

Memorandum

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Attention:	Naomi Humbles
Company:	Lodestone Energy Ltd
Date:	8 April 2026
From:	Prepared by: Rhys Girvan (Senior Principal, Landscape Planner), Sue McManaway (Principal, Landscape Planner).
Message Ref:	Response to RFI #3 (Questions 1b and 1c – Landscape Mitigation)
Project No:	BM240408

Introduction

This memorandum has been prepared by Boffa Miskell Limited (BML) in response to a request by Lodestone Energy to consider questions 1(b) and 1(c) of a Request for Further Information (12 March 2026) issued by the Fast-track panel.¹

BML has previously prepared an assessment of landscape effects of the proposed Haldon solar farm (the LEA) dated 22 August 2025 and clarified landscape mitigation opportunities as part to RFI #2². It is understood landscape information requested in RFI #3 relates to residual concerns about the effectiveness of that additional landscape mitigation proposed.

Question 1b):

Reconsideration of whether the native planting proposed will be effective at replacing the screening function of the willows, given the substantially smaller size of the native plant species proposed when compared to the existing willows. While the concept of native revegetation and rehabilitation within the Mackenzie Basin is supported, and the location of the planting is appropriate, the Panel asks whether reliance on native species alone is appropriate to achieve a replacement of the existing exotic screening planting. If a similar screening function will not be achieved, then please amend the design to incorporate some exotic species to assist with the screening function.

In considering the proposed landscape response in the area between Lake Benmore and the proposed solar array, the LEA acknowledges the presence of the existing exotic willow vegetation along the lake margin provides some screening of the proposed solar farm where visible from parts of the lake. Beyond this, including from the western shores of Lake Benmore, the lakeside willows also have benefit in terms of providing a layered buffer of contrasting colours and textures along the lake margin which assists with visually anchoring and containing the solar farm when seen in longer distance views (page 33). In other words, screening is not the only landscape function to be considered. A key dimension of proposed replacement planting is also to ensure elements proposed will respond to and otherwise contribute to the protected values of the ONL. This includes the addition of representative native planting which can improve the natural character of the margin of the modified lake edge, a benefit not otherwise provided by the replacement of willows with alternative exotic species.

¹ Letter (File ref FTAA-2508-1097) from Application Lead, Fast-track Applications to Daniel Cunningham (Lodestone) regarding 'Request for information from Lodestone Energy Limited in relation to the Haldon Solar application under the Fast-track Approvals Act 2024', by email, 12 March 2026.

² Boffa Miskell Ltd (26 February 2026) *Response to RFI #2 (Questions 1 and 2 – Landscape Mitigation)*

In visual terms, while the alternative native planting proposed is lower in stature, it covers a comparatively greater extent inland from the lake margin in addition to ensuring year-round benefit in terms of leaf cover. Based on these outcomes, representative native planting as proposed is considered most effective in addressing any potential change in adverse landscape and visual effects.

Question 1(c)

The drawing of the Conservation Area shown on the last page of the Memorandum shows 'green boxes' of planting loosely scattered across the Conservation Area in a dispersed manner. The Panel understands that there is primary reliance on spatial separation to buffer the proposed solar farm from Haldon Arm Road. The Panel considers that there may be additional benefits to the ecology of the area, and enhancements to the perception of the road's separation from the solar farm, by the placement of 'grey shrubland' and other planting near the road corridor. Please provide an option that includes this for the Panel to consider.

The addition of proposed mitigation planting along Haldon Arm Road is purposefully designed to avoid enclosing or foreshortening available transient views along this isolated road corridor and responds to the broader open and natural values recognised within the Mackenzie ONL. To this end, implementing intervening clusters of representative dryland planting has been carefully considered to assist with maintaining a perception of depth and separation between the road and the proposed solar farm without accentuating a sense of enclosure and adding to potential adverse visual effects, in potential conflict with the basin's inherent landscape values.

Notwithstanding the above, we acknowledge proposed planting within Conservation 1 Zone could be extended to incorporate additional clusters of dryland shrub species to the west and prior to Haldon Arm Road descending the scarp into the Haldon Arm Camp Ground. This accords with the full extent of Site Character Area A7 previously identified in the LEA and within the Haldon Station land holding. Based on this option, this equates to a total of 20 no. 10m x 10m plots located between Haldon Arm Road and the Solar Farm (see Figure 2A attached). As highlighted in our assessment, we do not consider an option of introducing planting aligned parallel with the road corridor warranted or indeed beneficial in this context.

This plan has been prepared by Boffa Miskell Limited on the instructions of our Client, in accordance with the agreed scope of work. If it is intended to support an application under the Fast-track Approvals Act 2024, it may be relied upon by the Expert Panel and relevant administering agencies for the purposes of assessing the application. While Boffa Miskell Limited has exercised due care in preparing this plan, it does not accept liability for any use of the plan beyond its intended purpose. Where information has been supplied by the Client or obtained from external sources, it has been assumed to be accurate unless otherwise stated.

LEGEND

- Indicative Planting Plot
- Fenced Area
- Conservation Zone 1 – planting opportunity area
- Site Character Area A7
- Lease Area
- Haldon Station private land

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 Projection: NZGD 2000 New Zealand Transverse Mercator

