

Fast-track - S53 Response - Landscape

Proposed Solar Farm
The Point, Mackenzie Basin

26 February 2026



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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 have responded to the landscape related matters in the Request for Further Information (**RFI**) Response 1, dated 16 February 2026 and RFI Response 2, dated 23 February 2026.

Section 53 parties, being the Invited Parties, provided comments on The Point Solar Farm Application on 19 February 2026. The purpose of this report is to respond to the landscape related matters that have been raised.

The Landscape Mitigation Plan has been updated to capture Transpower's comments. It forms **Appendix 1** to this report and is dated 25 February 2026.

2 Section 53 Parties – Response to Landscape Issues

2.1 Issues Raised

The Section 53 Parties that have raised landscape issues are:

- Mackenzie District Council, who engaged Mr Ben Espie, Senior Landscape Planner and Director of Vivian+Espie Ltd, who peer review my Landscape and Addendum Reports and RFI Response 1.

Mr Espie generally agrees with the conclusions I have reached, stating that they are credible. He notes that the visual mitigation and the subsequent visual effects are dependent on good plant success and growth. Regarding this, his only concern relates to irrigation.

- Lodestone Energy Ltd, who engaged Ms Sue McManaway, Principal Landscape Planner and Mr Rhys Girvan Senior Principal, Landscape Planner at Boffa Miskell, who peer reviewed RFI Response 1. The authors raise concern with regard to the cumulative effects assessment of the five solar farms currently on the Fast-track website.
- Department of Conservation (**DoC**), who has raised concern with plant species and cross boundary effects resulting from irrigation.

I note, we were provided Mr Richard Ewan's comments that formed part of DoC's comments prior to and proactively responded to these issues in the RFI 2 Response.

- Environmental Defence Society Inc (**EDS**) and Ms Susan Walker, who raise concern with irrigation, plant species selection, and setbacks from the terrace edge.
- Ngāi Tahu
- , who raise concern regarding cultural effects and cumulative effects.
- Royal Forest & Bird Protection Society of New Zealand In (**Forest & Bird**), who raised concern regarding the District Plan policy provisions referenced in the Addendum Report and cumulative effects.
- Transpower New Zealand Ltd (**Transpower**), who have raised concern regarding vegetation near the National Grid.

Below is a response to each of the issues raised, by the s53 Parties.

2.2 The Proposed Irrigation Scheme

It is worthwhile mentioning 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, as discussed with DoC during our first project meeting. Wildlands and RMM consider that good establishment of plants is dependant on irrigation in this harsh environment. Therefore, the updated proposed irrigation scheme has been reduced to better align with what DoC seeks, while ensuring the use of irrigation to establish native plants on Site.

I appreciate DoC and Ms Walker's ecological approach. However, holistically, I opine that replacing exotic grassland with native vegetation, whilst temporarily utilising irrigation, will have a better long term environmental outcome when compared with maintaining the exotic grassland.

The RFI Response 2 included updated draft conditions that will be finalised on 3 March 2026. Regarding irrigation and plant establishment, they currently state the following:

Landscaping

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

The key points that the draft conditions outline are:

- The frequency of irrigation, whilst not specified must ensure that plants establish on Site. In my professional opinion, this means that daily or every second day watering will be required during the hot drier seasons. However, it can be reduced during wetter months (summer or winter) due to the varied weather patterns we now experience.

- Irrigation via a boom arm can be directed downward, away from the Site boundary and occur when it is not windy so it can be as effective as possible and mitigate any cross-boundary irrigation.
- Mulch will assist with maintaining moisture levels, to assist with plant establishment and growth.
- Water crystals will be used to assist with maintaining moisture directly beside each plant's root ball.

I agree with Mr Espie that this irrigation scheme is not common practice. However, it will enable irrigation on site while mitigating potential cross boundary effects, while providing some flexibility if it is required to ensure that plants establish on Site.

2.3 Plant Species Selection

The Landscape Mitigation Plant Palette was updated based on the advice of Mr Ewan. The proposed conditions allow for further updates to the plant palette (if required), so long as the native vegetation can mature to 3m tall. Therefore, whilst there may be concern about some (not all) plant species, I am confident that the final plant species selection (if different to what is proposed) will achieve their desired outcome.

2.4 Setbacks From the Terrace Edge

As mentioned above, the cross-boundary effects, that respond to the proximity of landscape mitigation near the site boundary and terrace edge have been responded to in RFI Response 2, therefore are not repeated here.

2.5 District Plan Policy Provisions

The Addendum Report is dated 15 June 2025 and was prepared prior to the District Plan's REG Chapter being made operative.

On review of the Plan Change 26 process¹, I have found that I assessed the proposal against the proposed policy provisions as drafted in Council's S42A report. The policy provisions referred to by Forest & Bird, in their paragraph 58 weren't drafted at this time. Therefore, I did not omit these policy matters from my assessment.

Regarding REG Policy 6.5² and 6.7³, my assessment concluded that the adverse effects on the Mackenzie Basin's outstanding landscape values (within the identified receiving environment) will be of a low-moderate to moderate degree (not significant). Therefore, I am of the opinion that these two policy provisions are not relevant because there are no significant adverse effects.

¹ <https://www.mackenzie.govt.nz/council/plans-reports-and-strategies/plans/district-plan>

² REG Policy 6.5 - regard is had to any proposed offsetting measures or environmental compensation (including considering Policy 4 in Section 19 and Appendix Z), where there are significant residual adverse effects that cannot be avoided, remedied or mitigated.

³ REG Policy 6.7 - following application of 1-6 above, consideration is given to whether the benefits of the activity outweigh any significant residual adverse effects on the values of the area.

2.6 Cumulative Effects

RFI Response 1 includes a cumulative effects assessment of the five proposed solar farms currently listed on the Fast-track website. After completing this body of work, I found that there was a small error in Section 3.4. Noting that the Haldon, Twizel and The Point SFs would be seen from the Ōhau C look out area, not just Twizel and The Point SFs. I note that I made Mr Espie aware of this error the day after lodging RFI Response 1.

RFI Response 2 includes a more specific cumulative effects assessment of the Waitaki Hydro Scheme, and the Haldon and Twizel Solar Farms, as requested by The Panel. It is my understanding that this more specific assessment was sought because these two solar farms are currently being processed through the Fast-track process, whereas all other solar farms are not.

Because the Panel sought the more specific assessment, I do not see the need to respond to the comments made by Ms McManaway and Mr Girvan of Boffa Miskell. This is because I don't consider that further comment at this time is useful when substantive applications for Twizel, Grampions and the Balmoral Solar Farms have not been lodged.

With regard to Forest & Birds comment (para 61), it suggests that the cumulative effects assessment contradicts the conclusions in the Landscape and Addendum Reports. This is because the cumulative effects assessment concludes a lower degree of adverse effects when compared with the standalone assessment. It is important to recognise that the Landscape and Addendum Reports assessed The Point Solar Farm in relation to the identified receiving environment that takes in the southwest quadrant of the Basin. Refer to Graphic Attachment Sheet 5, appended to the Landscape Report. Whereas, the cumulative effects assessment, assessed the five solar farms in relation to the entire Basin. Noting two solar farms were outside the receiving environment, and the Waitaki Hydro Scheme (due to the dammed lakes) extends through the entire Basin. This difference, being the scale⁴ at which the landscape effects assessment was undertaken is a key factor on why there is a difference in conclusions.

I note other S53 Parties have raised concern with numerous other solar farms that may be proposed within the Basin. For the reasons above, I do not consider that a comment on the speculative nature of these other solar farms is required at this time.

2.7 Cultural Effects

Engagement with mana whenua is currently occurring through the consultation phase, post the preparation of the Landscape and Addendum Reports. Due to the timing of this, these reports only relied upon the information in the District Plan to inform the actual and potential adverse effects of the cultural values of Te Manahuna / The Mackenzie Basin.

Ngāi Tahu's comments make it clear that the physical and perceptual change within the site will affect their cultural, spiritual, historic and traditional associations (cultural associative values) with Te Manahuna / The Mackenzie Basin. It is also clear that the Waitaki Hydro Scheme has already impacted their connection to whenua because it has inundated areas of historic importance.

Unlike the Waitaki Hydro Scheme, the proposal is entirely contained within the Site, therefore, it will not physically restrict access to currently accessible locations. Therefore, a further physical reduction to areas of importance will not occur. However, I recognise that mana whenua's connection with the

⁴ Te Tangi a te Manu Guidelines, Page 161, 238, 240 and 241.

land is more than just physical and that the solar farm's location and extent does not mitigate the potential loss of their connection with the land.

Ngāi Tahu's comments have not raised concern regarding the Landscape and Addendum Reports. Rather they have highlighted that there will be adverse effects on Mackenzie Basin's outstanding landscape values and that these adverse effects can be mitigated through the ecological and biodiversity enhancement activities. Subsequently, "*Te Rūnanga considers that the proposed KGG [Kaitiaki Governance Group], together with the CMP [Cultural Monitoring Group] condition (discussed with Far North Solar), will provide ongoing opportunities to identify and progress measures that maintain and enhance Ngāi Tahu connections with the landscape over time.*"⁵

The Applicant has informed me that the updated conditions ensure that a Kaitiaki Governance Group and Cultural Monitoring Group will be created as to work with Ngāi Tahu in enhancing their connection within the landscape.

Due to the above, the solar farm itself will have an adverse effect on the cultural associative connection with the landscape. However, this adverse effect will be mitigated through the actions of the Kaitiaki Governance and Cultural Monitoring Groups. This aligns with District Plan REG Policy 6.3⁶.

2.8 Vegetation Near the National Grid

The Landscape Mitigation Plan has been updated to capture Transpower's comments in their paragraphs 4.11 – 4.14. Notable:

- A note has been included that stipulates that the proposed plant species within 12m either side of the centreline of Transpower transmission line will consist of the following plant species, or similar, that have a mature height of no more than 3m.
 - i. *Carmichaelia kirkii* (Kirk's Broom)
 - ii. *Carmichaelia petriei* (Petrie's Broom)
 - iii. *Ozothamnus leptophyllus* (Cottonwood)
- A Transpower Transmission Line Setback Area has been included. This area measures 30m north and 30m south from the outside of the transmission lines. The accompanying note stipulates that proposed plants within the Transpower Transmission Line Setback Area must be situated so when they are mature, they cannot fall and land within 4m of the transmission line.
- The Transmission Tower is partly within the Landscape Mitigation Area. A note has been included on the Landscape Mitigation Plan stating that all plants will be setback 12m from the Transmission Tower.

Regarding the above updates, the planting strip under and near the transmission line is wide enough that the desired screening will continue to be achieved.

⁵ Ngāi Tahu's comments. Para 4.32.

⁶ REG Policy 6.3 - adverse effects on the values of the area that cannot be avoided are remedied or mitigated, where practicable.