

My name is David (Dave) Charles Brady. I hold a Bachelor of Commerce degree from Otago University. I am an independent consultant with expertise in the commercial development of large-scale assets and in particular property and screen production facilities. I do not purport to be an expert in resource management law or solar generation development. I do have experience in the electricity generation industry as I spent eight years (1992 – 2000) with Contact Energy, in Clyde and Wellington, where some of my role was assessing the commercial viability of new or increased capacity generation projects.

I am here on my own behalf and while I am a member of many community groups and not for profits, I do not have authority to speak on their behalf.

My family has a strong connection with Central Otago and the Maniototo. I have children living in both Naseby and Ranfurly and grandchildren living in Ranfurly. My wife's family first settled in Ophir where her great-great grandfather was a stone mason, who worked on many of the notable buildings in the area. The family then turned on dairy farming. Her father and his parents were Ranfurly residents and when her parents married, they settled in Ranfurly. She has grandparents and parents in the Ranfurly cemetery and earlier ancestors in the Oamakau cemetery. I tell you this so that you will understand that I have a deep connection with the area, despite having grown up elsewhere in Otago and South Canterbury.

But my opposition to this proposed solar generation installation, is not because I am a Not in My Back Yard, NIMBY, but because it is in my front yard. And because I do not believe the benefits outweigh the costs to the community and environment.

I also question the economic impact that has been suggested in the proposal.

In preparing for today, I have reviewed the Assessment of Environmental Effects lodged with the application for resource consent and the subsequent revision, and the s42a report.

There are six elements that I would like to discuss today

1. Size and scale
2. Industrial versus rural
3. Location impact
4. Job creation numbers and impact locally
5. Transmission constraints

6. Impact on Dark Sky during construction.

First size and scale

The industrial development will be the largest built form on the Maniototo. It will be over twice the size of Ranfurly. Ranfurly is not built to capacity yet and there is still room for development within the town boundary for it to grow. But this industrial development will be over twice the size of the largest built environment on the Maniototo.

I question why this is not a plan change and the extent of change to the use of the land is so great that it cannot be ignored. Yes, sheep may still graze underneath and around this new industrial form of the development, but that is like saying a person who has 6 laying hens and sells eggs at their front gate is an egg farmer. This will no longer be farmland, it will be an electricity generation site.

The District plan deals with large scale electricity generation. The District has large scale electricity generation at Roxburgh and Clyde power stations. Roxburgh power station which has 320MW of installed capacity was commissioned in 1956. One must wonder if the Roxburgh Dam was proposed today, what the planning processes would. This thereby extends to this solar generation proposal. This is not a small 'change of use', this a significant change from rural to industrial use and as such needs to go through a proper 'Plan Change Process'.

Industrial versus Rural

The s42a report in paragraphs 118 through 121 considers the question of the effect on the rural character. However, it does not deal with the concept that this is a change of use. It implies that the predominate activity will remain rural. I do not agree with this implication, rather this is a significant change of character of the use of the land. Despite the best efforts of the developer to screen and with the use of planting and other measures, the land will change for rural to industrial. With such a change of use the commissioners must require that a plan change process be undertaken.

Location impact

This proposal may be not within the Natural Outstanding Landscape zones within the district plan. However, it is visible from major entry roads to Naseby

and Ranfurly. I question whether this is consistent with the current and desired future look and feel of the Maniototo.

Do we as a community want our front door to be an industrial corridor? I do not.

If the location was not on a main entry point to the main town and to the main tourism location of Naseby, then I believe there would not be such a large oppositional response from the community.

Secondly, is the South Island the right place for additional renewable generation? There is currently no non-renewable generation in the South Island. The predominant load centres are all in the North Island. I suggest that a North Island location would provide much better siting for the proposed development.

Job Creation Numbers and Impact Locally

The twenty-four month build program suggests a peak workforce of 200 jobs. It is likely that these workers will not be drawn from the Maniototo but rather imported from elsewhere due to their numbers and specialty. Certainly, there is some potential for additional work for locals in the areas of civil and general construction.

If these workers are to come to the Maniototo, are they to come daily? Are they to come and stay on the Maniototo?

The Maniototo currently has approximately 150 beds available for visitors. These are generally all used during the summer months for tourism visitors. Would the developer propose that the tourism activities cease while construction is going on? I do hope not, tourism is a critical industry for the Maniototo with many businesses and workers reliant on these tourists for income.

Transmission Constraints

I remain concerned that there is insufficient transmission capacity for the region. A lot of the renewable energy is transferred north. A lot of this via the Naseby Livingstone transmission lines. There is also the HVDC link between Benmore and Petone to consider. The HVDC has been at capacity for many years with little alternative for the export of renewable hydro power.

Secondly, the peak generation period for solar will be during the summer months when the wholesale price of South Island Hydro tends towards zero dollars per MWh. This must put in question the viability of adding more capacity to an already fullish South Island renewable generation platform.

Impact on Dark Sky during Construction.

The latest glare report suggests that there will be no impact on the light spill and pollution during the night hours post construction. I m worried that this report is not conservative enough to protect our Dark Skys.

The Naseby community has been working for the last 10 years on certification as a Dark Sky Community. The end is in sight for this certification. It would be a woeful oversight to compromise this after the Naseby Community and council have been so activity working on it.

There is little discussion on the impact of Dark Sky through the construction period. I note the hours of construction are to be within the hours of 0700 and 1800 hours each day. While there is no proposed conditions that limit hours of construction to these times. If the development was to proceed these hours must be codified and further that no lighting that does not comply with the lighting rules under plan change 22 should be allowed.

In conclusion, I maintain that the process for assessing this development need to be revisited and would like to see that a plan change process be required before this development can go ahead.

This is due to the size and scale of the development. This is not a short-term activity, and the impacts will be long and far reaching and need the due consideration that a plan change would give them.

This is a change of use from rural to industrial. This should not be allowed to go ahead without the due process of a plan change.

The location is not suitable for such an industrial development, and the proposal should be rejected.

The construction jobs will have a significantly detrimental effect on tourism, and the developers should be required to bring in temporary housing to cope with the influx. Such temporary housing would need its own resource consent, and it would likely have a detrimental effect on the fragile waters infrastructure of the Maniototo.

The transmission constraints should be overcome before the development proceeds.

The potential impact on Naseby's Dark Sky should not be overlooked and appropriate controls must be put in place.

Are there any questions?