

**BEFORE THE INDEPENDENT COMMISSIONER
OF CENTRAL OTAGO DISTRICT COUNCIL**

IN THE MATTER of the Resource Management Act 1991 ("**RMA**")

AND

IN THE MATTER of an application for resource consent by Helios OTA
OP LP ("**Helios**") to construct, operate and maintain a
photovoltaic solar farm and associated infrastructure
including a substation and transmission line
infrastructure for renewable electricity generation at
48 Ranfurly-Naseby Road, Naseby ("**Project**")

**STATEMENT OF EVIDENCE OF SUSAN JANE MCMANAWAY
ON BEHALF OF HELIOS**

21 JULY 2025

1. EXECUTIVE SUMMARY

- 1.1 This evidence is given in respect of the resource consent application by Helios for the proposed new solar farm at 48 Ranfurly-Naseby Road, Naseby ("**Site**"). My evidence addresses the potential effects on natural character, landscape and visual effects of the Project. In relation to natural character, the proposed planting, revegetation and fencing will lead to an overall enhancement of natural character at the Site over time.
- 1.2 In relation to effects on landscape character and values, the proposed Project is located within the Māniateoto Plain, a broad rural basin landscape characterised by expansive pasture, exotic forestry, and sparse residential development. The Site itself is not within or adjacent to any Outstanding Natural Landscapes ("**ONL**") or Significant Amenity Landscapes ("**SAL**") as defined by the Central Otago District Plan ("**CODP**"). While the Project introduces a new land use, it can be successfully integrated into the existing rural landscape with the proposed mitigation.
- 1.3 Visual effects are assessed from both public and private viewpoints. The most affected public views are from nearby low volume roads¹, particularly Ranfurly-Naseby Road and Ranfurly Back Road, and will be moderate following construction, reducing to between low to low-moderate as planting establishes.
- 1.4 Private views from nearby dwellings (notably Dwellings 2 and 4) are also addressed. Visual effects will be greatest during construction. Effects from Dwellings 2 and 4 will reduce to low-moderate into operation and will reduce further to low following planting establishment. The landowner at Dwelling 2 has submitted in support of the Project. Visual effects from all other dwellings are assessed as no more than very low.
- 1.5 The proposed mitigation measures include extensive planting, setbacks from sensitive features such as wetlands and roads, and a Landscape Planting and Maintenance Plan ("**LPMP**"). Measures are considered appropriate and effective in managing landscape and visual effects and are addressed in the conditions of consent.
- 1.6 Public submissions have raised concerns about landscape and visual matters such as visibility, scale, and the effectiveness of mitigation. I consider that while

¹ Naseby Solar Farm Development Transport Assessment prepared by Abley (23 August 2023), p5.

the Project introduces a new land use, it can be successfully integrated into the existing rural landscape with appropriate mitigation. The reversibility of the development after its 35-year operational lifespan is also noted as a factor reducing long-term landscape effects.

- 1.7 Peer reviews by Mr Espie and the Section 42A Report author, Mr Vincent, generally support the findings of the Assessment. Both note that effects will lessen over time and that mitigation measures are appropriate. There is one issue with a level of uncertainty indicated, regarding plant growth rates due to the challenging climate. I have endeavoured to address this matter by arranging the development of the LPMP, including a peer review by Habitat Restorations with their practical experience of the local climate. I understand the reasonableness of the growth rates provided in the LPMP have been confirmed by Dr Andrew Wells, senior ecologist from Wildlands.

2. INTRODUCTION

- 2.1 My full name is Susan McManaway.
- 2.2 I am a landscape planner and principal at Boffa Miskell Limited ("**BML**"), a national firm of consulting planners, ecologists and landscape architects, based in Christchurch.
- 2.3 I am a registered member of the New Zealand Institute of Landscape Architects. I hold a Bachelor of Landscape Architecture with Honours (2001) from Lincoln University as well as a Bachelor of Arts Degree in History and Education (1993) from the University of Otago.
- 2.4 I have practised as a landscape planner for approximately 20 years having held positions in both local government and as a consultant, predominantly in the South Island. My experience covers area-based and project-based landscape assessments within urban, rural and coastal areas, including for large scale infrastructure development encompassing solar farms, windfarms, hydro and irrigation schemes, landfills, and utilities.

Involvement in the Project

- 2.5 I was engaged by Helios in 2023 to prepare an assessment of landscape and visual effects of the proposed Project which was completed on 28 February 2024 ("**Assessment**") and included as Appendix 4 in the application for resource consent to Central Otago District Council ("**Council**").

- 2.6 A request for further information was received on 22 April 2024 to which I prepared a response with an updated planting plan to close remaining gaps in the perimeter planting and provide clarifications on the types of planting.²
- 2.7 I was subsequently engaged by Helios to coordinate the development of the Mānīatoto Solar Farm LPMP³, a piece of work that had been identified in the Assessment. BML landscape architects prepared a draft LPMP, incorporating information on plant growth rates in the Central Otago area from a range of nurseries. The draft was externally reviewed by Habitat Restorations before finalising in order to provide peer review of the plant types and methodology proposed in the draft, in light of the specific climate of the Project site.
- 2.8 For the purposes of the Assessment, I undertook a site visit to the Site and its surroundings on 5 April 2023 accompanied by Yvonne Pfluger (internal BML peer reviewer). I undertook a second site visit on 15 November 2023 accompanied by Corey Murray (BML visualisation specialist) specifically to visit four private residential properties to understand the nature of views and take GPS located photographs.

Code of conduct

- 2.9 I confirm that I have read the Expert Witness Code of Conduct set out in the Environment Court's Practice Note 2023. I have complied with the Code of Conduct in preparing this evidence and will continue to comply with it while giving oral evidence before the Hearing Commissioners. Except where I state that I am relying on the evidence of another person, this written evidence is within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed in this evidence.

3. SCOPE

- 3.1 This evidence is given in respect of the resource consent application by Helios for the proposed new solar farm at the Site. My evidence addresses the potential effects on landscape, natural character and visual effects of the Project and includes:
- (a) Methodology;
 - (b) Existing Landscape;

² Boffa Miskell Memorandum, RC 240065 - Helios Mānīatoto Solar Farm LVA - Request for further information dated 30 April 2024.

³ Boffa Miskell, Mānīatoto Solar Farm Landscape Planting and Maintenance Plan, dated 28 May 2025.

- (c) The Proposed Activity;
- (d) Assessment of Natural Character, Landscape, and Visual Effects;
- (e) Recommended mitigation;
- (f) Response to Relevant Submissions;
- (g) Response to Section 42A Report; and
- (h) Recommended conditions.

4. METHODOLOGY

4.1 The landscape, natural character and visual effects methodology and process applied is set out in section 1.0 and in full in Appendix 1 of the Assessment. The methodology includes consideration of the existing natural character and landscape values as part of determining the likely level and nature of landscape and visual effects. The Assessment was undertaken with reference to Te Tangi a te Manu: Landscape Assessment Guidelines (TTatM, 2022), including the use of a seven point scale from Very Low to Very High. The scale aligned with the RMA terminology is provided in Image 1 below for context:



Image 1: Landscape effects rating and RMA terminology

- 4.2 The Assessment is supported with a graphic supplement which includes photographs of the Site and wider context (Site Appraisal and Site Context photographs) and a high-level landscape mitigation plan including indicative cross sections.
- 4.3 The Assessment has encompassed a combination of field work and desktop analysis. This has included obtaining representative photography from publicly accessible viewpoints surrounding the Site and from four nearby private residential properties (identified as dwellings 2-5 in Figure 3 of the graphic supplement).

5. EXISTING LANDSCAPE

Site and existing environment

- 5.1 The Project Site is located in the Mānīatoto Plain,⁴ Central Otago, a large inland basin surrounded by block faulted schist mountain ranges. The Site is approximately 3.3 km southwest of Naseby and some 4.3 km north of Ranfurly. As outlined in section 3 of the Assessment, the Site is not considered to be adjacent to or form part of any significant or outstanding natural feature or landscape.
- 5.2 Land cover surrounding the Site today primarily consists of exotic pasture species, exotic shelterbelts and exotic forest. Land use is predominantly agricultural. Other land uses in the wider basin landscape include forestry, tourism, recreation and conservation. There are also existing features near the Site that are not associated with traditional farming land use with a more industrial appearance such as the LeoLabs Kiwi Space Radar and Naseby Transpower Substation.
- 5.3 Residential dwellings are sparsely located and at some distance to the Site boundaries with only five residential buildings within approximately 1km. Of these, one dwelling (Dwelling 1) is associated with the Project landowners and has been excluded from assessment. The owner of a second dwelling (Dwelling 2) has provided a submission in support of the Project.
- 5.4 There are many important physical, associative and perceptual values in the wider landscape which are set out in section 3 of the Assessment.
- 5.5 The Site itself is roughly triangular in shape, bounded by Ranfurly-Naseby Road to the west, the more undulating, unsealed Ranfurly Back Road to the east, and is set back approximately 1km from Bypass Road, the nearest road to the south.
- 5.6 The topography of the Site comprises a series of long folds of ridges and gullies orientated northwest to southeast. Vegetation at the Site is characterised by improved pasture with paddocks partially divided by evergreen shelterbelts. A well-established shelterbelt with occasional gaps and deciduous species, lines approximately half the length of the perimeter of the Site along the Ranfurly-Naseby Road. The Site contains many small wetlands/ depressions and two large wetlands located at the centre and southwest of the Site⁵.

⁴ While there are historical and cultural variations for the spelling, for the purposes of this report, Mānīatoto Plain is used as the preferred spelling according to mana whenua (refer to <https://aukaha.co.nz/>).

⁵ As identified by project ecologist Dr Jaz Morris during site walkovers. For further information please refer to the Statement of Evidence of Dr Jaz Morris - terrestrial ecology.

- 5.7 Key rural landscape and amenity values that relate to the Site and immediate surrounds include:
- (a) Expansive areas of pasture which creates a very strong pastoral rural character and a sense of openness with vast skies and opportunities for long views to the wider plains and mountain backdrops.
 - (b) The exotic forestry which is characteristic of this northern edge of the Mānīatoto Plain landscape.
 - (c) Legibility of landform such as the undulating folded landscape within the Site as well as the contrast between the plains and surrounding ranges.
 - (d) A low density of structures and buildings that are predominantly used for rural activities.

6. THE SOLAR FARM PROPOSAL

The proposed activity

- 6.1 The Proposal is described in full in the AEE⁶ and in the Statement of Evidence of Ms Mishka Banhidi.
- 6.2 Key features of relevance to landscape and visual matters comprise the solar panels, substation and supporting electrical infrastructure/ equipment and facilities, inverters, lighting, underground cabling, access and internal roading, fencing and landscaping.
- 6.3 The footprint of the panels and components will cover approximately 20.5%⁷ of the Site. The solar panels will be up to 2.8m high when tilted to the maximum angle. The panel height changes throughout the day, depending on the season. The panels will be mounted on arrays in rows approximately 6m - 8m apart.
- 6.4 Some earthworks will be required and will occur progressively. The piles supporting the panels will be driven directly into the ground, so no cut and fill or concrete foundations are proposed.
- 6.5 External lighting will be provided at the substation and site office for intermittent emergency work and inspection purposes only. Lighting will be directed

⁶ Assessment of Environmental Effects, 16 June 2025, section 3.

⁷ Refer to site layout plan (Preliminary Layout. Revision Dated 08/05/2025).

downwards, away from adjoining roads and properties and controlled by motion sensor.

- 6.6 A 2m high deer-fence type perimeter fence is proposed to be constructed using wooden posts and wire mesh and will be located on the inward side of the proposed mitigation planting.
- 6.7 It is understood that at the end of the intended 35-year operational lifespan, the solar farm will be dismantled, the site will be decommissioned and the land reinstated to its original pre-construction condition. I have given consideration to this reversibility in my assessment.

7. ASSESSMENT OF NATURAL CHARACTER, LANDSCAPE AND VISUAL EFFECTS

Natural character effects

- 7.1 Natural character effects are assessed in detail in section 5.1 of the Assessment.
- 7.2 The wetlands/waterways on the Site are modified⁸ and of low natural character.
- 7.3 In terms of natural character effects, construction works as part of the Project will avoid all wetlands/waterways on the Site and implement the minimum setbacks proposed⁹. All earthworks will be completed in stages and progressively rehabilitated with pasture to minimise the amount of soil exposed at any one time.
- 7.4 During construction, effects on natural character are assessed as very low to low. Following completion, the adverse effects on natural character values will be very low with some positive effects on the natural systems, characteristics and qualities of the Site due to the proposed native planting, that will become increasingly beneficial over time.

Landscape effects

- 7.5 Landscape effects are assessed in detail in section 5.2 of the Assessment.

⁸ Refer to the Ecological Impact Assessment dated 18 December 2023 and the Statement of Evidence of Dr Jaz Morris dated 21 July 2025.

⁹ As recommended by the Project ecologist Dr Jaz Morris, the two large natural inland wetlands (the central wetland and the wetland/waterway in the southwest of the Site) and the waterway in the northeast of the Site will have a minimum 10m setback from solar farm development. All other wetlands will have a minimum of a 5m setback.

- 7.6 The construction period is expected to last 24 months and will be undertaken in stages. Earthworks will be required to construct the Site access tracks, limited localised levelling for component foundations, trenching for cabling, and to construct the fencing around the Site. Development on steeper slopes will be avoided and the surveyed wetlands and waterways will be fenced and will not be impacted. The mounting structures the panels are fixed to will be installed via driven piles which will entail minimal earthworks.
- 7.7 The construction period will also involve the movement of vehicles and machinery, people working on the Site, and the erection of solar panels and ancillary equipment, including construction of the substation.
- 7.8 While effects on the physical aspects of landscape during the construction period will be low, it is considered that there will be a range of effects on landscape character, due to the ongoing changes in activity at the Site during that time, which have the potential to be up to moderate-high. These greatest effects will be short in duration and highly localised within the Site, (such as earthworks involving large machinery prior to restoration), and not significant.
- 7.9 In regard to the operational phase, the proposed Project will have the greatest influence on the character of its more immediate locality. The Site itself is located on undulating topography that comprises typical farmland, not on the district's hills, foothills, ranges, skylines, prominent places, or natural features.
- 7.10 However, there are landscape values relating to openness, expansiveness and rural character which are important to the landscape at both the Site and wider scale. Broad-scale rural land use and patterns underpin the Site and wider area (such as agriculture, horticulture, forestry and sparse settlements). The Site's proximity to Naseby Forest for example, means that the Project is located in an area where there is an existing utilitarian/working character that occurs at a large scale. Such rural land use patterns will continue in the context of the proposed Project and will remain juxtaposed against the more widely recognised and more visually prominent surrounding mountain ranges which are recognised as outstanding.
- 7.11 The conversion of the Site will lead to a shift in the character at the Site from rural, extensive pastoral to large scale renewable energy infrastructure land use. However, within the Site, the coverage of built form is broken up by existing shelterbelts and the folded landscape pattern. While existing openness at the Site will change, the solar panel structures are mounted on poles, with a relatively low profile (a maximum height of 2.8m) enabling a

degree of permeability. The landform under and around the solar panels will continue and is able to remain as rural pastoral land available for grazing.

- 7.12 While solar farms represent a type of production activity that is not yet a traditional form of development in rural New Zealand landscapes they do need to be located in areas where there is adequate suitable availability of land and in proximity to, or with the ability to connect to the National Grid, meaning large-scale transmission line infrastructure will already be present.
- 7.13 The proposed Project is considered to have moderate adverse effects on landscape character in the local landscape before mitigation planting establishes. Such effects remain contained within the undulating upland country at the base of the foothills, which continues to support an established working rural landscape context and are not considered to be significant. Effects reduce to low in the context of the wider basin.
- 7.14 With large new blocks of planting proposed, I consider the proposed solar farm can be embedded within the working rural context and will become increasingly concealed beyond perimeter vegetation and continued areas of shelterbelts consistent with surrounding areas. With the proposed mitigation and enhancement planting, landscape effects within the immediate context of the Site will reduce to low-moderate, and very low in the context of the wider Basin.

Visual effects

- 7.15 Visual effects are set out in detail in section 5.3 of the Assessment, including glint and glare. As Mr Nicholas Logan has provided a Statement of Evidence on Glint and Glare on behalf of Helios, I do not repeat his findings.
- 7.16 As with landscape character effects, the potential visual effects of solar panels and other built elements and structures associated with the Project including the inverters and substation is increasingly reduced with distance from the Site and depends on the extent of the Site that is visible. It is also emphasised that the effect of a change in available views is not automatically adverse.

Viewing audience

- 7.17 The visual catchment for public and private viewing audiences is outlined in detail in section 3.4 of the Assessment.
- 7.18 The visual catchment is relatively contained to the immediate context of the Site. The folded landform and existing shelterbelts visually break up and restrict views to the whole development. I understand this to have been a key

reason for the Site's selection as set out in the Statement of Evidence of Mr Jeff Schlichting.

- 7.19 Most available public views to the Site are from Ranfurly-Naseby Road (refer to photographs 5 to 8 in the graphic supplement) and Ranfurly Back Road (photographs 12 to 17) which are adjacent to the Site, and from Bypass Road to the south (photograph 18). There is also potential for views to parts of the Project from approximately 1km of State Highway 85 (Ranfurly-Wedderburn Road) to the southwest of the Site (photograph 2). Views will be oblique from the State Highway, more than 1km from the nearest panel array, and transient (i.e. most views are considered likely to be from a moving vehicle, noting there are no specific pull over areas).
- 7.20 Regarding private views, there is potential for close to middle distant views of parts of the Project from three properties within 1km of the Site:
- (a) Dwelling 2, 130m north of the closest site boundary.
 - (b) Dwelling 3, 580m northeast of the closest site boundary.
 - (c) Dwelling 4, 400m southeast of the closest site boundary.
- 7.21 Of these, views to the Site from Dwelling 3 are minimal due to topography and vegetation. Dwellings 2 and 4 will be the most visually affected. The owner of Dwelling 2 has provided a submission in support of the Project (Submission 131).

Visual effects during construction

- 7.22 Visual effects have been identified during the construction period, with the most pronounced effects from the northern end of Ranfurly-Naseby Road, the central section of Ranfurly-Back Road and from Dwellings 2 and 4.
- 7.23 Construction will occur progressively across the Site. The nature and level of effects will vary across the Site at different times, in different locations. The greatest effects will occur for limited, short periods of time such as when construction activities are closest to the viewpoint and involve visually prominent works such as earthworks with large-scale machinery. Effects are temporary, highly localised, and not significant.

Distant public views

- 7.24 Some distant views will be possible, such as from parts of Ridge Road, Bypass Road and State Highway 85 ("SH85"). SH85 is a key, highly frequented transport route, however viewers will be travelling at speeds of up to 100 km /

hour, limiting the time and clarity of observation. In views from these distances, visible panels will appear as dark bands amid the bands and layers of surrounding shelterbelts. The landform and vegetation on the Site also screens views to other parts of the Site. As mitigation planting establishes, the ability to discern what the panels are will be further reduced.

- 7.25 Adverse visual effects are considered to range from very low to low from these distant, transient viewpoints.

Closer public views

- 7.26 Closer views to the Site are available from Naseby Link Road, Gimmerburn Naseby Road and Fennessy Road. Views to much of the Site will be screened by intervening shelterbelts, including the existing shelterbelt along part of the western Site boundary. Where views towards the north, open end of the Site, are available, they will be in the context of existing infrastructure along Fennessy Road. As the proposed mitigation planting at this end of the western boundary establishes, views to the proposed panels will be softened and become screened over time. Visual effects in relation to these views are assessed as very low.
- 7.27 Close views will be available from the eastern end of Fennessy Road and from parts of Ranfurly-Naseby Road which borders the Site to the west. Viewing opportunities vary along different sections of the road and depending on the direction of travel.
- 7.28 Views from the central section of the Ranfurly-Naseby Road to the Project Site are largely screened by the existing shelterbelt along approximately half of this western boundary. To the north and south of this shelterbelt, there will be opportunities for open views from the road towards parts of the Project which will largely be oblique. Views to the southern end of the Site will be fleeting with panels set back from the road boundary and limited by on-site shelterbelts and landform. A greater extent of the Project Site will be visible when adjacent to the northern part of the Site, prior to establishment of mitigation planting. For those approaching the Site from the north, elevated views over the northern end of the Project will be available for approximately 200m. The nearest panels have been set back approximately 300m from the northern Site boundary and 40m from the western road boundary to provide a visual buffer.
- 7.29 Visual effects from Ranfurly-Naseby Road are assessed as varying between very low to moderate-high temporary effects during construction, reducing to moderate once the construction phase is complete.

- 7.30 Mitigation planting is proposed as part of the Project to extend the existing exotic shelterbelt northward. The hill slopes north of the panels will also be planted to assist with screening views from the north, primarily to the closest panels. Distant panels are likely to remain visible but softened and broken up by the proposed intervening planting. Views will typically be transient. Visual effects are assessed as up to low-moderate once planting is established.
- 7.31 In regard to close public views from the east, open views to parts of the Site are available from much of Ranfurly Back Road, an unsealed, lower-use road¹⁰ adjoining the Site. Setbacks of between 20m-30m, increasing towards the southern end of the Site to some 120m-250m, create a visual buffer with space for planting and avoid development on an adjacent wetland and steep slopes. Undulating landform and linear shelterbelts within the Site help to partially screen and visually break up the extent of the Site, primarily towards the southeast corner, particularly for those approaching the Site from the south.
- 7.32 Visual effects from Ranfurly Back Road are assessed as varying between very low to moderate-high temporary effects during construction, reducing to moderate once the construction phase is complete.
- 7.33 The native planting proposed as part of the Project will provide screening along much of the boundary. There is additional exotic shelterbelt planting proposed at the southeast corner. It is considered that visual effects will be up to low-moderate overall once planting is established.

Views from private dwellings

- 7.34 Visibility in the context of the Site is frequently reduced through established shelter and curtilage planting, with dwellings often relatively contained within more open, rural surrounds. Throughout this landscape, shelter planting is also frequently used in response to prevailing winds, for privacy and to help define outdoor living areas. It is at this 'heart' of the property from which appreciation of people's living environment, their farm or wider rural area is typically centred. Therefore, whilst effects from other locations within a property are acknowledged, views centred on dwellings and outdoor living areas within their curtilage are assessed as the most sensitive locations from which potential greater levels of effect may occur.
- 7.35 Views in relation to 17 private dwellings within approximately 3km of the Site have been assessed. Dwelling 1 is associated with the Project and is excluded from assessment. Dwellings 6-17 are between 1 km-3 km away. Where visible,

the Project will either typically be very difficult to discern or viewed within a wider context. Visual effects from these properties are assessed as very low.

- 7.36 Viewing opportunities from Dwellings 3 and 5 are reduced through a combination of distance (580m and 1200m), topography and the extent of existing intervening screening and visual effects are assessed as very low.
- 7.37 Dwelling 2 is located immediately north of the Site. Views are elevated but set back from the edge of the slope so that close views to the Site are screened. Existing vegetation within the property and on-site provide further screening. Views will be long-distance with the nearest visible panels approximately 1200m away. Adverse visual effects on this property will be low-moderate to moderate during construction and low-moderate once construction is complete.
- 7.38 Planting to further reduce this level of visibility is proposed along sections of the northern Site boundary and the northeast corner. Visual effects from Dwelling 2 are assessed as reducing to low once planting is established. A submission in support has been provided by this landowner.
- 7.39 Dwelling 4 is located approximately 400m from the southeast corner of Site, elevated but set back from the edge of the slope and surrounded by substantial mature hedging, considerably limiting views to the extent of the wider Site. The nearest visible panels will be approximately 900m away in northerly views from the vicinity of the dwelling and carpark/entrance garden area. Proposed solar panels will be visible as a mid-ground horizontal band in the gaps between and just above the existing, intervening, east-west orientated shelterbelt on the Site and will not be visually prominent. While a broader 'width' or east-west horizontal extent of the Site will be visible from the carpark/garden location, the north-south vertical 'depth' will continue to appear as a foreshortened band, backdropped by distant vegetation and the ranges and skyline beyond.
- 7.40 Adverse visual effects on certain views from Dwelling 4 are assessed as up to moderate during construction and up to low-moderate once construction is complete.
- 7.41 As the existing row of intervening shelterbelt trees on the Site continues to grow, it will screen more of the panels in the northeast portion of the Site. Together with the additional mitigation planting proposed to fill gaps in this shelterbelt, visibility of the panels will be considerably screened from the vicinity of the dwelling and the extent of the Site visible from the carpark/garden area will be considerably reduced. Adverse visual effects will reduce to low.

- 7.42 Additional exotic shelterbelt planting is proposed along the southwest section of Ranfurly Back Road boundary. Due to the lower contour level at the southeast Site boundary, once the shelterbelt planting in this location reaches at least 8m-10m, it will begin to provide screening to those panels in the west of the viewshaft from the carpark/garden viewing location.

Cumulative effects

- 7.43 Potential for cumulative effects is addressed in section 5.4 of the Assessment.
- 7.44 The approved Solar Bay solar farm site is located on a 54.5 ha site at the intersection of Gimmerburn Naseby Road and Fennessy Road (approximately 330 m from the closest point to the Site. The consent requires planting to be undertaken to provide screening.¹¹
- 7.45 Should the consented Solar Bay development be constructed, it would introduce solar farms as an occasional land use within the rural environment surrounding the Project Site. Development of the Helios Project would further reinforce this character but would not materially change the defining characteristics of the receiving rural landscape.
- 7.46 Opportunities for the most extensive cumulative views are likely from a short section of Ranfurly-Naseby Road in elevated locations north of Fennessy Road.
- 7.47 There is potential for adverse cumulative effects up to a low-moderate degree, reducing following establishment of mitigation planting.

8. MITIGATION

- 8.1 Proposed landscape and visual mitigation includes a range of boundary setbacks to provide a visual buffer, the retention of all mature trees/vegetation and the avoidance of wetland areas, waterways and steep slopes on the Site. Additional infill and new perimeter planting and wetland enhancement are also proposed and set out in the landscape mitigation plan.
- 8.2 The mitigation strategy is set out in section 2.3 of the Assessment and supported by the Landscape Mitigation Plan provided in Figure 5A (updated and attached to the RFI Response Memorandum dated 30 April 2024) and

Figures 5B-F and 7A-D in the graphic supplement. To support the Landscape Mitigation Plan, a LPMP, has also been provided.

Landscape Mitigation Plan

- 8.3 New strategic blocks of planting (totalling approximately 32.4 ha) are proposed,¹² varying in species and coverage in response to glint and glare requirements, varying landscape characteristics as well as the nature and extent of mitigation required, including seasonality considerations.
- 8.4 A mix of dryland native species is proposed in some locations, predominantly along Ranfurly Back Road where there are existing indigenous shrubs present. At Risk-Declining species identified at the Site (desert broom and scrub pohuehue) as well as matagouri (Not Threatened)¹³ are proposed to form part of this mix, as recommended by the Project Ecologists (see the Statement of Evidence of Dr Jaz Morris).
- 8.5 Faster growing exotic evergreen shelterbelt species are proposed in other locations where there are existing shelterbelts such as along Ranfurly-Naseby Road and where faster growth, denser foliage or additional height is needed such as to mitigate any residual glare impacts after the 10 degree limitation on backtracking is implemented. It is also proposed to fill gaps in existing shelterbelts.
- 8.6 The two natural inland wetlands (the central wetland and the wetland/waterway in the southwest of the Site) and the waterway in the northeast of the Site will have a minimum 10m setback from solar farm development. As outlined in the Statement of Evidence of Dr Jaz Morris, all other smaller wetlands will have a minimum of a 5m setback. The two larger wetlands (the central and southwest wetlands) will be fenced off from grazing stock and planted with appropriate native wetland species.

Landscape Planting and Maintenance Plan

- 8.7 A LPMP has also been prepared to address matters such as the preparation of planting areas, hardiness of plants, planting methods and season, irrigation and a landscape maintenance plan.

¹² Refer updated Landscape Effects Assessment, 28 February 2024, Table 3 and Graphic Supplement.

¹³ As explained in the statement of evidence of Dr Morris, this classification has recently changed from At Risk-Declining to Not Threatened.

- 8.8 A refined recommended planting palette is provided including planting grades and estimated heights after 5 years, based on information from three nurseries, (either experienced in or located within the Mānīatoto area), as well as input from Habitat Restorations (who peer reviewed the LPMP), drawing on their local expertise.
- 8.9 Detailed planting plans including grades, layout, numbers and spacing will be prepared as part of the Landscape Management Plan for certification by the Council. However, it is agreed that the proposed plantings will comprise no less than 70% of plants as 'very low' to 'low/moderate' flammability species¹⁴, to manage fire risk, as per the recommendations of the Fire Risk Study¹⁵. A number of key plants identified in the LPMP plant list meet these requirements, including some of the taller species for screening such as *Pseudopanax crassifolius* (very low), mingimingi (low), kōwhai (low), koromiko (low/moderate) and ribbonwood (low/moderate). The greater flammability species will be incorporated in lower numbers (20% 'moderate' to 'moderate-high' and 10% 'high'). Plants will also be established at appropriate spacings.
- 8.10 In relation to flammability, as explained in the Statement of Evidence of Mr Hamish Denize, as a result of discussions with FENZ, a revised layout is proposed, incorporating a 4m wide perimeter access track which acts as both a fire break and to allow FENZ access to the perimeter of the Site. The access track will be behind the planting and fencing and does not change my assessment.

9. RESPONSE TO RELEVANT SUBMISSIONS

- 9.1 A total of 181 submissions were received of which 106 have direct relevance to impacts on landscape and visual amenity. Responses to related submissions concerning glint and glare and the night sky are covered in the Statement of Evidence of Mr Nicholas Logan.
- 9.2 Broadly speaking the comments can be grouped under the following headings which relate to potential landscape and visual effects:
- (a) Broad landscape, rural character and amenity;
 - (b) Effects on specific values of the Mānīatoto and Central Otago landscape;
 - (c) Scale of the solar farm, industrialisation and character;

¹⁴ In line with the Fire and Emergency New Zealand Plant flammability directory.
¹⁵ Beca Limited, Fire Risk Mitigations and Commentary dated June 2025.

- (d) Visibility and visual effects on specific locations/distances; and
- (e) Mitigation planting.

Broad landscape, rural character and amenity effects

- 9.3 Concerns with broad adverse landscape and visual impacts on the landscape have been identified in 31 submissions¹⁶, one of which (submission #114) also raises general concerns regarding cumulative effects.
- 9.4 Concerns raised variably describe the proposed Project as an 'eyesore', 'blight', 'scar on the landscape' and 'visual pollution'.
- 9.5 Solar farms represent a type of production activity that features a grid pattern of built form directly associated with electricity infrastructure; it is not yet a traditional form of development in rural New Zealand landscapes but they are commonly located within a rural environment.
- 9.6 The Site will transition from a rural productive landscape to that of a landscape containing energy infrastructure as a result of the proposed Project, and rural amenity values will be reduced, particularly those related to open space within the immediate context of the Site. However, the Site is located on low, slightly undulating topography that comprises typical farmland, not on the district's hills, ranges, skylines, prominent places, or natural features. Visibility is relatively contained to within the Site and area surrounding the Site boundary, out to approximately 1km. Whilst I acknowledge there will be potential for wider publicly accessible, elevated views such as from the surrounding foothills and ranges, access is limited and views are from long distances, typically upwards of 6km and these views form part of a much broader rural working landscape.
- 9.7 Under the extensive proposed mitigation planting, the existing vegetation will be retained and reinforced in order to maintain and enhance this established rural outlook and visual filtering effect.
- 9.8 Submission #114 raises a concern in relation to cumulative effects, identifying that "...the Cumulative effects have not been properly assessed".
- 9.9 I have addressed potential cumulative landscape and visual effects in section 7, earlier in my evidence.

Effects on specific values of the Mānīatoto and Central Otago landscape

¹⁶ Submissions 5, 7, 9, 10, 20, 21, 31, 34, 43, 50, 77, 79, 80, 97, 98, 104, 105, 106, 109, 110, 114, 116, 122, 139, 143, 144, 145, 146, 154, 159, 177.

- 9.10 26 submissions¹⁷ speak more specifically to visual effects on the Mānīatoto and Central Otago landscape, identifying values such as “its wide open plains and stunning views”, “stark, striking beauty”, “uninhibited views of rolling land and Mountain ranges”, “iconic view of the Hawkdun mountains”, “natural grandeur, cultural depth, and tranquil isolation” and the “iconic historic Naseby township”. Many of these submissions also speak to the way the landscape is recognised beyond the Mānīatoto, drawing visitors for the appreciation of these landscape values.
- 9.11 I have identified similar landscape values in section 3.1 Broad Landscape Context and Section 3.3 Summary, within the Assessment. However, importantly, the Site is located at the edge of the basin landscape, is not within an ONL or SAL in the CODP and the relatively low-profile panels will not impede views to the surrounding ranges. There are no reserves, recreational activities, heritage sites, notable trees, or significant habitats within the Site. Those in the vicinity such as the Historic Town Centre at Naseby, are spatially and topographically separated from the Site and will not be impacted.
- 9.12 I address the effects of the Project on landscape values and rural character in section 5.2 of the Assessment and earlier in my evidence (section 7). The mitigation strategy recommends planting that will ensure that opportunities to enjoy views across the Site continue in places, while also enhancing biodiversity. However, it is also noted that while exotic shelterbelts can inhibit views, they are an established part of this rural landscape.

Scale of the solar farm, industrialisation and character

- 9.13 71¹⁸ of the submissions speak specifically to the size of the proposal and raise concerns relating to industrialisation and a change in character.
- 9.14 The Project Site is approximately 660 ha and will accommodate some 550,810 solar panels and other associated infrastructure. This represents a scale of development orders of magnitude above existing built development in this landscape and larger than the consented Solar Bay solar farm. The panels are relatively low-lying at less than 3m, and the scale of the development will be broken up by the existing landform and vegetation on the Site, to be further screened by the proposed new planting.

¹⁷ Submissions 17, 18, 23, 35, 36, 62, 66, 72, 74, 81, 87, 88, 92, 101, 123, 133, 135, 136, 137, 152, 156, 157, 158, 165, 168, 176.

¹⁸ Submissions 3, 5, 6, 7, 17, 18, 20, 24, 26, 27, 35, 37, 40, 41, 43, 58, 61, 62, 64, 65, 72, 73, 74, 77, 78, 80, 81, 82, 83, 87, 88, 89, 92, 94, 96, 97, 103, 107, 109, 111, 112, 114, 120, 125, 126, 127, 128, 132, 133, 134, 135, 136, 137, 138, 140, 141, 146, 147, 148, 149, 153, 154, 155, 156, 157, 158, 161, 162, 163, 164, 168.

- 9.15 The panels introduce dynamic, mechanistic structures which is different from either domestication or industrialisation in the way that houses or factories might change the character of a landscape.
- 9.16 In this context, the need for renewable energy and familiarity with solar farms also influences how changes in views are perceived, comparable to the perceived need to clear forest cover to provide productive farmland.
- 9.17 On balance, the sensitivity of the Site to land use change of the nature proposed is considered to be low given it is a modified landscape at the edge of the basin landscape, not identified as an ONL or ONF and contains no features that are character-defining when compared to the wider context. The Site is also located in the vicinity of other utilities with which it shares some characteristics including the large scale, productive activity and dense coverage associated with the Naseby Forest. At the same time, the Project has been designed in a manner so as to minimise impacts of its scale on the landscape and natural character values as far as practicable. This will be done through opportunities for the enhancement of the key wetlands and extensive blocks of additional planting. As part of an agri-industrial environment, this has the potential to improve aspects of the character of the landscape. One of the key features of the Proposal that will assist with its integration into the surrounding landscape character are through the dimensions and distribution of the panels and panel arrays which enable multi-layered use of the Site, including farming. This helps retain key elements of a rural productive character as well as a degree of landform legibility.

Visibility and visual effects from specific distances/locations

- 9.18 7 submissions relate to visibility and visual effects from specific distances or locations¹⁹.
- 9.19 I have addressed visual effects from public and private viewpoints in section 5.3 of the Assessment and earlier in my evidence (section 7) and find that there will be visual effects as a result of the proposed Project, and these will be relatively contained out to approximately 1 km, and will reduce to minor effects over time as mitigation planting establishes. Where more distant viewing opportunities are available, the visual prominence and consequent adverse

¹⁹ Submission #72 raises a concern relating to visibility from "20km away". Submission #82 identifies a concern that the solar farm will be "highly visible from the approach to Naseby and the Central Otago Touring Route". Submission #91 raises a concern regarding "the siting of the project adjacent to a main road". Submission #117 identifies opposition to the proposed solar farm "due to its proximity to my property". Submission #136 raises concerns relating to views from the elevated northern end of the Site on Ranfurly-Naseby Road and from SH85. Submissions #58 and #149 identify concerns relating to visual effects from Dwelling 4.

effects will gradually decrease with distance. Beyond 3 km of the Site, less than minor effects are anticipated.

Mitigation planting

- 9.20 Concerns with the effectiveness of the proposed mitigation planting have been identified in 33 of the submissions²⁰. Concerns raised are primarily focussed on the success of the proposed mitigation planting (especially native species) in the area due to the harsh climate and availability of water.
- 9.21 In order to assist in addressing these concerns, Boffa Miskell was engaged to prepare a LPMP to set out the establishment phase and the ongoing routine monitoring and maintenance, as set out earlier in my evidence (section 9).
- 9.22 Recommendations are made regarding the pot size at planting and projected plant heights²¹ after five years, based on information from three nurseries, either experienced in or located within the Mānātoto area, as well as input from Habitat Restorations, drawing on their local expertise. The proposed native mix includes a number of species capable of reaching 2m-4m in height after 5 years with species such as Kōhūhū, Ribbonwood / Mānatu, and *Olearia lineata*. In regard to the proposed areas of exotic shelterbelt planting, macrocarpa is capable of reaching 7m. I note that in the peer review of the ecological aspects of the proposal, Dr Wells has confirmed that he considers the estimations of plant height after five years to be reasonable.²²
- 9.23 Recommendations on matters such as plant hardiness, planting implementation, irrigation and maintenance are provided in the LPMP to maximise the chances of successful establishment and longevity. The LPMP, on advice from peer reviewers Habitat Restorations²³, notes that while irrigation is ideal if irrigation is not available, water retention crystals are considered a suitable alternative.
- 9.24 While the proposed species are likely to require at least 5 years to reach heights up to 2m-4m, landscape and visual effects can be expected to reduce over that period. It is important to note that in developing a mitigation planting strategy, the proposed planting is not solely intended for screening purposes but as a wider landscape response. The enhancement of the key wetlands and

²⁰ Submissions 17, 18, 20, 24, 38, 41, 57, 58, 63, 73, 74, 83, 84, 101, 116, 118, 119, 120, 123, 124, 127, 128, 132, 135, 136, 141, 142, 148, 149, 152, 164, 171, 176.

²¹ LPMP (2025), Appendix One.

²² Wildlands, (June 2025) Review of Helios Solar Farm Ecological Assessment, pp14-15.

²³ As per comments provided on 2nd May 2025, on draft LPMP (17 April 2025).

extensive blocks of additional planting will assist with biodiversity and natural character at the Site so that the solar farm will appear increasingly integrated.

- 9.25 It is also worth noting that other considerations have been incorporated into the design such as setbacks from road boundaries, which with the relatively low profile structures proposed, will assist in reducing visual prominence from close views such as parts of Ranfurly-Naseby Road.²⁴ The location of the substation maximises screening by existing trees. There are also existing shelterbelts within the Site which screen views to parts of the Site and which will be retained, infilled and maintained, and as they continue to grow, will further strengthen the level of existing screening.
- 9.26 A small number of submissions (#18, #135) raise concerns regarding the loss of 'famous vistas' and 'big views' due to the proposed planting. Whilst I acknowledge that planting can also act as a visual barrier, and in this case is intended in places for that purpose, one of the reasons that native species are predominantly recommended is to achieve lower overall heights on maturity to assist in retaining a sense of openness in this landscape. In some instances (on the northern end of Ranfurly-Naseby Road), pruning of the proposed exotic shelterbelt planting to approximately 3m is recommended to limit the sense of enclosure is recommended. However, I also note the level of enclosure currently established where the existing tall shelterbelt occurs alongside this road.
- 9.27 Submission #71 (Ka Runaka) requests the "inclusion of local seed sources for screening planting, to include indigenous species where locally available such as mikimiki/yellow wood (*Coprosma linarifolia*), kōtukutuku/tree fuchsia (*Fuchsia excorticata*), kāpuka/broadleaf (*Griselinia littoralis*), horoeka/lancewood (*Pseudopanax crassifolius*), Kānuka (*Kunzea serotina*), kōhūhū (*Pittosporum tenuifolium*), tōtara kiri kotukutuku/Hall's tōtara (*Podocarpus laetus*)", which is agreed as a condition requiring the final planting mix to include consideration of these species and their suitability where practicable, with the Plan to be discussed with Kā Rūnaka prior to submission to Council for certification.

10. RESPONSE TO SECTION 42A REPORT

- 10.1 I have reviewed the Section 42A Report with respect to identified landscape effects, and the technical peer review of the Assessment prepared by

²⁴

Setbacks vary in the vicinity of Ranfurly-Naseby Road from 30-50m up to 200m at the southwest corner and 300m from the northern Site boundary.

landscape architect Mr Espie. There is a very high level of alignment between the Section 42A recommendations and my Assessment.

- 10.2 The Section 42A Report author, Mr Vincent, agrees that landscape effects would *"lessen over time as the facility slowly becomes a part of the landscape character of the area and people adapt to its presence."*²⁵ In regards to visual effects, Mr Vincent concludes that *"...over the life of the facility, these effects will be adequately managed [sic] and the most significant effects minimised to a reasonably practical extent."*²⁶
- 10.3 Mr Espie concludes that the Assessment covers all relevant issues and is generally in agreement with the findings regarding the degree of adverse landscape and visual effects. Mr Espie identifies some additional factors he has given consideration to, and raises some minor outstanding issues, and I respond to these below (largely agreeing with Mr Espie).

Section 13 of the CODP

- 10.4 Mr Espie states that his understanding is that Section 13 (Infrastructure, Energy and Utilities) of the CODP is a "complete code" and as such, reduces the level of guidance taken from Section 4 of the CODP.
- 10.5 I support Mr Espie's view in regard to the importance of Section 13 in relation to this Project and also agree that *"Reference to Section 4 is perhaps useful to inform consideration of what landscape values are generally important in the district's rural landscapes"*.²⁷ My assessment was undertaken utilising both Section 4 and Section 13 to assist with narrowing down and responding to the key landscape issues relevant to the Project.
- 10.6 In drawing from Section 13, Mr Espie considers that, *"...the CODP includes some degree of expectation that there will be some increased presence of renewable energy generation within the district's rural landscapes, particularly outside of ONLs and SALs, and this is relevant to the environment against which the effects of the proposal should be assessed."*²⁸
- 10.7 I acknowledge Mr Espie's point that I did not specifically discuss this aspect of what could be considered to be anticipated as part of the environment within the Assessment, which focused on the Objectives and Policies that seek to avoid, remedy or mitigate adverse effects on landscape values. However, I am

²⁵ Section 42A Report, paragraph 44.

²⁶ Ibid, paragraph 51.

²⁷ Ibid, paragraph 16.

²⁸ Ibid, paragraph 47.

in agreement on this matter that, particularly given the direction of the National Policy Statement for Renewable Electricity Generation 2011, there is some anticipation of the increased presence of renewable energy generation within the district's landscapes, particularly outside of ONLs and SALs.

Reversibility

- 10.8 Mr Espie also highlights the general reversibility of the changes to the landscape that are proposed.²⁹ I identified the decommissioning process as part of the proposal within the Assessment, and fully agree with Mr Espie's point that levels of effect are also influenced by the reversibility of landscape change on characteristics and values.

Conditions

- 10.9 Among Mr Espie's conclusions he finds that the measures that form part of the Project that are intended to mitigate landscape and visual effects are generally appropriate and have been well designed,³⁰ and recommends minor additions to the consent conditions. I agree with Mr Espie's recommendations that the conditions refer to Figures 7A to D within the Graphic Supplement and to the Landscape Planting and Maintenance Plan (28 May 2025), and I note that proposed consent conditions require implementation of the consent to be carried out in a manner that follows the application, including the Assessment and Graphic Supplement.
- 10.10 Mr Espie also recommends that conditions require "*...details to be given of irrigation such that all planting is irrigated for at least the first 3 years after implementation and thereafter have irrigation available if required through harsh summer months*". I note that the LPMP (to which it is recommended that the consent conditions refer), incorporates sections addressing irrigation in both the establishment and maintenance phases (section 2.7 and 3.3.1). I take my guidance from the authors and peer reviewers of the LPMP in that while ideally, all plants will receive irrigation regularly during the establishment phase of three years (section 3.3.1), it is sufficient that all plants are to receive establishment irrigation for at least the first two years after planting, provided it is also available as required during dry periods thereafter (section 2.7 and 3.3.6). However, I also note that the LPMP states, "*If irrigation is not available water retention crystals are considered a suitable alternative. Crystals to be installed in each plant hole as per manufacturers specified rates and installation instructions.*" This advice was provided by the peer reviewers

²⁹ Ibid, paragraphs 29, 47.

³⁰ Ibid, paragraph 49.

(Habitat Restorations Ltd) who are locally experienced and I accept their guidance.

- 10.11 Mr Espie also recommends that conditions give details of a comprehensive pest control plan. I note the LPMP provides guidance on pest control (section 3.3.3) including, "*Consider preparing and executing a pest monitoring and control strategy*" of which I am supportive, to assist with protecting the proposed plantings.
- 10.12 I am also comfortable with Mr Espie's recommendation to provide minimum maintenance heights for all relevant shelterbelts which I recommend be set at 3m.
- 10.13 In relation to Mr Espie's recommendation to "*...give some detail or undertaking regarding the continuation of grazing that is proposed since the BM report and AEE place some reliance on this land use*", I agree that providing the conditions whereby grazing is enabled to continue is an important aspect of managing landscape effects, and I understand the Project has been designed to do so.³¹

Mitigation planting growth rates

- 10.14 As Mr Espie has noted, the LPMP gives expected heights for planting after 5 years of growth, based on information from three locally experienced nurseries and Habitat Restorations Ltd. I agree with Mr Espie's comment that, "*The heights after 5 years of growth that are given indicate vegetation that is starting to have a useful screening function in relation to the proposed activities.*"
- 10.15 I acknowledge Mr Espie's statement that "*Beyond non-site-specific general knowledge, I can offer no expertise regarding growth rates in relation to this vicinity. I simply raise the issue that the timeframe over which effects may reduce in degree, due to mitigation planting, is not something that I can give expert advice on.*"
- 10.16 I would add that the Assessment findings and the expert advice I provide in my evidence in regard to plant establishment and growth rates at the Project Site, rely on and are drawn from the comprehensive advice of BML colleagues and information gathered, provided and peer reviewed in the LPMP.
- 10.17 The Section 42A Report author, Mr Vincent also identifies that in regard to landscape and visual effects, the outstanding question, is whether the

landscaping will become established within acceptable timeframes to minimise these short term effects.

- 10.18 I note that Mr Vincent states that Dr Andrew Wells, senior ecologist from Wildlands, provided comment on plant growth rates: *"In his peer review of the ecological aspects of the proposal, Dr Wells has confirmed that he considers the applicant's estimations of plant height after five years to be reasonable."*³²
- 10.19 As noted in my paragraphs above, I rely on the LPMP for my understanding of potential growth rates in this location and am satisfied that given the information provided by locally experienced nurseries and peer reviewer, Habitat Restorations, heights after 5 years of growth indicate vegetation that will have a useful screening function.

11. RECOMMENDED CONDITIONS

- 11.1 Helios has provided an updated conditions of consent attached to the Statement of Evidence of Ms Banhidi. The condition set includes my proposed mitigation measures in that they require implementation of the consent to be carried out in a manner that follows the application, including the Landscape Effects Assessment, Graphic Supplement (including the updated Landscape Mitigation Plan)³³ and LPMP.
- 11.2 I have responded to Mr Espie's recommendations regarding conditions, in the previous section of my evidence, which I am broadly in agreement with, and consider to largely be addressed within the LPMP.
- 11.3 In regard to updated condition 21 (previous condition 19 in the Section 42A Report), I support the provision of a minimum maintenance height of 3m for all shelterbelts within the Site.
- 11.4 Referring to updated condition 18.a.ii on irrigation (previous condition 16 in the Section 42A Report), I take my guidance from the authors and peer reviewers of the LPMP and consider this to be reflected in the updated condition, as I explain in paragraph 10.10.
- 11.5 In relation to Mr Espie's recommendation to *'...give some detail or undertaking regarding the continuation of grazing'*, I understand the project design

³² Ibid, paragraph 39.

³³ provided as Figure 5A attached to the Boffa Miskell memorandum RC 240065 - Helios Mānīatoto Solar Farm LVA - Request for further information dated 30 April 2024.

submitted (and required by condition to be implemented) will ensure sufficient farm infrastructure such as fencing will remain, allowing for grazing to continue.

- 11.6 I support updated conditions 18.a.iii and 18.a.iv which are provided to address the potential fire risk due to the proposed mitigation planting whilst enabling the planting to achieve the landscape and visual mitigation required, as I explain in paragraph 8.9.
- 11.7 I note the changes made to condition 20 (previous condition 18 in the Section 42A Report) in relation to the management of dead and dying trees and consider these to reflect the updated guidance in the LPMP.
- 11.8 I also note the updates to condition 22 (previous condition 20 in the Section 42A Report) which exempts specific equipment that cannot meet the LRV limits due to operational requirements and does not change my assessment.

12. CONCLUSION

- 12.1 The proposed Project Site is located within an area of undulating rural country between Ranfurly and Naseby townships. There are no outstanding or significant landscapes or features which relate to the Site.
- 12.2 In regards to natural character, adverse effects will be very low and the proposed removal of stock from the wetlands on the Site and restoration planting will result in beneficial effects over time.
- 12.3 In regards to landscape effects during the construction phase, there is potential for up to moderate-high temporary, adverse effects that will be internal to the Site.
- 12.4 The Project will have adverse effects on the landscape values of openness and expansiveness at both a broad and a local level. I consider that effects will be moderate adverse on the immediate local landscape character and values and low adverse on the broader Māniateoto Basin, before mitigation planting establishes. Once mitigation vegetation becomes established, I consider these adverse effects will reduce to low-moderate in the immediate context and very low in the context of the wider basin.
- 12.5 In regards to visual effects during construction, there is potential for temporary adverse effects on views from public roads up to a moderate-high degree. These effects will reduce to moderate once construction is complete, and further reduce to low-moderate once planting establishes.

- 12.6 There is potential for adverse visual effects during construction up to a moderate degree at times from private Dwellings 2 and 4. As proposed planting establishes after five years, adverse visual effects will reduce to low. Residents of Dwelling 2 have submitted in support of the project.
- 12.7 Given the established rural character underpinning available views of solar panels and related infrastructure which will remain, I consider the level and nature of adverse visual effects can be absorbed within this rural landscape. Where there are open views, these mostly comprise transient views obtained along surrounding roads and more open areas within rural landholdings.

Susan Jane McManaway

21 July 2025