

17 May 2025

Mr Brad Henderson  
South Island Development Manager  
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AUCKLAND 0740  
[delivered to: [REDACTED]]

Tēnā koe Brad,

### **HALDON SOLAR PROJECT – LANDSCAPE ASSESSMENT**

Aoraki Environmental Consultancy Limited (AECL) thank you for the opportunity to review and comment on the Landscape Effects Assessment and Glint and Glare Summary prepared for the Haldon Arm Station Solar Farm proposal by Boffa Miskell (File Reference: BM240408 Haldon\_Solar\_LEA\_20250409.docx) dated 9 April 2025. This response refers to the information provided in your email dated 10 April 2025.

This letter provides feedback from Arowhenua on the Landscape Effects Assessment and Glint and Glare Summary so it can be addressed in the Assessment of Environment Effects report (AEE) yet to be prepared. This letter does not represent the affected parties written approval of Te Rūnanga o Arowhenua (Arowhenua) and/or AECL for the new solar farm proposal to be reviewed and assessed as part of the Fast Track process.

AECL has no concerns with the technical aspects of the report nor do we recommend any changes to the report in terms of gaps in the analysis. However, it is noted that the assessment of the objectives and policies from Plan Change 23 to the Mackenzie District Plan does not correctly recognise Policy NFL-P1.

Policy NFL-P1 states:

*Recognise the values of the identified ONF and ONL overlays on the Planning Maps and protect these values from adverse effects by:*

1. **avoiding** inappropriate subdivision, use and development in those parts of outstanding natural features and landscapes with limited capacity to absorb such change;
2. **avoiding** inappropriate use and development that detracts from extensive open views, or detracts from or damages the unique landforms and landscape features;
5. ensuring buildings and structures are designed to minimise glare and the need for earthworks, and are mitigated by plantings to reduce their visual impact where appropriate; and
6. recognising and providing **protection for identified values in Sites and Areas of Significance to Māori**;

The use of the term 'avoid' or 'avoiding' has a strong threshold under the current Resource Management Act 1991 (RMA) legislation. An analysis that does not include the key component of the policy is misleading to the assessor. AECL recommend the report writer correct the accuracy of the referencing of this policy to recognise the importance of "avoid" in the AEE.

Please contact our Principal Planner, Kylie Hall by phone on [REDACTED] or by email [REDACTED] you have any questions or require further clarification.

Ngā mihi



**Ally Crane**  
General Manager  
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