively, by increases in the application of nutrients to land or other changes in land use; and</li> <li>controlling changes in land uses to ensure water quality standards are maintained or where water quality is already below the minimum standard for the water body, it is improved to the minimum standard within an appropriate timeframe.</li> </ol>	<p>To determine consistency with this policy, further detail on the proposed discharges relating to the proposed activity (temporary construction phase and operational phase, as well as stocking of sheep), as well as further detail on proposed mitigations and methodology will need to be provided to assess effects on water quality. It is likely that erosion and sediment control measures, including erosion and sediment control plan/ management, if suitable, would help to give effect to this policy.</p>
<p><b>Chapter 9 – Ecosystems and Indigenous Biodiversity</b></p>	
<p><b>Objective 9.2.1</b>  <b>Halting the decline of Canterbury’s ecosystems and indigenous biodiversity</b>  The decline in the quality and quantity of Canterbury’s ecosystems and indigenous biodiversity is halted and their life-supporting capacity and mauri safeguarded.</p>	<p>Based on information available, the applicant has indicated that they have undertaken an ecological assessment to identify areas of significant indigenous vegetation and significant habitats and indigenous vegetation more generally throughout the site. This ecological assessment has then influenced the site layout and design, including proposing setbacks from waterways, wetlands and indigenous biodiversity. The applicant is also</p>

	<p>proposing enhancement (native planting), and restoration of these environments with the intent that this improves/ promotes their associated biodiversity.</p> <p>To fully determine consistency with this objective a copy of the full ecological assessment, and further detail on proposed mitigations and methodology is required.</p>
<p><b>Objective 9.2.2</b>  <b>Restoration or enhancement of ecosystems and indigenous biodiversity</b>  Restoration or enhancement of ecosystem functioning and indigenous biodiversity, in appropriate locations, particularly where it can contribute to Canterbury's distinctive natural character and identity and to the social, cultural, environmental and economic well-being of its people and communities.</p>	<p>The applicant has undertaken an ecological assessment which has influenced the site layout and design, including proposing setbacks from waterways, wetlands and indigenous biodiversity. The applicant is also proposing enhancement (native planting), and restoration of these environments, and the protection of these areas through fencing, with the intent that this improves/ promotes their ecological health and associated biodiversity.</p> <p>While the information suggests intent to enhance indigenous biodiversity, to fully determine consistency with this objective, a copy of the full ecological assessment, and further detail on proposed mitigations and methodology is required.</p>
<p><b>Objective 9.2.3</b>  <b>Protection of significant indigenous vegetation and habitats</b>  Areas of significant indigenous vegetation and significant habitats of indigenous fauna are identified and their values and ecosystem functions protected.</p>	<p>Based on advice available, the applicant has indicated that they have undertaken an ecological assessment to identify areas of significant indigenous vegetation and significant habitats and indigenous fauna within the site.</p> <p>To fully determine consistency with this policy, a copy of the full ecological assessment is required.</p>
<p><b>Policy 9.3.1</b>  <b>Protecting significant natural areas</b>  1. Significance, with respect to ecosystems and indigenous biodiversity, will be determined by assessing areas and habitats against the following matters:</p> <ul style="list-style-type: none"> <li>a. Representativeness</li> <li>b. Rarity or distinctive features</li> </ul>	<p>Based on advice available, the applicant has indicated that the ecological assessment has used the CRPS Appendix 3 criteria.</p> <p>To fully determine consistency with this policy, a copy of the full ecological assessment is required.</p>

<ul style="list-style-type: none"> <li>c. Diversity and pattern</li> <li>d. Ecological context</li> </ul> <p>The assessment of each matter will be made using the criteria listed in Appendix 3.</p> <ul style="list-style-type: none"> <li>2. Areas or habitats are considered to be significant if they meet one or more of the criteria in Appendix 3.</li> <li>3. Areas identified as significant will be protected to ensure no net loss of indigenous biodiversity or indigenous biodiversity values as a result of land use activities.</li> </ul>	
<p><b>Policy 9.3.2</b>  <b>Priorities for protection</b>  To recognise the following national priorities for protection:</p> <ul style="list-style-type: none"> <li>1. Indigenous vegetation in land environments where less than 20% of the original indigenous vegetation cover remains.</li> <li>2. Areas of indigenous vegetation associated with sand dunes and wetlands.</li> <li>3. Areas of indigenous vegetation located in “originally rare” terrestrial ecosystem types not covered under (1) and (2) above.</li> <li>4. Habitats of threatened and at risk indigenous species.</li> </ul>	<p>Based on advice available, the applicant has indicated that they have undertaken an ecological assessment to identify areas of significant indigenous vegetation and significant habitats and indigenous fauna within the site.</p> <p>While the information suggests intent to protect indigenous vegetation, to fully determine consistency with this objective, a copy of the full ecological assessment, and further detail on proposed mitigations and methodology is required.</p>
<p><b>Policy 9.3.4</b>  <b>Promote ecological enhancement and restoration</b>  To promote the enhancement and restoration of Canterbury’s ecosystems and indigenous biodiversity, in appropriate locations, where this will improve the functioning and long term sustainability of these ecosystems.</p>	<p>The applicant is also proposing enhancement (native planting), and restoration of these environments to improve ecological health, with the intent that this improves/ promotes their associated biodiversity.</p> <p>While the information suggests intent to restore indigenous biodiversity, to fully determine consistency with this objective, a copy of the full ecological assessment, and further detail on proposed mitigations and methodology is required.</p>
<p><b>Policy 9.3.5</b>  <b>Wetland protection and enhancement</b></p>	<p>Based on advice available, the applicant has indicated that they have undertaken an ecological (including wetland assessment)</p>

<p>In relation to wetlands:</p> <ol style="list-style-type: none"> <li>1. To assess an ecologically significant wetland against the matters set out in Policy 9.3.1 and the national priorities listed in Policy 9.3.2 For the purposes of this policy, ecologically significant wetlands do not include areas that are predominantly pasture and dominated by exotic plant species and where they are not significant habits of indigenous fauna.</li> <li>2. To ensure that the natural, physical, cultural, amenity, recreational and historic heritage values of Canterbury's ecologically significant wetlands are protected.</li> <li>3. To generally promote the protection, enhancement and restoration of all of Canterbury's remaining wetlands.</li> <li>4. To encourage the formation of created wetlands that contribute to the restoration of indigenous biodiversity.</li> <li>5. To protect adjoining areas of indigenous and other vegetation which extend outside an ecologically significant wetland and are necessary for the ecological functioning of the wetland.</li> </ol>	<p>assessment to identify areas of significant indigenous vegetation and significant habitats and wetlands.</p> <p>This ecological assessment has then influenced the site layout and design, including proposing setbacks from waterways, wetlands and indigenous biodiversity. The applicant is also proposing enhancement (native planting), and restoration of these environments to improve ecological health, with the intent that this improves/ promotes their associated biodiversity.</p> <p>While the information suggests intent to meet this policy, to fully determine consistency with this policy, a copy of the full ecological assessment, including whether wetland areas meet the ecologically significant wetland criteria, and further detail on proposed mitigations and methodology is required.</p>
<p><b>Chapter 10 – Beds of Rivers and Lakes and their Riparian Zones</b></p>	
<p><b>Objective 10.2.1</b>  <b>Provision for activities in beds and riparian zones and protection and enhancement of bed and riparian zone values</b>  Enable subdivision, use and development of river and lake beds and their riparian zones while protecting all significant values of those areas, and enhancing those values in appropriate locations.</p>	<p>Based on advice available, the applicant has indicated that they have undertaken an ecological assessment to identify ecological values within the site.</p> <p>This ecological assessment has then influenced the site layout and design, including proposing setbacks from waterways, wetlands and indigenous biodiversity. The applicant is also proposing enhancement (native planting), and restoration of these environments with the intent that this improves/ promotes their associated biodiversity.</p>



	To fully determine consistency with this objective, a copy of the full ecological assessment, and further detail on proposed mitigations and methodology is required.
<b>Objective 10.2.3</b> <b>Protection of essential structures</b> Protection of the stability, performance and operation of essential structures from activities in river and lake beds and on their banks or margins.	To determine consistency with this objective, further information is required to determine if any existing essential structures (e.g. Transpower essential structures) are located within waterbodies (or their banks/ margins), and then if the proposed activities would have any impact on the stability, performance and operation of essential structures (Transpower essential structures).
<b>Policy 10.3.1</b> <b>Activities in river and lake beds and their riparian zones</b> To provide for activities in river and lake beds and their riparian zones, including the planting and removal of vegetation and the removal of bed material, while: <ol style="list-style-type: none"> <li>1. recognising the implications of the activity on the whole catchment;</li> <li>2. ensuring that significant bed and riparian zone values are maintained or enhanced; or</li> <li>3. avoiding significant adverse effects on the values of those beds and their riparian zones, unless they are necessary for the maintenance, operation, upgrade, and repair of essential structures, or for the prevention of losses from floods, in which case significant adverse effects should be mitigated or remedied.</li> </ol>	The applicant will likely undertake some works within beds and riparian zones relating to tracking and access. Other proposed activities will involve vegetation removal and planting relating to the applicants proposed ecological enhancement and restoration of indigenous biodiversity and waterbodies within the site. To fully determine consistency with this policy, a copy of the full ecological assessment, and further detail on proposed mitigations and methodology is required.
<b>Policy 10.3.2</b> <b>Protection and enhancement of areas of river and lake beds and their riparian zones</b> To preserve the natural character of river and lake beds and their margins and protect them from inappropriate subdivision, use and development, and where appropriate to maintain and/or	Based on advice available, the applicant has indicated that they have undertaken an ecological assessment to identify ecological values within the site, including freshwater values. The proposal has been designed to have setbacks from waterways and wetlands and the applicant is proposing enhancement (native

<p>enhance areas of river and lake beds and their margins and riparian zones where:</p> <ol style="list-style-type: none"> <li>1. they exist in a degraded state and enhancement will achieve long-term improvement in those values;</li> <li>2. they have ecological values for which protection and/or enhancement will assist in the establishment or re-establishment of indigenous biodiversity or ecosystems, particularly for ecosystems that are threatened or unrepresented in protected areas;</li> <li>3. they have existing significant trout or salmon habitat;</li> <li>4. maintenance and/or enhancement will improve or establish connections between habitats and create corridors for indigenous species and trout and salmon and their movement between areas;</li> <li>5. riparian zones provide a buffer from activities that may adversely affect bed values;</li> <li>6. opportunities exist to create habitat corridors for plants and animals; or</li> <li>7. riparian zones provide spawning or other significant habitats for at risk or threatened species, such as inanga or Canterbury mudfish.</li> </ol>	<p>planting), which should help to preserve the natural character of rivers and their riparian zones.</p> <p>The applicant is also proposing enhancement (native planting), and restoration of these environments with the intent that this improves/ promotes their associated biodiversity.</p> <p>To fully determine consistency with this policy, a copy of the full ecological assessment, and further detail on proposed mitigations and methodology is required.</p>
<p><b>Policy 10.3.4</b>  <b>Removal of vegetation and bed material from river beds</b>  To manage the use and removal of vegetation and bed material in river beds and their margins to ensure:</p> <ol style="list-style-type: none"> <li>1. the maintenance of flood-carrying capacity of rivers</li> <li>2. the protection of essential structures; and</li> <li>3. erosion control and prevention.</li> </ol> <p>provided its management does not adversely affect:</p>	<p>The applicant is proposing some vegetation removal as part of the ecological enhancement around waterways. Disturbance of the bed would likely occur if the applicant needed to install culverts and/ access tracks across the site.</p> <p>To fully determine consistency with this policy, further detail on the proposed site plan, works and construction methodology is required.</p>

<ul style="list-style-type: none"> <li>a. the instream and other values of the beds including habitat and associated ecosystems; or</li> <li>b. the stability, performance, operation and maintenance, upgrade and repair of essential structures</li> </ul>	
<b>Chapter 11 – Natural Hazards</b>	
<p><b>Objective 11.2.1</b>  <b>Avoid new subdivision, use and development of land that increases risks associated with natural hazards</b>  New subdivision, use and development of land which increases the risk of natural hazards to people, property and infrastructure is avoided or, where avoidance is not possible, mitigation measures minimise such risks.</p>	<p>There does not appear to be any assessment of risk and hazard potential to the site. It is noted that the through Plan Change 28, Mackenzie District Council is introducing a flood hazard assessment overlay, which covers the site. Other hazard considerations such as fire risk should also be considered. To fully determine consistency with this Objective, a flood and hazard risk assessment should be undertaken.</p>
<p><b>Policy 11.3.1</b>  Avoidance of inappropriate development in high hazard areas  To avoid new subdivision, use and development (except as provided for in Policy 11.3.4) of land in high hazard areas, unless the subdivision, use or development:</p> <ol style="list-style-type: none"> <li>1. is not likely to result in loss of life or serious injuries in the event of a natural hazard occurrence; and</li> <li>2. is not likely to suffer significant damage or loss in the event of a natural hazard occurrence; and</li> <li>3. is not likely to require new or upgraded hazard mitigation works to mitigate or avoid the natural hazard; and</li> <li>4. is not likely to exacerbate the effects of the natural hazard; or</li> <li>5. Outside of greater Christchurch, is proposed to be located in an area zoned or identified in a district plan for urban residential, industrial or commercial use, at the date of notification of the CRPS, in which case the effects of the natural hazard must be mitigated; or</li> </ol>	<p>The site is identified as being within the Mackenzie District Council's Flood Hazard Assessment Overlay. While this does not necessarily mean that the site would be considered a 'high hazard area' under the CRPS, it is recommended that a flood assessment (which would determine if the site would be subject to a 0.2% AEP flood event) is undertaken or order for the activity to be assessed under this policy.</p>

<p>6. Within greater Christchurch, is proposed to be located in an area zoned in a district plan for urban residential, industrial or commercial use, or identified as a "Greenfield Priority Area" on Map A of Chapter 6, both at the date the Land Use Recovery Plan was notified in the Gazette, in which the effect of the natural hazard must be avoided or appropriately mitigated; or</p> <p>7. Within greater Christchurch, relates to the maintenance and/or upgrading of existing critical or significance infrastructure.</p>	
<p><b>Policy 11.3.2</b>  <b>Avoid Development in areas subject to inundation</b>  In areas not subject to Policy 11.3.1 that are subject to inundation by a 0.5% AEP flood event; any new subdivision, use and development (excluding critical infrastructure) shall be avoided unless there is no increased risk to life, and the subdivision, use or development:</p> <ol style="list-style-type: none"> <li>1. is of a type that is not likely to suffer material damage in an inundation event; or</li> <li>2. is ancillary or incidental to the main development; or</li> <li>3. meets all of the following criteria: <ol style="list-style-type: none"> <li>a. new buildings have an appropriate floor level above the 0.5% AEP design flood level; and</li> <li>b. hazardous substances will not be inundated during a 0.5% AEP flood event; provided that a higher standard of management of inundation hazard events may be adopted where local catchment conditions warrant (as determined by a cost/benefit assessment).</li> </ol> </li> </ol>	<p>The site is identified as being within the Mackenzie District Council's Flood Hazard Assessment Overlay. It is recommended that a flood assessment (which would determine if the site would be subject to a 0.5% AEP flood event) is undertaken or order for the activity to be assessed under this policy, particularly with respect to clause 3(b) of the policy.</p>

When determining areas subject to inundation, climate change projections including sea level rise are to be taken into account.	
<p><b>Policy 11.3.5</b>  <b>General risk management approach</b>  For natural hazards and/or areas not addressed by policies 11.3.1, 11.3.2, and 11.3.3, subdivision, use or development of land shall be avoided if the risk from natural hazards is unacceptable. When determining whether risk is unacceptable, the following matters will be considered:</p> <ol style="list-style-type: none"> <li>1. the likelihood of the natural hazard event; and</li> <li>2. the potential consequence of the natural hazard event for: people and communities, property and infrastructure and the environment, and the emergency response organisations.</li> </ol> <p>Where there is uncertainty in the likelihood or consequences of a natural hazard event, the local authority shall adopt a precautionary approach.  Formal risk management techniques should be used, such as the Risk Management Standard (AS/NZS ISO 31000:2009) or the Structural Design Action Standard (AS/NZS 1170.0:2002).</p>	The site is identified as being within the Mackenzie District Council's Flood Hazard Assessment Overlay. It is recommended that a hazards assessment is undertaken or order for the activity to be assessed under this policy.
<b>Chapter 12 – Landscape</b>	
<p><b>Objective 12.2.1</b>  <b>Identification and protection of outstanding natural features and landscapes</b>  Outstanding natural features and landscapes within the Canterbury region are identified and their values are specifically recognised and protected from inappropriate subdivision, use, and development.</p>	The site is within an Outstanding Natural Landscape. The applicant has provided a memorandum on landscape and visual effects. To fully determine consistency with this objective, a detailed, comprehensive landscape and visual effects assessment would be required.
<p><b>Objective 12.2.2</b>  <b>Identification and management of other landscapes</b></p>	The applicant has provided a memorandum on landscape and visual effects.

<p>The identification and management of other important landscapes that are not outstanding natural landscapes. Other important landscapes may include:</p> <ol style="list-style-type: none"> <li>1. natural character</li> <li>2. amenity</li> <li>3. historic and cultural heritage</li> </ol>	<p>To fully determine consistency with this objective, a detailed, comprehensive landscape and visual effects assessment would be required. Cultural effects, and advice relating to cultural effects would also need to be considered in the context of this policy, and a cultural assessment was not available in the application package provided.</p>
<p><b>Objective 12.2.3</b>  <b>Consistency of assessment and management</b>          Ensure consistency of assessment and promote consistency of management of outstanding natural features and landscapes across the Canterbury region.</p>	<p>The applicant has provided a memorandum on landscape and visual effects.          To fully determine consistency with this objective, a detailed, comprehensive landscape and visual effects assessment would be required.</p>
<p><b>Policy 12.3.1</b>  <b>Identification of outstanding natural features and landscapes</b>          To identify the outstanding natural features and landscapes for the Canterbury region, while:</p> <ol style="list-style-type: none"> <li>1. recognising that the values set out in Appendix 4 indicate the outstanding natural features and landscapes for Canterbury, at a regional scale; and</li> <li>2. enabling the specific boundaries of outstanding natural features and landscapes, for inclusion in plans, to be determined through detailed assessments which address the assessment matters set out in Policy 12.3.4(1).</li> </ol>	<p>The applicant has provided a memorandum on landscape and visual effects. This memorandum outlines the methodology used and seeks to identify outstanding natural landscape values within the site. However, it is not clear if the values set out in Appendix 4 of the CRPS have been recognised (noting the assessment is brief and refers mainly to the Mackenzie District Plan). To fully determine consistency with this objective, a detailed, comprehensive landscape and visual effects assessment would be required.</p>
<p><b>Policy 12.3.2</b>  <b>Management methods for outstanding natural features and landscapes</b>          To ensure management methods in relation to subdivision, use or development, seek to achieve protection of outstanding natural features and landscapes from inappropriate subdivision, use and development.</p>	<p>To fully determine consistency with this objective, a detailed, comprehensive landscape and visual effects assessment would be required.</p>

<p><b>Policy 12.3.4</b>  <b>Consistency of identification and management of outstanding natural features and outstanding natural landscapes</b>  Seek to achieve regional consistency in the identification of outstanding natural features and landscape areas and values by:</p> <ol style="list-style-type: none"> <li>1. considering the following assessment matters which address biophysical, sensory and associative values when assessing landscapes in the Canterbury region: <ol style="list-style-type: none"> <li>a. Natural science values</li> <li>b. Legibility values</li> <li>c. Aesthetic values</li> <li>d. Transient values</li> <li>e. Tāngata whenua values</li> <li>f. Shared and recognised values</li> <li>g. Historic values</li> </ol> </li> <li>2. requiring methods for landscape management to be developed and considered, having regard to the management methods in adjoining districts or regions, and the extent to which these may, in combination, protect outstanding natural features and landscapes.</li> </ol>	<p>The applicant has provided a memorandum on landscape and visual effects. This memorandum outlines the methodology used and seeks to identify outstanding natural landscape values within the site. However, it is not clear if the values set out in policy 12.3.4 of the CRPS have been identified and considered with respect to the proposed activities (noting the assessment is brief and refers mainly to the Mackenzie District Plan). To fully determine consistency with this objective, a detailed, comprehensive landscape and visual effects assessment would be required.</p>
<b>Chapter 14 – Air Quality</b>	
<p><b>Objective 14.2.1</b>  <b>Maintain or improve ambient air quality</b>  Maintain or improve ambient air quality so that it is not a danger to people’s health and safety, and reduce the nuisance effects of low ambient air quality.</p>	<p>Given the size of the site, and provided good construction management techniques are adhered to, dust and nuisance effects should be managed appropriately so that it is not a danger to people’s health and safety.  It is considered that the proposed activity would likely be consistent with this objective.</p>
<p><b>Objective 14.2.2</b>  <b>Localised adverse effects of discharges on air quality</b></p>	<p>Given the size of the site, and provided good construction management techniques are adhered to, dust and nuisance effects should be managed appropriately so that there are not</p>

<p>Enable the discharges of contaminants into air provided there are no significant localised adverse effects on social, cultural and amenity values, flora and fauna, and other natural and physical resources.</p>	<p>significant localised effects on social, cultural and amenity values, flora and fauna and other natural and physical resources. It is considered that the proposed activity would likely be consistent with this objective.</p>
<p><b>Policy 14.3.1</b>  <b>Maintain and improve ambient air quality</b>  In relation to ambient air quality:</p> <ol style="list-style-type: none"> <li>1. To set standards to maintain ambient air quality in Canterbury based on concentrations of contaminants that cause adverse health effects and nuisance</li> <li>2. Where existing ambient air quality is higher than required by the standards set, to only allow the discharge of contaminants into air where the adverse effects of the discharge on ambient air quality are minor.</li> <li>3. To give priority to ensuring that PM10 ambient air quality improvements are achieved in Rangiora, Kaiapoi, Christchurch, Ashburton, Timaru, Geraldine and Waimate.</li> </ol>	<p>Given the size of the site, and provided good construction management techniques are adhered to, dust and nuisance effects should be managed appropriately so that it is not a danger to people's health and safety. It is considered that the proposed activity would likely be consistent with this policy.</p>
<p><b>Policy 14.3.3</b>  <b>Avoid, remedy or mitigate localised adverse effects on air quality</b>  To set standards, conditions and terms for discharges of contaminants into the air to avoid, remedy or mitigate localised adverse effects on air quality.</p>	<p>Given the size of the site, and provided good construction management techniques are adhered to, dust and nuisance effects should be managed appropriately so that there are not significant localised effects. It is considered that the proposed activity would likely be consistent with this policy.</p>
<p><b>Chapter 15 - Soils</b></p>	
<p><b>Objective 15.2.1</b>  <b>Maintenance of soil quality</b>  Maintenance and improvement of the quality of Canterbury's soil to safeguard their mauri, their life supporting capacity, their health and their productive capacity.</p>	<p>Further detail would be required to understand the contaminant type and concentration to determine potential effects on soil quality. Further information is required to assess the proposed activities against this objective.</p>



<p><b>Policy 15.3.1</b>  <b>Avoid remedy or mitigate soil degradation</b>  In relation to soil:</p> <ol style="list-style-type: none"> <li>1. to ensure that land-uses and land management practices avoid significant long-term adverse effects on soil quality, and to remedy or mitigate significant soil degradation where it has occurred, or is occurring; and</li> <li>2. to promote land-use practices that maintain and improve soil quality.</li> </ol>	<p>Further detail would be required to understand the contaminant type and concentration to determine potential effects on soil, and if the proposal could result in significant long-term soil degradation. Further information is required to assess the proposed activities against this policy.</p>
<p><b>Chapter 16 - Energy</b></p>	
<p><b>Objective 16.2.1</b>  <b>Efficient use of energy</b>  Development is located and designed to enable the efficient use of energy, including:</p> <ol style="list-style-type: none"> <li>1. maintaining an urban form that shortens trip distances</li> <li>2. planning for efficient transport, including freight</li> <li>3. encouraging energy-efficient urban design principles</li> <li>4. reduction of energy waste</li> <li>5. avoiding impacts on the ability to operate energy infrastructure efficiently.</li> </ol>	<p>The siting of the solar farm within such close proximity to the national grid will ensure that there is minimal energy wastage in the conveying of electricity from the proposal substation to the transmission lines.</p> <p>The information provided does note that some engagement with Transpower has occurred, however more detailed comment from Transpower would be needed to assess the impacts of the proposal (if any) on Transpower's ability to operate their energy infrastructure (National Grid) efficiently.</p> <p>Further information is required to assess the proposed activities against this objective. Provided Transpower do not raise concerns around their ability to operate their energy infrastructure, the proposed activity would be consistent with this objective.</p>
<p><b>Objective 16.2.2</b>  <b>Promote a diverse and secure supply of energy</b>  Reliable and resilient generation and supply of energy for the region, and wider contributions beyond Canterbury, with a particular emphasis on renewable energy, which:</p> <ol style="list-style-type: none"> <li>1. provides for the appropriate use of the region's renewable resources to generate energy;</li> </ol>	<p>If the proposal was to go ahead, it would contribute positively to energy security and add resilience to the energy generation capabilities in Canterbury and New Zealand more broadly. It would also:</p> <ul style="list-style-type: none"> <li>- increase New Zealand's renewable energy capacity</li> <li>- reduce reliance on fossil fuels</li> </ul>

<ol style="list-style-type: none"> <li>2. reduces dependency on fossil fuels;</li> <li>3. improves the efficient end-use of energy;</li> <li>4. minimises transmission losses;</li> <li>5. is diverse in the location, type and scale of renewable energy development;</li> <li>6. recognises the locational constraints in the development of renewable electricity generation activities; and <ol style="list-style-type: none"> <li>a. avoids any adverse effects on significant natural and physical resources and cultural values or where this is not practicable, remedies or mitigates; and</li> <li>b. appropriately controls other adverse effects on the environment.</li> </ol> </li> </ol>	<ul style="list-style-type: none"> <li>- minimise transmission losses, given its proximity to the National Grid (noting that advice is needed from Transpower)</li> </ul> <p>The site appears to be an appropriate place of solar energy generation with respect to solar access (where a resource is located). However, it should be noted that there are already two listed solar energy projects within the Mackenzie Basin on Schedule 1 of the FTAA, and that the CRC is aware of two other solar farms being investigated within the Mackenzie Basin.</p> <p>If all these projects were to go ahead, the Mackenzie Basin would contain five solar farms, totalling approximately 2,200ha, and producing approximately 1,328mW of energy. Given the Mackenzie Basin already produces 5,189GWh of energy from Hydro, this would mean that the Mackenzie Basin is producing a significant amount of renewable energy. Grouping renewable energy in one sub-region may be inconsistent with Objective 16.2.2.5 which seeks diversity in the location of renewable energy development.</p> <p>To determine adverse effects and consistency with this objective, further information is needed on the values present at the site, and steps taken to avoid, remedy or mitigate any effects, including cumulative effects of multiple solar farm proposals in the Mackenzie Basin.</p>
<p><b>Policy 16.3.3</b>  <b>Benefits of renewable energy generation facilities</b>  To recognise and provide for the local, regional and national benefits when considering proposed or existing renewable energy generation facilities, having particular regard to the following:</p>	<p>If the proposal was to go ahead, it would increase New Zealand's renewable energy capacity, improve security of supply, reduce reliance on fossil fuels and imported fossil fuels.  It is considered that the proposed activity would likely be consistent with this policy.</p>

<ol style="list-style-type: none"> <li>1. maintaining or increasing electricity generation capacity while avoiding, reducing or displacing greenhouse gas emissions;</li> <li>2. maintaining or increasing the security of supply at local and regional levels, and also wider contributions beyond Canterbury; by diversifying the type and/or location of electricity generation;</li> <li>3. using renewable natural resources rather than finite resources;</li> <li>4. the reversibility of the adverse effects on the environment of some renewable electricity generation facilities;</li> <li>5. avoiding reliance on imported fuels for the purposes of generating electricity; and</li> <li>6. assisting in meeting international climate obligations.</li> </ol>	
<p><b>Policy 16.3.4</b>  <b>Reliable and resilient electricity transmission network within Canterbury</b></p> <p>To encourage a reliable and resilient national electricity transmission network within Canterbury by:</p> <ol style="list-style-type: none"> <li>1. having particular regard to the local, regional and national benefits when considering operation, maintenance, upgrade or development of the electricity transmission network;</li> <li>2. avoiding subdivision, use and development including urban or semi urban development patterns, which would otherwise limit the ability of the electricity transmission network to be operated, maintained, upgraded and developed;</li> <li>3. enabling the operational, maintenance, upgrade, and development of the electricity transmission network provided that, as a result of route, site and method selection, where;</li> </ol>	<p>While the applicant has indicated engagement with Transpower, more detailed comments from Transpower is needed to determine effects on the transmission network to determine if the proposal is consistent with this policy.</p>

<ul style="list-style-type: none"> <li>a. the adverse effects on significant natural and physical resources or cultural values are avoided, or where this is not practicable, remedied or mitigated; and</li> <li>b. other adverse effects on the environment are appropriately controlled.</li> </ul>	
<p><b>Policy 16.3.5</b>  <b>Efficient, reliable and resilient electricity generation within Canterbury</b></p> <p>To recognise and provide for efficient, reliable and resilient electricity generation within Canterbury by:</p> <ul style="list-style-type: none"> <li>1. avoiding subdivision, use and development which limits the generation capacity from existing or consented electricity generation infrastructure to be used, upgraded or maintained;</li> <li>2. enabling the upgrade of existing, or development of new electricity generation infrastructure, with a particular emphasis on encouraging the operation, maintenance and upgrade of renewable electricity generation activities and associated infrastructure: <ul style="list-style-type: none"> <li>a. having particular regard to the locational, functional, operational or technical constraints that result in renewable electricity generation activities being located or designed in the manner proposed;</li> <li>b. provided that, as a result of site, design and method selection: <ul style="list-style-type: none"> <li>i. the adverse effects on significant natural and physical resources or cultural values are avoided, or where this is not practicable remedied, mitigated or offset; and</li> </ul> </li> </ul> </li> </ul>	<p>The proposal is seeking to establish renewable energy generation. However, to determine consistency with this policy, further information is needed to determine the potential environmental effects of the proposed energy generation on natural and physical resources.</p>

<ul style="list-style-type: none"> <li>ii. other adverse effects on the environment are appropriately controlled.</li> <li>3. providing for activities associated with the investigation, identification and assessment of potential sites and energy sources for renewable electricity generation;</li> <li>4. maintaining the generation output and enabling the maximum electricity supply benefit to be obtained from the existing electricity generation facilities within Canterbury, where this can be achieved without resulting in additional significant adverse effects on the environment which are not fully offset or compensated.</li> </ul>	
<b>Chapter 17 – Contaminated Land</b>	
<p><b>Objective 17.2.1</b>  <b>Protection from adverse effects of contaminated land</b>  Protection of people and the environment from both on-site and off-site adverse effects of contaminated land</p>	<p>The site of the proposed substations and batteries would be considered HAIL sites. Provided these sites are managed appropriately, the proposed activities would likely be consistent with this objective.</p>
<p><b>Policy 17.3.2</b>  <b>Development of, or discharge from contaminated land</b>  In relation to actually or potentially contaminated land, where new subdivision, use or development is proposed on that land, or where there is a discharge of the contaminant from that land:</p> <ul style="list-style-type: none"> <li>1. a site investigation is to be undertaken to determine the nature and extent of any contamination; and</li> <li>2. if it is found that the land is contaminated, except as provided for in Policy 17.3.3, the actual or potential adverse effects of that contamination, or discharges from the contaminated land shall be avoided, remedied or mitigated in a manner that does not lead to further significant adverse effects.</li> </ul>	<p>Information available does not indicate that the site in its current condition is contaminated, however it is advised that further investigations are undertaken to determine any contaminant levels (or not) at the site, to ensure that sufficient baseline data is available, and if remediation would be required post-activity. It is likely that this proposed activity would be consistent with this policy.</p>

<b>Chapter 18 – Hazardous Substances</b>	
<b>Objective 18.2.1</b> <b>Avoid, remedy or mitigate adverse effects</b> Adverse effects on the environment from the storage, use, disposal and transportation of hazardous substances are avoided, remedied or mitigated.	It is likely that the site will contain areas where hazardous substances are stored. Provided this storage occurs in accordance with relevant legislation and it carried out appropriately, it is considered that the proposed activity would be consistent with this objective.
<b>Objective 18.2.2</b> <b>New contamination of land</b> To avoid contamination of land.	The location of the substations and batteries would be identified as HAIL, but the area containing solar panels would not. Provided appropriate measures are taken with the installation and management of substations and batteries, the proposed activity would likely be consistent with this objective.
<b>Policy 18.3.1</b> <b>Protection of sensitive areas and activities</b> Avoid actual or potential adverse effects, resulting from the use, storage or disposal of hazardous substances, in the following locations: <ol style="list-style-type: none"> <li>1. High hazard areas</li> <li>2. Within a community drinking water protection zone, or within such a distance from a community drinking water supply that there is a risk of contamination of that drinking water source</li> <li>3. In areas of unconfined or semi-confined aquifer, where the depth to groundwater is such that there is a risk of contamination of that groundwater</li> <li>4. Within the coastal marine area and in the beds of lakes and rivers</li> <li>5. Within any area identified by a district or regional plan as being sensitive to the potential effects of hazardous substances, which may include, but are not limited to, areas such as wāhi tapu, urupā, institutions and residential areas.</li> </ol>	It is likely that the site will contain areas where hazardous substances are stored. Provided this storage occurs in accordance with relevant legislation and it carried out appropriately, it is considered that the proposed activity would be consistent with this policy.

<p><b>Policy 18.3.2</b> <b>Avoid, remedy or mitigate adverse effects</b> To avoid, remedy or mitigate adverse effects on the environment, including contamination of land, air and water, associated with the storage, use, transportation or disposal of hazardous substances.</p>	<p>It is likely that the site will contain areas where hazardous substances are stored. Provided this storage occurs in accordance with relevant legislation and it carried out appropriately, it is considered that the proposed activity would be consistent with this policy.</p>
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**1 April 2025**

## **RMA253863 – Helios Fast Track Proposal**

### **Solar Farm – Grampians – Mackenzie Basin**

#### **Executive Summary**

**Status:** Applicant seeking referral under s13 of the Fast Track Approvals Act (FTAA)

**Date Comment sought from EPA:** 14 March 2025

**Due Date:** 7 April 2025

#### **Key issues Identified:**

- **Canterbury Regional Council (CRC) previous involvement with applicant:**

The applicant previously sought a pre-application meeting with CRC in August 2023. In response, initial pre-application advice was provided via email to the applicant. We have no recorded minutes to confirm if the meeting did indeed take place. We have no record of any further correspondence between the applicant and CRC occurring until 13 February 2025, when the applicant notified CRC that they intended to apply under s13 of the FTAA. We were provided with two brief memos, and the applicant declined any further consultation with CRC staff. Under s11 of the FTAA, the applicant must consult relevant local authorities. It is the view of CRC staff that the previous pre-application advice may not be adequate consultation in terms of the FTAA.

- **Lack of detailed information about the proposal:**

The information provided does not give sufficient detail on what specific activities are taking place and where. This means that it is difficult to determine what consent types would be required.



- **Lack of detailed ecological, wetland and freshwater assessments to identify effects:**

The information provided includes basic information about the proposal and brief memos covering ecological effects (including wetland and freshwater effects). It is the view of CRC staff that this information is insufficient to determine what specific activities are taking place, and what effects these activities are likely to have on ecological or freshwater values within the site.

Your written comments on a project under the Fast Track Approvals Act 2024

Project name	The Grampians Solar Project – Helios CAN Op LP
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Before the due date, for assistance on how to respond or about this template or with using the portal, please email [contact@fasttrack.govt.nz](mailto:contact@fasttrack.govt.nz) or phone 0800 FASTRK (0800 327 875).

All sections of this form with an asterisk (\*) must be completed.

1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
Organisation name (if relevant)	Transpower New Zealand Limited		
*First name	Jo		
*Last name	Mooar		
Postal address	PO Box 1021 Wellington 6011		
*Contact phone number	s 9(2)(a)	Alternative	
*Email	s 9(2)(a)		

2. Please provide your comments on this application
<p>Transpower has been identified as an “other person” for the purpose of section 17(5) of the Fast-track Approvals Act 2024 (Act). Thank you for the opportunity to provide comments about the Project, and its potential impact on National Grid assets.</p> <p>We have been asked to include comment on the following matters:</p> <ul style="list-style-type: none"><li>• Whether the applicant requires approvals from Transpower to connect to the local electricity grid, and whether those approvals are already in place;</li><li>• Whether Transpower considers there are any barriers to the applicant delivering the project.</li></ul> <p>Subject to appropriate conditions, Transpower supports the Project as it is proposes renewable electricity generation and will support climate change mitigation (section (22)(2)(a)(vii) of the Act. The applicant proposes to connect the generation to the Grid via the Christchurch-Twizel A 220kV line (CHH-TWZ A line), near Tekapo.</p>

The Grid in the vicinity of the Project has existing capacity, meaning that no changes are needed to the wider Transpower assets to transport the electricity generated to demand (provided connection occurs using the technical arrangement previously agreed with Transpower).

The proposed generation would surround the CHH-TWZ A line. Development directly under the line could compromise the line, contrary to the protection afforded by policy 10 of the National Policy Statement on Electricity Transmission (**NPSET**). Appropriate conditions will need to be placed on any consent, to ensure the Project is appropriately set back from the line.

Helios and Transpower have had some discussions regarding the Project. Transpower has provided some preliminary concept designs. At this stage, we expect a new 220kV substation and new transmission tower on the CHH-TWZ A line will be required. Meetings are occurring between Helios and Transpower from time to time.

We anticipate that the following approvals would be required from Transpower. None of these approvals are yet in place:

- 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 and subsequent construction and other works (including whether any approvals obtained beyond those sought by Helios were required).
- Approval from the System Operator for the technical performance of the generating plant as part of the System Operator's testing and commissioning process.

Transpower is not aware of any barriers to the applicant delivering the project.

Note: All comments will be made available to the public and the applicant when the Ministry for the Environment proactively releases advice provided to the Minister for the Environment.