

## **C LANDSCAPE AND VISUAL IMPACT**

### **Statutory considerations**

#### **Resource Management Act 1991**

1. TAG and FOTR submit that the Turitea wind farm application fails to comply with requirements of Part 2, Section 6(b) of the RMA.
2. As the Board of Enquiry members will be aware Section 6 of the RMA states:

*In achieving the purpose of this Act, all persons exercising functions and powers under it, in relation to managing the use, development and protection of natural and physical resources, shall recognise and provide for the following matters of national importance –*

*(b) The protection of outstanding natural features and landscapes from inappropriate subdivision, use and development*

*We also submit that this application fails to comply with requirements of Part 2, Section 7(c), 7(d) and 7(f) of the RMA :*

*(c) The maintenance and enhancement of amenity values:*

*(d) Intrinsic values of ecosystems:*

*(f) Maintenance and enhancement of the quality of the environment:*

3. Whilst preparing this evidence it has been helpful for us to examine the specific meaning of 'effect' as described by the RMA in Part I, Section 3:

#### ***Meaning of effect***

*In this Act, unless the context otherwise requires, the term **effect** includes—*

*(a) Any positive or adverse effect; and*

*(b) Any temporary or permanent effect; and*

*(c) Any past, present, or future effect; and*

*(d) Any cumulative effect which arises over time or in combination with other effects—*

*regardless of the scale, intensity, duration, or frequency of the effect, and also includes—*

*(e) Any potential effect of high probability; and*

*(f) Any potential effect of low probability which has a high potential impact'*

### **Manawatu Wanganui (Horizons) Proposed One Plan (POP)**

4. Manawatu Wanganui (Horizons) Regional Policy Statement relative to Proposed One Plan("POP") – Landscapes and Natural Character

Officers recommendations (10<sup>th</sup> March 2009) include amendments to Schedule F that include as an 'Outstanding Natural Feature or Landscape

*(j) The skyline of the Ruahine and Tararua Ranges – defined as the boundary between the land and the sky as viewed at a sufficient distance from the foothills so as to see the contrast between the sky and the solid nature of the land at the crest of the highest points along ridges. The skyline is a feature that extends along the Ruahine and Tararua Ranges beyond the areas mapped in Figures F:8 and F:9.*

which has Characteristics/Values of:

*visual and scenic characteristics including aesthetic cohesion and continuity, its prominence throughout much of the Region and its backdrop vista in contrast to the Region's plains*

5. Based on discussions with submitters at several pre-hearing meetings, issues were raised in submissions relating to primarily the identification and protection of landscapes of the Tararua and Ruahine ranges. To assist the Proposed One Plan Hearing panel understand the scope of the request, Horizons Regional Council's Planning Officer sought expert evidence from Mr Clive Anstey (Section 42A report of Clive Anstey on behalf of Horizons Regional Council, <http://www.horizons.govt.nz/horizons/Images/One%20Plan%20Hearings%20200>

[8/S42A%20Report%20by%20Clive%20Anstey%20-%20Landscapes%20&%20Natural%20Character.pdf](#))

*'on landscape provisions as set out in the Proposed One Plan, to provide responses to submissions, and to recommend a way forward'*

6. Mr Anstey dealt with the identification and protection of the landscapes of the Tararua and Ruahine Ranges in some detail. in para 14 he states [emphasis added];

***Outstanding natural features and landscapes are generally described as memorable, affording aesthetic pleasure and experiences that are shared and valued by the wider community. Outstanding natural features and landscapes have natural and cultural dimensions that are central to our identity and our sense of belonging; they are places that reveal our history and provide a coherence and connectedness in our lives through time and space. Most of the areas listed as Outstanding Natural Features or Landscapes in Schedule F are designated conservation land, or private land with a similar character. In my view all of the areas scheduled as Outstanding Natural Features or Landscapes would satisfy the criteria accepted by the Environment Court. It is my further view that a comprehensive landscape assessment would confirm that the scheduled features and landscapes are outstanding at a regional scale. Some boundaries are clearly cadastral rather than topographical and do not reflect natural patterns. Without the benefit of a comprehensive landscape assessment I am not able to confirm that the boundaries shown on maps are accurate. Some of the scheduled items are undoubtedly nationally outstanding.***

7. Furthermore, in para 34 Mr Anstey describes:

*A number of submissions requested a clarification in the terminology used and a consistency in its use. The most significant of these related to the definition of 'skyline'. In the operative Regional Policy Statement (RPS) this definition is precise whereas in the Proposed One Plan the 'skyline' is defined as a particular feature of visual and scenic character that is prominent. The tables in Schedule F list 'Outstanding Natural Features and Landscapes' which are shown on supporting maps as 'Significant Landscape'. The maps clearly show the areas referred to in the tables and should be titled the same. Skylines are not specifically located on the*

*maps so that all prominent skylines in the areas shown on the maps potentially contribute to the prominence of the ranges. **Importantly, the skyline is not limited to the highest ridge. The implication is that any ridgeline when seen against the sky becomes a feature to be protected from inappropriate subdivision, use, and development. I support this more inclusive and flexible approach to skylines, an approach which acknowledges that the skyline moves with the viewer and many ridgelines in an outstanding landscape can assume particular prominence when seen against the sky. For the same reason, a number of ridgelines in an outstanding landscape may be 'outstanding natural features', not only the highest ridgeline.***

8. Mr Anstey then goes into more detail in para 37, describing the area 'between the Tararua Forest Park boundary and the Pahiatua Track' which generally corresponds to the Turitea Reserve:

*It is relevant to point out that most of the Tararua-Ruahine ridgeline falls within the forest parks, ie. within scheduled outstanding natural features and landscapes. The only substantial section of the ridgeline that does not is between the northern end of the Tararua Forest Park and the Manawatu Gorge. The most significant landscape along this section sits between the Tararua Forest Park boundary and the Pahiatua Track. The elevation and vegetation cover is similar to that within the forest park. It is of a similar character. Not to recognise the significance of this section of the ridgeline would be inconsistent with the more general approach to delineating outstanding natural features and landscapes within the Proposed One Plan. Areas neighbouring DoC land that are of a similar character should be acknowledged as outstanding natural features and landscapes (as reflected in the area identified in Figure F:10). The current assessment being undertaken by the Council will provide the opportunity to explore the significance and extent of this section of the ranges, in particular whether or not it is only the ridgeline that is outstanding or whether a more extensive area of spurs and upper slopes should also be recognised as outstanding.*

9. Mr Anstey summarises his expert evidence in para 9:

*Only with a comprehensive understanding of the regions landscapes and the ways in which communities relate to and value them can we begin to establish any sense of their relative importance and vulnerability.*

*Accordingly, it is my view that all of the Schedule F areas should be retained as presented in the Proposed One Plan (with minor modifications as described below) until comprehensive landscape assessments and evaluations have been carried out by the Region's Territorial Authorities.*

and states his recommendations in para 36:

*It is my view that the current acknowledgement of the skyline of the Tararua-Ruahine Ranges in the operative RPS as an outstanding feature should be carried over to the One Plan as an interim measure. I understand that this provision in the operative RPS has not been contested. I therefore endorse the approach proposed in Fiona Gordon's report which is to describe in words a specific item in Schedule F for the skyline of the Ruahine and Tararua Ranges as: "The skyline of the Ruahine and Tararua Ranges' defined as the boundary between the land and the sky as viewed at a sufficient distance from the foothills so as to see the contrast between the sky and the solid nature of the land at the crest of the highest points along ridges. The skyline is a feature that extends along the Ruahine and Tararua Ranges beyond the areas mapped in Figures F:8 and F:9".*

10. Risks to natural features and landscapes with regard to cumulative effects are covered in the **POP Policy 7-2** (Officers Recommendations):

*(a) The Region's natural features and landscapes are at risk from the effects of development, particularly the Tararua and Ruahine Ranges. Adverse effects of development on natural features and landscapes include the potential for significant adverse cumulative effects. Developments with the potential for greatest impact include wind farms, residential subdivision and other major structures.*

11. Similarly POP Objective 7-2 (Officers Recommendations) states [emphasis added]:

*Natural features, landscapes and natural character*

*(a) The characteristics and values of the regionally outstanding natural features and landscapes, including those identified in Schedule F are **protected from inappropriate subdivision, use and development.***

12. Furthermore, POP Policy 7-7(a) (Officers Recommendations) describes:

*Regional outstanding natural features and landscapes*

*The natural features and landscapes listed in Schedule F and Table F1 shall be recognized as regionally outstanding. All subdivision, use and development affecting these areas shall be managed in a manner which:*

*avoids adverse effects as far as reasonably practicable and, where avoidance is not reasonably practicable, remedies or mitigates adverse effects on the characteristics and values specified in Schedule F Table F1 for each natural feature or landscape*

*avoids any significant adverse cumulative effect*

**Manawatu Wanganui (Horizons): Current operative regional policy statements**

13. The POP is well-developed in its structure with Officers Recommendations having been drafted and sent to all parties. Although well-developed, the POP is not yet operational. Thus the current operative regional plan lists outstanding natural features and landscapes within the Region and the values ascribed to each.

The list includes Policies 8.1, 8.2 and 8.3;

*Policy 8.1*

*To consider the following matters when identifying which natural features and landscapes are outstanding and regionally significant:*

- a. With respect to major geographical and geological features or landscapes, the degree to which it contributes to the Region's character in terms of:
  - i. visual prominence; and*
  - ii. scenic characteristics, including views, vistas and backdrops; and...**
- e. The degree to which the feature or landscape has recognised national or regional protection.*

*Policy 8.2*

*To protect regionally significant natural features and landscapes which are outstanding from inappropriate subdivision, use and development. In determining inappropriate subdivision, use and development the following will be taken into account:*

- a. The degree to which activities would adversely affect the values specified in Policy 8.3 so far as those values provide a significant **contribution** [my emphasis] to outstanding features and landscapes; and*
- b. The degree to which the activity provides for the social or economic well-being of people and communities, (including providing essential services to the public);*

*While ensuring that in all cases, adverse effects of any activity on the features or landscapes are avoided, remedied or mitigated*

### *Policy 8.3*

*To protect, from inappropriate subdivision, use and development, the specified values associated with the following features which are **both outstanding and regionally significant**: [my emphasis]*

- p. The skyline of the Tararua Ranges, specifically:
  - (i) its scenic qualities provided by its prominence throughout much of the Region and its backdrop vista in contrast to the Region's plains.**

The feature is defined as;

*the land/sky boundary as viewed at a sufficient distance from the foothills so as to see the contrast between the solid nature of the land at the crest at the highest points along the range and the sky.*

### **Palmerston North (“PNC”) District Plan**

14. PNC District Plan describes core values associated with the various visual characteristics of the City and that they should be managed.

Section 2.4 outlines the City View Objectives, where 'city' means the area within the Palmerston North District Council's territorial boundaries.

### ***The Attractive Community***

- *To maintain and enhance the visual appeal of the city.*
- *To recognise the distinctive rural and urban character of the city.*
- *To manage the adverse effects of activities on the environment.*

## **Section 9 Rural Zone**

9.1 Introduction, describes the Rural Zone as:

*'quite varied, ranging from flat areas on both sides of the Manawatu River, through to the rolling land of the foothills of the Tararuas, to the actual Tararua Ranges themselves. The dominance of the Tararua Ranges in particular and the very settled rural land at its edges, provides an attractive visual backdrop for the urban area of Palmerston North ...*

*There has also always been a significant number of people who choose to live in the country, some in small settlements such as Linton and others on small rural blocks, some of whom undertake at least some part-time rural activity. **Rural-residential dwellers are often attracted to rural areas by the perceived quality of the rural environment, particularly its amenity values** ... [emphasis added]*

15. The intrinsic values of the Turitea Valley in particular are noted in the PNC District Plan with rules governing the setback distance for structure and the rationale behind such rules (Figure :

### **Section 10: Residential Zone**

#### **10.7.1 Rules: Permitted Activities**

##### **R 10.7.1.1 Dwellings**

##### **Performance Conditions.**

##### **(i) Turitea / Aokautere Residential Zone Setback**

*No development, fencing (other than a Rural Fence), structures, buildings or earthworks shall be built or undertaken in “Area A” as shown on Map 10.7.1.1 “Landscape Provisions – Pacific Drive Extension”, except where such work is necessary to maintain the safety of residents through land or soil stabilisation.*

**Explanation**

*Structures on ridgelines tend to be prominent in the landscape when viewed from the floor of the adjoining valley. Height controls and development setbacks from the escarpment can greatly reduce visual impact of development. The escarpment top which marks the boundary of the Turitea Valley with the Aokautere residential area of Pacific Drive, is rounded in nature. The previous practice of building, developing, or carrying out earthworks over the rounded lip of the escarpment top, tended to create adverse effects on the visual amenity of the Turitea Valley below. A setback from the escarpment edge, applicable to almost all manmade modifications, can help maintain the rural character of the Turitea Valley and the escarpment by hiding modifications, when viewed from the valley floor. Fences can also have a visual impact, especially if made of panels or close boarding. To maintain the rural character, if fencing is required, a rural fence is regarded as more appropriate, being both less visible, and more in keeping with other fencing in rural areas.*

16. We maintain that the Turitea wind farm application is contrary to Section 6(b), 7(c), 7(d) and 7(f) of the RMA, POP Policy 7-2, POP Objective 7-2 and POP Policy 7-7(a), and Policy 8.1 to 8.3 of the current operative Regional Plan. We consider that this area contributes significantly to the overall Tararua Range in terms of its visual prominence throughout much of the Region and its backdrop vista in contrast to the plains. It is of academic interest only as to whether the area is foothills or main range in terms of landscape impact perspective.

**Expert Landscape Assessment**

17. It is of note that through Mr Browns evidence there is singular attention towards the Tararua Ranges as a whole. Mr Brown has made a very wide ranging natural ‘landscape’ assessment across the Region but doesn't seem to address the issue of the natural ‘feature’ of greatest importance in this case, i.e. the ‘skyline’ of the Tararua (and Ruahine) Ranges (and the backdrop vista which contrasts with the Region's plains), despite it having been defined as a Outstanding Natural

Feature or Landscape in the POP Officers Recommendations for *Schedule F: Regionally Outstanding Natural Features and Landscapes*.

18. We are uncertain of the purpose of Mr Brown's evidence. Mr Brown determines that the Turitea site is deemed to be an 'amenity' landscape. However, he does not identify the values of that landscape, nor discuss how the wind farm development would impact on those values. Furthermore he does not consider the level to which these impacts would be adverse, acceptable or not acceptable.
19. Whilst never categorically stating so, Mr Brown infers that an amenity landscape is somehow lesser than those described as outstanding. However 'amenity' implies visual, recreational, residential, cultural factors. These are core values that people relate to and embrace and that enhance their lives. Given that it is people who give meaning to landscape - whether wilderness, rural, coastal or urban, we believe that this is a significant viewpoint and rather an important matter to discuss in the context of the proposed development

#### **Cumulative effects**

20. We strongly believe that the core aesthetic values associated with the Turitea wind farm site are already high and highly valued around Palmerston North city and the surrounding environs, even rising in importance because of losses to wind farm and residential development further north and south. Unfortunately Mr Wyatt discusses potential adverse effects as if the viewer is rooted to a spot where there may be a number of turbines in view. He fails to see that the proposal is of up to 122 125m high visible units with moving blades, pylons, and over head cables within a context of 365 disparate moving objects.
21. Indeed, aesthetic values and associated concerns regarding visual pollution and cumulative effects of the proposal were highlighted in 379 submissions (Mighty River Power – Turitea wind farm project, Summary of Submissions, April 2009. Ministry for the Environment) made on the proposal. Several submitters described the Turitea Reserve area in general terms as being all that is left untouched by wind farm development. Many submitters were also concerned with cumulative effects (Mighty River Power – Turitea wind farm project, Summary of Submissions, April 2009. Ministry for the Environment, Page 20-22).
22. Cumulative effects have also been well-covered in the report of Milne (<http://www.qualityplanning.org.nz/pubs/Dealing-with-cumulative-effect-under->

[the-RMA.pdf](#)). He goes into detail to examine the cumulative effects debate aptly summed up with the **'death by a thousand cuts'** argument.

*'each cut on its own may seem inconsequential but together they may be catastrophic.'*

He goes on

*One only needs to visit... Woodville to wonder whether we have reached (or exceeded) the sustainable limit of some landscape resources.*

This he indicates, is not a flaw with the RMA but with:

*delays in imposing sustainable limits and/or there have been difficulties identifying those limits.*

23. Unfortunately the sustainable limits for wind farms have not and are not being assessed on the Tararua Ranges viewed from Palmerston North or the Manawatu Plains. Mr Milne describes the strategy adopted by the Marlborough District Council which has a:

*plan which has areas where marine farms are prohibited and others where they are controlled activities.*

24. Milne also describes the **Planning Creep – the thin end of the wedge (or the bolting horse)** concept.

*The concept of planning creep could be summarized as being a situation where an initial application is made for a modest proposal and the gate is then opened for expansion of that activity by the consent holder or other related development in the future.'*

25. This we consider is exactly what has occurred in the Manawatu with the consent for and construction of Tararua 1 in the 1990s followed by continuous applications for additional wind farm consents.

*The first application for a wind..... farm may be contentious, but if granted the application for expansion or more farms... is often easier to obtain than the initial consents. At some point however the horse may well have bolted*

*too far to be retrieved in one piece. Cumulative effects may become unacceptable. The trick is to draw the line before it is too late.*

26. No line has been drawn by PNCC and now we find ourselves with a wind farm application that essentially doubles the area of the local skyline currently covered and threatens the last wind turbine-free vistas from our city.
27. Applicants often use the **'existing environment argument ("just a wincey bit more won't hurt...")**. Mr Milne describes a classic case being coastal developments but it more than adequately applied also to wind farms:

*One the coastal development... is in place, subsequent applicants will inevitably argue that their proposal will have 'no more than minor' additional effects when assessed beside the effects of existing development. I agree that this can eventually lead to unacceptable cumulative effects, however again the problem is not the legislation or the case law on existing effects. Rather, the problem is with resource managers failing to identify the limits for development or at least failing to do so before the horse has bolted. Of course effects should be assessed against the existing environment however that also includes taking into account the cumulative effects of the proposal in conjunction with existing development.'*

28. We believe that these examples aptly represent the on-going situation with wind farms within the Manawatu. The Turitea wind farm application represents the seventh wind farm seeking consent in the local Palmerston North area. Although Mr Wyatt does not explore this in any detail, we have been unable to find another example of so many different wind farm developments in such a proximity to a town/city similar in size to Palmerston North. It is not surprising that this continual exposure to additional and constant wind farm developments so near to Palmerston North has caused a degree of polarization in the community. Indeed Mr Wyatt states that wind farm applications can polarize local communities especially before hearings to determine whether they should be consented or not (para 5.11). Furthermore it is not surprising that the continued and unabated wind farm hearings and wind farm construction further radically polarizes communities.

### **Core values**

29. We appreciate the importance of respecting landscapes and that there is a duty of responsibility and an ethic of stewardship involved in their sustainable

management. Indeed, we do not own the land, but merely look after it temporarily in the hope that we leave it in a better condition for the next carer. Whether we live 1km or 10km or more from the proposal, we should and do respect the quality and integrity of what little there is of the remaining Tararua Range visible from our City. Thus we are deeply concerned about the changes that will eventuate to the inherent intrinsic and amenity values and overall characteristics of the Tararua Ranges as viewed from this region, including our neighbours in Tararua.

30. We enjoy and immerse ourselves in the land in our own individual ways, whether that is by small-scale farming, tending our gardens, providing safe play areas for our children, operating home-based businesses, retiring the land back to native bush or just simply relaxing.
31. We enjoy a real sense of rural community and valuable neighbourhood relationships. These friendships we have forged with our neighbours are often based on a shared sense of caring for the land and common experiences that are unique to 'rural life'. We feel we move amongst 'like-minded' people who by choosing to live in the same neighbourhood, have made a personal commitment to the area. We respect and recognize the right for space and privacy yet we know that we can rely on our neighbours in times of need – a charming characteristic so rare in many urban neighbourhoods.
32. How do we reconcile the values of those people that find the turbines graceful and elegant with those others that consider that they are visually unappealing?
33. During the hearings process, everyone has the same opportunity to make a submission. What then is the underlying reason for ever increasing numbers of people submitting against further local wind farm proposals? It seems apparent that as the vista from Palmerston North towards the Tararua Ranges has been eroded, what is left undeveloped by wind farms becomes increasingly valuable to an ever-increasing section of the community. With further, and in this wind farm application, complete development of the Tararua Range viewpoints and vistas from Palmerston North, those people that have a connection to the landscape as is are those with the most to lose from its development. This sense of loss cannot be compared with any similar feelings that those who support wind farm development feel for a landscape NOT bestowed with turbines, especially as here in Palmerston North their needs are more than adequately catered for.

34. We maintain that the Tararua Ranges are beautiful, sometimes breathtakingly so. The many landscape features have significant transient values due to atmospheric, light and weather conditions such that the consequent varying definitions and character of the landscape can be dramatic and memorable. These characteristics are enhanced for the very reason that the land has been cleared for pasture, and because they are different (not lesser) in nature and character, from bush-clad slopes, steeper or higher terrain, or for example the Manawatu Gorge. Sunset and sunrise, even moonrise, are sights to behold. Often dramatized by cloud formations or mist. Regardless of the aspect, whether it be views across native lowland tawa forest, tree plantations, rivers or farmland, these characteristics reinforce our joy at the uniqueness of where we live.
35. There is a sense of sterility and disconnectedness with the evidence of Mr Wyatt and his consideration of community likes, dislikes, needs and intrinsic values. It seems that Mr Wyatt fails to recognize that there are vibrant, dynamic, healthy communities within and around the landscape that he carefully dissects. This dislocation between the evidence and individual/community core values fails to examine the changing or transient values that are experienced from our own houses, neighbourhoods, city we live in or more general view-shed from many kilometres away. The landscape changes hour by hour, day by day, by night by day and by the season. These observations connect us to the landscape and irreversibly tie us to its ever-changing nature. The fact that recent (and proposed future) development has occurred out towards the Tararua Ranges gives rise to residential sections with views of the Tararua Ranges.
36. The views and vistas from our homes and properties are many, varied and unique, whether inside or out, upstairs or down, front garden or back. We appreciate that our property's perspective is lightly different, even from our closest neighbours. Of course we move around our properties and as we do so we celebrate our views and surroundings whether we are using our outdoor living areas or taking pleasure from our gardens and landscape. We are engaged, often intimately, with the land and all it has to offer with the visible surroundings being a significant part of that engagement. It is not just one view that appeals but the sum of the whole depending upon where we are.
37. Indeed, much-cherished views are sometimes not even associated with private properties, but may be from work, recreational areas or from sites that have their own intrinsic values associated with our previous experiences in the local area

and wider view-shed. We move around our communities, recreationally, socially, for work, but we return to our homes.

38. We would ask if any reliable, effective or reasonable conditions are even available in this application to mitigate landscape and amenity effects. We do not agree with the ease that Mr Wyatt suggests that overall visual impacts can be mitigated with trees, shrubs or other plantings. A characteristic of many of the properties on and surrounding the Tararua Range foothills is their orientation to take advantage of all day sun. Hand-in-hand with this feature though is the relative exposure to winds. This has a severe influence on the rate at which many trees and shrubs grow. We appreciate that Mr Wyatt's pictures are only indicative, but vegetation screening of those views that are adversely effected in circumstances where turbines will be on elevated landforms, thus visually dominating the landscape, will take decades. It is not practical for vegetation to be used as mitigation for some properties where the zone of adverse visual amenity due to the proposal is effectively along a complete boundary. This is of course, presuming the owners want to screen a once-cherished view and lose early morning sun from parts of their property. Unfortunately this vegetative screening fails to take account that property owners are likely to enjoy all of their property both inside and outside, from one boundary to another. When one considers the number of properties with overall visual impacts that would be adversely affected, we consider screening to be an unsuitable mitigation strategy for this proposal. Indeed, the recent environment Court discussed this subject (Project West Wind, EC W031/2007) and concluded (para 520:

*'Given that we are looking at a project with a current life of 20 years at the very least, screening vegetation for turbine mitigation is something we cannot necessarily rely on'.*

39. For many residents, the views across the flat Manawatu Plains are perfectly contrasted with the elevated views of the Tararua Ranges or the ridges, spurs or foothills that are associated with the ridge. The assessment describing a modified landscape of pine forest or pastoral land as less worthy than undisturbed native bush, fails to consider the transient values of winter sun on farmland or the changing colours of the pasture with the different seasons. These landscapes are no less visible when viewed from further away and often become more striking as they find their inherent position within the wider landscape units. For example, Bryants Hill is the predominant and local landscape feature associated with the Turitea Valley because of its visual dominance. However, when viewed from

Palmerston North city (Princess Street) its pastoral colours serve as a striking contrast to the darker hues of the Turitea Reserve.

### **The viewshed and zones of visual influence**

40. We believe that Mr Wyatt has failed to adequately assess the visual impact of the application as a whole and that the zones of visual influence that he has described are not representative of the complete proposal. For example (para 6.14):

*'In the case of the outer 18km limit, this was chosen as the extent of the viewshed due to the fact that .... a wind turbine 150m high viewed from a distance of 17.2km will take up 5% of the vertical field of view, and so will be considered visually insignificant at that distance.'*

Here Mr Wyatt describes the impact of a single turbine and not a cluster of 122 spinning objects; some on the skyline and others contrasted against the green hues of the Tararua foothills.

41. We are concerned that there has been insufficient attention paid by Mr Wyatt to the vistas and landscape views associated with the many streets within Palmerston North City. Only one visual montage (PV02, Fitzherbert Avenue looking SE) was taken from a street within the City proper (NW of Fitzherbert Bridge) and we do not believe that this is a wholly representative montage. Diverse vistas are offered from many Palmerston North streets both parallel and perpendicular to the Tararua Ranges from Maxwells Line in the SW of the city to Ruamahanga Crescent in the NW. Many of these roads possess their own specific vista of the Turitea Reserve and surrounding areas which almost serve as a reminder of that landscape's key importance for providing the City with much of its water supply. We are alarmed that any movement around the local area and wider view-shed will be constantly and unendingly filled with turbines and that for those that appreciate views without turbines, we will need to make special trips away from our houses and City to other areas further away.
42. Our homes are but a small part of the package that defines our properties. By far the greatest component is the landscape that our properties and neighbourhoods nestle in. We are concerned with the number of turbines, their size, their movement, their dominance and their impact on the landscape. No photomontage could accurately depict the potential visual affects that concern us. Indeed, the people of Palmerston North are experts at the visual dominance associated with the currently consented wind farms in our local area.

43. If consented, we and future generations lose all that is left of the immediate and only prominent, natural, scenic, amenity-shared visual landscape – a finite resource. If declined, the applicant does not lose. We simply get to keep what little remains.