Technical Memorandum

To:	Nicola Kirby, Team Leader Planning		
Organisation:	Hurunui District Council		
From:	Rachael Annan, Technical Director | Landscape Planning		
Date:	14 May 2025	SLR Project No.	860.015797.00001

RE: Waipara Solar Farm, 380 Waipara Flats Road - Landscape Peer Review (V1.1)

Introduction

SLR Consulting NZ (SLR) has been engaged by Hurunui District Council (HDC) to carry out a landscape peer review for this 150MWp solar farm consent application. The application landscape assessment has been prepared by Simon Cocker Landscape Architecture, on behalf of the applicant, Far North Solar Farms Limited. The application drawing set referenced is that included with the updated landscape report.

Unless otherwise stated through this document, quoted text is taken from the updated application landscape assessment (Simon Cocker, 4 February 2025).

As part of the peer review process, a visit to the site and surrounds and some neighbouring properties was undertaken on 25 July 2024, and further neighbouring properties visited on 13 August 2024.

Response

Existing Landscape Character and Values

The assessment sets out a detailed description of the existing site context and character from p.8. This references existing landscape studies, geological information and other sources for desktop study. There is however, less depth of information linking through to the assessed landscape attributes and values of the author's own observations; summarised at p.16. Of note:

- The meandering terraces (including of the site) are noted to lend high legibility;
- A low level of absorption capacity (as on open and legible pastoral landscape) to uncharacteristic development is ascertained for the immediate landscape setting;
- Viticulture is noted as a defining local factor, alongside other working (rural) landscapes of the Canterbury Plains,
- …'*expansive views across the flat pastures to the surrounding hills conveys a visually coherent outlook that while typical, has high amenity and aesthetic value*', and;
- *'Transient values are associated with weather systems and light effects, which at times of the day / year emphasise the rolling landforms and distant hills.'*

These points are agreed. Local landscape attributes and embodied values are key factors in assessing the landscape capacity for this type of the application in the location proposed.

> *'Landscape effects are consequences of changes to the physical environment, being outcomes of landscape values derived from physical, associative and perceptual dimensions. Effects on landscape values are assessed against the existing*

environment and the relevant statutory provisions'. (p. 135, 'Te Tangi a te Manu', 2022)

'Values often arise from the interplay of physical, associative, and perceptual attributes. Effects should therefore be interpreted in the same way…' (p. 140, 'Te Tangi a te Manu', 2022)

Having viewed the application site from locations including properties to the opposite side of Weka Creek, the interplay of landscape values (as set out in the bullet points above) are evident, i.e., the afternoon light on the terraces (evident and highly legible on the application

Figure One: View to Application Site from 55 Glenmark Drive (captured at 1:16pm, 13 August 2024).

Figure Two: View to Application Site from 247 Mackenzies Road (captured at 4:24pm, 25 July 2024).

site), and the wider framing hill country which take on sculptural qualities.

However, with inclement weather at the time assessment viewpoint photographs were captured, visibility afforded of some photographs falls short of the surrounding ranges framing the Waipara Valley. The grey conditions also negate the light qualities afforded by clearer skies, inclement weather being a limiting factor for reference photography.

The assessment viewpoint locations indicate a closely based study (to the site), with most photographs taken from within the site looking out (Figure 4), also less representative of a contextual study. The foreground view captures rough pasture over alluvial dry soils of the river (Weka Creek) terrace site.

Figure Three: Photo 4 inset (From the application landscape assessment)

Figure Four: Photo 5 inset (From the application landscape assessment)

The assessment author rates the landscape setting, including the site, as 'ordinary' (p.17), drawing on a ratings table criteria from the UK (at Appendix 3, p.32: Determination of Landscape Quality); whereby a higher value such as 'Good' is attributed to a *'Nationally, regionally recognised site or great majority of area of local landscape importance*'.

These categories denote quite wide bands in categorising landscape quality. 'Ordinary' equating here to landscapes less than for instance, a regional park or regionally significant Outstanding Natural Landscape (ONL) or Significant Natural Area (SNA). This is limiting for instance in terms of recognising the *distinct* amenity and scenic quality of the local landscape.

The assessment references the Hurunui District Plan descriptions of the Rural Zone (p.12):

> *…'qualities, characteristics and amenity values that differ from those of settlements, in particular a sense of open space and the predominance of what is perceived to be a 'natural' landscape',* and also that;
>
> *'However the rural area is also a working environment, with a predominance of land-based activities such as farming, forestry, extractive industries and other forms of primary production and associated rural industries, and a living environment for residents. It is also a popular area for both residents and visitors to enjoy outdoor recreational pursuits.*'

These concepts are not considered to be in conflict. While expressing a level of modification, the local productive pastoral and viticultural land use contributes to the 'natural landscape' qualities and 'sense of open space' contrasting settlements (and urban areas). In this way too, it is considered an overstatement to describe such a rural landscape generically as *'highly modified'* (p. 25, 28). The modification is for the most part of vegetation type for productive use, i.e., not notable landform change or built development, such that it dominates open space. It would be more accurate to consider a urban setting as a highly modified landscape.

The linear presence of power poles, pylons and transmission lines infrastructure which traverse the site, and the presence of the nearby Waipara Substation on Mackenzies Road are also acknowledged.

The assessment notes limited associative values in relation to the site (p.20). However the relevant area of consideration is the landscape setting, not defined cadastral parcels. Associative values include 'the meaning and values we associate with places' (p. 72, 'Te Tangi a te Manu', 2022), be it cultural, recreational or other local values. No cultural findings were noted of the site, and iwi engagement is stated as ongoing (p.17).

The Waipara Valley is not generic of the Canterbury Plains; it's scale a notable distinction from the expanse of the broader Canterbury Plains south of this locality. The local area is valued for it's landscape amenity, and association with the viticulture industry.

> *'…the expansive views across the flat pastures to the surrounding hills conveys a visually coherent outlook that while typical, has high amenity and aesthetic value' (p.16).*

As noted, the broad landscape categorisation of 'ordinary' referenced in the landscape report is problematic for its generalisation, not encompassing specific local values. In response to the landscape report, local landscape values are considered to more effectively be described as moderate, rather than 'ordinary' This means possessing a degree of importance and character, but not being as valued as setting of high to very high value.

Specific assessment which goes beyond broader or generic terms however is essential. The landscape report is considered to lack an effective and consistent assessment approach throughout, to reach conclusions on the distinct landscape capacity and the effects of the application in the location proposed.

Assessment Findings

Landscape Effects

In assessing the effects of the application, it is the *local* rural working landscape, with its distinct landscape character (and derived amenity), within which the solar farm needs to be integrated.

> *'It is important not to conflate specific and generic character. Specific character conveys more than generic character. It is often more pertinent to managing a landscape's values than generic character. Even where it is generic character that is relevant (such as in response to a policy to maintain rural character), it will occur in the context of specific character. A pitfall is to focus on generic attributes (such as ruralness or naturalness) and overlook the specific character.'* (p. 140, 'Te Tangi a te Manu', 2022)

The retained pastoral use of the site for land management is acknowledged (below and between panel arrays), as is the proposed introduction of native revegetation planting.

The report describes the proposal as commensurate with farming buildings or horticultural structures. Solar arrays are both more solid than horticultural frames, draped with and softened by vegetation, and of greater site coverage and scale horizontally, albeit lower, than agricultural buildings (p. 25, 28). Broader scale agricultural buildings, such as glasshouses are not characteristic of the setting.

The flat expansive landscape is described as being low in absorption capacity to uncharacteristic development at p. 16. However at p.28, the opposite is implied, by the flat rural landscape noted as less valued, being *'highly modified to achieve optional production'*.

Based on observations while visiting the application site and surrounding landscape, the following points are set out in response to assessment comments:

- A number of neighbouring properties include dwelling locations elevated enough to look *across* proposed array area, rather than level enough with the site to just see the first solar panel row. The assessment generalisation that views to the site '*tend to be from the rear of dwellings'* (p.26) is considered incorrect. An arrangement with living areas and outdoor living areas orientated towards the site was commonly observed, including for 247 and 253 Mackenzies Road (for whom the applicant has requested notification).
- In general terms, the narrow rectangular form of the proposal area sets up extensive frontage lengths addressing Mackenzies Road properties and SH7. This equates to:
  - A broad view (of varying height and depth), to the proposal for residents on Mackenzies Road opposite Weka Creek from the site, and;
  - An extensive frontage viewing distance for the public along SH7. The proposal area frontage length to SH7 measures approximately 3.5kms. Of this length, the application drawing set indicates an approx 600m length (or 17%) currently in shelterbelts (p.16, 20), affording visual containment. This is a transient not fixed outlook, but it will be experienced by locals and visitors alike, in a setting identified as 'attractive, productive, aesthetically high… ' (p.16). The proposed frontage of a single tree species shelterbelt is also considered out of character for the setting for such an extended length.
- As a foreground element (to site boundaries), deer fence styled security fencing topped by triple row barbed wire (p. 4, 20) will be industrial, in appearance, viewed in conjunction with panel arrays awaiting intervening boundary vegetation to establish. This combination is not be considered rural in character.
- Time frames for all proposed planting (p. 18, 20) to establish needs to be considered conservatively given the dry climate and alluvial soils, noting also that native planting for embankments is not proposed to be irrigated. Several neighbourhoods visited on Mackenzie Road have highlighted very slow growing conditions in trying to establish their own planting on embankment and terraces areas. In this way the report is considered to overestimate the ability of mitigation planting to reduce adverse effects; likely over-represented this in visual simulations.

View to site from 257 Mackenzies Road

View to site from 251 Mackenzies Road

View to site from 247 Mackenzies Road

View to site from 163 Mackenzies Road

View to site from 161 Mackenzies Road

View to site from 73 Mackenzies Road

View to site from 23 Glenmark Drive

Visual Effects

Factors key to the assessing the effects of the application include it's elongated frontages to SH7 and the opposite site, the associated breadth of view for neighbours overlooking the site from Mackenzie Road.

Adverse visual effects, experienced in views for public outlooks from SH7 are considered to be mod-high at the end of construction (i.e., at installation), then moderate in the short term and mod-low in the long term.

While shelterbelts may be a generic rural landscape feature in this setting, landscape attributes and values include the amenity of the highly legible and open landscape and outlook of surrounding hills. The extensive road frontage length will first involve a near uninterrupted extent of built form and security fenced frontage, replaced overtime by establishing vegetative enclosure. This change will be uncharacteristic in this setting, the former aspect more so. This will be experienced by road users sequentiality for the length of the property frontage, and on approach to the site (more so from the north).

The visual simulations provided with the report do not include simulations of the proposal area at installation. This would more accurately reflect the proposal in the short term, noting that planting implemented will need to both thicken up and gain height for mitigation or visual softening. On this basis, it is also considered that the planting at 3 years represented, such as illustrated at VP 2 may be overstated.

Views afforded towards proposed development areas of the application site are variable for neighbouring outlooks.

The outcome for residents views towards the site varies dependant on:

- The overall distance between the viewer and development areas,
- The viewer's elevation in relation to development areas,
- How far the viewpoint (i.e., dwelling or outdoor living area) is setback from the terrace edge it is located - as when increasingly setback the viewer's terrace contributes intervening landform to views beyond, and;
- The presence of intervening (and framing) vegetation, albeit that the applicant cannot rely on vegetative mitigation outside the site as it is beyond their control.

Pages 6 and 7 of this memo depict the panoramic rural residential views towards the site (some depicting visual simulation locations). These illustrate varying examples of upper terrace locations along MacKenzies Road affording fixed residential outlooks towards the site. The report both describes the presence of elevated outlooks from dwellings (p. 14, 20) and, in contrast to this, the limited number of these (p.26).

A pattern is evident in that the application site terraces are a fore to near mid-ground landform feature for a number of neighbouring views which broadly wrap around the site from the south, east and north. Weka Creek can drop from view below the terraces from some outlooks, foreshortening the outlook more immediately to the site terraces.

For the original application the applicant requested limited notification for 247, 249 and 253 Mackenzies Road, and subsequently also for 251 Mackenzies Road. In response, and with regards to the updated application reviewed, it is considered that for (properties visited with dwellings at) 257, 251, 247, 163 and 161 Mackenzies Road, the ongoing adverse effects of the application will not reduce below moderate.

A further relevant property may be 253 Mackenzies Road, where there is not currently a dwelling, but one may be built as of right. For clarification it is confirmed that there is a dwelling present at 161 Mackenzies Road (a circular segment building as viewed in plan view).

The later outlook from 23 Glenmark Drive outdoor living area (p.8 of this memo) provides a representative viewpoint from Glenmark Drive. Lower street numbers to the south afford a closer view to the site (Table 2).

Glenmark Drive properties typically take in a short end view of the site, the visible development area extending over a narrower aspect. Although the width of this area is not fully captured in VP5 due to intervening structures, the solar arrays will be visible at two levels. This introduces narrow bands of constructed elements to the rural outlook.

The landscape report appears to draw on vegetative softening planting including embankment planting, although this will not be irrigated in dry stony conditions. It is generally agreed that effects for residents to the southern end of Glenmark Drive would decrease from low-mod to very low, and from the northern end, from low to very low over time. However, the ‘short term’ time frames are considered underestimated (at up to five years) and under represented by vis sims accompanying the landscape report. This is due to the dry stony conditions in which planting needs to establish, and the lack of vis sims depicting the proposal at implementation.

It is considered that the visual effects for Glenmark Drive residents at low-mod or low initially (considered as translating to minor, not less than minor) will remain such for a more conservative timeframe anticipated of at least another two to three years.

Summary

It is considered that the landscape report too readily discounts the limits of the location's low landscape absorption capacity, identified at p. 16. Related to landscape sensitivity, generalisations regarding productive rural character and it's 'highly modified' nature fail to draw on effective and consistent assessment of the distinct landscape attributes and values of the setting.

Because the distinctive values of this landscape are not consistently brought through to assessing effects in place, this has lead to an erroneous degree of effect conclusions.

Similarly downplayed is the development area's SH7 road frontage length and the extent to which, along which this, there are predominately open existing views into the site, and to the hills behind, lost once boundary planting establishes.

With regards to visual effects, the landscape report denotes the low lying nature of solar arrays, as something not detracting from views beyond. However, balanced consideration is needed of the breadth of the development area, and the effect to landscape attributes experienced of the view as a whole. Further to this, the effective establishment of proposed planting is considered overestimated.

With regards to outlooks from both Mackenzies Road and Glenmark Drive, the assessment states (in Table 2) that:

> *'Whilst visible, the panels not form a dominant element within this midground strip, and will not intrude on or detract from the longer views to the hills.'*

At p. 19 the *'large area of built forms'* are described as something which will become *'a noticeable, eye catching, and unique element of the wider landscape'.*

Some balance is afforded by the following statement acknowledging *'that the solar farm will diminish the undeveloped nature of the site*'. However, this is relevant for perception of the landscape as a whole for the proposal in this location, particularly noting the anticipated permanence of residential outlooks to the development area (p.20).

It is considered that the landscape report has not demonstrated landscape effects *overall* as being less than moderate (adverse), translating to more than minor. The landscape report references an accepted definition of moderate below. This is considered the most accurate reflection for rating of the effects of the application (inset below from the landscape report's assessment methodology).

Moderate to high	Modifications of several key elements / features / characteristics of the baseline, i.e. the pre-development landscape character remains evident but materially changed.
Moderate	Partial loss of or modification to key elements / features / characteristics of the baseline, i.e. new elements may be prominent but not necessarily uncharacteristic within the receiving landscape. Concise Oxford English Dictionary Definition Moderate: adjective- average in amount, intensity, quality or degree
Moderate to low	Minor loss of or modification to one or more key elements / features / characteristics, i.e. new elements are not prominent or uncharacteristic within the receiving landscape.

Regards,

SLR Consulting New Zealand

Author

Rachael Annan, BLA (hons)

Technical Director | Landscape Planning

REGISTERED

Peer Review / QA

Nigel Parker, BLA

Technical Director | Landscape Architecture

REGISTERED

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