

## **Statement for Helios Application – 20 August 2025**

My name is Jenny Grimmett. My submission on the Helios application was neutral, and raised a number of issues by highlighting gaps in the application. I still consider that there are gaps in the proposal that need to be addressed before any decision is made. The matters I am covering are within the scope of my original submission and largely coincide with the line of questioning by the Commissioners at the hearing yesterday.

I provide my statement as an individual but noting that my day job is a planning consultant. I therefore am relying on my experience as a professional planner in some of my comments. I acknowledge that I am not presenting expert evidence as this was required to be submitted prior to the hearing.

I have a Masters of Regional and Resource Planning (with credit, 1991), a Bachelor of Science in zoology (1986), and a number of postgraduate papers in environmental science, including chemistry of hazards.

I have over 34 years' experience in resource management and planning, working in both the public and private sectors around New Zealand. I work as a professional planner for my own company, Down to Earth Planning, which I've owned and operated for the last 11 years.

I assisted a number of submitters in preparing responses to the current application on a *pro bono* basis.

Much of my recent local work has been for development in the Rural Resource Area (Rural Zone) in Central Otago. I have also assisted Naseby Vision with a now operative Private Plan change to protect the dark skies in the area. I have walked and cycled a lot in the area, including to the ridgeline on parts of the Hawkdun Range where it is possible to look down towards the application site. I have also flown in light aircraft through the area. This experience is relevant to my statement, and my understanding of the local area and its issues, and my familiarity with the local community.

## Rural Amenity and Character and Landscape/Visual Effects

To date I have found the Council to be very particular about controlling the colour and the location of buildings in the Rural Zone, and it is quite difficult to convince officers to approve individual black structures in the Rural Zone, as black does not comply with the District Plan colour palette.

Paraphrasing Rural zone subdivision and land use standards, one house per 4 ha is an acceptable development density, but more buildings may not be in many circumstances as this adversely impacts on rural character and amenity values. The appearance of 660+ hectares largely covered with solid black structures will adversely affect rural character and amenity values if not mitigated effectively.

The initial landscape report prepared for the applicant noted that while the site is not within a Significant Landscape Protection area, it is part of an internationally significant landscape. This comment has not been followed up anywhere else by the applicant.

The landscape backdrop that the Hawkdun Range, Mt Ida, the Kakanuis and other mountains creates is significant for the tourism industry in Central Otago. The rural farming foreground contributes to part of that landscape by remaining as open and unencumbered spaces in the way that a famous painting is set on a wall in an art gallery. The painting sits alone on a big blank wall so that people can really appreciate its beauty. It's not cluttered by lots of other pictures close by. Putting 660+ ha of panels in the foreground of the majestic Hawduns will create visual clutter and a distraction that detracts from the unique, majestic, internationally loved character and amenity of the landscape, if the development cannot be successfully mitigated.

None of the applicant's assessments have placed value on agritourism and the use of the land for farming, local B&B operations or related tourist businesses. Farming is referred to as modification of the land, as if it is a bad thing.

None of the assessments have talked about the views of the site from elevated positions. These are available when people are flying over on

the scenic flights that occur in this area, or when small aircraft are flying through to somewhere else. From some parts of the walkways and 4WD trails in the Oteake Conservation Area on the Hawkdun and Ida Ranges, and Mt Buster areas the site will be visible. Even from this distance, looking down over the site, viewers will see a defined black shape in the landscape with unnatural, hard straight edges that does not reflect the character of the area. It will stand out against the softer greens and brown colours and variety of rural agricultural lines of shelter belts and fences and roads.

The mitigation planting is mostly in straight lines so will not necessarily soften the edges of the site when viewed from above/beyond the site.

### Mitigation Planting and Water Supply

The adverse visual and landscape effects of the proposal have been acknowledged by the applicant, with mitigation planting offered to screen the development. However, the reliance on this planting seems to be flawed as it in turn relies on a reliable water supply to irrigate the plantings to ensure their initial establishment and ongoing survival to the required effective screening height.

I was therefore surprised that the use of water crystals was to be relied on by the applicant for the proposed planting, but there is no mention of an irrigation system or a water supply in the applicant's evidence. Crystals will only work if the ground starts off wet and the crystals have soaked up enough water to release it slowly back to the plants. You still have to water plants when you use crystals as they will dry out.

This is a dry harsh climate with high winds.

If there's no water, the plants can't grow.

A reliable water supply needs to be addressed, both for plantings and fire-fighting.

### Reliance on Planting to Mitigate Other Adverse Effects

Several statements of expert evidence presented on behalf of the applicant to date seem to rely on one another. The traffic effects

assessment relies on the glint and glare assessment conclusions, which rely on the planting / visual / landscape assessment conclusions. Proposed planting (once it has established in 5 years) is intended to screen the development and mitigate glint and glare effects and hence alleviate traffic safety concerns. However, nothing has been stated that gives me confidence that the plantings will survive to achieve the proposed level of mitigation, based on lack of water, so all of the expert conclusions fall over.

### Lithium Batteries

The lithium batteries have been removed from the consent application to address submitter concerns. However, what will stop these being put straight back in again at a later date? An approved inverter container could be swapped for another with different contents and would anyone know? If batteries are proposed in the future, (and the applicant has indicated they intend to do so), this brings back the fire and contaminant risks.

Solar Farms trigger a consent in their own right under the Infrastructure Chapter of the District Plan. However, new buildings associated with existing infrastructure are permitted under these rules, subject to meeting certain standards.

If containers with batteries are to be used in the future I would question very carefully whether this could be done as a permitted activity without any recall back to the council for consideration. This needs to be addressed now rather than at a later date. Consent conditions need to address this now.

### Grass Control and Fire Risk

The use of sheep grazing underneath the panels has been mentioned in the s42A report and the application, as a way of keeping the grass down under the panels, and in doing so would deal with the risk of fire. Fire is very big threat out here in this dry climate. While this is raised in the planning officer report, the need for grazing or some form of grass control is not covered in conditions. There should be some fire control

method to avoid a fire risk, if grazing sheep are not going to be used for any reason.

### Panel Cleaning

Water is a precious resource in the Maniototo. There's meant to be some kind of regular cleaning process for the solar panels. The method has not been discussed but I can only assume it will require water. Where is the water coming from to do this and how often will the cleaning need to be done? How much water is required? Has anyone considered the actual effects of dust in this area on the panels? I know from living here that there's dust everywhere in summer and the dust gets on everything often on a daily basis. You can't just keep spraying water every time it gets dusty, as it wastes water. What is an acceptable water use to keep the solar panels clean and operating properly? Has that been considered?

### Effects on Local Businesses

I know the local tourism industry relies on the beautiful landscape character of the rural area. The Naseby / Hawkdun Range areas are among those special places that people from all over the world come to see, and stand amidst its wide-open space grandeur, under its big skies. They take photographs of it, and buy the Graham Sydney prints of it. Photography trips come here and bring people to learn about the area. We locals love this place.

If the solar farm detracts from the local amenity and character it could have adverse effects on the viability of local businesses.

Will people that come here to see the big open skies in the day and at night still come here when they see 660+ hectares of big black shiny panels on the side of the road at the gateway to Naseby?

The small businesses here are part of a small community. People are struggling to find ways to make money on top of their farming or other service. The level of employment linked with the proposal is also limited and short term, as after the initial construction period, the applicant has indicated only five people will be required. They indicate people will be bussed into the area, so there is no local economic benefit either.

The council is already struggling with its financial responsibilities for things like the three waters and roading, and rates are on the rise. If people can't run their own businesses anymore because no one wants to come and stay in the motels or walk in the hills because of this giant development, they will struggle to meet their rates requirements.

### Other Matters

The applicant has noted things like acoustic fencing and wind break fencing to assist with mitigation or plant survival. They have not also provided an assessment of the visual and landscape effects of these over the 660+ hectare site. This could be really significant visually.

### Conditions

1. Condition for a bond is required otherwise the Council cannot enforce decommissioning and remediation;
2. Water supply is needed for plant survival and all mitigation to be effective;
3. ORC consents are not in place – so will prevent activity commencing;
4. Use of lithium batteries need to be covered now – in case they are permitted later.

Thank you. I'm open to questions.