

Memorandum

Christchurch

Level 1
141 Cambridge Terrace
Christchurch 8013
PO Box 110
Christchurch 8140

+643 366 8891

Whangarei 15 Porowini Avenue, Morningside, Whangarei 0110

Auckland PO Box 91250, Auckland 1142

Hamilton PO Box 1094, Hamilton 3240

Tauranga PO Box 13373, Tauranga 3141

Wellington PO Box 11340, Wellington 6142

Nelson 27 Vanguard Street, Nelson 7010

Queenstown PO Box 1028, Queenstown 9348

Dunedin 49 Water Street, Dunedin 9016

Attention: Brad Henderson

Company: Lodestone Energy Limited

Date: 05 February 2026

From: Sue McManaway / Rhys Girvan

Message Ref: Haldon Solar Farm FTAA-2508-1097 Landscape Response to MDC Comments

Project No: BM240408

Boffa Miskell Limited (**BML**) has previously been commissioned by Lodestone Energy Limited (**Lodestone**) to prepare a Landscape Effects Assessment dated 22 August 2025 (**LEA**), to accompany an application for consent sought under the Fast-track Approvals Act (**FTAA**).

We have now been asked by Lodestone Energy Limited (Lodestone) to respond to comments received from the Mackenzie District Council (**MDC**) in regard to our LEA.

To prepare this memorandum, we have reviewed the Planning Review Comments by Nick Boyes on behalf of MDC (**the Planning Review**) with a particular focus on the Vivian + Espie Peer Review of the Boffa Miskell Landscape Effects Assessment Report (**the Peer Review**), both dated 2 February 2026.

We note that there is a broad level of alignment with the Peer Review who finds our commentary on effects on landscape values, natural character and visual effects other than those viewpoints noted, generally plausible and appropriate.

We have identified three main areas which express minor differences in regard to the assessment of effects with additional comments on cumulative effects and in regard to the relevant planning framework. We set these out below, followed by our response on each.

More broadly we note the and that the Peer Review generally considers that the BML assessment has been done appropriately and has come to credible conclusions.

Comments and Responses

1. Differences in Assessment of Effects

a) Visual Effects Ratings:

Haldon Arm Road

- BML find visual effects are **low–moderate**.
- The Peer Review considers the panels will be 'prominent' and effects are **moderate**.

Ohau C Power Station and Falston Road in the vicinity of the campground

- BML find effects are **low**.
- The Peer Review considers effects are **low–moderate**

Response to differences in visual effects ratings:

- We note differences in visual effect are nominal and it is agreed that the Site sits in a remote part of the Mackenzie Basin, well away from populated areas, high-use roads or well-used public locations.
- The nearest public viewers on Haldon Arm Road would be approximately 300m from the nearest panels at the closest point. This setback was a key recommendation in the project shaping stage and is considered to reduce potential for prominence and consequent levels of visual effect from this road.
- In regard to Haldon Arm Road, Ohau C and Falston Road, these are not fixed views from residences – even at the Ohau C lookout, it is a transient viewing audience and we have considered that the panels are less likely to be experienced as prominent / detracting from landscape values in such transient views given the existing modifications in the wider context and the way the solar farm is integrated into the Site i.e. contained by the line of vegetation and tucked against the break in slope of Mt Maggie.

b) Reliance on Vegetation on Public Land:

- The Peer Reviewer notes that our conclusions in regard to views from Lake Benmore (and the McAughtries Road/Falston Road area) rely on external lakeside vegetation not controlled by the applicant and therefore could be removed in the future.
- The Peer Reviewer considers there are areas where new vegetation within the Site could future proof / bolster the existing external planting and the Planning Review recommends a condition to require this additional planting.

Response to reliance on vegetation on public land:

- There is general agreement on the mitigating function of the existing vegetation although we have considered that the lake scarp will assist in screening close views where it is most pronounced.
- A condition on planting could be tied to the potential future removal of the existing lakeside vegetation should this eventuate i.e once future plans regarding the maintenance / removal of the lakeside vegetation are known, planting within the Site could be undertaken in advance. We have considered that the relatively secluded, contained location dilutes potential landscape effects beyond the Site and immediate setting.

c) Landscape Effects Ratings at Mackenzie Basin (ONL) Scale:

- BML concluded there would be a **neutral effect** on landscape values at the overall ONL scale.
- The Peer Reviewer considers there may be a **very low-level adverse effect** at this scale.

Response to differences in effects ratings at the ONL Scale:

- The level of effect on landscape is influenced by the size or spatial scale, geographical extent, duration and reversibility of landscape change on the characteristics and values within the specific context in which they occur. Nonetheless, we agree any adverse effect at the broader ONL scale would be at the very low end and akin to a negligible effect when placed on the continuum of a standard seven-point scale.

2. Assessment of Cumulative Effects on Landscape

a) Cumulative Effects Comments:

- The Peer Review and Planning Review note that BML have been commissioned to undertake an assessment of the cumulative effects on the surrounding landscape and that to date this

has not been received and does not form part of Mr Espie's peer review or these planning comments.

- The Peer Review considers the current solar farm application will not combine with any existing or consented facility to create a cumulative effect but 'when the time comes to consider a number of solar farms in the Mackenzie, cumulative effects are likely to be important'.
- The Peer Review, supported by the Planning Review, consider that at this time, the more relevant issue is likely to be the cumulative effects of numerous solar farms on the overall values of the Mackenzie Basin ONL, i.e. effects on the way the community perceive, characterise and value this landscape.

Response to cumulative effects comments:

- Following questioning by the Fast-track Panel, BML were engaged by Lodestone to assess cumulative effects on the landscape, accounting for Haldon Solar and The Point projects. While not part of the existing environment, the proposal for a solar farm on "The Point", approximately 2.3km northwest of the Haldon Site, is registered on the Fast Track project list and therefore, a closer review has been undertaken.
- We agree that, as additional solar farms become part of the existing environment, cumulative effects on the overall values of the Mackenzie Basin ONL are likely to become a very relevant consideration. The BML assessment of cumulative effects finds the combined presence of The Point and Haldon Solar Farm would result in an appreciable change at the Sites but as a dispersed pattern and the existing coherent character of the expansive basin and the wider basin ONL values, will remain.
- We understand that Lodestone intends to submit our more detailed assessment which confirms our findings of moderate cumulative effects on the surrounding landscape when considered together with the Point.

3. Relevant Planning Framework

a) Renewable Energy Generation Chapter Comments:

- The Peer Review and Planning Review note that the Renewable Electricity Generation (REG) chapter of the District Plan is now more enabling of new REG within Te Manahuna/the Mackenzie Basin ONL.

Response to Renewable Energy Generation Chapter comments:

- We acknowledge that the REG Chapter of the District Plan forms part of the relevant statutory context in which effects should be considered.