LANDSCAPE AND VISUAL EFFECTS ASSESSMENT - PEER REVIEW

THE POINT SOLAR FARM – FAR NORTH SOLAR FARM LIMITED

APPLICATION UNDER THE FAST-TRACK APPROVALS ACT [FTAA-2508-1100]

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16th February 2026

INTRODUCTION

1 Far North Solar Farm Limited proposes to construct and operate a solar farm for energy generation. The solar farm is to cover approximately 670ha between the Tekapo and Twizel Rivers, to the immediate north of the northern arm of Lake Benmore. Consents are sought under the Fast-Track Approvals Act (**FTAA**).

2 The application includes the following landscape assessment work prepared by Rough Milne Mitchell (**RMM**):

- a Landscape Assessment Report dated 25 May 2023 (**the RMM report**);
- an Addendum Landscape Assessment Report dated 30 April 2025 (**the RMM addendum**),
- An RFI response report dated 9 February 2026 (**the RMM response)**.

3 I have been engaged by the Mackenzie District Council to peer review the RMM assessment work. In doing so, I have corresponded with the author of the RMM work (Paul Smith) to clarify queries. I have also taken note of comments and questions in the minutes of the Expert Panel, most relevantly Minute 3 of 23 January 2026 and the associated Request for Information of the same date.

4 In response to a request from the Mackenzie District Council, I have also prepared a peer review (dated 23 January 2026) in relation to the Haldon Solar Project [FTAA-2508-1097]. The two sites are close to each other. There is therefore some repetition in my peer review comments regarding the two sites.

5 The RMM report sets out its methodology in its Section 1.2. The approach of the assessment work is comprehensive and appropriately has been guided by Te Tangi A Te Manu, Aotearoa New Zealand Landscape Assessment Guidelines (**TTatM**)[1].

6 This peer review has similarly been guided by TTatM. This report appraises the RMM assessment work and is not a parallel assessment[2]. I give review comments on the methodology, completeness, plausibility, findings and conclusions of the RMM work.

7 As part of my peer review, I visited the vicinity of the site on 20 January 2026. I visited the various public locations that are discussed in the RMM assessment work. I did not visit private land.

8 For completeness, I note that I am no relation to Dr Peter Espie of Ag Science Limited.

RELEVANT DETAILS OF THE PROPOSAL

9 The proposal is described in Section 2 of the RMM report and in the many appendices of the substantive application. Since the lodgement of the substantive application, some details of the proposal that are relevant to landscape issues have changed and/or been clarified. The Applicant's response to the Expert Panel's 23 January Request for Information (response dated 9 February) sets out the amended application. The most relevant aspects of these amendments are:

i. Irrigation water for the plantings in the Landscape Mitigation Areas will be supplied via tanker trucks that will spray or hose the water on the planting areas. At its peak, this will involve 600 tankers over the "*water season for Year 3*" and this will then reduce until Year 5 is reached[3].

ii. The Landscape Mitigation Areas are the paler green areas shown on the plans that form Appendix 10 to the Applicant's response of 9 February. These areas are described in paragraph 2.1 of the RMM response. In total this area is 10.7ha and is to contain 35,958 plants (one plant per 1.5m^2).

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1 'Te Tangi a te Manu: Aotearoa New Zealand Landscape Assessment Guidelines'. Tuia Pita Ora New Zealand Institute of Landscape Architects, July 2022 (**TTatM**).

2 TTatM, paragraphs 6.57 to 6.63.

3 FNSF - Response to Request for Information, under heading 1.5. Response dated 9 February 2026.

iii. The darker green areas shown on the plans that form Appendix 10 to the Applicant's response are the areas that were originally proposed to be an extensive ecological reserve (referred to in the RMM work as the Ecological Enhancement Area, as distinct from the Landscape Mitigation Areas). I understand that this is no longer proposed. An alternative approach is to be taken involving a 14ha reserve area to be predator-proof fenced and more intensively managed to bring about ecological goals. This is described in Appendices 6 and 9 of the of Applicant's response of 9 February 2026. An Ecological Enhancement Plan (**EEP**) is required by proposed conditions of consent and will give detail of ecological management.

iv. The RMM response discusses the changes described above in relation to the visual simulations that are attached to the RMM report. I understand the RMM response to be describing that the depiction of the Landscape Mitigation Areas is still correct and these are the areas relied upon by RMM in relation to visual mitigation, while the depiction of the Ecological Enhancement Area in the visual simulations is no longer relevant[4].

v. In the visual simulations attached to the RMM report, the proposed situation is depicted at Years 2 and 5 in relation to Viewpoints 9, 12 and 22. In relation to the other viewpoints, the proposed situation is depicted at an unspecified year. The RMM response describes the growth rates of plants, "*taking into account the proposed irrigation scheme*" and notes that "*overall, it is estimated that the proposed native landscape mitigation vegetation will take four to seven-ten years to reach the level of screening shown in the visual simulations*"[5]. The RMM response is drawing on information provided by Wildlands Consultants.

10 In my consideration, the above amendments are feasible, but the irrigation approach is unusual in my experience. Irrigating 10.7ha of plantings by spraying from tanker trucks appears inefficient. Looking at point (i) above, even if we consider the water season for Year 3 to be 9 months, that equates to more than 2 tanker trucks everyday for that period.

4 RMM response, paragraph 2.4.

5 RMM response, paragraph 2.5.

RELEVANT POLICY PROVISIONS

11 Section 3 of the RMM report discusses the National Policy Statement for Renewable Electricity Generation (**NPS-REG**) and the Mackenzie District Plan (EPlan version) and references Strategic Objective NE-01.

12 The Renewable Electricity Generation (**REG**) chapter of the District Plan is designed to be a stand-alone suite of provisions that deal with renewable electricity generation without the need to refer to other chapters of the District Plan (except where specified) [6]. The REG chapter is a result of Stage 3 of the District Plan Review and I understand that it is no longer subject to any appeals and is operative. Taking direction from the REG chapter, it is my interpretation that renewable electricity generation is now more anticipated in the Mackenzie Basin ONL than it would be if we did not consider the REG chapter and instead, placed emphasis on the Natural Features and Landscape Chapter.

13 The above is relevant to the assessment of landscape and visual effects because:

Effects on landscape values are assessed against the existing environment and the relevant statutory provisions. Provisions often anticipate change and certain outcomes for landscape values.

Landscape effects are assessed against:

- *The landscape values (embodied in certain attributes); and*
- *The relevant provisions (what the objectives and policies say with respect to landscape values, what type and magnitude of development or change in the landscape is anticipated)*[7]*.*

14 Given that The REG Chapter sits as a stand-alone suite of provisions, I consider that under the District Plan there is some anticipation of the increased presence of renewable energy generation

[6] The introduction to the REG chapter notes that the NE chapter is to be considered but not (for example) the NFL chapter. This part of the REG chapter also notes that the chapter has been formulated to give effect to the National Policy Statement for Renewable Energy Generation.

[7] TTatM, paragraphs 6.06 and 6.12.

facilities within the district's landscapes, including within the Mackenzie Basin ONL, albeit that adverse effects on the ONL are still to be considered[8].

LANDSCAPE DESCRIPTION

15 Section 4 of the RMM report describes the existing landscape, focussing on the vicinity of the site and the southern part of the Mackenzie Basin. The description is appropriate and it notes the Tekapo and Ohau Rivers Sites of Natural Significance that are adjacent to the site. The agricultural use of the site is noted, including its pivot and K-Line irrigation.

16 The relevant landscape values are appropriately described at Section 4.3. Useful additional references that are not specifically set out in this part of the RMM report are Objective NFL-02 of the Mackenzie District Plan and also Appendix 4 of the Canterbury Regional Policy Statement that sets out a description of the Mackenzie Basin ONL at a regional level. These District Plan and Regional Policy Statement descriptions are at the broad scale of the entire Mackenzie Basin. Essentially, the RMM consideration of the existing landscape includes all relevant aspects.

VISUAL EFFECTS

Landscape values are the reasons a landscape is valued – the aspects that are important or special or meaningful.

Landscape effects are consequences for landscape values which arise from changes to a landscape's physical attributes.

Visual effects are a subset of landscape effects they are effects on landscape values as experienced in views[9].

17 Section 6.1 of the RMM report covers visual effects. The graphic attachment to the RMM report includes many photographs from relevant viewpoints and a number of photo-simulation images.

18 The various locations that allow some visibility to the site are each examined. For each location, the existing views are described, the change to the view that the proposal will bring is discussed,

8 Mackenzie District Plan (EPLan), REG chapter, Objectives REG O1 to O3 and Policies REG P1 to P6.

9 TTatM, pages 105 and 167.

and a comment on the extent of visibility and visual effects is given. A summary regarding visual effects is then given at paragraph 6.1.11 of the RMM report (and paragraph 4.11 of the RMM addendum).

19 The RMM report's graphic attachment is useful in understanding the commentary on visual effects, however, visual effects can only be fully assessed and understood by visiting the relevant locations and viewing the site in the field. As noted in my paragraph 9 (iii) to (v) above, I understand that the proposed vegetation in the Landscape Mitigation Areas is still correct in the photo-simulation images, but not the Ecological Enhancement Area. The Landscape Mitigation vegetation is shown at 3m tall, which I understand assumes good irrigation and plant health[10].

20 I set out below comments that I consider to be of further assistance in examining the visual effects of the proposal.

i. I agree that there will be no relevant effects as perceived from SH6 or the Alps 2 Ocean Trail.

ii. A part of McAughtries/Falston Road is the location from which the highest degree of visual effect will be experienced, particularly the elevated area adjacent to Ohau C power station and above (south of) the campground. Viewpoint 9 of the RMM graphic attachment is a good example of this view. The vegetation of the Landscape Mitigation Area will provide some mitigation, but relatively limited. I consider that the solar farm facility will be prominent in this view. I agree that the immediately adjacent Ohau C power station, canal, stop banks and substation influence the type of landscape character that an observer currently experiences, such that the proposed situation is less of a departure from existing character and amenity than it might otherwise be. Overall, I agree that the degree of adverse effect in relation to this location can be described as moderate.

iii. I agree that in relation to less elevated viewpoints in the McAughtries/Falston Road vicinity, such as viewpoints 10 to 12, visual effects will be minimal, but this is dependent (at least in part) on the success of proposed vegetation in the Landscape Mitigation Area.

[10] The RMM addendum, paragraph 2.5.

iv. I agree that there will be no relevant effects as perceived from Haldon Road, and effects of up to a low degree (at the most in my opinion) from parts of Haldon Arm Road.

v. Section 6.1.7 of the RMM report discusses views from the four-wheel-drive accessible areas within the corridors of the Pukaki, Tekapo and Twizel Rivers, including some areas immediately adjacent to the site. While these appear to be public land, I am unsure of the legal ability of the public to access them and understand that operating easements in favour of power generation operators (or other similar legal mechanisms) may exclude public access. Even in a physical sense, some of these areas are very difficult to access. Regarding the four-wheel-drive track on the true right of the Pukaki River, immediately adjacent to the site, the RMM report discusses close views, and moderate adverse visual effects, with mitigation vegetation screening solar panels over time. Given that significant planting is only proposed within the Landscape Mitigation Areas, there are stretches of this track from which there will be plain, unmitigated visibility of the solar farm facility. For these particular observers, the solar farm will significantly detract from the scene that would otherwise be seen (perhaps a moderate-high adverse effect) but I consider that such viewers would be very infrequent and effectively would have to deliberately travel to the solar farm site via an arduous off-road journey.

vi. I have not visited the Ben Ohau Greta Track nor the Benmore Range Easement Track. It appears that visibility would be difficult from Ben Ohau but reasonably plain from the Benmore Range. A moderate degree of adverse effect from the Benmore Range (as stated by the RMM report) appears plausible.

LANDSCAPE EFFECTS

21 Section 6.2.1 of the RMM report relates to physical effects. The physical attributes of the site itself will obviously change markedly, with the vast array of solar panels, inverter stations, internal roads, partially-buried water tanks and the substation. I have taken the "Revegetation Area and Predator Proof Reserves" plan (Appendix 10 of the Applicant's 9 February response to the Expert Panel) to be an up-to-date depiction of the proposal.

22 I understand that the solar panels are mounted on supporting piles that are driven into the ground without any concrete footing. During construction, there will be considerable ground disturbance

across the site, including the formation of internal roads, but no sizable earth shaping or alteration of levels. Regarding the ground cover within the site the, the RMM report notes that:

i. the land under the solar panels will no longer be irrigated or cropped but "*will be managed, with the inclusion of light grazing, to restore indigenous vegetation throughout this area*".

ii. The current boundary fence around the site will be upgraded to a rabbit and hare proof fence, and a 1.8m high security fence will then be located around the area of the panels[11]. These can be seen on the plan referred to in my paragraph 21.

23 I note that part of the scope of the EEP is animal and pest management throughout the entire site and that proposed condition 43 requires established vegetation over the ground beneath the solar panels at all times[12]. Therefore, my understanding is that, outside of the Landscape Mitigation Area and the 14ha reserve area, ground cover is essentially to be pasture and herb field, lightly grazed and managed in relation to plant and animal pests.

24 As is discussed by the RMM report in relation to existing landscape values, large-scale electricity generation elements are part of the associative attributes of the Mackenzie Basin. The proposed solar farm will add to the association between electricity generation and the Mackenzie Basin landscape.

25 Regarding effects on the perceptual values of the landscape, the RMM report refers back to its assessment of visual effects, and notes that the places from which a moderate degree of adverse visual effect will be experienced are McAughtries Road, Ben Ohau and the Benmore Range Easement Track. It also highlights the low, horizontal form of the solar farm and that this mitigates potential effects on open and long views.

26 Concluding on landscape effects, the RMM report finds that:

"*In summary, the **proposed solar farm by itself**, due to its size and scale will have a **moderate-high** [degree] of adverse landscape effects on the Mackenzie Basin's outstanding natural landscape values.*

[11] The RMM report, Section 2.1, page 10.

[12] The Point Solar Farm: Response to Ecological Issues, Wildlands Consultants, Appendix 6 of the Applicant's 9 February response to the Expert Panel), and proposed conditions 43 and 44 within "WWLA amended conditions", Appendix 12 of the Applicant's 9 February response to the Expert Panel.

These adverse landscape effects will be lessened *by the proposed landscape mitigation and ecological and biodiversity enhancement activities that will benefit the natural character landscape values of the basin.*

Overall, the proposed solar farm and its associated landscape treatment, and ecological and biodiversity enhancement activities will have a ***low-moderate to moderate degree*** *of adverse landscape effects on the Mackenzie Basin's outstanding landscape values"*[13]*.*

27 I consider that the above conclusion is plausible and appropriate but depends upon good success in relation to ecological management and planting growth within the Landscape Mitigation Area.

28 In addition to the factors discussed by the RMM report (and addendum and response), I consider that the following aspects of the activity are also relevant to effects on landscape character and values:

i. The minimal staff and activity when the facility is operational[14]. This assists in maintaining the generally empty and unoccupied character of the Mackenzie Basin. The facility will be relatively inert, largely devoid of busyness and movement.

ii. The reversibility of the effects of the project. In the long term, if or when the facility becomes obsolete, I understand that practically every part of it can be removed without significant permanent changes to the landscape (unlike the hydroelectric-related modifications to the Mackenzie Basin).

iii. The fact that under the District Plan there is some anticipation of the increased presence of renewable energy generation facilities within the district's landscapes in order to give effect to the National Policy Statement for Renewable Energy Generation.

ASSESSMENT AGAINST RELEVANT POLICY PROVISIONS

29 The RMM addendum updates the assessment against policy provisions that is given in the RMM report. As discussed in my paragraphs 11 to 14 above, my understanding is that the REG Chapter of the Mackenzie District Plan (EPlan version) is operative and not subject to any appeals. The

[13] The RMM report, paragraph 6.2.4.

[14] Substantive Application, 27 August paragraph 4.5.1.

Objectives of the REG Chapter are to increase the output of renewable energy generation within the district while managing adverse effects[15]. As I have previously discussed, my interpretation is that there is some anticipation of the increased presence of renewable energy generation facilities within the district's landscapes, including within the Mackenzie Basin ONL, albeit that adverse effects on the ONL are still to be considered.

CUMULATIVE EFFECTS

30 The RMM response includes an assessment of the cumulative effects of five proposed solar farms that are listed or referred under the FTAA. These are the Twizel, Point, Haldon, Grampians and Balmoral solar farms. These locations are shown on Appendix 1 of the RMM response. The RMM response notes that it has not assessed the effects of each proposal individually, rather it has relied upon the assessments included with the five applications.

31 The individual visibility of the five solar farms is discussed by the RMM response and simultaneous and sequential views are described. Separate from cumulative visual effects, if we assume the presence of five large solar farms in the Mackenzie Basin, there will be a cumulative effect on the overall values of the Mackenzie Basin ONL, i.e. effects on the way the community perceive, characterise and value this landscape, even if those solar farms are not seen together simultaneously or sequentially. Solar generation, in conjunction with hydro generation, will become a more relevant characteristic of the Mackenzie Basin landscape in the perception of the community. This issue is covered in Section 3.7 of the RMM response.

32 A relevant factor to the consideration of cumulative effects on landscape values is the trajectory that the Mackenzie Basin landscape is on (with or without solar farms). No landscape is frozen in time and ongoing ecological and soil degradation, spread of wilding conifers, other pest infestation, irrigation requirements for practical farming, and tourism development are all factors that are relevant to the future evolution of landscape character in the Mackenzie. If the five solar farms (and possibly more besides) are all built, then electricity generation will be a more pronounced part of the character of the Mackenzie Basin landscape into the future. The degree to which this cumulative effect on landscape character and values is adverse is a complex

[15] EPlan, Objectives REG-01 and REG-02.

question. An abundance of solar farms will degrade some of the important reasons the Mackenzie Basin landscape is currently valued (openness, vastness, long views, open grasslands, lack of structures[16]) but will complement the large-scale hydro generation aspects of the Mackenzie, and is anticipated to some degree by the NPS-REG and the REG Chapter of the Mackenzie District Plan. As discussed in Section 3.7 of the RMM response, the answer must relate to the number of solar farms or at least the overall combined area of solar farms, particularly (in my opinion) if located in one particular part of the basin; too much will dominate other important aspects of landscape character.

33 The RMM response's analysis of cumulative visual effects is useful in relation to the above. Regarding both simultaneous and sequential visibility, the most relevant areas are Haldon Arm Road, elevated parts of McAughtries/Falston Road and the Benmore Range Easement Track (that I discuss in my paragraph 20.

34 Regarding Haldon Arm Road, the RMM response finds an adverse cumulative effect of a moderate degree due to the Grampians and Haldon solar farms being experienced sequentially. This is plausible and I note that some visibility of The Point solar farm from the westernmost part of Haldon Arm Road will contribute to this cumulative effect.

35 Regarding the relevant elevated parts of McAughtries/Falston Road (discussed in my paragraph 20(ii) above), the RMM response discusses this area at Section 3.6.4 and finds an adverse cumulative effect of a moderate degree, the Twizel, Point and Haldon solar farms being experienced sequentially and simultaneously. The RMM response notes the solar farms will be clustered together and with hydro generation elements and Twizel town. It also notes that "*other user groups including people who holiday in the vicinity and those who spend days on the lake may feel surrounded by solar infrastructure resulting in adverse visual effects*"[17]. I agree and consider that this southern part of the Mackenzie Basin would be the most affected area in relation to cumulative effects of the five solar farms, effects being of a moderate-high degree in terms of landscape character. The area adjacent to the Ohau canal and experienced from McAughtries Road would begin to be dominated by electricity generation in terms of landscape character.

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16 The RMM report, Section 4.3, Objective NFL-02 of the Mackenzie District Plan, Appendix 4 of the Canterbury Regional Policy Statement.

17 The RMM response, Section 3.6.4.

36 Regarding the elevated part of the Benmore Range Easement Track, the RMM report finds that the Point solar farm will have an adverse visual effect of a moderate degree[18]. Considering the Twizel, Point and Haldon solar farms in combination, a broad expanse of solar arrays would be seen in the midground of the very long and broad views across the Mackenzie Basin to the surrounding mountains. I consider that this adverse cumulative visual effect will be of at least a moderate degree.

37 Setting aside visibility and returning to cumulative landscape effects overall, the RMM response finds that the five solar farms would result in moderate-high to high adverse cumulative effects on the Mackenzie Basin landscape; while the Twizel, Point and Haldon solar farms will have moderate to moderate-high adverse cumulative effects on the southern Mackenzie Basin since they are more clustered together and therefore have less wide-ranging effects. Without having examined the Twizel, Grampians or Balmoral proposals in detail, the RMM response is generally credible, however, I reiterate that I consider that the southern part of the basin is more affected in a cumulative sense than other parts of the basin, since electricity generation will begin to dominate landscape character.

CONCLUSIONS

38 The RMM assessment report, addendum and response use and an appropriate methodology and structure and cover all relevant issues. I consider that the RMM assessment work has been done appropriately and has come to credible conclusions. As a result of my peer review work, the following are the main points that I consider may be of further assistance to the Expert Panel:

i. My interpretation of the REG Chapter of the EPlan is that there is some anticipation of the increased presence of renewable energy generation facilities within the district's landscapes, including within the Mackenzie Basin ONL. This is relevant to the context against which landscape effects are to be considered.

ii. I consider that the RMM assessment work's findings regarding effects on landscape values are generally logical, plausible and appropriate. I have taken account of some factors that are not explicitly emphasised in the RMM report. These are the relatively inert

[18] The RMM report, Section 6.1.10.

and unoccupied nature of the solar farm, the long-term reversibility of the effects of the project, and the EPlan's anticipation of some degree of increased renewable energy generation facilities.

iii. I generally agree with the RMM conclusions regarding visual effects, however regarding certain viewing audiences, this is dependent upon good plant success and growth within the Landscape Mitigation Areas. In this regard, I note that the proposed irrigation of plantings via spraying from tanker trucks (as opposed to some form of automatic irrigation) appears unusual in my experience.

iv. If we are to consider the five solar farms within the Mackenzie Basin that are listed or referred, there will be cumulative effects, both visually and in relation to overall landscape values. The RMM response covers this issue appropriately but I consider that adverse cumulative effects are somewhat understated in relation to:

- Views from elevated parts of the McAughtries/Falston Road area. From this area, I consider that adverse cumulative visual effects of the Twizel, Point and Haldon solar farms will be of a moderate-high degree;

- Views from particular parts of the Benmore Range Easement Rack. I consider that adverse cumulative visual effects of the Twizel, Point and Halon solar farms will be of at least a moderate degree;

- The landscape character and values of the southern part of the Mackenzie Basin. The RMM response finds a moderate-high to high degree of adverse effect, which is credible, put I also add that this southern part of the basin (such as is experienced from McAughtries Road) will begin to be dominated by electricity generation.

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