Boffa Miskell

Memorandum

[redacted]

Attention:	Jon Bright, Project Director
Company:	ElectroNet Consulting
Date:	17 November 2025
From:	James Bentley, Landscape Architect
Message Ref:	Additional Landscape Assessment following release of TTPP Decisions Version
Project No:	C12108

Fast Track Approvals Act: Waitaha Hydro: Additional Landscape Assessment following release of TTPP Decisions Version

This memorandum concerns additional landscape assessment relating to the recent notification of the Proposed West Coast District Plan – Te Tai Poutini Plan (referred to as the TTPP Decisions Version) concerning the Waitaha Hydro application under the Fast Track Approvals Act.

This memorandum should be read in conjunction with:

- Waitaha Hydro FTAA Substantive Application Appendix 27: Boffa Miskell Waitaha Hydro Scheme Landscape Effects Assessment, dated 30 July 2025 (and associated appendices of that report, including the Graphic Supplement) – referred to as the **BML LEA Report**.

The TTPP Decision Version was publicly notified on 10 October 2025. The Appeals period extends from 10 October through to 24 November 2025, with an opportunity for people to join any appeals (as a s274 party) extending from 25 November through to 15 December 2025.

Within the TTPP Decisions Version[1], the following was confirmed (as to which it concerns landscape and/ or natural character):

- Confirmation concerning the ONLs in relation to the project. These are:
  - ONL 18 Mt Elie De Beaumont – Mt Whitcome *(which concerns the Weir and upper tunnel portals)*.
  - ONL 22 Bonar, Rangitoto & Bald Hill Ranges *(which concerns the Power Station and Transmission up to MacGregor Creek*).
  - ONL 20 Wakanui/Wanganui Bluff to Waitaha River *(which concerns upgrades / minor upgrades to existing transmission lines alongside SH6 and Beach Rd)*.
- Confirmation that Morgan Gorge, whilst located within an ONL (generally ONL18) is not a natural feature mapped and identified in Schedule Six – Outstanding Natural Features.

[1] Part 4 Appendices; Schedule 5 Outstanding Natural Landscapes -Te Rārangi Tuarima: Ngā Whenua Aotūroa Puru Rourou.

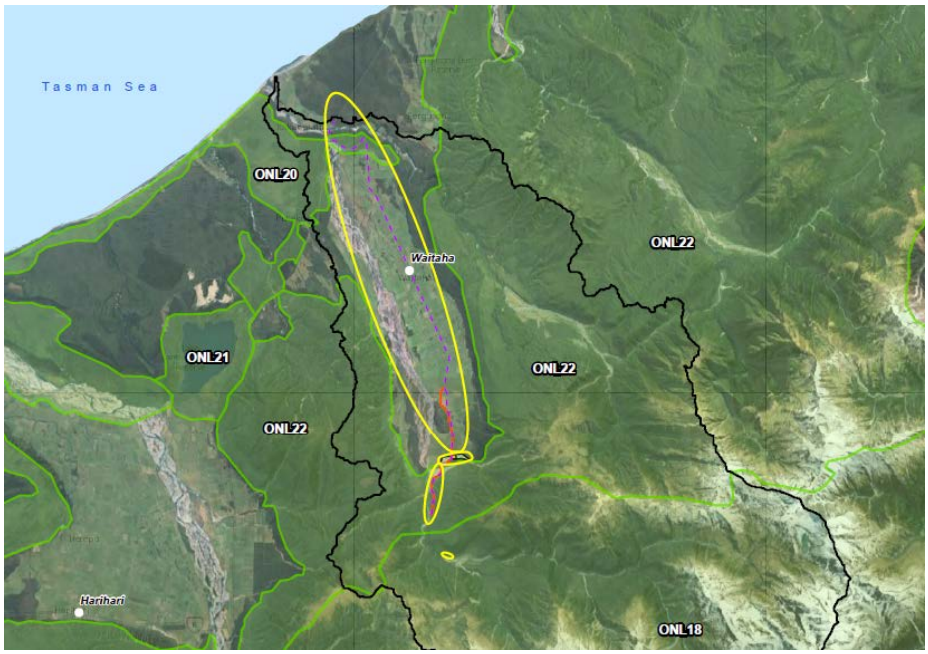


Image 1: Extent of scheme in relation to mapped ONLs in the TTPP. Also refer to Figure 7 in the BML LEA Report

The commencement of Schedule 5 now contains a Preamble. The Preamble states:

> *Schedule Five identifies and describes 55 Outstanding Natural Landscapes (ONLs). The ONL Schedules are a tool to assist with the identification of the landscape values that are protected within an area. They contain both factual information and evaluative content and are to inform plan development and plan implementation processes and assist technical landscape assessment. The ONL Schedules are based on the scale of the relevant ONL and form a relatively "high level" summary of the more natural landscape values of the area. This means that the landscape values identified in an ONL Schedule may not apply to a site within the ONL. The ONL Schedules do not address established modifications that form part of the landscape to which they apply, such as infrastructure, rural buildings, farmhouses, roads, pastoral land use and production forestry. It is acknowledged that this existing modification is of a scale, character and/or location such that the area still qualifies as ONL. Given the scale of the landscape assessment underpinning the ONL schedules and the high-level nature of the schedules themselves, a finer grain proposal-specific assessment of landscape values will typically be required for plan development or plan implementation purposes (including plan changes or resource consent applications). Through any proposal-specific landscape assessment, landscape modifications and/or additional landscape values may be identified that are not recorded in the ONL Schedules.*

The following was also confirmed within the TTPP Decisions Version and concerns the new transmission lines between the Power Station and SH6:

- Under the WDP, all proposed new transmission lines and upgrade works were **Permitted Activities** under Rule 6.2 (j) of the Westland District Plan.
- Under the TTPP Decisions Version, the new transmission lines between the Power Station through to SH6 is now a **Discretionary Activity** under Rule ENG-R16.

Further, there is a level of ambiguity under the new TTPP Decision Version rules regarding whether the proposed Upgrades / Minor Upgrades to existing transmission lines alongside SH6 and Beach Rd located within ONL20 is an additional reason for consent or not (noting that irrespective the transmission line in full was included in the FTAA Schedule 2 listing for the project).

Based on this, I have been asked to review my assessment, and where necessary provide additional commentary concerning the transmission lines between Maclean Farm and along Waitaha Road. I have also been asked to consider implications concerning the proposed upgrades/ minor upgrades to existing transmission lines alongside SH6 and Beach Rd located within ONL20. Finally, I have also been asked to outline my input concerning previously discussed alternative transmission corridor routes.

Updated Assessment

Landscape effects between Maclean Farm (north of Macgregor Creek) and along Waitaha Road, to SH6

As stated in the application, it is proposed to establish a new 66kV existing transmission corridor from (and including) the Mclean Farm northwards, towards SH6. This extends from the proposed Power Station further south. The 66kV transmission corridor will extend north of Macgregor Creek along paddock boundaries within the Mclean Farm, close to the eastern side of the Doughboy. At this point close to the Doughboy, the transmission lines will be combined with the existing 11kV line. Beyond Anderson Road to the north, the 66kV transmission corridor separate from the 11kV line and will extend along the eastern side of Waitaha Road, with the existing 11kV transmission extending along the western side of Waitaha Road. At just north of Douglas Road, the 11kV line swaps sides of Waitaha Road within the centre of the Waitaha Valley. At this point the 66kV line will either swap sides or a decision be made during detailed design to combine them both.

Approximately 500m south of Waitaha Road's connection with SH6, and as the road and transmission corridor enters an area of existing bush (ONL20), the two transmission lines will reconnect and will extend along the existing eastern side of Waitaha Road to SH6 (using the same 11kV footprints). A plan showing the alignment of the proposed transmission lines (and where they connect, and separate) is illustrated in **Appendix 1** of this memorandum. **Image 1** illustrates an example of what the 66kV pole will look like.

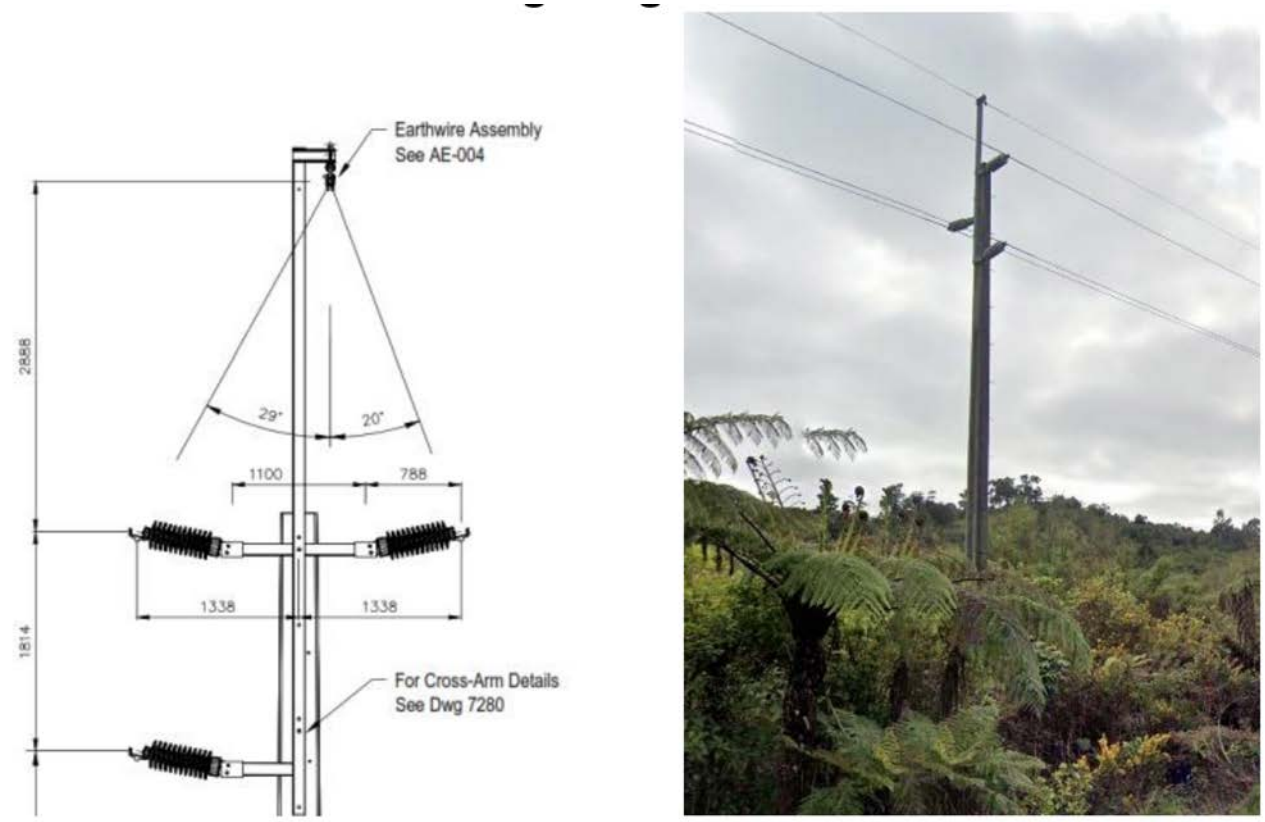


Image 2: Anticipated design of the 66kV pole (as described in the Project Description)

The proposed 66kV power poles will be marginally taller than the 11kV poles (at approximately 15.5m in height). Pole spacings along the corridor will range from 150-180m (possibly slightly larger spacing than the 11kV poles). As stated in the BML LEA Report:

> *'Concerning the upgrading of the transmission corridor through the Lower Waitaha Valley, this would essentially be replacing existing power poles and lines, with a slightly larger pole. The number of overhead wires would remain the same. There would be limited disturbance caused through this replacement as it extends from the upper part of the Lower Waitaha Valley towards an area close to the State Highway. The transmission line would extend through predominantly a modified landscape, within the road reserve, and enter a small area of vegetation close to the State Highway. It is anticipated that no vegetation will be required to be removed to facilitate the upgrade in this area, where required. As such, the landscape and visual effects are assessed as being **low** during the construction phase returning to **neutral** in the long term*'.[2]

I have reconsidered the landscape (and visual) effects associated with the new and combined nature of the transmission poles (66kV and 11kV) within the modified rural context, north of Macgregor Creek (and outside of ONL22), extending through the Mclean Farm northwards to SH6 and ONL20, as a discretionary activity.

As stated in the BML LEA Report, this is a working rural landscape, where existing transmission lines, along with other buildings and structures, form an element of the rural landscape. The proposed 66kV transmission line will be an additional component within this rural landscape and associated primarily with paddock boundaries (within Mclean Farm) or associated with the eastern alignment of Waitaha Road.

As stated within the BML LEA Report, there will be up to 0.2 hectares of vegetation close to the doughboy that will need to be removed (primarily as a result of the upgrade to the access road). No other areas of vegetation are proposed to be removed to facilitate the 66kV transmission corridor (other than occasional trimming of branches, where required).

Within the Mclean Farm, the combined 11kV and 66kV transmission route will be primarily evident at distance from Waitaha Road (when looking south), therefore the primary effects will be associated with the slightly higher 15.5m high poles (and overhead wires). Visually, there will only be one transmission alignment evident.

On Waitaha Road, the 11kV and proposed 66kV transmission routes separate. The existing 11kV route maintains its alignment along the western side of Waitaha Road, with the new 66kV aligning the eastern side of Waitaha Road. This arrangement will extend to just north of Douglas Road, where the 11kV line swaps sides of the road, within the centre of the valley at which point the 66 kV line will swap to the other side of the road. Detailed design decisions will be made as to whether to combine the two lines or to swap sides along the route, for instance to avoid notable trees. Adding a second, parallel line will intensify the linear infrastructure present, making it a more dominant element in views from the road and surrounding properties. This additional visual presence along Waitaha Road (between Anderson Road and ONL20) will introduce **low-moderate** adverse visual effects during construction, reducing to **low** adverse visual effects in the longer term. The current level of openness experienced will be reduced by a small degree due to the presence of power poles on both sides of the road. However, this is located within a modified rural context, where overhead wires are a recognised and accepted feature within the landscape, along with farm tracks, roads, houses and grazing land. More elevated land will remain in native vegetation cover.

Proposed upgrades/ minor upgrades to existing transmission lines alongside SH6 and Beach Rd located within ONL20

Within the northern part of the Waitaha Valley, the proposed upgrades to the transmission poles extend into ONL20. Within the ONL are modifications, including transmission poles, SH6, part of Waitaha Road and part of Beach Road. The BML LEA Report rated the landscape effect of the transmission route upgrade through this area '*as being **low** during the construction phase returning to **neutral** in the long term*'

[2] BML LEA, page xv.

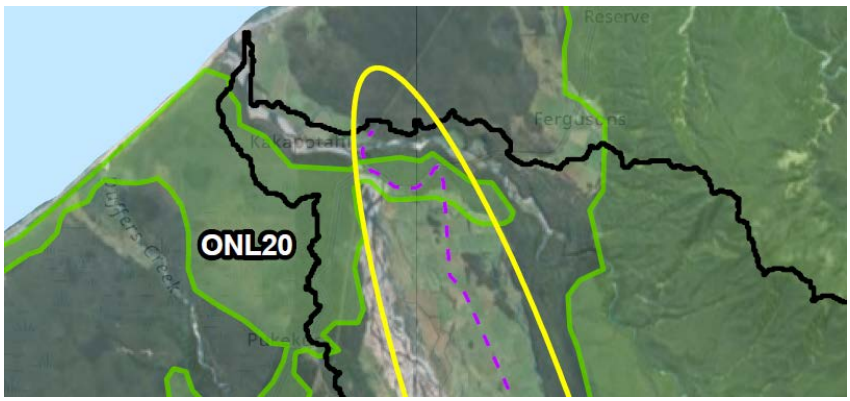


Image 3: The extent of ONL 20 in relation to the transmission line upgrade along Waitaha Road, SH6 and Beach Road.

The transmission line extends adjacent to roads, mown berms and at the 'edge' of the native bush that forms the majority of the values that underpin this ONL. Images of the existing transmission towers are located below (**Images 4 and 5**). Any effects of the upgraded transmission corridor in this location (combining both the 11kV and new 66kV transmission corridor) will essentially be the same in scale and character as currently exists, with no vegetation loss. The principal difference will be slightly higher poles (up to 15.5m in height). Based on this, and that the viewing audience is primarily travelling at speed, the adverse visual effects of the electricity upgrade in this ONL would be low.

Image 4: View looking south from a location on Waitaha Road (within ONL20). Source: Google Maps.

Image 5: View looking west along SH6 (within ONL20). Source: Google Maps.

Potential alternative transmission corridor routes Landscape Effects

As outlined within Waitaha Hydro Scheme, Project Overview (July 2025)[3], there were numerous different options considered for the transmission line as part of the design of this FTAA project.

At 3.62(d) the report noted:

> *'a realigned transmission route following the local roads and State Highway 6 to a connection point with Westpower's 66 kV line (at Westpower's existing Waitaha Substation site in Bold Head Road) so that the alternatives of crossing private land or traversing to the true left of the Waitaha River (requiring more vegetation clearance) are no longer needed;'*

The true left route option is illustrated in **Appendix 2** where it crossed the Waitaha River and extended along Allen Road, to connect with SH6 and the existing transmission corridor. This option meant that a potential power pole with piled foundations would be required within the riverbed of the Waitaha River, as well as some additional vegetation clearance associated with the northernmost part of Allen Road as it enters an area of native bush. In addition, this option also meant that a new substation would also require to be constructed[4].

It was assessed at the time that the landscape (visual) and natural character effects of this transmission option would be far greater than the current option (aligning Waitaha Road). This previous option would have created up to moderate adverse natural character effects to the natural elements, patterns and process on the Waitaha River, as well as areas of moderate-low adverse landscape effects where vegetation was proposed to be removed.

Between the Power Station and Anderson Road (within Mclean Farm)

The alignment of the proposed transmission line has been developed through an iterative design process, informed by multidisciplinary input from ecology, landscape, and engineering specialists. The selected route between McLean Farm and the Power Station Site represents an outcome that balances technical feasibility with the objective of minimising landscape and natural character effects.

[3] Appendix 3 of the FTAA, prepared by Rodger Griffiths.
[4] The current proposed option means that the connection of the 66kV transmission line to the existing Westpower substation on Bold Head Road will require some local upgrading, rather than establishing a new substation.

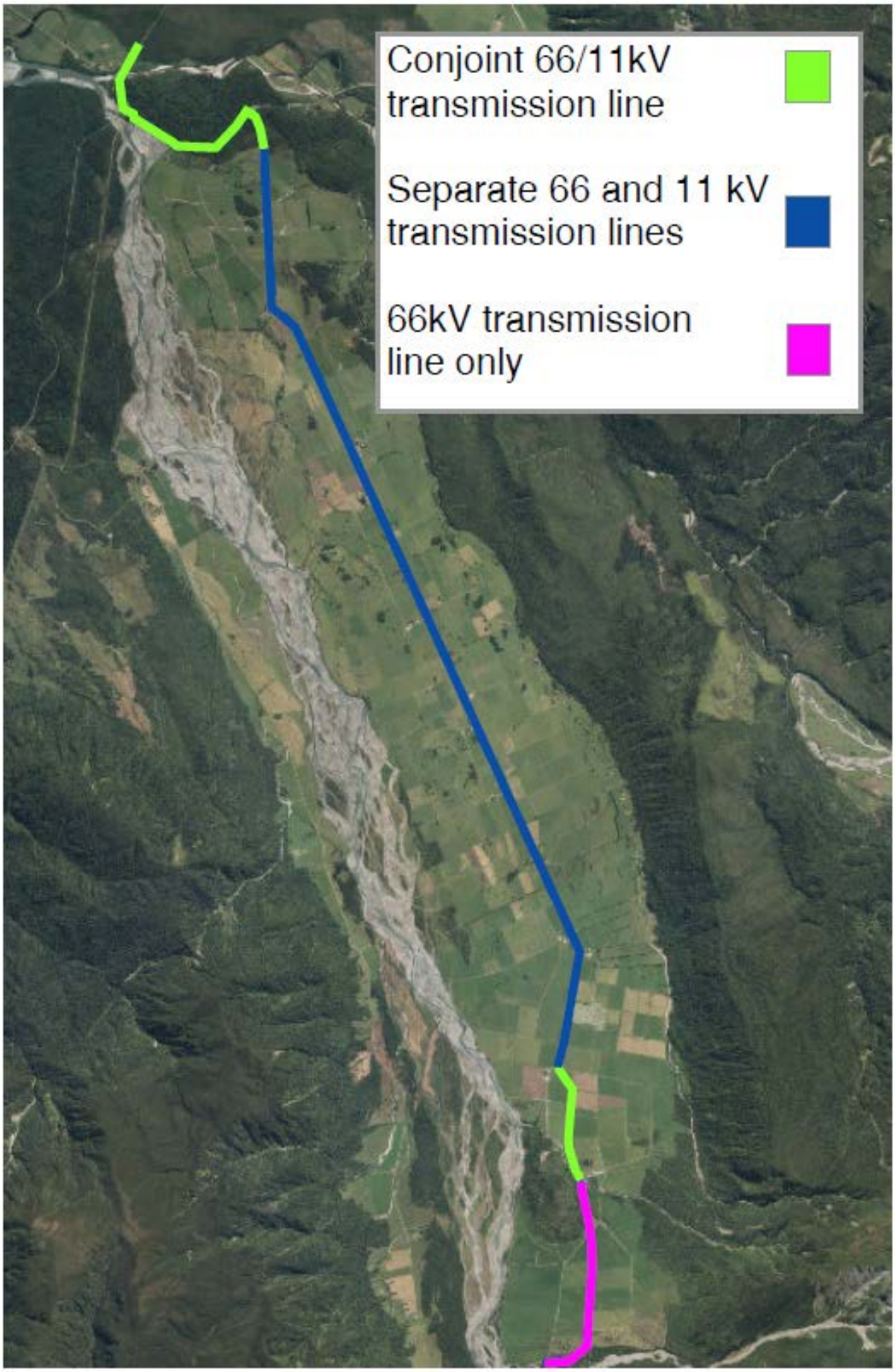
Between the Power Station and Macgregor Creek, the preferred alignment was selected for its ability to avoid sensitive ecological and landscape features, including wetlands, large podocarps, and a stable tributary of high ecological and hydrological value. Aligning the transmission route in close association with the proposed access road allows the corridor of modification to be consolidated within an existing or modified footprint, thereby reducing the spatial extent of new visual and landscape disturbance.

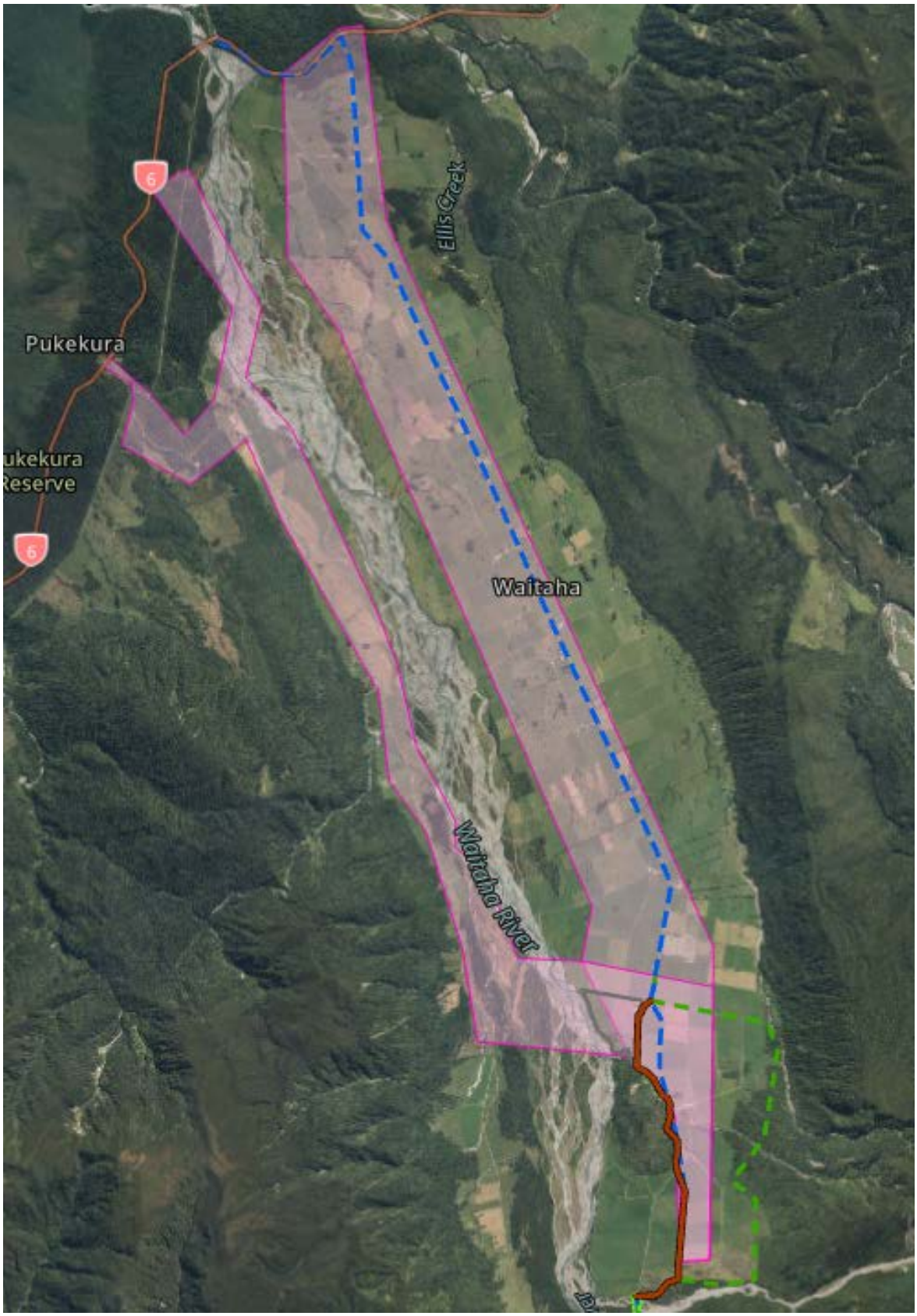
This alignment approach ensures that the transmission infrastructure remains visually coherent with other functional elements of the project, avoiding unnecessary fragmentation of the surrounding landscape pattern. Multiple alignment iterations were investigated and refined collaboratively between the ecological and landscape specialists to confirm that the chosen route presents the least practicable environmental and landscape effects within this sensitive setting.

Beyond Macgregor Creek, the proposed transmission corridor and access road continue to be closely co-located, following lower-elevated paddock boundaries to minimise visual exposure and avoid the steeper, more visually prominent landforms to the east. This approach reduces potential visual catchment and limits the extent of earthworks and vegetation clearance. The eastern slopes in this area are more visually apparent from Waitaha Road and contain greater densities of regenerating scrub and native bush, making them less suitable from both a landscape and natural character perspective.

Some localised vegetation clearance will be required along the eastern base of the elevated and vegetated Doughboy feature. However, an existing access track is already present in this location, and vegetation removal will be limited to roadside and paddock-edge vegetation associated with that existing modification. The proposed transmission line will join with the existing farm related 11kV line northwards to Anderson Road following an existing track to Waitaha Road. Refer to **Appendix 1**.

Appendix 1: Transmission line make-up Plan





The Pink hatched boxes represent the two broad valley options to SH6. The dashed lines represent the transmission options with green being an option considered and blue the final chosen route. The red line is the access road through the farm.