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LANDSCAPE ARCHITECTS

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# Fast-track RFI Response 2 - Landscape

Proposed Solar Farm
The Point, Mackenzie Basin

23 February 2026

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…….
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# 1 Introduction

## 1.1 Background, Purpose and Scope

Rough Milne Mitchell Landscape Architects (**RMM**) have prepared the Landscape Assessment Report, dated 25 May 2023 (**the Landscape Report**), and the Addendum Landscape Assessment Report, dated 15 June 2025 (**the Addendum Report**) that formed part of Far North Solar Farm's Fast-track Application. Noting that the Landscape Report was originally prepared for a resource consent application.

Since lodgement, I attended the Expert Panel Overview Conference on 16 January 2026 and responded to the landscape related matters in the Request for Further Information (**RFI**) 1, response dated 9 February 2026.

The Point Solar Farm Expert Panel (**the Panel**) have requested further information via RFI 2, dated 13 February 2026. The landscape related matters in RFI 2 seek:

- further certainty / specificity regarding conditions, and
- explore cumulative effects in relation to the Haldon Solar Farm proposal and Waitaki HEPS structures, that was accidentally missed in RFI response 1.

For ease of reading, Section 6 of RFI 2 is included with a response to each section immediately below.

Additionally, the Applicant has been provided with Mr Richard Ewan, from the Department of Conservation (**DoC**) Comments on terrestrial flora and ecosystems components of proposal, dated 11 February 2026. Noting these comments are provided prior to Wildlands updated surveys and findings being provided. Mr Ewans comments have been taken on board when responding to RFI 2 and updating conditions.

Lastly, minor updates to the Landscape Plan and updates to the plant species list have occurred. **Appendix 1** includes these updated plans / sheets from the graphic document and is now a standalone document to assist with the wording in the proposed conditions.

# 2 RFI 2 – Response – Landscape Effects

## 2.1 RFI 6.1 - Conditions

*The revised conditions remain quite broad-brush and do not appear to be specific enough to effectively manage The Point's effects. This concern lies at the core of the following questions.*

*The requests for information are:*

*a) Could the proposed conditions address the maximum heights of the solar panels, inverters and structures in the proposed substation (bus, transformers and building) and ensure that these are consistent with those assessed by RMM?*

b) *Could the proposed conditions address the colours to be applied to the solar farm's main structures with reference to the columns of the BS5252 colour chart or similar?*

c) *Could the proposed conditions address the specification of plant species (including sizes at the time of planting), plant spacings and irrigation in the Landscape Mitigation Areas to ensure that they are consistent with the Landscape Mitigation outlined on page 9 of the Application Appendix F (together with GA Sheets 9 and 10) and the planting proposals detailed on pages 5 and 6 of RMM's Appendix 5?*

***2.1.1*** ***Response to RFI 6.1.a***

The Applicant has engaged an expert 'Condition' writer, and a final draft set of conditions are proposed to be completed by 3 March 2026. Below are suggested updates to the conditions, that the Applicant endorses. I note that these suggested updates may slightly alter, but at this stage the do include the level of detail sought and illustrate the intent of what is to be achieved.

The conditions under the heading 'Panels and Structures' have been updated as part of this RFI - 2 response to be more specific and provide more certainty regarding the heights of the proposed solar panels and inverters.

*Panels and Structures*

*The solar panels, array tables, and substation structures must be constructed in general accordance with the dimensions shown on the plans submitted with the application in Annexure X, and must not exceed the following maximum dimensions:*

*a. Solar panels and array tables: a maximum tilted height of 2.95 metres above ground level.*

*b. Inverter units: Each inverter shall be housed within a 20-foot shipping container frame measuring approximately 6.0m in length, 2.4m in width, and 2.9m in height above ground level.*

*b. Substation buildings: a maximum height of 5 metres above ground level.*

*c. Lower poles and transformer structures within the substation: a maximum height of 9.2 metres above ground level.*

*d. Tall poles within the substation: a maximum height of 22 metres above ground level.*

*e. Substation footprint: a maximum area of 105 metres by 92 metres.*

Regarding the solar panels, from the outset of the project it was never intended to install a two-panel single axis tracking system that would result in panels standing 4.5m tall when at maximum tilt. Rather, it has always been intended to install a one-panel system, as described in the Landscape Report and as illustrated in the visual simulations.

Since preparing the Landscape Report, further detail has been provided in the design. In particular, the centre pivot stands 600mm higher, and the panels are 100mm longer. This has resulted in the panels standing at 2.95m above ground level when at maximum tilt, and 2.1m above ground when parallel to the rounds surface. This is lightly higher than the 2.2m and 1.5m respective dimensions previously assessed.

The updated height of the proposed solar panels continues to sit below 3m, that the proposed native vegetation will mature to within 5 years, or 7 to 10 years when considering poor weather conditions. Therefore, the anticipated screening provided by the proposed vegetation has not changed and the conclusions reach in the Landscape Report remain.

The details regarding the inverters have not changed.

Minor changes to the substation have occurred since preparing the Addendum Report. Specifically:

- the footprint will be 105m x 92m, previously assessed as 99m x 87m
- the three building will have a maximum height of 5m, previously assessed as 3.2m.

These differences are small in size and extent when compared with what was previously assessed. Importantly, the substation infrastructure is centrally located with the Site, therefore these minor differences will not exacerbate the prominence of these structures and subsequently do not alter the conclusions in my Addendum Report.

### *2.1.2 Response to RFI 6.1.b*

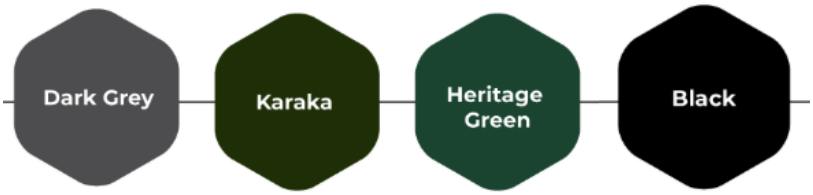
The condition relating to colours states (underlined for emphasis):

> "*All transformers, water tanks and structures on Site must be coloured in a dark, natural and recessive colours within the hues of greys, greens and browns which have a light reflectance value of less than 30%. Any externally visible part of a transformer, water tank and / or other structure that is externally visible cannot meet the light reflectance value requirement, the Consent Holder must submit written justification to Mackenzie District Council for certification prior to installation.*"
>
> ***Advice Note:** This condition does not apply to any transmission pole and lines, solar panel housing and supporting structures or fencing.*

Taking a pragmatic approach to purchasing 'off the shelf items' this condition allows for the following water tank colours to be used, as per Promax Water Tanks[1] and RX Plastics[2] 'easy to use' websites, and the Colorsteel colours as listed on their website[3]. Noting, Resene Paints can match these colours. On review, none of the below colours are listed in the BS5252 colour range, therefore no reference is made to those colours.

*Promax and RX Plastics Water Tanks*

These two websites have the same colour range.

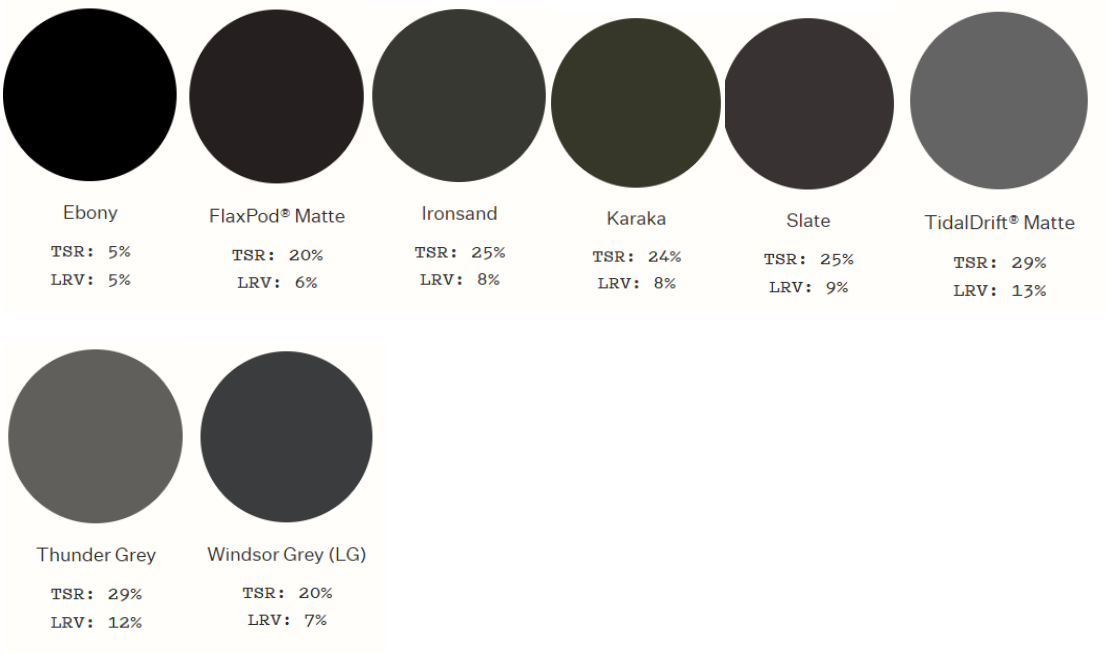



[1] www.promax.co.nz/enduro-water-tanks

[2] https://rxp.co.nz/tanks/water-tanks-max/

[3] https://www.colorsteel.co.nz/products/colours/

*Colorsteel*




With regard to the above, the condition relating to colours has been updated to capture the above listed colours, as below.

> "*All transformers, water tanks and structures on Site must be finished in the colours Black, Dark Grey, Ebony, Flaxpod, Heritage Green, Ironsand, Karaka, Slate, Tidal Drift, Thunder Grey, Windsor Grey or similar. Any externally visible part of a transformer, water tank and / or other structure that is externally visible cannot meet the light reflectance value requirement, the Consent Holder must submit written justification to Mackenzie District Council for certification prior to installation.*"
>
> ***Advice Note:** This condition does not apply to any transmission pole and lines, solar panel housing and supporting structures or fencing.*

### *2.1.3* ***Response to RFI 6.1.c***

The proposed conditions under the heading 'Landscaping' have been updated as part of this RFI - 2 response, as to provide more certainty on plant species, heights at time of planting, plant spacings, irrigation within the Landscape Mitigation Areas.

Updated text in underlined blue.

Deleted text in ~~crossed out red~~.

> *Landscaping*
>
> 1. *Implementation of the landscaping within the Landscape Mitigation Strip, in accordance with the below conditions and as illustrated on the landscape plan prepared by Rough Milne Mitchell (titled: Proposed Solar Farm Plan), dated 30 ~~4~~ April 2025, and provided with resource consent application titled Substantive Assessment of Effects Report, prepared by Williamson Water and Land Advisory Ltd, dated XXX (RMM Landscape Plan) prepared by Williamson Water & Land Advisory, is to be:*

a. *Undertaken within the first five planting seasons (approximately September - November) directly following commencement of any of the works relating to the solar farm (from detailed design stage onwards); and*

b. *Must be maintained by the Consent Holder from that point onwards for the term of the resource consent to the satisfaction of Mackenzie District Council or a duly delegated Council officer.*

~~*Advice Note:*~~

~~*Condition XX does not apply within 12 m either side of the centreline of Transpower transmission lines (refer to Condition X).*~~

2. *The vegetation within the Landscape Mitigation Strip as illustrated on the landscape plan prepared by Rough Milne Mitchell (titled: Proposed Solar Farm Plan), dated 30 ~~4~~ April 2025, is to achieve a minimum height of 3 m tall and create a visually continuous band of planting. To achieve this:*

   a. *36,000 native plants will be planted on Site. This includes:*

      i. *4,900 native plants will be planted within the 1,467m long x 7.5m wide planting strip along the northern boundary.*

      ii. *12,500 native plants will be planted within the 1,041m long x 40m wide planting strip along the southern boundary.*

      iii. *18,600 native plants will be planted within the 1,032m long x 35m wide planting strip along the eastern boundary.*

   b. *Plants will be planted in offset rows. Plants will be spaced at a maximum of 1.5m centres along each row. Each row will be spaced at 1.0 – 1.5m centres.*

      i. *Five offset rows of plants will be established within the planting strip along the northern boundary*

      ii. *Eighteen offset rows of plants will be established within the planting strips along the southern and eastern boundaries. The eighteen rows will be separated into three groups of six, separated by vehicle accessways for planting and maintenance purposes.*

3. *Plant species will consist of the following, or similar, and as agreed upon by a suitably qualified ecologist, so long as all plant species provide the desired screening.*

      i. *Aristotelia fruticose, (Mountain Wineberry)*

      ii. *Coprosma intertexta (Tumbledown Coprosma)*

      iii. *Coprosma propinqua (Mingimingi)*

      iv. *Coprosma rigida (Rigid Coprosma)*

      v. *Coprosma virescens (Mikimiki)*

      vi. *Corokia cotoneaster (Korokia)*

      vii. *Discaria toumatou (Matagouri)*

      viii. *Leptospermum scoparium (Manuka)*

ix. *Olearia odorata (Scented tree daisy)*

x. *Phyllocladus alpinus (Mountain Toatoa)*

4. *The exception to the above are the plant species 12m either side of the centreline of Transpower transmission lines along the eastern boundary, being a 24m long x 35m wide area. Plant species within this area will consist of the following, or similar:*

   i. *Carmichaelia kirkii (Kirk's Broom)*

   ii. *Carmichaelia petriei (Petrie's Broom)*

   iii. *Ozothamnus leptophyllus (Cottonwood)*

5. *At the time of planting, plants will be of a root trainer grade or larger.*

6. *The landscape area will be fenced off by either the rabbit and hare-proof fence around the perimeter of the Site and the security fence around the Solar Farm. Additionally, all plants will be planted with staked, pest protective sleeves.*

7. *A slow-release fertiliser will be included with every plant, at the time of planting.*

8. *All plants will be planted with mulch, to suppress weeds and retain moisture.*

9. *Plants will be irrigated for the first three years following planting focused on ensure their survival and establishment, during the hot and drier summer, autumn and spring months.*

   *Irrigation will be via water crystals and / or a water truck / tractor with a boom arm that can provide direct top-down irrigation as it travels alongside the planting strips or similar. When applied, the truck / tractor will be situated between the Site's boundary and the planting strips, to direct water into the Site and away from its boundary. Irrigation will not occur during high wind days, when irrigation may drift over the site boundary.*

   *Advice Note: No specific frequency of irrigation is required. However, it is a requirement that these plants establish and thrive. Therefore, the maintenance methodology(s) in the LMP will include a strategy to apply and monitor irrigation, and how it is used on Site to achieve the desired outcomes.*

10. *At least 30 working days before the commencement on landscaping on Site, the Consent Holder must submit to Mackenzie District Council for certification a LMP. The purpose of the LMP is to assist with achieving the best plant success rate possible and ensuring that the landscape mitigation vegetation, establishes, survives and thrives in this environment.*

11. *The LMP, at a minimum will include a planting methodology(s), maintenance methodology(s), and record the success and failure of the plant establishment. Therefore, the LMP will be a working Document that can be altered if and when better planting and maintenance methodology(s) can be implemented. This may include substituting plant species if it is found that a more appropriate plant species is better suited to this environment, whilst achieving the desired screening.*

12. *The LMP will be prepared and updated by a suitably qualified landscape architect and / or ecologist. The LMP must be consistent with the EEP required by Condition X and informed by the PAWMP, AMP, LzMP and RGMP required by Conditions X-XX.*

13. *The vegetation identified within the RMM Landscape Plan must not be cut down, damaged or destroyed (except for the purposes of replacing any vegetation that has died or represents an unacceptable risk to buildings or people as a result of a natural event) without the prior written consent of Mackenzie District Council. Such consent may be given in the form of resource consent.*

14. *The Consent Holder must ensure that the ground underneath the solar panels is covered in established vegetation at all times to prevent sediments entering stormwater. Should the vegetation under the solar panels not thrive in the shade of the solar panels then the vegetation must be immediately replaced with shade tolerant species.*

15. *At least 30 working days before the commencement of landscaping, the Consent Holder must engage a SQEP ecologist to produce a PAWMP for the Solar Farm. The purpose of the PAWMP is to provide details on how pest animals and weeds will be managed on the site during the operation of the Solar Farm. The PAWP must be informed by the AMP, LzMp and RGMP required by Conditions XX-XX and as a minimum must:*

    a. *Identify measures for how pest management and weed control will be undertaken on the Site;*

    b. *Identify times of year to focus particular pest management and weed control strategies;*

    c. *Establish mechanisms to report annually on the results of pest and weed management to Mackenzie District Council ~~Council~~.*

16. *The PAWMP must be provided to Mackenzie District Council's' SQEP ecologist(s) at least 15 working days before the commencement of landscaping, for certification.*

<u>*Mr Ewan's Comments on Plant Species*</u>

Mr Ewan has outlined that kanuka (*Kunzea robusta*) and ribbonwood (Plagianthus regius) will be inappropriate due to kanuka being a native weed in the Mackenzie Basin and Ribbonwood standing too tall. I appreciate Mr Ewan's advice on the screening plants.

The plant species list has been updated to include the following:

- *Aristotelia fruticose*, (Mountain Wineberry)
- *Coprosma intertexta* (Tumbledown Coprosma)
- *Coprosma propinqua* (Mingimingi)
- *Coprosma rigida* (Rigid Coprosma)
- *Coprosma virescens* (Mikimiki)
- *Corokia cotoneaster* (Korokia)
- *Discaria toumatou* (Matagouri)
- *Leptospermum scoparium* (Manuka)
- *Olearia odorata* (Scented tree daisy)
- *Phyllocladus alpinus* (Mountain Toatoa)

Below the Transmission lines it includes:

- *Carmichaelia kirkii* (Kirk's Broom)
- *Carmichaelia petriei* (Petrie's Broom)
- *Ozothamnus leptophyllus* (Cottonwood)

As per 3 and 4 above, the plant species list has been updated. Also, for completeness, the Graphic Attachment has been updated to reflect these updates.

*Mr Ewan's Comments on Cross Boundary Effects*

Mr Ewan has raised concern about the landscape mitigation vegetation and irrigation near the Threatened and At-Risk Species and the potential for cross boundary effects.

I note that it was originally intended to use an automatic irrigation system to establish native vegetation on Site. DoC has always sought a planting regime that includes no irrigation. Therefore, the updated proposed irrigation regime has been reduced to better align with what DoC seeks, while ensuring plants establish on Site.

The Landscape Plan is at 1:5,000 scale, being quite far out so the proximity of the landscape mitigation vegetation in relation to the boundary was missed. The updated design plans in RFI 1 Response in Appendix 10, and **Figure 1** below illustrates that the landscape mitigation planting is set back more than 20m from the boundary line. Therefore, all plants and irrigated areas are at least 40m from that At-risk plant species.

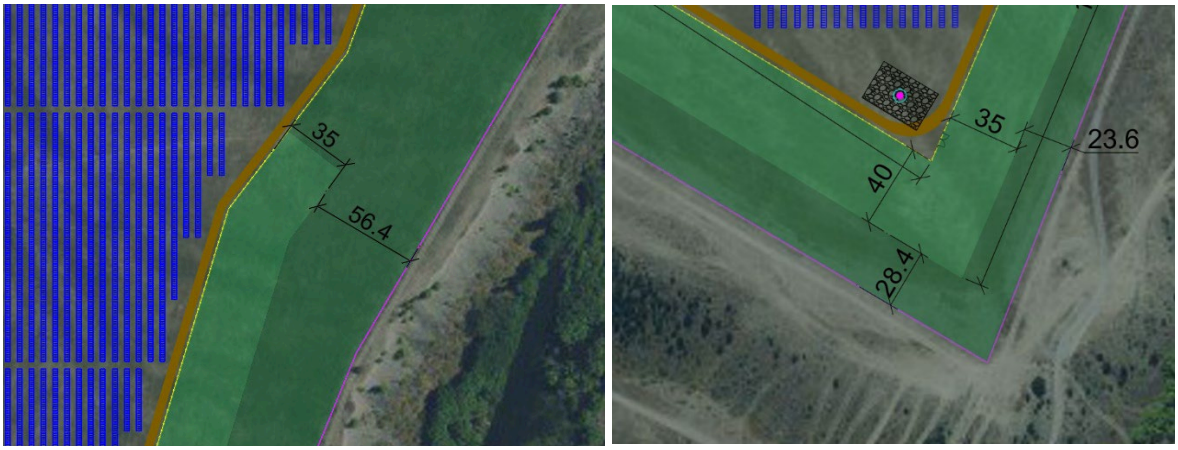



**Figure 1**. Illustrating the distance between the boundary and the Landscape Mitigation Vegetation.

As per 9 above, the purpose of irrigation is to ensure survival and establishment of the native vegetation for the initial three years. Therefore, 'overwatering' is not intended, that may otherwise occur from leaving an automatic irrigation system on for too long. Rather, irrigation will be via water crystals and / or a truck / tractor with a boom arm with a direct top-down spray. The accessways and offset areas enable the irrigation to be sprayed 'into' the Site and away from the At-risk plant species. Noting, irrigation will not occur during strong wind days when spray may drift south and east of the site.

Mr Ewan is concerned that irrigation will facilitate the establishment of exotic grass and weeds. A photo of the exotic grass cover within the Site's southern corner is in **Figure 2** below. Based on my on-site observations, I am of the opinion that the proposal will result in the removal of a substantial area of exotic grass cover near the Site's boundary. Also, where this does not occur, the existing grass cover will be more intensively managed via stock grazing (that in the first instance will push any lizards out of this area) and regular mowing, which is currently not the case with the exotic grass standing up to 1m tall at times.

**Figure 2**. Illustrating the existing exotic grass cover in the Site's southern corner. November 2022.

Due to the above, from a landscape perspective and without factoring in moisture levels (outside of my expertise), I consider that the concerns raised by Mr Ewen have been adequately mitigated via the proposed conditions. Also, I opine, that the proposal consisting of a more intensive land management regime will reduce the risk of cross boundary effects when compared with the current farming practices on Site.

## 2.2 RFI 6.2 - Cumulative Effects

*At the Project Overview Conference (Teams) presentation on the 16th of December 2025* [16 January 2026]*, the Applicant was asked to address cumulative effects with regard to both the Haldon Solar Farm and the existing Waitaki HEPS structures – to explore whether or not the combination of new solar farms and existing infrastructure would start to turn the Mackenzie Basin into an 'energy production landscape'. The RFI addresses cumulative effects in the context of the Haldon Solar Farm proposal, but not Meridian's Waitaki HEPS.*

*The request for information is:*

a) *Could RMM address the issue of cumulative effects, with regard to both the Haldon Solar Farm proposal and the Waitaki HEPS, to determine if this might lead to the creation of an 'energy production landscape' within the Mackenzie Basin?*

### *2.2.1* ***Response to RFI 6.2***

The Waitaki Hydro Scheme, consisting of Lakes Tekapo, Pukaki, Ōhau, Ruataniwha and Benmore, and the extensive canal network located throughout the entire Mackenzie Basin currently contribute to the Basin's character, with energy production being one of its characteristics that contributes to the Basin's associative values. Whilst these are large landscape features situated throughout the Basin, these energy production attributes do not dominate the Basin's character because they are primarily perceived as 'natural' consisting of large lakes and bodies of water, being a natural element. Also, Twizel township's history (built to accommodate the Waitaki Hydro workers) contributes to the Basin's historic associative values and its energy production characteristics.

The proposed solar farms differ to the lakes and canals, because The Point and Haldon Solar Farms will comprise approximately 990ha of solar array infrastructure that are not perceived as natural. For scale, Twizel township's existing footprint (excluding anticipated zoned growth) is approximately 740ha. Therefore, these two solar farms will contribute to the Mackenzie Basin's energy production characteristics and may create an 'energy production landscape', cumulatively, but also on their own.

At a wider scale, one of the key characteristics of the Mackenzie Basin's rural landscape, with the basin being in excess of 400,000ha is its open character that stems from its openness, vastness and lack of built form. Collectively, I consider the Waitaki Hydro Scheme, and The Point and Haldon Solar Farms will remain subservient to the openness and vastness of the Mackanzie Basin. Also, they are clustered within one small part of the Basin, with a limited viewing catchment so they do not result in the perceptual spread of such development that may otherwise occur. Therefore, the two solar farms will contribute to the energy production characteristics of the Basin. However, at a wider scale, energy production will not become the dominant characteristic of the Mackenzie Basin.

At a local scale, centred around the top end of Lake Benmore, I consider that The Point and Haldon Solar Farms will have a moderate to moderate-high (not significant) degree of change to the character of this part of the Mackenzie Basin, by introducing large scale solar infrastructure to this area. As assessed in the Landscape Report, the change in character (currently rural) will be of a semi-industrial / renewable power generation character, that could also be referred to as an energy production landscape. I consider that this would be the case with or without the Waitaki Hydro Scheme. Importantly, the entire character of this southern part of the Basin will not change, because it will continue to be influenced by the large-scale mountains, terraces, rivers, Lake Benmore and wider rural intermontane features.

I opine that the Waitaki Hydro Scheme does not meaningfully contribute to the cumulative adverse effects that may arise, nor on its own it does not create a threshold with respect for the Basin to absorb additional renewable energy, including the two proposed solar farms. Rather, the energy production characteristics attributed by the Waitaki Hydro Scheme along with the physical, associative and perceptual values attributed by the Basin's high irradiance and flat land, and this part of the Basin containing more built form than all other areas assist with mitigating the potential adverse cumulative effects that may arise. Also, as mentioned in the RFI 1 Response, clustering these activities assists with mitigating the spread of this localised character change.

Due to the above, at a local scale, The Point and Haldon Solar Farms will have a **moderate degree** of adverse cumulative effects on the landscape character and values of the southern part of the Mackenzie Basin. Regarding the wider Mackenzie Basin, these adverse effects will be of a **very low to low degree**.

## 2.3 RFI 6.3 - Assessment of Landscape Effects – Appendix 5 of RFI Response

*In Section 2.4 (p.7) of RMM's Appendix 5 it is stated that the proposed Landscape Mitigation Planting has been designed to address solar panels that have a tilted height of 1.5m to 2.2m height. However, as indicated above, this is not consistent with proposed Condition 72, which accommodates panels with a maximum tilted height of 4.5m.*

*The requests for information are:*

a) *Could the Applicant clarify which maximum height is applicable to the proposed solar panels?*

b) *If the maximum tilted height remains at 4.5m, does this mean that RMM's Landscape Mitigation Planting and its assessment of effects need to be amended accordingly?*

### *2.3.1* ***Response to RFI 6.3***

The response in Section 2.1.1 above has covered off this issue in full. In brief, the maximum height of the solar panels will be 2.95m above ground level. This height is below the 3m height of the proposed native vegetation after 5 years of growth. Therefore, the anticipated screening of the panels remains true, and so do the conclusions reached in the Landscape Report.