

## FTAA–2502–1006: Application received for referral of the Grampians Solar Farm project under the Fast-track Approvals Act 2024 – Stage 1 decisions

### Project Name: Grampians Solar Farm

Date submitted:	26 February 2025	Tracking #: BRF–5885	
Security level:	In-Confidence	MfE priority:	Urgent

	Action sought:	Response by:
To Hon Chris Bishop, Minister for Infrastructure	Decisions on recommendations in Table A	To be advised

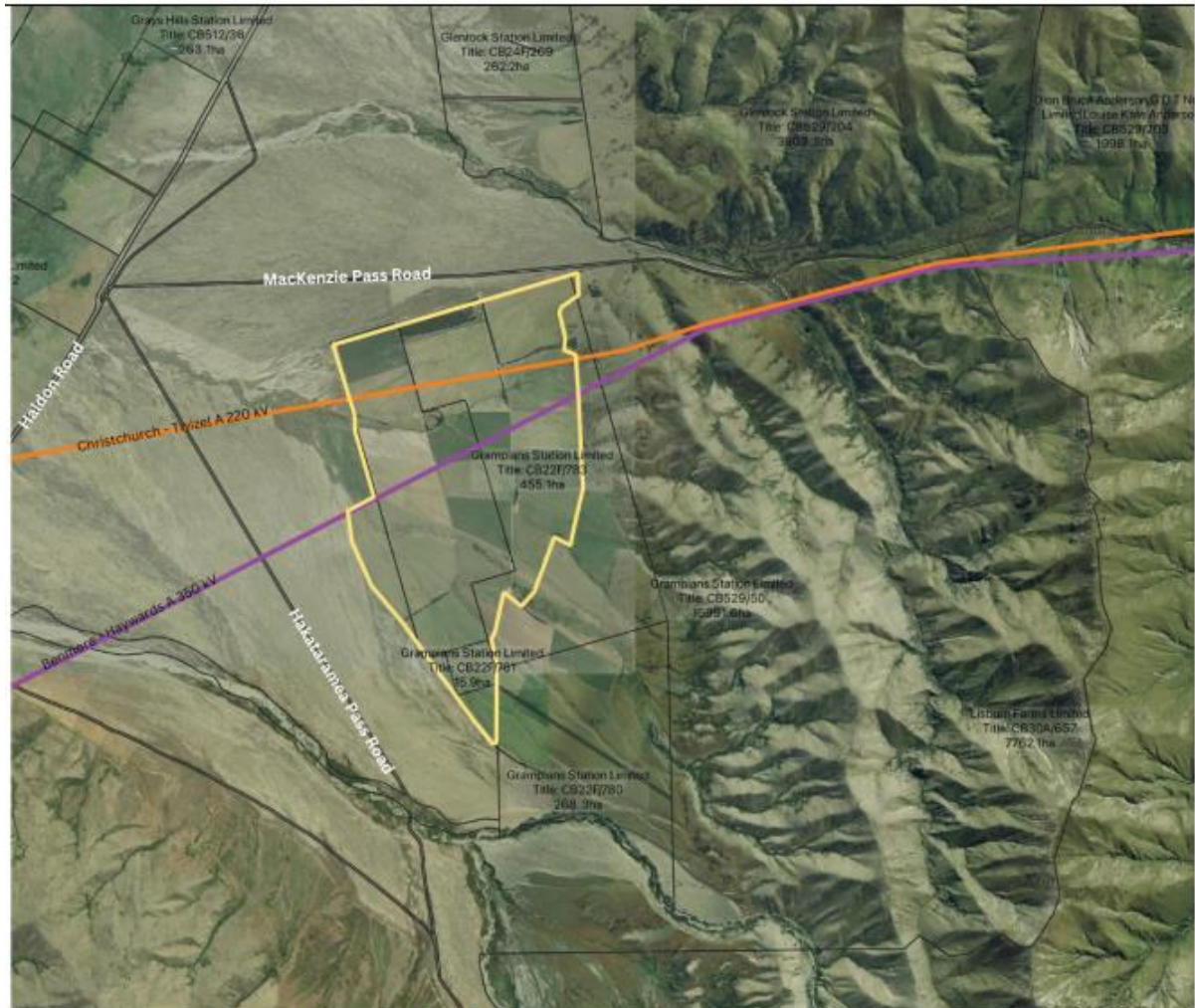
Actions for Minister's Office staff	<p><b>Return</b> the signed briefing to MfE <a href="mailto:FTAreferrals@mfe.govt.nz">FTAreferrals@mfe.govt.nz</a></p> <p><b>Send</b> attached letters (if signed)</p>
Number of attachments: 5	<p>Attachments:</p> <ol style="list-style-type: none"> <li>1. Application documents for the Grampians Solar Farm Project: (File Exchange link provided in email)</li> <li>2. Parties to invite comments from (including list of the Māori groups referred to in section 18(2))</li> <li>3. Draft letter to relevant portfolio Ministers – inviting written comments on the project under section 17(1)(b)</li> <li>4. Draft letter to other persons - inviting written comments on the project under section 17(5)</li> <li>5. Statutory framework</li> </ol>

### Ministry for the Environment contacts:

Position	Name	Cell phone	1 <sup>st</sup> contact
Principal Author(s)	Ben Bunting, Stephen Church		
Manager	Stephanie Frame	s 9(2)(a)	✓
General Manager	Ilana Millar	s 9(2)(a)	

# FTAA-2502-1006: Application request to refer the Grampians Solar Farm project under the Fast-track Approvals Act 2024 – Stage 1 decisions

Project location (yellow line indicates project outer boundary)



## Key messages

1. This briefing seeks your initial decisions on an application from Helios CAN Op LP to refer the Grampians Solar Farm project (the project) under the Fast-track Approvals Act 2024 (the Act) to the fast-track approvals process. At this stage you can either decline an application for the reasons set out section 21, or you can provide the application to, and invite comments from, the parties identified in section 17. If you do not decline the application, you will receive a further briefing following receipt of comments, to support your final decision on whether to refer the project.
2. The project is to establish and operate a 300 mega-watt solar farm with co-located energy storage, located on 574 hectares of pastoral land in the south-eastern corner of the Mackenzie Basin, 21 km south-east of Tekapo in the Canterbury Region.
3. The project is expected to generate the equivalent electricity to power approximately 70,000 households annually. The project comprises:

- a. Approximately 500,000 photovoltaic panels, panel mounting structures, and steel piles.
  - b. Associated components including inverters, transformers and electrical cabling to connect the solar panel arrays to the substation.
  - c. An operations and maintenance building, 1-2 spare parts containers, new and upgraded access tracks, parking and storage yard, water tanks, fencing, and a security system.
  - d. Energy storage facilities providing approximately 100MWh of storage capacity
  - e. A 220kV substation connecting the facility to the National Grid.
  - f. New and infill planting along existing shelterbelts, boundaries and native species enhancement of gullies and intermittent waterways.
4. The project will require the proposed approvals:
  - a. Resource consents under the specified Act – Resource Management Act 1991.
5. We have undertaken initial analysis of the referral application and this is presented along with our considerations and recommendations in Table A below.
6. We have decided the application is complete and complies with section 14 of the Act, as the application complies with section 13 requirements, may be capable of satisfying the criteria in section 22 and does not appear to involve an ineligible activity. The applicable fee and levy has been paid.
7. We recommend you progress consideration of the referral application to the next stage of analysis (Stage 2) and invite written comments from the parties prescribed in section 17(1) of the Act being: local authorities, the Minister for the Environment and relevant portfolio Ministers, relevant administering agencies, the owners of Māori land within the project area and identified Māori groups from section 18(2) of the Act. The parties are listed in Appendix A, Attachment 2.
8. We recommend that you invite written comments from the following parties as additional parties under section 17(5) of the Act:
  - a. Transpower NZ Ltd
9. We recommend that under section 20 you request further information from the applicant and relevant local authorities as detailed in Table A.

### Action sought

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10. Please indicate your decisions on the recommendations below in Table A

### Signature

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Ilana Miller  
**General Manager – Delivery and Operations**



Table A: Stage 1 analysis

	Project Name	Applicant	Project Location			
Project details	Grampians Solar Farm	Helios CAN Op LP	574 hectares of pastoral land in the south-eastern corner of the Mackenzie Basin, 21 km south-east of Tekapo in the Canterbury Region comprised in the following records of title: CB22F/781 CB22F/783 CB22F/784 CB529/50 (leasehold)			
Project description	The project is to establish and operate a 300 mega-watt solar farm with co-located energy storage, located on 574 hectares of pastoral land in the south-eastern corner of the Mackenzie Basin, 21 km south-east of Tekapo in the Canterbury Region.  The project comprises: <div><div>a.</div><div>Approximately 500,000 photovoltaic panels, panel mounting structures, and steel piles.</div></div> <div><div>b.</div><div>Associated components including inverters, transformers and electrical cabling to connect the solar panel arrays to the substation.</div></div> <div><div>c.</div><div>An operations and maintenance building, 1-2 spare parts containers, new and upgraded access tracks, parking and storage yard, water tanks, fencing, and a security system.</div></div> <div><div>d.</div><div>Energy storage facilities providing approximately 100MWh of storage capacity</div></div> <div><div>e.</div><div>A 220kV substation connecting the facility to the National Grid.</div></div> <div><div>f.</div><div>New and infill planting along existing shelterbelts, boundaries and native species enhancement of gullies and intermittent waterways.</div></div>					
Consultation undertaken	As required by s11, the applicant has consulted with:					
	Relevant local authorities	Relevant iwi authorities, hapu and Treaty settlement entities:	Relevant MACA groups	Ngā hapū o Ngāti Porou]	Relevant administering agencies	Holder of land to be exchanged
	<div><div>•</div><div>Mackenzie District Council</div></div> <div><div>•</div><div>Canterbury Regional Council</div></div>	<div><div>•</div><div>Ngāi Tahu</div></div> <div><div>•</div><div>Te Rūnanga o Arowhenua</div></div> <div><div>•</div><div>Te Rūnanga o Moeraki</div></div> <div><div>•</div><div>Te Rūnanga o Waihao</div></div>	N/A	N/A	Ministry for the Environment	N/A
Will project help to achieve the purpose of the FTAA? [section 22 assessment criteria]						
The project is an infrastructure or development project that would have significant regional or national benefits [section 22(1)(a)]	<div><div>The project has been identified as a priority project in a central or local government, or sector plan or strategy or a central government infrastructure priority list [s22(2)(a)(i)]</div><div>No – however, the applicant advises the project aligns with a number of key strategies promoting renewable energy to meet national targets including: Electrify NZ, National Party (March 2023), New Zealand Infrastructure Strategy 2022-2052, and The NZ Infrastructure Action Plan (May 2023).</div></div> <div><div>Will deliver new regionally or nationally significant infrastructure or enable the continued functioning of existing regionally or nationally significant infrastructure [s22(2)(a)(ii)]</div><div>Yes. The applicant notes that the scale of the proposed project and the strategic location (in one of the highest solar irradiance locations in the country) as well as proximity to robust National Grid infrastructure, the ~NZ\$450 million project is expected to generate the equivalent electricity to power approximately 70,000 households annually. It will also have significant job creation during the ~24 month construction period. This is expected to be in excess of 300 jobs during peak construction periods.</div></div> <div><div>Will increase the supply of housing, address housing needs, or contribute to a well-functioning urban environment [s22(2)(a)(iii)]</div><div>No.</div></div> <div><div>Will deliver significant economic benefits [s22(2)(a)(iv)]</div><div>Yes. The applicant states the project will deliver economic benefits including:</div><div><div>•</div><div>generation of renewable electivity to power approximately 70,000 homes annually</div></div><div><div>•</div><div>economic benefits of construction</div></div><div><div>•</div><div>employment during construction (300+ jobs) and ongoing employment once operational (5+ jobs)</div></div><div><div>•</div><div>enabling current land use sheep grazing of the land to continue once the project is operational.</div></div></div> <div><div>Will support primary industries, including aquaculture [s22(2)(a)(v)]</div><div>Yes. The applicant has entered into a lease arrangement with Grampians Station Limited for the duration of the solar farm which provides consistent, stable income to support the wider farming operation which includes sheep grazing and cattle breeding. The solar farm is designed to allow for ongoing sheep grazing of the site allowing for co-agricultural use of the project site once operational.</div></div> <div><div>Will support development of natural resources, including minerals and petroleum [s22(2)(a)(vi)]</div><div>No</div></div> <div><div>Will support climate change mitigation, including the reduction or removal of greenhouse gas emissions [s22(2)(a)(vii)]</div></div>					

	<p>Yes. The applicant states that renewable electricity use is likely to result in a material reduction in the use of fossil fuels (thereby reducing carbon emissions and wider reliance on fossil fuels)</p> <p><i>Will support climate change adaptation, reduce risks arising from natural hazards, or support recovery from events caused by natural hazards [s22(2)(a)(viii)]</i>  Yes. The applicant notes that New Zealand's current electricity mix primarily relies on hydroelectric power, supplemented by thermal (coal and gas) and wind energy sources. The addition of solar power at diversified locations across the country will enhance resilience to natural hazards and support recovery efforts in the aftermath of such events. Specific to the project, the applicant notes that Solar Farm is located away from areas of high natural hazard risk. The site is not subject to coastal inundation, flood risk, notable seismic activity or fault lines, enhancing resilience to climate-related hazards. The design and construction of solar farms further contribute to resilience against natural hazards, minimising down time after a significant weather event. Additionally, solar farms are not permanent structures with decommissioning at the end of the lease requiring land to be returned to conditions suitable for continued agricultural use. At the end of their operational life, a solar farm offers flexibility for future land use, either repowering, a return to the previous land use or a future use.</p> <p><i>Will address significant environmental issues [s22(2)(a)(ix)]</i>  Yes. The applicant notes the project provides a meaningful increase to New Zealand's supply of renewable energy necessary to meet both growing demand for electricity and to reduce greenhouse gas emissions. The project also includes fencing and protection of areas of ecological value (native species) so to exclude the current use of sheep grazing, and extensive native species planting in those areas so to enhance biodiversity.</p> <p><i>Is consistent with local or regional planning documents, including spatial strategies [s22(2)(a)(x)]</i>  Applicant states 'yes' noting alignment with policies under the Canterbury Regional Policy Statement, and Mackenzie District Plan that support renewable energy. The applicant notes project design and construction methodologies will be consistent with objectives and policies in the Canterbury Land and Water Regional Plan.</p> <p>The applicant also notes that the Mackenzie District Plan also promotes the restoration, preservation and maintenance of the Outstanding Natural Landscape, indigenous vegetation and biodiversity values. The proposed solar farm is not identified as a Site of Natural Significance in the Mackenzie District Plan and areas of indigenous vegetation have been identified with suitable setbacks and enhancement planting to increase indigenous biodiversity values. The existing shelterbelts on site boundaries provide significant screening of views of the solar farm site from the wider Mackenzie Basin protecting the Outstanding Natural Landscape values of the wider basin.</p>		
referring the project to the fast-track approvals process [section 22(1)(b)]	<p><i>Would facilitate the project, including by enabling it to be processed in a more timely and cost-effective way than under normal processes [s22(1)(b)(i)]</i>  Yes. The applicant notes that if the project were to follow a standard RMA District Council consent process, we would anticipate public notification, a hearing and Environment Court appeal being likely. We would expect these additional stages adding a minimum of 2-3 years to the project timeframe and significant additional costs in consenting and external support cost (more than \$1 million). Consequently, it is considered that the project will progress faster under the Fast-track process than the traditional RMA consenting pathway.</p> <p><i>Is unlikely to materially affect the efficient operation of the fast-track approvals process [s22(1)(b)(ii)]</i>  Yes. The applicant notes proposal will not materially affect the efficient operation of the fast-track approvals process. The applicant has been developing the Grampians Station Solar Farm since late 2020 and has undertaken extensive baseline technical assessment to inform the resource consent application (as is evidenced by the technical memos provided with this referral application). The project's connection investigations and preliminary design are already well advanced with Transpower as connection investigations began in 2021. The applicant states they have a fully engaged project team who are already progressing towards a full resource consent package, hence referring this project will see the substantive application lodged in the following few months to ensure the efficient operation of the fast-track process.</p>		
referring the project to the fast-track approvals process [section 22(1)(b)]	N/A		
referring the project to the fast-track approvals process [section 22(1)(b)]	<p><i>the impact of the proposed land exchange on the person or persons responsible for managing the Crown-owned reserve</i>  N/A</p> <p><i>compare the activity involved in the project against the current and other likely uses of the space, taking into account—</i></p> <ol style="list-style-type: none"> <li>the economic benefits and strategic importance of the proposed project; and</li> <li>the likely impact of the proposed project on current and proposed marine management regimes; and</li> <li>the environmental impacts of the competing activities.</li> </ol>		
Minister invites comments	<p><i>You must copy the application to, and invite written comments from [s17(1)]:</i></p> <ol style="list-style-type: none"> <li>Relevant local authorities – Mackenzie District Council and Canterbury Regional Council</li> <li>Minister for the Environment</li> <li>Relevant portfolio Ministers: <ul style="list-style-type: none"> <li>Minister for Energy</li> <li>Minister for Climate Change</li> </ul> </li> <li>Relevant administering agencies: <ul style="list-style-type: none"> <li>Ministry for the Environment</li> </ul> </li> <li>The Māori groups identified in Appendix A, Attachment [2]: <ul style="list-style-type: none"> <li>Te Rūnanga o Ngāi Tahu;</li> <li>Te Rūnanga o Arowhenua;</li> <li>Te Rūnanga o Waihao;</li> <li>Te Rūnanga o Moeraki;</li> <li>Aoraki Environmental Consultancy Limited; and</li> <li>Aukaha</li> </ul> </li> <li>The owners of Māori land in the project area identified in Appendix A, Attachment [2]: None</li> </ol>	<p><i>The Minister may also copy the application to, and invite written comments from, any other person[s17(5)].</i></p> <p>We recommend you invite comments from the following additional parties:</p> <ul style="list-style-type: none"> <li>Transpower NZ Ltd, because the project intends to connect to the National Grid, operated by Transpower and that connection will require approval from Transpower.</li> </ul>	<p><i>The Minister may request further information about a referral application from the applicant, the relevant local authorities, or the relevant administering agencies to be provided within the time frame specified in the request.</i></p> <p>We recommend you request the following additional information from:</p> <ul style="list-style-type: none"> <li>The applicant: on whether the project area includes development within the marginal strip boundaries identified on record of title CB529/50 and confirmation whether the encumbrances shown on the records of title relevant to the project will affect the applicant's ability to undertake the work.</li> <li>Canterbury Regional Council: on whether it considers the project and benefits to be regionally (or nationally significant), along with any comments on alignment with the Canterbury Regional Policy Statement.</li> <li>Mackenzie District Council: on whether it considers the project and benefits to be regionally (or nationally significant), along with any comments on alignment with the Mackenzie District land-use strategies and policies.</li> </ul>



	We consider the Minister of Energy and the Minister for Climate Change are relevant portfolio Ministers because the project includes large-scale electricity generation using renewable energy. They will be able to provide advice on whether the project is regionally significant.		
Recommendations			Minister's decision
a.	<b>Note</b> that section 23(3) of the Act permits you to decline the referral application without inviting comments from the relevant local authorities and any relevant Ministers.		
b.	<b>Note</b> that you have not yet provided the application to, nor sought any comments on it from, relevant local authorities or relevant Ministers but that you are required to do so if you do not decline the application under section 23(3) of the Act.		
c.	<b>Note</b> that section 21(3) of the Act permits you to forward an application to, and invite written comments from, any other person.		
d.	<b>Note</b> that section 22 of the Act permits you to request further information from the applicant or relevant local authorities at any time before you decide whether to accept or decline an application.		
e.	<b>Agree</b> to progress the Grampians Solar Farm Project to our Stage 2 analysis. The project warrants further analysis because we need to consider whether the project definitely meets the criteria in section 22 before providing you with our final advice on the referral application.		
f.	<b>Agree</b> to provide the application to, and invite comments from: <ul style="list-style-type: none"> <li>• Mackenzie District Council and Canterbury Regional Council under section 17(1)(a)</li> <li>• The Minister for the Environment, and the Minister for Energy and the Minister for Climate Change as relevant portfolio Ministers under section 17(1)(b)</li> <li>• The Ministry for the Environment as the relevant administering agency under section 17(1)(c)</li> <li>• Te Rūnanga o Ngāi Tahu, Te Rūnanga o Arowhenua, Te Rūnanga o Waihao, Te Rūnanga o Moeraki, Aoraki Environmental Consultancy Limited, and Aukaha under section 17(1)(d)</li> </ul>		Yes/No
g.	<b>Agree</b> to provide the application to and invite comments from the following additional entities/persons under section 17(5): <ul style="list-style-type: none"> <li>• Transpower NZ Ltd</li> </ul>		Yes/No
h.	<b>Agree</b> to seek further information from the applicant on whether the project area includes development within the marginal strip boundaries identified on record of title CB529/50, and confirmation whether the encumbrances shown on the records of title relevant to the project will affect the applicant's ability to undertake the work.		Yes/No
i.	<b>Agree</b> to seek further information from: <ul style="list-style-type: none"> <li>• the Canterbury Regional Council</li> <li>• the Mackenzie District Council</li> </ul> on whether how the benefits of the project are regionally (or nationally significant), along with any comments on alignment with the Canterbury Regional Policy Statement and the Mackenzie District land use strategies and policies.		Yes/No Yes/No
j.	<b>Note</b> that you have agreed to delegate to the Secretary for the Environment your responsibility to send all correspondence other than to Ministers		
k.	<b>Sign and send</b> the attached letters to the relevant portfolio Ministers.		Yes/No

**Signed:**

Hon Chris Bishop  
Minister for Infrastructure

**Date:**

**Appendix A:**

**Attachment 1: Application documents for Grampians Solar Farm project:**

## Attachment 2: List of the Māori groups referred to in section 18(2)

Name of group	Type of group (section of Act)
Te Rūnanga o Ngāi Tahu	Iwi authority (s18(2)(a)); Treaty settlement entity – Ngāi Tahu Claims Settlement Act 1998 (s18(2)(a))
Te Rūnanga o Arowhenua	Ngāi Tahu Papatipu Rūnanga (s18(2)(a))
Te Rūnanga o Waihao	Ngāi Tahu Papatipu Rūnanga (s18(2)(a))
Te Rūnanga o Moeraki	Ngāi Tahu Papatipu Rūnanga (s18(2)(a))
Aoraki Environmental Consultancy Limited	Entity owned by Papatipu Rūnanga (s18(2)(k))
Aukaha	Entity owned by Papatipu Rūnanga (s18(2)(k))



**Attachment 3: Draft letter to other Ministers – inviting written comments on the project under section 17(1)(b)**

**Attachment 4: Draft letter to other persons – inviting written comments on the project under section 17(5)**

## Attachment 5:

### Statutory framework summary

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1. You are the sole decision maker for referral applications. If you accept a referral application then the whole or part of the project will be referred to the fast-track approvals process.
2. If a Treaty settlement, the Marine and Coastal Area (Takutai Moana) Act 2011, the Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019, a Mana Whakahono ā Rohe or a joint management agreement provides for consideration of any document or procedural requirements, you must, where relevant:
  - a. Give the document the same or equivalent effect through this process as it would have under any specified Act; and
  - b. Comply with any applicable procedural requirements.
3. You must decline a referral application if:
  - a. you are satisfied the project does not meet the referral criteria in s22
  - b. you are satisfied the project involves an ineligible activity (s5)
  - c. you consider you do not have adequate information to inform your decision.
4. You may decline an application for any other reason, including those set out in s21(5) and even if the application meets the s22 referral criteria.
5. You can decline an application before or after inviting comments under s 17(1). However, if comments have been sought and provided within the required time frame, you must consider them, along with the referral application, before deciding to decline the application.
6. If you do not decline a referral application at this stage you must copy the application to, and invite written comments from:
  - a. the relevant local authorities
  - b. the Minister for the Environment and the relevant portfolio Ministers
  - c. the following relevant administering agencies:
  - d. The Māori groups identified in Appendix 2
  - e. The owners of Māori land in the project area.
  - f. you may provide the application to and invite comments from any other person.
7. You can request further information from an applicant, any relevant local authority or any relevant administering agency at any time before you decide to decline or accept a referral application (see section 20 of the Act).
8. However, if further information has been sought and provided within the required time frame you must consider it, along with the referral application, before deciding to decline the application.