

**BEFORE A COMMISSIONER APPOINTED BY THE SELWYN DISTRICT COUNCIL
AT SELWYN DISTRICT COUNCIL**

Under The Resource Management Act 1991 ('**RMA**')

In the matter of an application by KeaX Limited to construct and operate a 111ha solar array at 115 & 187 Buckleys Road, Leeston.

STATEMENT OF EVIDENCE OF SIMON ROBINSON

04 March 2024

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INTRODUCTION

- 1 My full name is Simon Robinson. I live at 79 Buckleys Road and I have resided there for roughly 12 years, choosing to settle my family in Brookside on our 5 acre property, after moving around various parts of the South Island after our immigration from The United Kingdom. My property is marked with the red box on the Applicants map below.



- 2 I provide this evidence on behalf of myself and Donna Irons, Donna and Dave Kewish, Michael Anneka Dalley, Clark and Elizabeth Casey, Corey Krygsman, and Anne and Donald Green (the **Brookside Submitters Group**), who were all part of the limited notified group and lodged submissions in oppositions to the KeaX Limited proposal RC235464 to construct and operate a 111ha solar array at 115 & 187 Buckleys Road, Leeston (the **Application**).

BACKGROUND

- 3 I currently work as a Civil Foreman for Fulton Hogan Limited and have done so for the entirety of our residence at Buckleys Road. This means that I commute roughly 65kms a day (round trip) to and from work and I do so happily, as we have deemed the extra travel time a worthy sacrifice, given the lifestyle it affords us.

- 4 We chose to reside in Brookside for the lifestyle – quite simply, we wanted a little piece of land that we could call our own and enjoy the tranquillity of. Since then, we have had the opportunity to rear our own livestock, grow our own vegetables and fruits, and made significant investment into numerous improvements to both our home and the land itself.

IMPACTS OF THE PROPOSAL

Effects on, Family and Wellbeing

- 5 After happily raising our family where we are, I am hugely concerned about losing part of the lifestyle that Donna and I have worked so hard to achieve over the years, due to a development that has no business going ahead on the fully farmland directly neighbouring our property. Donna & I work tirelessly both in our professional lives and in our home lives, as I'm sure you can appreciate that there is always something to do around a lifestyle block, and so we value the peace and refuge that our current surroundings enable us to have in our limited down time.
- 6 We have also become aware that one of the other neighbouring properties has had a property evaluation done, at their own expense. This has come back with findings of up to a 30% reduction in their property value, due to the land changing from rural to industrial/commercial titling. Whilst we have not had our own evaluation completed, this would surely apply to us as well, given we are located so close to the boundary of the site.

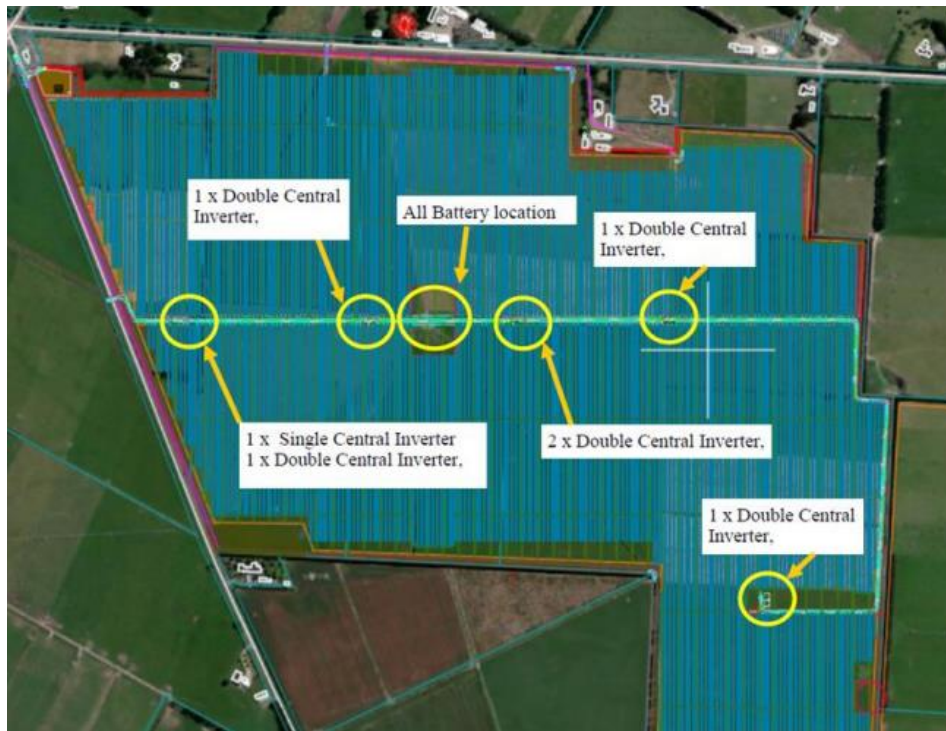
Amenity

- 7 Amenity value can be defined as the environmental characteristics of an area that contribute to the pleasantness and attractiveness of that area as a place to live, work or visit. Surely it would not be disagreeable to state that the construction of a 111ha solar farm right in the middle of surrounding lush, green countryside would have a hugely negative affect on this. As it stands, the existing views, noise levels and overall tranquillity of our neighbourhood will all be significantly altered should this proposal go ahead. These impacts will not just impact the immediate neighbours to the Application site, but also wider members of the community who live, work and play in the area and also come into 'contact' with the Application site on a regular basis when walking, biking, and enjoying the surrounding area of their neighbourhood.

Visual & Noise

- 8 As the below photos show, the proposed boundary lines for the site have changed since the first submission and now encroach even closer to our property. I accept that the this application needs to be assessed on its own merits and shortfalls, however the original visual impact report conducted by KeaX Limited stated that the boundary of the site was 120 metres away from our dwelling. After conducting my own measurements, I have concluded that the closest point from our dwelling to the boundary is now 59 metres under the current Application. This means that we will be able to see the site through our back hedge, as it is very sparse at the bottom. We are also concerned that we will be affected more so now by the noise from the cooling fans and inverters, as the inverters are now centralised along a line that is closer to our boundary.
- 9 The comparison made in the report submitted by Dr. Zac Beechey-Gradwell (2024, February) regarding the Wairau Valley based assessment on noise levels is irrelevant, as there is only one inverter there – whereas there is planned to be 6 double central inverters and 1 single central inverter. We will also surely be affected continuously by the on-going construction noise while the site is established (which I also understand to be proposed to occur on weekdays and Saturdays as well) as well as future maintenance activities that will be undertaken.





Natural wildlife

- 10 As I'm sure you can imagine, living rurally comes with the added benefit of being surrounded by a number of different wildlife.
- 11 We love gazing out to the lush open pastures and cows grazing in the neighbouring paddock, and listening to the many native birds chiming in and around our property. I am concerned that the electromagnetic fields surrounding the proposal site will have hugely negative impacts on these. Of particular concern, is the effect on the large bee population we have around our property – a decline in this would have a detrimental effect on our pastures and vegetable gardens due to lowered pollination rates. Operation of the solar farm (and especially when considering the indefinite term) could also disrupt the local ecosystems and other wildlife habitats, affecting the balance of pests and beneficial organisms around the area.
- 12 I am also aware that the introduction of solar panels has the potential to increase the temperature around the panel sites significantly. We already experience terribly dry summer periods, especially without irrigation, and I consider that the Application does not provide an adequate level of assurance around fire. The event of such would be disastrous, and with the solar batteries being highly flammable, particularly difficult to extinguish and full of toxic fumes in the event of ignition, we and many other neighbouring properties would surely be at high risk of property damage, long-term health risks or even death due to exposure.
- 13 I have read the evidence of Mr Hainsworth where he cites some recent research regarding the highly flammable nature of some crops and horticulture activities. The Application attempts to

manage the highly productive land issues by addressing some potential primary production activities that could be undertaken across the site. As well as potential grazing of sheep, horticulture options are also touched on, including the growing of berry fruits. I do not understand how this would be a suitable option, and expect these options are introduced to 'tick the box' for the highly productive land concerns, but have been introduced with little consideration for their appropriateness.

Stormwater Management and contaminant runoff

- 14 We have concerns relating to stormwater and contaminant runoff from the proposal. Our property currently lies down-gradient of the proposed site, and we already experience a tremendous amount of flooding when there is heavy rainfall, due to the heavy Clays found throughout with minimal drainage abilities. Installing the proposed panels is sure to alter the drainage and runoff patterns dramatically, and I understand from the evidence of Mr Hainsworth that this is likely to impose greater runoff issues, above what is provided for under the ECan consent. Due to having lived at the Property for some many year, I know our property is directly impacted by overflow paths form the Application Site.
- 15 The pictures below was taken following a storm, we simply cannot be put in a position that increases the level of flooding on our property any more than it already does.



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Contamination

- 18 I would also like to make note of the potential that contaminated water from the panels could leach into our soil. This could drastically alter the soil profile of our property, resulting in reduced grass and crop growth, negatively effecting both us and our livestock hugely. Soil contamination would result in our significant investment into testing, fertilizers, and other management avenues, just to ensure our property was at a safe and workable level.
- 19 Though the report submitted by Dr. Zac Beechey-Gradwell (2024, February) suggests that the likelihood of leaching into the soil is low, we find it hard to view these findings as substantial evidence due to the non-comparable land used. The land at the Wairau Valley Solar Farm is composed of old forestry ground, that will be highly acidic and non-productive due to the strong presence of pine trees and the grounds previous use.
- 20 Our property uses a well in order to source the water that services the household. I would like to raise that we also cannot be sure that any contaminated runoff from the panels won't end up at this source, therefore rendering our water unusable and undrinkable. There are also berms that run alongside the front of our property that house a number of wildlife, the information provided by the Applicant gives me no assurance here no contaminated run-off will reach those and have an effect. Again, I don't believe that anyone can guarantee that contamination will end at the proposed site boundary.

Livestock

- 21 We frequently have a number of sheep, horses and pigs on our property – both for lifestyle purposes and consumption. I am deeply concerned that their exposure to metals through runoff may have implications on their health and the end use of animals we keep for home-kill.
- 22 I have had multiple conversations regarding the potential effects on livestock that have been grazed on solar sites, and frankly I am not convinced that anyone can guarantee we won't be subject to the same risks, simply because there is a fence between us and the proposed site.

Home reared animals are the main source of our meat. Notwithstanding the impacts that the heavy metals will have on the Application site herds (if this primary production activity is to be progressed), I am concerned that our animals will be contaminated, imposing animal welfare concerns, but also putting us at risk if we continue to consume them. We also often breed our ewes, and are concerned that there could be birth defects or birthing complications due to their exposure. I know that animals are checked upon entry to meat work factories with metal detection tests and have been advised that it is likely stock directly exposed to metals would fail this test and be rejected from the factories – deeming these animals entirely unusable for the purpose they are reared.

Effects on the wider community

- 23 The proposal itself has already caused rifts between neighbours that were once close, and on the tightly knit community. Those in our neighbourhood with the same stance as us would agree I'm sure - that it is not pleasant to feel as if you are being forced out of your lifestyle, by those who know firsthand how lucky we are to have it in the first place. There has been no engagement sought from the wider community either – something I would have deemed appropriate given the nature of the proposal, the size of the site and the supposed community benefit that the Applicant boasts. I would also add that given this, surely the proposal should have been publicly notified. Instead, Campbell McMath has claimed that he has consulted with us, when in fact we have only received one generic email and after the application was filed. If he was a responsible developer who wanted to meaningfully engage, he would have called a public meeting to facilitate conversations around the proposal before he had even begun the application process.
- 24 It has also not been forgotten that when Campbell first became interested in placing the solar farm in Brookside, he tried to slip under the radar by only approaching Clark Casey and asking him to consent on behalf of the neighbourhood! It has also been noted that he has claimed to the commissioner in the earlier hearing, that there are 3 kva lines, when there are actually only 2. The community has lost faith in the integrity of the Applicant, and are concerned not only about the Application, but also about how this site will be managed if Approved given the conduct of the Applicant.
- 25 I would like to note that there is absolutely no direct benefit to those who this proposal will affect the most, with the power destined to serve the Rolleston/Lincoln area. I would ask why the proposal site hasn't been situated closer to these areas then, instead of on valuable agricultural land that is more than 20km away. It makes no sense to sacrifice our valuable countryside and productive land for sites such as this, and as quoted in the provided article *"As we take solar to the next level, we must be thoughtful, sensitive to public opinion, and mindful of the wider environmental and visual impacts"*. Campbell McMath has the luxury of living 9km away from the proposed site, and will feel no such impact, however we will and it feels as if there is a complete disregard for that.

26 I would also like to note that as a community, we struggle to understand why this proposal is being so forcefully pushed upon us in the first place. As referenced multiple times in the provided article named '*The Problem with Solar Farms*', there are many shortfalls regarding Solar energy. If solar farming were in fact the saving grace that it is being claimed to be, then why isn't it being adopted everywhere? Why isn't every new-build home being fitted with solar panels? Why isn't everyone speaking about the overall price of power decreasing since the introduction of solar farms? Unfortunately we can't help but think that the driving factor behind this proposal is nothing but profit, greed and an absolute disregard for those it effects in order to achieve this, hence why anyone who may have a negative stance has only been drip-fed information.

CONCLUSION

27 With consideration to all of the concerns raised previously, I seek that the proposal be declined in its entirety.

28 In the event that the proposal is not declined, I seek meaningful consultation be undertaken to develop a palatable set of conditions, including that quarterly water & soil contamination testing is carried out by independent professionals with no conflict of interest in the site, for the life of the solar farm.

29 I would also seek monetary compensation for all of the above concerns raised, for myself and all other affected properties who stand to lose the way of life they have worked tirelessly to have.

Simon Robinson

4 March 2024