

REVIEW OF RESPONSE LETTER

Prepared for: Selwyn District Council (SDC)

Date: 5 February 2025

Consultant: Jamie Gordon

On the 17th January 2025 the Selwyn District Council (SDC) received a letter from Mitchell Dayish Ltd on behalf of Darfield Solar and Energy Storage Ltd (“DSES”) responding to further information required by the SDC. Jane Anderson (Consultant Planner SDC) has requested a review of the responses that relate to the NPS-HPL in this letter.

MRB provided a report to the SDC on the 15th December 2024 titled “Review of Highly Productive Land (HPL) Assessment”. It is noted that the request for further information made by the SDC was made on the 12 November 2024 prior to MRB providing this report.

Review and comments to the responses refer to the numbering in the letter and table provided by DSES.

11. Please advise if the applicant has investigated the economics of installing irrigation.

The MRB report considered irrigation in section 5.2. but concluded that the Landowner was unlikely to become a shareholder in the Central Plains Water (CPW) Irrigation scheme and therefore the report assumed the property would not attain any irrigation capability.

The DSES response considered the SDC Request was beyond the scope of what the NPS_HPL under Clause 3.9(3). Part (a) of this clause states “*minimises or mitigates any actual loss or potential cumulative loss of the availability and productive capacity of highly productive land in their district; and*”. Irrigation does impact the productive capacity and versatility of the land and therefore I believe the ability to attain irrigation should be considered in an HPL review.

12. Please advise if the applicant have a baseline nutrient loss (Overseer) for the property

The baseline nutrient loss may impact the type of farm system that can be implemented, particularly if irrigation was available. A low nutrient loss baseline could restrict the introduction of some farm systems and ultimately the productive capacity and versatility of the land.

It is acknowledged that without the ability to irrigate the current baseline will have less impact on the type of farm system that can be implemented.

- 13. There is limited detail on the type of Solar panels, apart from noting that they are single axis trackers. The type of drive mechanism is important as this can impact the farm management programme. The layout of them is also important for the movement of vehicles. Please provide further information to address these matters**

The response from DSES is *"Further detail of the solar panels and drive mechanism will not be known until the detailed design / procurement stage of the project. It is not practicable to specify this information at this at this stage, nor is it considered necessary for the reasons given above."*

It is assumed that the reason DSES does not consider providing design details necessary (as highlighted above) is based on the commentary in section 11 of the DSES letter, *"This demonstrates that the productive capacity of the site will remain largely unchanged and effects will be less than minor (and the existing grazing use can continue largely unchanged). In light of this DSES considers that the HPL matters requested are not necessary for consideration of the application."* I disagree with this view and whilst it may not be practical to provide the final design, it is important that provision be made in the initial design so that typical farm practises such as mowing, rolling, baling, drilling, weed control and stock grazing and movements can be undertaken. If these practises are compromised by the design of the solar farm, then the productive capacity and versatility of the land will be impacted.

Sections 4.0 and 5.4.4 of the MRB report discusses key design considerations. Of these the drive mechanism of the Single Axis Tracker (SAT) panels, the turning distance at the end of the rows and the gap between the rows are considered the most important design features that could impact agricultural vehicle and machinery related activities.

On page 3 of the DSES letter in the "Transport" section the SDC requested *"In order to maintain the existing agricultural activities on site, it is anticipated that vehicles with agricultural implements (such as mowers, balers, drills and sprayers) may be required. In the event that agricultural implements will be required, the applicant may wish to consider the proposed setback of the solar array from internal and road boundaries and whether there is sufficient space for manoeuvring."*

DSES responded *"The detailed design of the development will include accommodating any maintenance equipment and machinery necessary for the site, as well as compliant turning circles for fire appliances to manoeuvre safely within the internal access track network."*

The DSES response does not specifically refer to agricultural vehicles and machinery, although it may be included in the maintenance equipment and machinery. The turning circles are to be compliant for fire appliances to manoeuvre safely, however large agricultural equipment may require a larger turning area than fire appliances. Without more specific design parameters it is difficult to assess if the solar farm layout will impact the use of agricultural vehicles and machinery.

Disclaimer

Neither the author or Macfarlane Rural Business (MRB) are formally trained in policy and planning or experts in solar electricity generation. MRB consultants are land-based agriculturalists focused on optimising physical production and financial viability of primary production systems.

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