

From: [Adrian Loo | Forest Management Group](#)
To: [Online Resource Consent Applications](#)
Subject: Re: RC246059 - 80 Struie Road, Hororata - Limited Notification
Date: Tuesday, 1 April 2025 12:11:44 pm
Attachments: [Outlook-A green an.png](#)

Dear SDC,

Response to RC246059 - Limited Notification: We object to the consent being issued as per the current application.

Thank you for the opportunity to submit on this consent application. As an immediately adjacent property owner, we have some concerns which we have raised below. As the consent application currently stands, we would object to the consent being issued as we believe there are issues needing attended too.

The greatest risk to us as a neighbouring forestry block we consider fire. This is probably a risk that can be managed appropriately, ideally by strengthening the conditions of consent, rather than one that means a solar farm shouldn't be built on that property. To expand briefly on the risk, and acknowledging I am going to make some generalisations that are not representative of all solar farms:

- The solar farm is essentially a grassy paddock with about 12,000 live electrical current sources (solar panels).
- Solar farms typically do not arrange their own water source (at the scale required for fighting a fire).
- Once operating the facility is likely to be unmanned most of the time (relies on remote monitoring).
- Pasture control is important for mitigating fire risk but is sometimes neglected by operators who are more interested/knowledgeable in electrical matters than pasture matters. Grazing can be established in theory but is not always successful in practice. Mowing and spraying around the solar structures is expensive and therefore a risk of being neglected. (Is spray drift an issue for you?)
- Conditions of consent proposed by the developer do include creating a fire response plan, but there doesn't appear to be an expectation that FENZ or anyone else needs to be satisfied with that plan, nor is there evidence of considering fire risk mitigation in the plant design/layout.

In addition, the risk of fire (without approval of a fire response plan approved by from our insurer/FENZ) may have negative implications for our insurance cost as a neighbouring property with a standing forest with a timber value of over \$500,000. We would want a condition included that the fire plan is approved by FENZ and our insurer to ensure that it is sufficient if a fire occurs.

We also have concerns about the setbacks, and these are not clear from the drawings. We would want sufficient setbacks in place to ensure that an existing tree does not fall on the solar farm. Typically, electricity lines companies request a two-tree length buffer from infrastructure. We expect this size buffer as a minimum would be suitable in this case.

Likewise, a gravelled fire break between the solar farm and neighbouring properties is suggested as a suitable risk management for fires starting within the solar farm (or started from reflection from sun or infrastructure caused refraction).

The trees could also shade the solar farm which might cause conflict and is a disadvantage to the solar farm operator.

We are willing to work with the Solar Farm applicant to plan an appropriate clearance buffer and are open to negotiating the clearing of trees from our property to install this buffer if design constraints limit the buffer space available.

Please let me know if you have any questions on our objection and/or if you (or the application) would be available to discuss these issues.

Thanks,

Adrian Loo
NZIF Registered Forestry Consultant/ MInsD



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From: Online Resource Consent Applications
<Online.ResourceConsentApplications@selwyn.govt.nz>
Sent: Monday, 10 March 2025 3:46 pm
Subject: RC246059 - 80 Struie Road, Hororata - Limited Notification

To whom it may concern

Limited Notification of Applications for the construction and operation of a 10ha solar array (solar farm) at 80 Struie Road, Hororata.

Selwyn District Council has received resource consent application RC246059 for the construction and operation of a 10ha solar array (solar farm).

Please note, application documents are available via WeTransfer link due to the size and number of documents for this application - <https://we.tl/t-qDUPx2ILX9> (please note this link expires 7th April 2025)

Information relating to the application and the Council's decision to notify the application can be found on the Council's website: <https://www.selwyn.govt.nz/property-And-building/resource-consent/limited-notified-resource-consents>

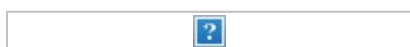
The Council has made the decision to limited notify the application. The submission period now closes on **Monday 7th April 2025 at 4:30pm.**

Please do not hesitate to contact the Duty Planner, Ph (03) 347 2800 or email duty.planner@selwyn.govt.nz

Yours sincerely,

Yasmine Binnie

Online Resource Consent Applications



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