

21 March 2025

Stephanie Frame
The Ministry for the Environment
PO Box 1036
Wellington 6143

via email: referral@fasttrack.govt.nz

Helios CAN Op LP Grampians Solar Farm: Response to further information request

Please find below our response to the further information request dated 14 March 2025.

Request Item 1

Confirmation as to whether the project area includes development within the marginal strip boundaries identified on record of title CB529/50. If so, you (as the applicant) must consult with the Department of Conservation to ascertain if a concession under the Conservation Act 1987 is required.

Response

Helios CAN Op LP (**Helios**) has worked with its solar project landowner partner Grampians Station Limited (**Grampians**) and Gary Walker, High Country Portfolio Manager (Land & Property) at Land Information New Zealand (**LINZ**) to prepare further information in response to this request. Helios understands the request is in relation to the portion of the proposed solar project site located on record of title CB529/50 - the area shaded green and circled in red within **Figure 1** below (**Relevant Land**).

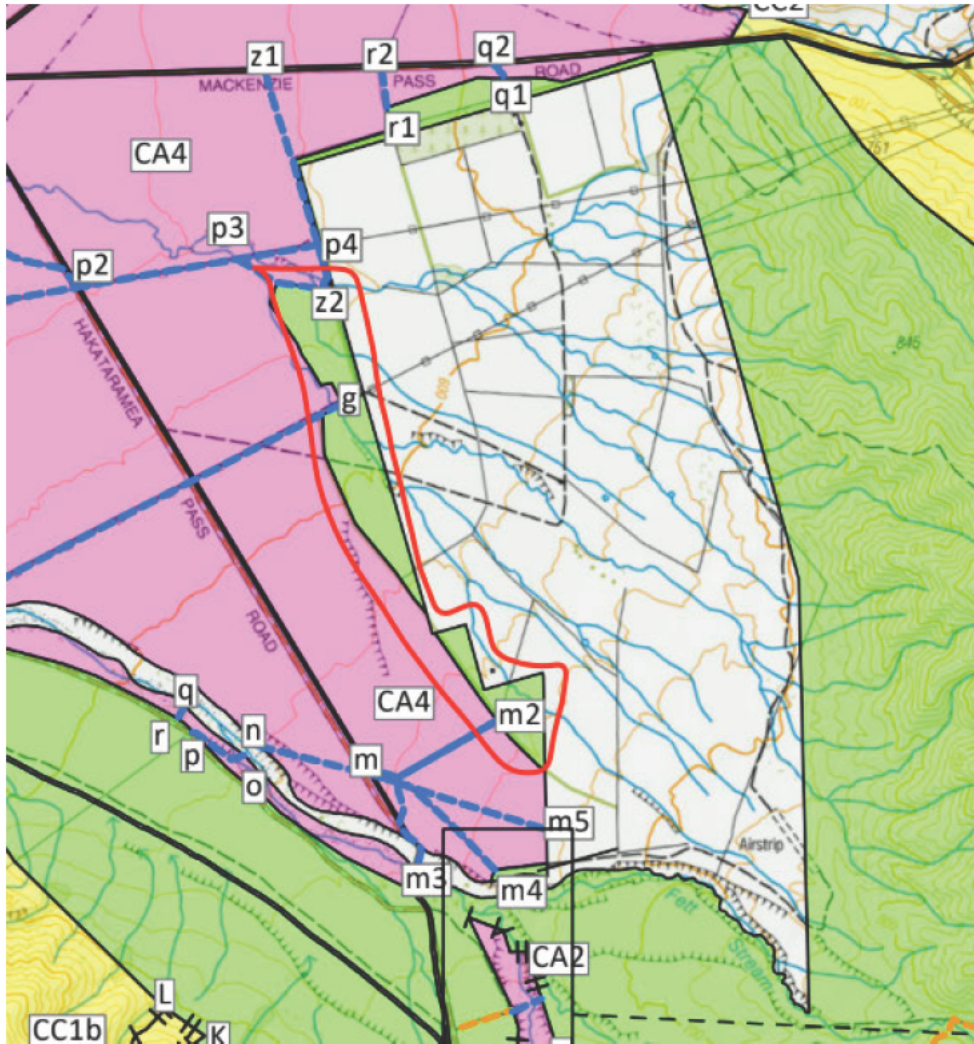


Figure 1 - Extent of Relevant Land within record of title CB529/50

Mr Walker from LINZ has provided a survey of confirmed 'Qualifying Water Bodies' (QWBs) (where marginal strip boundaries under the Conservation Act 1987 apply) within land comprised in record of title CB529/50 (see **Attachment 1**). This is replicated in **Figure 2** with the solar project site boundary shown in yellow, and the marginal strips shown in red to demonstrate there are no marginal strip boundaries within the solar project site located within record of title CB529/50.

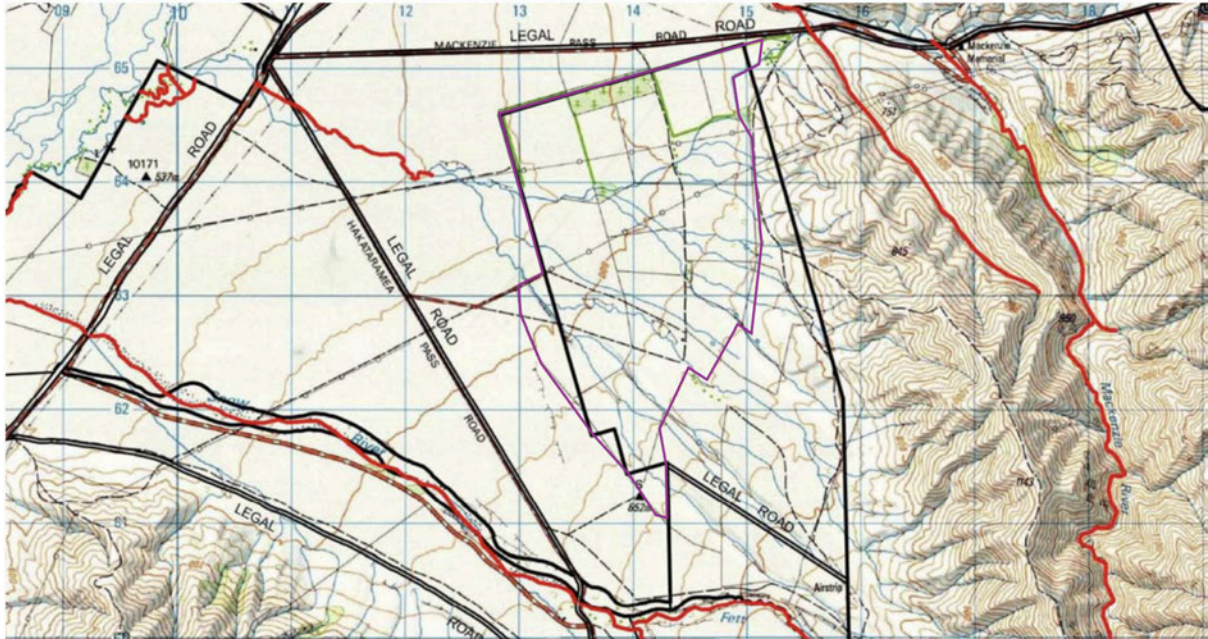


Figure 2 - Solar project boundaries (purple) in relation to marginal strips (red). For further detail refer to Attachment 1.

LINZ has also confirmed to Grampians, via email dated 19 March 2025, that no QWBs exist within the Relevant Land. Please see **Attachment 2** for this email.

For additional context, Helios also notes that the Relevant Land is subject to an irrevocable Substantive Proposal dated 9 February 2021¹ between Grampians and the Crown under which certain sections of land within record of title CB529/50, including the Relevant Land, will be transferred to Grampians freehold ownership (**Substantive Proposal**).

The implementation of the Substantive Proposal by LINZ is now in its final stages and Grampians expects the freehold title transfer (including the transfer of the Relevant Land) to be completed imminently. This transfer will not delay the submission of a substantive resource consent application under the Fast-track Act.

In summary, and based on the facts provided above, there are no circumstances requiring the applicant to consult with the Department of Conservation regarding a concession under the Conservation Act 1987.

Request Item 2

Confirmation regarding if, and how, the encumbrances shown on the records of title relevant to the project will affect your ability (as the applicant) to undertake the work

Response

The records of title relevant to the proposal are as follows:

¹<https://www.linz.govt.nz/our-work/crown-property-management/pastoral-land/location-crown-pastoral-land/grampians>

- **CB22F/781:** Freehold Owner is Grampians Station Limited (Grampians Station Limited is Helios' landowner partner pursuant to an Investigation Licence and Option to Lease for Solar Energy and Energy Storage Purposes dated 26 August 2024)
- **CB22F/783:** Freehold Owner is Grampians Station Limited
- **CB22F/784:** Freehold Owner is Grampians Station Limited
- **CB529/50:** Leasehold Owner is Grampians Station Limited, currently subject to a long term Crown Pastoral Lease

Aside from record of title CB529/50, Helios understands that the only record of title encumbrances applicable to other titles relevant to the solar project site is a mortgage to ANZ Bank. Obtaining mortgagee consent for a solar lease is a standard process for solar development and this is not anticipated to affect Helios' ability to undertake the work.

Regarding encumbrances on record of title CB529/50:

- *Deed of Easement 11649016.2:* The relevant easement area does not affect the part of the record of title within the solar project site area, therefore this will not affect Helios' ability to undertake the work.
- *Other encumbrances linked to existing Crown Pastoral Lease:* these will cease to apply once the Substantive Proposal has been completed and the Relevant Land is transferred to Grampians freehold ownership. As this will occur before a substantive consent application is lodged, and also prior to physical works being undertaken, these will not affect Helios' ability to undertake the work.
- *Encumbrances linked to Substantive Proposal:* while the Substantive Proposal will create a number of new public access and conservation management access easements across new freehold title issued to be issued to Grampians, none of these will be located within the solar project site (as shown in the map in **Attachment 3**) and therefore these will not affect Helios' ability to undertake the work.

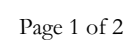
I trust that the above and attached information satisfies the request for further information.

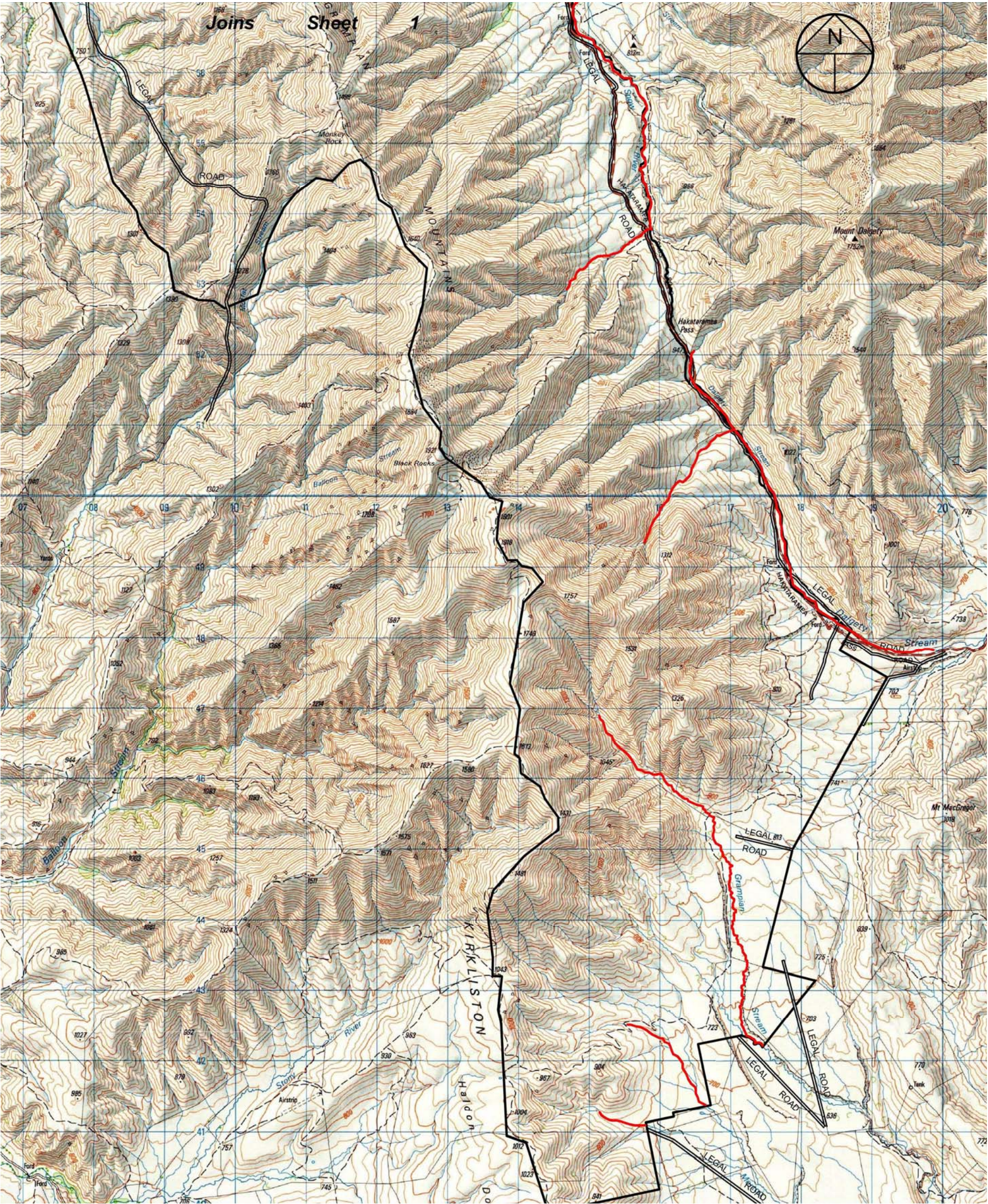
Please do not hesitate to contact me directly if you require anything further.

Yours sincerely

Jeffrey Schlichting
Director, Helios CAN Op LP

Attachment 1 - Grampians Qualifying Water Bodies map provided by LINZ





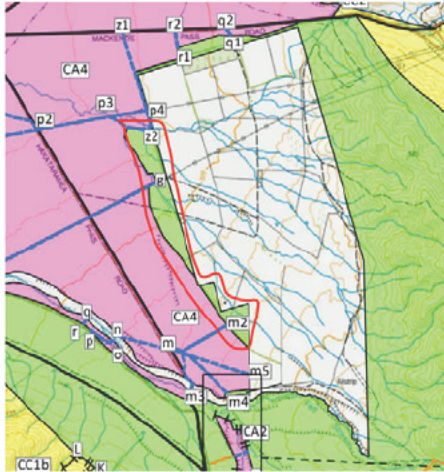
Attachment 2 - LINZ confirmation of no Qualifying Water Bodies within Relevant Land

From: Gary Walker [s 9\(2\)\(a\)](#)
Sent: 19 March 2025 11:11 AM
To: Simpson, Robert [s 9\(2\)\(a\)](#)
Subject: RE: FW: Tenure Review progress at the Gramplains

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Hi Bob,

As discussed, I provide The Gramplains Qualifying Water Body (QWB) plan for your information. You will see from the attached plan that there are no QWBs (shown in red) that are in the area to go to freehold and (circled below on the plan below in red) on the completion of Tenure Review.



I note that the "Proposed Responses" document, in the areas highlighted in yellow state "that the Department of Conservation marginal strip boundary restriction will cease to apply to the Relevant Land based on the Substantive Proposal designations plan shown in Appendix 1". This statement is incorrect. Once the QWB (also known as marginal strips) are identified, they remain in perpetuity.

I hope the above is of assistance Bob, and as always, please feel free to ring me if you have any questions.

Kindest regards

Gary Walker
High Country Portfolio Manager
Land & Property

[s 9\(2\)\(a\)](#)

Attachment 3 - Substantive Proposal Designations Plan

