



# Memorandum

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Attention: Brad Henderson

Company: Lodestone Energy Ltd

Date: 19 February 2026

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Message Ref: Review of RMM Cumulative Landscape Effects Assessment

Project No: BM240408

## Executive Summary

This memorandum has been prepared by Boffa Miskell Limited (BML) in response to a request by Lodestone Energy to review the cumulative effects assessment undertaken by Rough Milne Mitchell (RMM)<sup>1</sup> as part of their Fast-track RFI response.

This review responds specifically to the cumulative framework adopted in the RMM assessment and the internal consistency of that framework. We have pulled out and commented on the following key areas of inconsistency and disagreement.

- RMMs reliance on visibility assessments from the landscape effects assessments (LEAs) prepared for each of the five solar farm proposals.
- RMMs consideration of vegetation screening
- RMMs description of lake / campground users as surrounded by solar infrastructure due to Haldon
- RMMs conclusion that cumulative effects will be reduced if Haldon is not included.

We do not agree with RMM's findings at the wider Mackenzie Basin scale and that the ability to reduce cumulative effects is solely dependent on Haldon being withdrawn, regardless of scale.

Overall, while we consider that cumulative effects within the southern Basin / 'Local' area are likely to be moderate in the event that Haldon Solar Project and The Point are both approved; in the event that one of the other proposed solar farms in the southern basin is approved, the effects could rise to moderate to moderate-high adverse. This should not be interpreted as accepting that Haldon is the incremental or determinative contributor to Basin-wide cumulative effects. This memorandum does not accept any assumption around sequencing beyond that considered in the original Boffa Miskell cumulative effects assessment and subsequent memorandum addressing cumulative effects.

<sup>1</sup> Rough Milne Mitchell Landscape Architects Limited. *Fast-track RFI Response 1 – Landscape. Proposed Solar Farm. The Point, Mackenzie Basin.* 9 February 2026.

## Background

BML has previously prepared both a standalone Landscape Effects Assessment for Haldon (22 August 2025) and a memorandum addressing cumulative effects of Haldon and The Point within a joint panel context (22 January 2026). The following comments are made in this context and this memorandum should therefore be read as a targeted review of the cumulative reasoning presented in the RMM material, rather than a re-assessment.

## Overview

RMM provides a cumulative assessment of five solar farms (Twizel, The Point, Haldon, Grampians, Balmoral). While there is some inconsistency in the report (noted below), the primary conclusion is of moderate-high to high cumulative effects Basin-wide as a result of all five solar farms; moderate to moderate-high cumulative effects in the southern Basin for Twizel + The Point + Haldon, but stating that effects would reduce if Haldon were not included.

We have set out the key RMM effects ratings of relevance to Haldon in the following table format for ease of reference:

RMM Reference	Type of Cumulative effects	Scale described	Solar Farms described	Cumulative effect rating
Para 3.6.4, Page 13	Sequential views	Southern part of Basin	Twizel, The Point, Haldon	Moderate adverse (due to Haldon)
Paras 3.7, 3.8, Pages 14-15	Landscape effects	Local / Southern part of Basin	Twizel, The Point, Haldon	Moderate to Moderate-high (due to Haldon)
Paras 3.7, 3.8, Pages 14-15	Landscape effects	Basin-wide	Twizel, The Point, Haldon, Grampians, Balmoral	Moderate-high to high (due to Balmoral and Grampians)
Paras 3.7, 3.8, Pages 14-15	Landscape effects	Basin-wide	Twizel, The Point	Low (due to not including Haldon)

## Key areas of inconsistency

- **RMMs reliance on visibility assessments from the landscape effects assessments (LEAs) prepared for each of the five solar farm proposals:**

RMM states their assessment '*relies upon the quantifiable information*' in others' reports and provides a '*summary of where the five solar farms may be seen from*'<sup>2</sup>. This 'summary', is presented in Section 3.4 Visibility of the Five Solar Farms as the reduction of detailed analysis provided in other LEAs, to a simplified statement involving the selective inclusion / exclusion of relevant information such as viewing distances and level of visibility, with varying degrees of accuracy and limiting the usefulness of what are credible and finely graded conclusions across the original LEAs.

For example, RMM notes Haldon SF will be difficult to distinguish from SH8 between Lake Ruataniwha and the Pukaki Airport, at distances of 13kms away. The Haldon LEA identified that 13km is the closest potential viewing distance and that in reality, the terrain obscures sightlines so that due to the combination of topography and distance, it will be so difficult to distinguish Haldon from SH8 and A20 that there will be no material effect. However, while RMM similarly describes The Point as '*difficult to distinguish...at distances between 7 -13 km*',<sup>3</sup> no assessment of simultaneous effects is provided that includes The Point. We also note that Haldon is located beyond The Point in views from this southwesterly direction.

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<sup>2</sup> RMM, para 3.3, page 9

<sup>3</sup> Ibid, page 12

To provide a further example, in regard to sequential views in the southern part of the Mackenzie Basin, RMM states that *'People travelling to Ohau C Campground and Lake Benmore will see the Twizel SF and The Point SF alongside one another from McAughtries Road. Once on Falston Road, those two solar farms will be out of sight as the Haldon SF will be seen.'*<sup>4</sup>

We consider there is potential for views to both The Point and Haldon from close locations to the south and southwest such as viewpoints on McAughtries Road including the dam lookout (refer to BMLs Haldon Site Context Photograph 8, and RMMs The Point VP 9), and from the northern end of Falston Road (refer to BMLs Haldon Site Context Photographs 9, Visual Simulation 3 and RMMs The Point VP 12).

We also note that Haldon will not be visually clustered together with The Point or Twizel solar farms or co-located with Twizel township as described by RMM (3.6.4). As written at 3.6, sequential views occur when seeing two areas of development in sequence but not necessarily alongside one another.

In terms of views from Haldon Road between Haldon Station Farm Base and Black Forest to the south-east, we also note that any views from this area are substantially screened by intervening landform including Te Pā-o-Kāti-Kurī / Mt Maggie and by intervening established vegetation along the margins of Stony River and the edge of Te Ao Marama / Lake Benmore (refer to BMLs Site Appraisal Photograph A and Site Context Photograph 14). As identified in the LEA any visibility from this area is therefore limited with potential for no more than very low visual effects.

- **RMMs consideration of vegetation screening:**

RMMs visibility statements in section 3.4 describe The Point solar farm as *'screened by the proposed native vegetation'*.<sup>5</sup> We note that the proposed vegetation to provide screening forms part of The Point SF proposal. As set out by RMM, this vegetation may take *'take four to seven-ten years to reach the level of screening shown in the visual simulations'*<sup>6</sup> in the context of the Mackenzie Basin climate. Within the Mckenzie Basin landscape, we also consider it relevant that the vegetation may be perceived as an attempt to screen an adverse effect and therefore be perceived of itself as an adverse effect. We also note an apparent inconsistency at Section 3.5 Simultaneous Visual Effects and 3.6 Sequential Views of the Five Solar Farms, where RMM describes The Point as being seen and does not reference the screening effect of the proposed vegetation, for example:

*'The Twizel SF and The Point SF will be seen alongside one another from seen from the lookout area beside the Ohau C Power Station, along McAughtries Road.'*<sup>7</sup>

- **RMMs description of lake / campground users feeling *'surrounded by solar infrastructure'*<sup>8</sup> due to Haldon:**

Haldon SF is located at the northern end of the eastern side of Lake Benmore and as noted in the Haldon LEA and cumulative effects memo, will be partially visible from locations along the western edge of Lake Benmore as well as areas on the lake however it will not be perceived as *'surrounding'* viewers.

- **RMMs conclusion that cumulative effects will be reduced if Haldon is not included:**

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<sup>4</sup> Ibid, para 3.6.4, page 13

<sup>5</sup> Ibid, pages 10-11

<sup>6</sup> Ibid, para 2.5, page 7

<sup>7</sup> Ibid, page 12

<sup>8</sup> Ibid, para 3.6.4, page 13

We tend to agree with the assessment that cumulative effects of the southern Basin / 'Local' are likely to be moderate to moderate-high adverse cumulative effects as a consequence of the three proposed solar farms comprising The Point, Haldon and Twizel solar farms. Beyond this, however we do not agree that at the wider Mackenzie Basin scale, this level of effect would be reduced to low if the Haldon Solar Farm was to be withdrawn.

RMM finds that '*Collectively the five proposed solar farms will have moderate-high to high adverse cumulative effects on the landscape character and values of the southern part of the Mackenzie Basin. These adverse effects would be reduced if Haldon SF was not included due to perception of being surrounded by solar infrastructure that it will create on lake and campground users. Regarding the wider Mckenzie Basin, these adverse effects will be a low degree.*'<sup>9</sup>

If this is interpreted as finding that the removal of Haldon would drop Basin-wide cumulative effects to low, we consider there is some internal contradiction in the RMM report. RMMs emphasis on the '*spread of development through the Basin resulting from the Balmoral SF and the Grampians SF*' as the primary reason for moderate-high to high adverse effects<sup>10</sup> means that logically, removing Haldon does not address this 'spread'. Claiming a drop in effects to low, Basin-wide, therefore appears inconsistent with the report's own rationale.

In regard to the southern Basin and the Twizel + The Point + Haldon solar farms, we note RMMs finding that '*...the three solar farms will collectively contribute to a significant change to the character of the southern part of the Mackenzie Basin.*'<sup>11</sup> At this scale, we consider the assertion that removing Haldon alone will reduce cumulative effects, while inferring that removing Twizel or The Point would not, to be inconsistent.

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<sup>9</sup> Ibid, para 3.8, page 15

<sup>10</sup> Ibid, para 3.7, page 14 and para 3.8, page 15

<sup>11</sup> Ibid, para 3.7, page 14