

**BOARD OF INQUIRY**

**Turitea Wind  
Farm Proposal**

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**TRANSCRIPT OF PROCEEDINGS**

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**BOARD OF INQUIRY**

**Turitea Wind Farm Proposal**

**Hearing**

**HEARING at PALMERSTON NORTH on 13 AUGUST 2009**

**BOARD OF INQUIRY:**

Environment Court Judge S.E. Kenderdine

Mr D. Bunting

Mr R. Heerdegen

Mr J. Hudson

Mr C. Shenton

**APPEARANCES**

MR J. MAASSEN appeared on behalf of Palmerston North City Council

MR N. DAVIDSON appeared on behalf of Mighty River Power Limited

MR M. McCLELLAND appeared on behalf of Tararua-Aokautere Guardians Inc (TAG) and Friends of Turitea Reserve

MRS PERCY appeared as a submitter

MS A. MILDON appeared as a submitter

MS M. BAILEY appeared as a submitter

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[9.34 am]

5 HER HONOUR: Good morning. Yes, Mr McClelland?

MR McCLELLAND: Ma'am, just two points that I thought I should draw the Court's attention. The first is Di Lucas has been in bed sick for the whole week and I have just spoken to her this morning, and she is still in bed and still sick, and I suspect if we were to get to her tomorrow I do not think she will make it. That is the first point so I just ask that you bear that in mind and I have spoken to counsel and they are well aware of that. Shannon Bray will be available though.

[9.35 am]

15 HER HONOUR: Yes, thank you.

MR McCLELLAND: The other matter is, with the Board's leave, I have a High Court judicial telephone conference at 10 past 10 so if I can excuse myself for about 15 minutes. Mr Maassen is under instructions to keep going until I come back.

HER HONOUR: I am sure that will not be a difficulty for Mr Maassen.

25 MR McCLELLAND: Those are the two points I wanted to raise, ma'am.

HER HONOUR: Thank you. Please extend our sympathies to Ms Lucas.

MR McCLELLAND: Yes, I will, thank you.

30 HER HONOUR: Having been marginally in that camp I have some sympathy for her.

MR McCLELLAND: Yes. Well, I have certainly noted that and I admire your courage.

HER HONOUR: Thank you. Yes, Mr Maassen?

40 <ALLAN WYATT, on former affirmation [9.36 am]

<CROSS-EXAMINATION BY MR MAASSEN [9.36 am]

MR MAASSEN: Mr Wyatt, we were talking at the end of the day yesterday about cumulative impacts, and the council's understanding of cumulative impacts as being impacts of a wind farm proposal in addition to other existing or consented wind farms, but also the

cumulative impacts of the total number of turbines within that proposal, do you recall that we talked about that?

5 MR WYATT: I do and I said that I had never heard of that particular inference.

10 MR MAASSEN: I want to just ask you to get out the Motorimu decision that you have available to you - and for the Board that is in volume 2, tab 5 - and turn to page 47, paragraph 185. Now, it might be some time ago that you read this decision but you recall that the context of the argument was that some turbines had been consented from a proposal but in addition the applicant wanted the front ridge of turbines which had not been consented, do you recall that?

15 MR WYATT: I do.

20 MR MAASSEN: Now, in paragraph 185 there is reference to the “front ridge” which the council says means the ridge that was in debate. Can you just read that paragraph for me?

MR WYATT: Before addressing that concern - - -

MR MAASSEN: You can read it to yourself if you like.

25 MR WYATT: Yes.

MR MAASSEN: You have read it?

30 MR WYATT: I have read it, and that is exactly what I was saying yesterday in our discussion, I said that the only cumulative effect on one wind turbine or one wind farm was where additional wind turbines were added and, in that context, I could see the definition having some effect. Turitea is not adding to any existing permit, it is an application in its own sense and I did not think that cumulative impact applied in that  
35 instance.

MR MAASSEN: Well, in this context Motorimu was a single proposal submitted by the applicant?

40 MR WYATT: As I understood this it was an additional row so, as I said, in that instance I can see where cumulative impacts could occur.

45 MR MAASSEN: So your understanding is that this was an application for an extension as opposed to a single application which had been advanced through the council and Environment Court process?

MR WYATT: I do not know how the planning works but if you read that paragraph that seems to be what it is saying. Placing additional turbines along the front ridge above the consented turbines would seem to imply that it was a second stage of an application, an additional amount of turbines. And then in that instance, as I said yesterday, I could see some understanding but I had never heard of cumulative impact being derived from a single wind turbine application. It is the impact of that particular planning application that is under review.

MR MAASSEN: All right, so I am clear about your understanding then. What I want to now ask you to refer to is the Di Lucas report and attachment 24.

MR WYATT: Yes.

MR MAASSEN: This is a viewpoint intended to mirror your public viewpoint 06 and cumulative viewpoint 01, do you see that?

MR WYATT: Yes, I do. This is on 24, yes.

[9.40 am]

MR MAASSEN: From that viewpoint can you see that a number of the turbines, in what I would describe as the "cleared ranges" to use your nomenclature, are penetrating into the reserve and the turbine blades are spinning, in a sense, behind a background of the reserve, do you see that?

MR WYATT: Are you referring to the wire frame one on the bottom of that attachment 24, the wire framed diagram?

MR MAASSEN: What I am referring to is this here.

MR WYATT: I am sorry, you are referring to my - - -

MR MAASSEN: This is Di Lucas, attachment 24.

MR WYATT: I have got that as attachment 24, is that the same?

MR MAASSEN: Yes, it looks similar.

MR WYATT: And you are referring to her - - -

MR MAASSEN: You have only got an A4 version.

MR WYATT: I have only got an A4 version and - - -

MR MAASSEN: There are three parts to it, it seems to me that you have only got one side of it.

5 MR WYATT: That may well be the case, if I could have a copy of the original I would appreciate it.

MR MAASSEN: Perhaps if your counsel could provide the Di Lucas evidence.

10 MR WYATT: Thank you very much. That is exactly the same as what I have got.

MR MAASSEN: All right, well, I will ask you to have a look at my copy.

15 MR WYATT: Oh, that is at 25, that is on the following page, I am sorry.

MR MAASSEN: 24 and 25.

20 MR WYATT: Yes, sorry, we have got the same one, you just said 24 and it was A4.

MR MAASSEN: Okay, but you have got the A4 version?

25 MR WYATT: I have got the A4 versions of those, it is exactly the same.

MR MAASSEN: Thank you. Now, you describe that as a wire diagram?

MR WYATT: It is a wire framed diagram, yes.

30 MR MAASSEN: Wire framed diagram. Do you see the point that I am making though that some of the turbines in the foothills have a different impact on the Turitea Reserve than those which sit on the ridgeline?

35 MR WYATT: In the wire framed diagram?

MR MAASSEN: Yes.

MR WYATT: Yes, I suppose they do.

40 MR MAASSEN: And one of the differences is that the blades and the turbine pylon, if you like, actually go into the reserve and the reserve is the background to that viewpoint?

45 MR WYATT: Are you referring to turbines 74, 75 or are you referring to the turbines on the left hand side around the - - -

MR MAASSEN: Let us use some examples: turbine 133 and turbine 132, in fact, all the turbines that I would describe as coming down the Love property in front of Game Ridge, which is - - -

5

MR WYATT: Are you referring now to attachment 25?

MR MAASSEN: I am referring to attachment 24.

10

[9.45 am]

MR WYATT: 133, the ones on the far right?

MR MAASSEN: Yes.

15

MR WYATT: I can see them coming down the ridge, yes, 130, 129.

MR MAASSEN: So what is your assessment of the impact of those turbines on, from that viewpoint, the expressiveness and legibility of the Turitea Reserve?

20

MR WYATT: I do not believe at that distance they change it. I think they are subservient to the ranges, I think they will be noticeable but it is some distance away, and possibly the best interpretation cannot be done from a wire frame which is picking them up from both sides but done from the photomontage, which if I could ask it to be shown to the Court, the proper photomontage.

25

MR MAASSEN: All right, thank you. So you would like cumulative viewpoint?

30

MR WYATT: 01.

MR MAASSEN: No, you are some way away from that, the road there. Do you see that?

35

MR WYATT: Yes.

MR MAASSEN: So you would like the Board to be shown your CVP01?

40

MR WYATT: Yes. On the screen behind me is the original photograph, that is from 80 to 230, it is a 150 degree panorama, but if you go down and look at viewpoint A, and this is the part of the photomontage that is shown in exhibit 24 with the wire frame and all the numbered turbines.

45

MR MAASSEN: Sure.

MR WYATT: But if you actually have a look at a 60 degree view, which is behind me now - - -

5 MR MAASSEN: Just pause for a moment. Your counsel has indicated they cannot hear you so perhaps you are falling away and you need to speak into the microphone.

MR WYATT: Sorry, yes.

10

MR MAASSEN: Just wait for a moment. Just let the Board, before you answer, see the visual that we are talking about so that they can – no, the Board not me.

15 MR.....: Yes, is that what you want?

MR MAASSEN: Yes, that is correct.

MR WYATT: Number A.

20

MR HEERDEGEN: Could I ask Mr Wyatt if he could show us with the mouse pointer exactly what turbines he is referring to and you are referring to so I can see it on here?

25 MR WYATT: Yes certainly.

MR MAASSEN: Yes certainly. So would you, Mr Wyatt, please indicate the line of turbines that we are referring which are on the Love property by reference to that cumulative viewpoint?

30

MR WYATT: Let me just increase the magnification, if I may. The numbered ones are, obviously, easier to find but - - -

35 77, 82, I think it is 133, 134 there. You are referring to 133, 130, 129, is in this area, commissioner, just there.

COMMISSIONER .....: Thank you.

40 MR MAASSEN: So to put that on the record, these are the turbines that run on what is described as the Love property on a spur running north from Tirohanga Peak? Is that a fair description?

MR WYATT: I will accept that description, yes.

45 MR MAASSEN: And in relation to that viewpoint, what is your answer as to the impact on expressiveness and legibility of the reserve?

MR WYATT: It is very, very minor. You are 9.4 kilometres away from it. You are probably further away as these are at the end of the range. They are a very small element in that landscape. I don't believe they have an effect on the legibility or memorability of the reserve. They are a very small component. I think that is supported by the 60 degree views.

[9.50 am]

I do say that the inclusion of that one does not do it justice. Some of those turbines are on the other side, so they are showing the entire array of turbines even if they are in the wireframe image in Ms Lucas' evidence. It doesn't actually show the ones that are visible, it shows all the turbines because we modelled, as I said originally, the landscape with all the turbines in it and then we take off the turbines that are behind the ridges when we do the final modelling, and the wireframe view shows even turbines that are behind the hills, which obviously you won't be able to see.

So I think it is not quite a good representation of what you see, I think the photomontage is much better. It is useful for identifying it but I wouldn't use it as an impact assessment model.

MR MAASSEN: Right.

MR WYATT: I think it is quite biased in that way.

MR MAASSEN: Let us move now to a closer viewpoint, which is RVP2 and we can look at 2A and 2B to break that up if you like.

MR WYATT: I am just trying to find it, I'm sorry. RVP2?

MR MAASSEN: Yes.

MR WYATT: Pacific Drive.

MR MAASSEN: From that viewpoint, describe for the record the features that we see?

MR WYATT: On the existing skyline you see the transmission towers which run down into the valley. You see the ridges, the low-lying ridges.

MR MAASSEN: Just speak up please.

MR WYATT: I thought I was, sorry. You see the power line on the ridge; you see the existing fence line and houses of the subdivision. Moving around to the right you see the existing cleared ridges, forested areas and some area within the valley. After the wind farm is constructed you see a range of turbines going across the landscape, moving from left to right and continuing some distance. And in that far right view, the transmission towers have now dropped into the valley and are below the ridgeline.

MR MAASSEN: Thank you. So if we start with number A, one sees the skyline of the Turitea Reserve in part of that viewpoint?

MR WYATT: One does.

MR MAASSEN: And there are a number of turbines located on what we would call Bryant's Hill which is a foothill in the middle ground?

MR WYATT: Yes. I mean Bryant's Hill is not even in that photograph. Yes, it is a local highpoint but it is not, as I said to you earlier in my evidence, it is not a spectacularly different highpoint in that range.

MR MAASSEN: And in respect of some of the turbines running on the spur to the south, one sees that they have in part a background of the Turitea Reserve?

MR WYATT: On some of those, yes.

MR MAASSEN: Yes. And if one looks at the turbine on the most right of that viewpoint, but not in the reserve, what you see is in fact the turning blades but not the actual hub of the turbine. Do you see that?

MR WYATT: You don't see the nacelle?

MR MAASSEN: The nacelle, yes, sorry.

MR WYATT: This is on – are you referring to that turbine here?

MR MAASSEN: Yes, I am.

MR WYATT: I think you would probably just see the nacelle, but yes.

MR MAASSEN: Yes.

MR WYATT: If you were slightly further down and around then the nacelle may drop below.

MR MAASSEN: And my question again is now looking at this viewpoint which I think is approximately three kilometres, or exactly three kilometres from this site - - -

5

MR WYATT: The closest turbine? If not from that particular one, it would be the one probably on Bryant's Hill. I think we measured that to Ngahere Park Road into this area, so to Pacific Drive at about 3.2 when I did it. This is a slightly closer one, so three kilometres.

10

MR MAASSEN: And my question is, do those turbines that I have just described in your opinion affect the expressiveness and legibility of the Turitea Reserve in the background?

15

**[9.55 am]**

MR WYATT: No, I don't believe they do. I think that the Turitea Reserve from this distance would be considerably further away. It is probably in the order of five or six kilometres but I can measure it if you would like. The legibility of the ridgeline, I think this does show that this is not impacted by the turbines.

20

And if you took out that particular turbine, for example, here, would that make a difference to the overall impact, and my view would be strongly of the opinion that it would not make any difference at all to the impact from this particular location.

25

MR MAASSEN: And can you give that answer in terms of impact on natural character?

30

MR WYATT: This appears to me to be a landscape that has, if you like, severe impacts already on natural character. It is a very much a man-modified landscape even in the edges of the pine and forest lines. They are very straight, it is angular, there is nothing natural about those edges.

35

In fact the edge of the Turitea Reserve along that embankment is a much more a straight line than what occurs on the other side of the ranges. It is a much more an unnatural break. If you want to define what is natural, I do not think that these with or without the transmission tower, which also sits on that hill and runs across that valley, I don't believe it is a natural landscape.

40

MR MAASSEN: Right. Now, if you move to RVP2B.

45

MR WYATT: Yes.

- MR MAASSEN: You will recall that we were talking about in relation to cumulative viewpoint 1, turbines running on a spur in the Love property north and those are also shown in that viewpoint are they not?
- 5 MR WYATT: I think they are these ones you are referring to?
- MR MAASSEN: No.
- 10 MR WYATT: Right down the end or these ones down here?
- MR MAASSEN: 1.33, yes.
- MR WYATT: Yes.
- 15 MR MAASSEN: So you are indicating in RVP2B the turbines running down the spur from Tirohanga Peak roughly north?
- MR BUNTING: Mr Maassen, it might help our referencing if you could just refer to the degrees. See the degree scale?
- 20 MR WYATT: There is a bearing on the top photograph. So a bearing of about 180, 170 to 180?
- 25 MR MAASSEN: All right.
- MR BUNTING: Yes, that is much better.
- MR MAASSEN: Thank you, Mr Bunting. That is a much easier way.
- 30 MR WYATT: For both of us.
- MR MAASSEN: From bearing roughly 182 or 83 degrees through to 170 degrees on RVP2B.
- 35 MR WYATT: Yes.
- MR MAASSEN: Again my question is, in relation to those turbines on the foothills, what is your opinion about the impact they have on the expressiveness and legibility of the Turitea Reserve?
- 40 MR WYATT: As far as defining the ridgelines, in many respects they increase the legibility because of the way they are located. So if you are looking at being able to read the folds of the hills, in some respects they assist that. Memorability was your other? So legibility they may well increase.
- 45

5 As far as memorability, I think the reserve is one component within that broad panorama from the valley to the right, all the way across to Bryant's Hill on the left. I do not think it is a particularly memorable location prior to the windfarm. I think it is one of the smaller areas across that whole panorama, and I think this does support that, and I do not think it increases or decreases it.

10 MR MAASSEN: Well, I am surprised you say that Pacific – these are similar locations on Pacific Drive on the southern side of Pacific Drive, and there is an orientation as houses along the river terrace and roughly in a straight line.

15 MR WYATT: It is. Very, very visible from the valley below.

MR MAASSEN: Yes.

20 MR WYATT: And they do have these views over a panoramic landscape that takes in that valley, and it takes in the ridgeline stretching from the right, right around to Bryant's Hill - - -

**[10.00 am]**

25 MR MAASSEN: Yes.

MR WYATT: Up along the other fence lines if you have – by the way that was taken right at the fence, it was not taken back at the house, so it was taken right on the edge of that private property.

30 MR MAASSEN: Right.

MR WYATT: And yes, that view does entail very much a panoramic view of which the reserve is one component.

35 MR MAASSEN: Yes.

MR WYATT: But it is definitely not the dominant component in all that view, I would not have thought.

40 MR MAASSEN: Well, I would suggest to you that the juxtaposition of the foothill with the reserve creates a very memorable and vivid landscape.

45 MR WYATT: I would say that it is a lovely landscape, it is a superb view. Whether that component of it is memorable in its own right, I probably disagree with you. I did not come back from viewing that and thinking that is an image I will always have; whereas if I go down and, as I said,

come across from here and look up Mako Mako Road, and look down at the southern ranges, I think that is the image that I will always like to keep.

5 Similarly, when I am going up on the roads heading northwards I will  
look up to the Ruahine Ranges and you see those sharp peaks. They are  
images that I will always have. Going into the reserve itself, into areas  
of that and looking down into those valleys, and very much up close,  
10 they are images – does that match it? No, I do not believe it does. It is a  
very lovely view but it is a panoramic view which takes in an enormous  
amount of elements. So I would not say that the turbines in fact change  
that.

15 MR MAASSEN: All right, so we have got to the position that you accept that  
it is a lovely view?

MR WYATT: Yes.

20 MR MAASSEN: It is not as good as the ones you have seen on Mako Mako  
Road?

25 MR WYATT: It is not as – if you were defining it as memorable, coming  
around and just getting that whole view down the eastern edge of the  
ranges to the mountains below covered in snow, especially at the  
moment, it is pretty spectacular.

MR MAASSEN: Yes. All right. But in these locations we have residential  
properties, don't we? We have residential zoning in Pacific Drive?

30 MR WYATT: At this location.

MR MAASSEN: In Pacific Drive?

35 MR WYATT: Yes. And you have, I suppose, rural residential in the valley  
below.

MR MAASSEN: Yes. So we have got patterns of human habitation enjoying  
what we would describe as a lovely view?

40 MR WYATT: Yes, I would totally agree with that.

45 MR MAASSEN: And my proposition to you is that there is a cumulative  
effect of turbines both on the ridgeline and on the foothills in terms of  
the legibility and expressiveness of that landscape.

MR WYATT: Well, as I said, there is but it may well increase the legibility of the landscape. As you mentioned in earlier submission, and I think you quoted to me, in some lighting conditions they tend to merge. Well, if you are assessing legibility, by the very fact that you have the two rows of turbines, it is going to pick out the ranges.

So in term of legibility, if that is an attribute that you hold dear, then in fact the turbines may well increase the legibility. But I do not know that that is a measure that I would like to use to say, "Well therefore these are a positive impact". But I don't – yes, the legibility may well have been increasing, but I do not think that that is something that I think weighs heavily on my assessment of the implications of that view.

MR MAASSEN: What about the idea of coherence, visual coherence? Do you think it has an impact on the coherence of the view?

MR WYATT: Well, when you look at that existing view, when you look across here, is it a completely – it has a number of elements in it right from the, I suppose, the transmission towers. The manmade elements, the houses in the valley below which are not shown in the bottom of that panorama, but they are obvious when you actually stand there. We have taken a strip across, but all the houses in the development down in valley view, then you look across and you have got pine plantations and other signs of agriculture. It has an enormous amount of components in it, it is not a simple view. So if that was just forested hills dropping down at the plain and then you had your rural landscape running up to it, I think there might be some argument, but that is a very broken - it is very attractive, but it is not a single cloaked hillside.

MR MAASSEN: Well, do you accept the proposition that the more turbines you put onto visually sensitive landscapes, the greater the risk that you create landscape impacts that are severe. Do you accept that proposition?

**[10.05 am]**

MR WYATT: That is very simplistic, generalistic and I do not think will apply. We have had cases in fact, a recent Court case in Australia dealt with exactly that where previously at – it is near, sorry just trying to think of the name, it will come to me. I did actually work on it but the court there, there was a decision given by the government department to allow I think 75 wind turbines and the proponent went back and said that some of the conditions were not acceptable and at the same time asked the Court to consider whether or not the deletion of 10 turbines made a difference.

5 My view was it did not and the Court ruled along those lines, that in fact the deletion of those 10 turbines made no difference whatsoever to the visual impact from localities around the wind farm and I tend to hold that view that taking off a couple or taking off a few in there will not affect the visual impact from this property.

10 MR MAASSEN: Have you made a comparison, for example, between the visual impact of turbines for example in the reserve compared with turbines in the entire proposal. Have you made a comparative analysis to justify that conclusion for example?

MR WYATT: From this viewpoint?

15 MR MAASSEN: From any viewpoints.

20 MR WYATT: Well I don't think you can say from any viewpoint. If you are looking at a viewpoint from a residential property, I have assessed this as more than minor. What I am saying is taking out those ones within the reserve if you like, would I don't believe make any difference to my assessment as more than minor from this particular viewpoint.

25 MR MAASSEN: No, my question is did you make a comparative assessment between a wind farm which had turbines only in the reserve and a wind farm which is the one as presently proposed?

MR WYATT: No, I didn't.

30 MR MAASSEN: Now, I want to turn to the subject of residential viewpoints and you were able to make an assessment of the impacts on residential viewpoints once those 25 RVP photomontages were taken. Is that correct?

35 MR WYATT: That was not it totally, no. Some, as I mentioned to you yesterday, there was some assessment in the AEE and that was then planned and more extensive residential viewpoints were examined, as part of the SOE.

40 MR MAASSEN: I think that we got to the point yesterday where you said you had flagged them in the August 2008 assessment and then once you had responses from submitters you went into a more detailed assessment.

45 MR WYATT: And that is really common. In that court case I tried to think of, it is Teralda Wind Farm in New South Wales, I'm sorry, and I had worked on it, it's just – the name escaped me.

MR MAASSEN: Now, it appears the Board has not had the opportunity to see the AO versions of the residential viewpoints and I wonder whether or not it is useful for us to simply display those to the Board to get a general impression of the subject that we are talking about. Do you agree that that would be useful?

MR WYATT: Yes, or one at a time whichever you prefer.

MR MAASSEN: All Right. Well let's do that exercise then. Mr Omer if you could start with RVP1 and then go through, past the Board, and in the meantime Mr Wyatt can give a brief commentary on what you see in the photograph, in the photomontage I should say, and the rating that he gave to that. Now, when you give the rating Mr Wyatt, would you give the rating based on your assessment without mitigation and the rating based on your assessment that mitigation is possible?

MR WYATT: Right.

MR MAASSEN: So, for the record RVP1 taken from Summerhill Drive.

[10.10 am]

MR WYATT: Ma'am and Commissioners. We did discuss this yesterday. That viewpoint is actually taken across the road from the particular residence. It is approximately 5.2 kilometres to the nearest wind turbine. From the residence itself, in my assessment, I said it had a de minimus effect and as you can see from the planting in front of that property on figure 36 in my report, it would have a very limited view across the road and the view has to be angled up, so in fact it is well screened. I said that from the driveway it would be minor and I don't think landscape mitigation was required, there was already landscape there.

MR MAASSEN: Right. RVP2.

MR WYATT: Ma'am, in my report on page 67, I show the rear elevation of a house. That photograph was taken right at the edge of the garden, right on their rear boundary so that I could get a view that went up to Bryant's Hill and the panorama that we have discussed previously. In that, I did consider it a more than minor adverse effect as the turbines are within three kilometres and I think that is the correct assessment from that area without mitigation.

If you go down to Valley View and look back up to the hillside and see many of the properties have planting along that boundary, some don't, and what I showed in the landscape mitigation sketch was the notion of

5 a denser boundary planting which would remove the views of all those  
fence lines and the transmission tower as you look to the left of that  
panorama. If I can just go back to that. You can see that the left hand  
side of that existing view is not exactly attractive; I mean the rural  
aspect is lovely but if I was designing a landscape for that house I  
would probably like to take out the fence lines and the houses and the  
power lines on top of the ridge and so some boundary planting would  
focus your attention more towards the rural landscape.

10 And then in the sketch I showed some open canopied trees in the  
foreground, but if that was required, you could still get a view through  
but it would definitely take away some of the impact if you found that  
unacceptable. Then if landscape mitigation was done, it would be a  
minor to de minimus effect.

15 MR MAASSEN: Thank you.

MR .....: Could I just ask a question? So the landscape you gave is about  
140, is it?

20 MR WYATT: The landscape went to about – yes, it went down to about 140,  
so it took out that edge of the fence on the right. And um – remember  
this is moving right down into their property and standing right on the  
edge. So it's really suggesting planting along the fence line which  
would take away that view and then open canopy trees in the frontage.

25 It would be a response that I'd probably start with in a garden design  
for that particular house, but I haven't spoken to the owners. It is a  
complete – it is a response without a brief.

30 MR MAASSEN: RVP3.

**[10.15 am]**

35 MR WYATT: The closest wind turbine from that location is 1.3 kilometres.  
The house itself doesn't look directly towards it, the driveway does.  
These photographs are taken just below that front fence, which is  
shown in my photograph on page 71, and it had a more panoramic view  
than the location closer to the house itself. So we actually came down –  
40 it was on the entry drive, so I felt it was representative because as he  
was driving down the entry and swung around that corner he'd get this  
panoramic view.

45 So we took it some distance from the house, but it was the – it had a  
much greater impact than the location close to the house because of the  
sheds etcetera around it and when you visit that you'll see the same

thing. Now it's quite a – it's very much a panoramic view, and the – that is shown on that original page. The following one shows the wind turbines and then we broke it down.

5 On the left hand side of this view which is the first one you saw it does include the existing wind turbines to the left. As you move around the proposed Turitea wind farms become evident and they then come across the hills, right across to the right.

10 In my evaluation I said that it was a more than minor – was it 1.3 – and there was possible on that driveway, if you did have some driveway planting, it would in fact take away from that view, and as the house was orientated slightly differently I think that would be an acceptable outcome.

15 MR MAASSEN: And do you know what the size of this property is in terms of its title dimensions?

20 MR WYATT: Oh, no, I don't, but it seemed quite substantial. I was looking at the house and the immediate environments.

MR MAASSEN: Right. Would it surprise you that is a 80 hectare property?

25 MR WYATT: No, it wouldn't.

MR MAASSEN: And would you expect people living on that property to work and relate to that property beyond just simply the house environs?

30 MR WYATT: Yes, I don't disagree with that at all.

MR MAASSEN: RVP4.

35 MR WYATT: In RVP4 the photograph was taken at the deck immediately adjoining the residence at a slightly lower level in the garden. The panorama includes an extensive pine plantation on the hill opposite and the wind turbine blades would just be visible, or a couple of them, above the edge of that ridge. I believe it would be a fairly minor change and with pine tree growth or removal it could change.

40 MR MAASSEN: RVP5.

MR WYATT: RVP5 is the same location, I've just got to - - -

45 MR MAASSEN: All right, so we don't - - -

MR WYATT: But it was just – it made it worse because we went up further up the garden, right.

5 MR MAASSEN: All right. So it's the same property?

MR WYATT: It's the same property. It's just further – you can see on figure 52 on page 77 you can actually see the deck - - -

10 MR MAASSEN: Yes.

MR WYATT: - - -from which the previous photograph was taken. We went up high to try to get the wind turbines to come up above the horizon line.

15

**[10.20 am]**

MR MAASSEN: Mm'hm.

20 MR WYATT: Do you want me to bring those up on the screen or?

MR MAASSEN: If you like.

25 MR WYATT: Just trying to get the cursor on the right one, it's proving to be somewhat more difficult – sorry, if it – leave it at that if that's okay.

MR MAASSEN: That's fine. RVP6 which is at the end of Oram Drive. Now that Oram Drive is in Ngahere Park, correct?

30 MR WYATT: It's off Harry Park Road, runs down to the water treatment plant or a sewerage treatment plant or a – some large tanks at the end of the road.

35 MR MAASSEN: This photomontage wasn't taken from any particular - - -

MR WYATT: No.

MR MAASSEN: - - -property, it was taken from a road.

40 MR WYATT: The properties themselves, as you can see are at a bearing of about 1.30 had some planting around it. We tried to find a spot down the road that if you like maximise the views but, no, I haven't been on the properties so I don't - - -

45 MR MAASSEN: Would you accept that the cottage on the left hand side of figure 56 enjoys expansive lateral views across the ranges?

MR WYATT: Yes, they're very similar to what I would have shown here I would think.

5 MR MAASSEN: Yes.

MR WYATT: So it wasn't – it was just trying to find an open spot along that road that maximised the viewing back to the location of the wind farm.

10 MR MAASSEN: All right.

MR WYATT: And that was about 2.2 and again I said more than minor adverse effect, and I believe that it was possible and as you can see on the property on that right hand side of the photograph that landscape mitigation was an available option.

15

MR MAASSEN: Just pause with this. Now I'm looking now at your table 12, page 80 of your statement of evidence.

20 MR WYATT: Yes.

MR MAASSEN: You evaluate or rate the visual impact as "medium" based on distance of 2.2 kilometres.

25 MR WYATT: It's slightly over 1 – the 1.5 I tend to use is very much a high impact and beyond that and this is a bit beyond that I rate as "medium".

MR MAASSEN: So anything further than 1.5 you rate it as medium?

30 MR WYATT: Yes, it's – you also look at the landscape and what else is there.

MR MAASSEN: Well, tell me how you got to "medium" in this case other than - - -

35

MR WYATT: Other than "distance" for that one, and then I said it was a more than minor adverse effect which is the same as what I've used on the previous one where it was 1.1, or it was closer. So I still regard it as a high level of impact. It is possible to mitigate it - - -

40

MR MAASSEN: Yes.

MR WYATT: - - -and it is a more than minor, I think is the correct call for the level of impact that would be felt by residents in Oram Road with that particular location.

45

MR MAASSEN: You recall that we talked about your rating system in your August 2008 report - - -

MR WYATT: Yes.

5

MR MAASSEN: - - -and one of the distinctions between more than minor effect and high effect is the capability of mitigation.

MR WYATT: That's one of the reasons you call that. It's also because it – if you say that there is a high level of impact and this is 1.5 kilometres open landscape etcetera, then there is a lesser level of impact below that which is more than minor. Now I'm not saying that isn't a high level of impact, I think it is, but I think that is what would be experienced by people in this location who didn't like the presence of wind farms on the hills behind them. It would be a correct assessment to call it a more than minor.

10  
15

MR MAASSEN: Would you, I suggest, be more properly describing it as a high impact?

20

MR WYATT: Yes, it is a more than minor to high if you wish, but high in the definitions that have been used by the Court says it is unacceptable. I don't believe it is unacceptable, so it is a fairly significant impact on those residents but it is not an unacceptable impact.

25

MR MAASSEN: And you reached the conclusion that landscape mitigation was feasible. Looking at the cottage, for example, in figure 56, what was the foundation for your opinion in that location?

30

**[10.25 am]**

MR WYATT: The house to the right.

MR MAASSEN: The house to the right?

35

MR WYATT: Well there is landscape being established around the houses along Oram Drive, not only this house but others. I haven't spoken to the owner of that particular cottage and I am not aware of their long term landscape plans. I have no knowledge of what that is.

40

But many of the houses in Oram Drive are establishing quite extensive shelterbelt and landscape planting around their perimeters. It seems a fairly common response. I was suggesting that such a response would not be inappropriate there either.

45

- MR MAASSEN: Do you know the distance between that cottage's deck and the edge of the terrain of the property, the dropping away of the terrain? Do you know how the - - -
- 5
- MR WYATT: No, I haven't. I said I haven't been onto that property.
- MR MAASSEN: Well, can you imagine what the impacts on the experience of that property might be if you put vegetation along the perhaps northern boundary? Imagine what impact that would have on the – have you thought about that?
- 10
- MR WYATT: If it was on the northern boundary, it would block their views back to Palmerston North as I understand it. Or the southern boundary do you mean?
- 15
- MR MAASSEN: Sorry, let us just orientate that. What do you contemplate would be the type of landscape mitigation that cottage would do to make the impact de minimis?
- 20
- MR WYATT: Unless – I think it is a possibility, but I haven't been onto that property as I said, and it is dangerous enough me suggesting landscape on properties that I have been to, but trying to design a property in my head to a situation that I haven't been to, I am really right into areas that would be I think problematic to say at best.
- 25
- MR MAASSEN: That maybe true, but you are asking the Court to consider mitigation - - -
- 30
- MR WYATT: As a measure.
- MR MAASSEN: As a measure.
- MR WYATT: Correct.
- 35
- MR MAASSEN: And the Court would want that to be a reasonably robust idea rather than just a theoretical possibility would it not?
- MR WYATT: I think it is a reasonably robust idea. You asked for a design outcome. It could range from several deciduous trees planted near the deck edge. It is on the southern side so it is not affecting their - as I understand where they are in that view. It is not affecting solar access if that view is looking to the south, it is a view of 80.
- 40
- 45 If you are looking back that way, you could put planting, maybe deciduous trees close into the deck, through the deck. You could use

5 some evergreen species further down, I don't – I mean without seeing the topography, what I meant was I think there is a range of landscape possibilities but to say what they are sight unseen, it is as I said dangerous enough me doing so and I have tried to make it very general in my report when I have seen the property, and then I admit I haven't spoken to the owners.

10 But I haven't seen this particular property. I would have to cast my mind in that context. But there are a range of landscape options that I believe would make mitigation possible and potentially improve the immediate surrounds of the house.

15 MR MAASSEN: I understood when you produced this residential viewpoint, that you were trying to capture the impacts of properties adjoining the road that you were on.

20 MR WYATT: Correct. And if you look at that, I have taken this through a gap in vegetation. I might have moved up 100 metres and taken it looking into the next property, which has already an established vegetation screen and said this is the view from here. I actually went and found the gap where there was no vegetation and said this is the view from a very exposed property, but it doesn't mean that the landscape is not appropriate.

25 MR MAASSEN: So the answer to my question is yes?

MR WYATT: I'm afraid you would have to restate the question.

30 MR MAASSEN: The question was, the purpose of this RVP was to capture the likely views from houses adjoining the road?

MR WYATT: The worst affected houses, yes.

35 MR MAASSEN: Right. So when you look at that cottage, what do you understand the living areas for face?

40 MR WYATT: As I said, I haven't seen it, but there is a pergola that is just visible on the left of that cottage that I can just see here just on bearing, what is it, 73? And that would seem, if that's 80, which is 90s east, it is at, it is north facing, so it would seem to me to be facing away from the wind farm but I haven't seen the property.

**[10.30 am]**

45 There is a – on the other side of the house towards the wind farm there is obviously the green water tank, so it would suggest that on that side

of the property away from, towards the wind farm is more the yard and serviced area. And so therefore planting, you know, next to a water storage tank and screening that off would not be inappropriate in any landscape sense that I can think of.

5

And, as I said, it doesn't block views so it would seem to me to be inappropriate both landscape and irresponsible if those particular people didn't like it. But I haven't, I don't know whether their lounge room windows look south. That is all supposition on what I can determine from that particular photograph.

10

MR MAASSEN: Well in that paragraph answer were a whole lot of assumptions were there not?

15

MR WYATT: Well there is a shed on the right, there is pergola on the left, that is not assumptions.

20

MR MAASSEN: No. But your assumptions about how the house orientates to the view is based on what assumptions you can make from the location of the pergola and the location of the water?

MR WYATT: Well I think it is a fair assumption to assume that people would not orientate their house towards their water tank.

25

MR MAASSEN: Well, do you know what the major views from this property are?

MR WYATT: I said I haven't been onto this property.

30

MR MAASSEN: No.

MR WYATT: But I can make some call from what I can see on the photograph, which seem logical.

35

MR MAASSEN: Okay, so you have made a call, the Court if it wants to can go and see whether your call is accurate or not?

MR WYATT: Correct.

40

MR MAASSEN: But the proposition is that the position is that similarly you have made some assumptions about landscape mitigation, but not considered the details?

45

MR WYATT: I have made assumptions that landscape mitigation is an effective and appropriate tool to manage views and has been for human history, but no, I have not come to a certain – I have not done a design

with that particular owner and I would never ever suggest that I would do a design without consulting the owner.

5 MR MAASSEN: And have you assessed the consequence of that landscape mitigation in terms of a loss of amenity of views?

10 MR WYATT: Only insofar as what I have just stated, that from this orientation it appears the house is orientated towards the north away from the wind farm and that the views, the area towards the service yard. And, if that is the case, then landscape is definitely effective on that side. So I can't state any more than that.

MR MAASSEN: Thank you. Now, if we go to RVP7.

15 MR WYATT: And this is a view taken further down Oram Road just before the Ngahere Park Road intersection, which on the right hand side of those two photomontages you saw, you can see the T intersection. Or if I start from there, it is a view across in that photomontage at bearing 20 150 down to that intersection and as you sweep around you see the wind turbines running around onto that ridge, and the nearest wind turbine is approximately 1.9 kilometres to the south-east.

MR MAASSEN: And the 1.9 is why you have given it a rating of medium?

25 MR WYATT: I have said for those residences without existing vegetation or landscape screening a more than minor adverse effect and then if it has landscape screening similar you can see the sort of landscape that is coming up in the foreground of that photograph up on the screen behind me, that could be reduced.

30

MR MAASSEN: But in terms of rating based on distance you have given medium because it is beyond 1.5?

35 MR WYATT: Correct. It is visually evidence.

**[10.35 am]**

40 MR MAASSEN: And then you are not thinking about any particular type of vegetation or landform screening for a particular property, you are just simply saying that some forms of vegetation will be effective in screening the wind farm?

45 MR WYATT: I think that is obvious from other properties along Oram Road and other roads in the area.

MR MAASSEN: And the consequence of that in terms of loss of views for particular properties is not something that you have assessed?

5 MR WYATT: It is something that – loss of views – landscape can screen views. The hedgerow that we saw in the previous viewpoint, the cypress pine or cupressaceae's on all sides will obviously screen all views and there are many examples of properties which have an internal landscape. Obviously those people find that an attractive proposition, whether it is for windbreak or aesthetic reasons I cannot determine.

10  
15 Then there are other ways of treating landscape, as I said, with just deciduous trees, light foliage in the foreground which also appropriate to frame and screen and filter views and make the landscape more interesting, more layered. That is a technique that landscape architects have used for many centuries.

20 I mean there is not just one landscape response that – I am not saying here is a potato stamp, I will go around and surround every property with a cypress hedgerow and nobody will see a thing, I think that would be singularly inappropriate. There are a whole range of options open and I think they are effective and do they restrict views? Possibly. Do they add extra dimensions to the views? Yes, if designed appropriately.

25 Can they make the residential experience more exciting and better? Yes. Definitely yes, as a designer that is the basis of my career.

MR MAASSEN: Well, if as we understand it from your answer – or I understand it from your answer – that every case is case specific in its responses need to be case specific - - -

MR WYATT: Oh, it has to be for residential, you could not just role out a residential landscape design like a one size fits all. I mean that would be just – that is not what I am recommending.

35 MR MAASSEN: No. And the consequences in terms of that in terms of enclosure and experience are also therefore going to be case specific, are they not?

40 MR WYATT: Yes, exactly. It depends on what the particular owner wants. He may well want screening as we saw in that earlier one or he may want filtered or he may want views to be controlled. There area whole range of options open to him.

45 MR MAASSEN: Or she may want to retain the views that she has at the moment?

MR WYATT: She may well do so and with the presence of turbines there she may well also find those attractive. So, I mean let us start with the assumption that she does not find those attractive.

5

MR MAASSEN: Yes.

MR WYATT: Then if that is the case there area range of landscape options that will assist that.

10

MR MAASSEN: Well if we start with the assumption, as it seems to me the Motorimu Court did, that she does not want the change and she does not appreciate the views where they are over-dominating then that is a reliable basis to assess visual impact, is it not?

15

MR WYATT: It is a basis to visual impact and you are right about them being over-dominant but I think this landscape is quite a strong landscape and as seen in that photo montage behind me, yes, they are very evidence at two kilometres. But that is still a very strong ridgeline and people around that distance have in the past said they quite like looking at wind turbines. So it is not an area where at the 1.5 and closer where it becomes very dominant and you do find many people do not like – a lot greater proportion of people do not like it.

20

MR MAASSEN: All right. So RVP8.

25

MR WYATT: My apologies, I cannot seem to get that one up on the screen.

MR MAASSEN: That is all right. This is again a roadside location.

30

**[10.40 am]**

MR WYATT: There they are. Yes, this was one that I think the TAG group suggested to MRP for us to look at. There are two houses not really visible in that photograph, your Honour.

35

The house to the left, which his down in the valley at a bearing of about 122, will have no views. It has got fairly dense pine plantations but it also looks into a small – well small in your terms – a small ridge that runs behind it. I think the views back out from there and because of the pine plantations would be absolutely minimal.

40

On the right hand side I did not go up to that property and it is even less visible from this road than what the property in the valley is. There is a property up here to the right that is nestled in amongst the pine trees. I have not been to that property but at the moment I cannot really see it

45

from any location around that particular spot. But we did it to show the view if the pine plantations, if you like, were removed, if there were properties added into here. And it is approximately five kilometres – 4.9 kilometres – south. It is the closest wind turbine.

5

I did a de minimis effect with existing vegetation and a minor effect at about that level with no screening vegetation.

10 MR MAASSEN: Your Honour, I am not sure if you are finding this useful to go through these RVP's. I have got some key ones that I want to deal with, but if you are finding it useful I am very happy to continue what we are doing because I was conscious that the AO's have not been made available to you, but if you are comfortable that I focus on the ones of concern that I think are illustrative of the council's concerns then I am certainly happy to contract that exercise. We do have I think 15 25 RVP's and we are only up to number 8 so I just want some direction from the Board as to whether that is where it wants to go with that.

20 HER HONOUR: Thank you. Mr Hudson, how do wish to - - -

MR HUDSON: I think if you maybe concentrate on the key ones.

MR MAASSEN: All right. Thank you. Thanks for that information.

25 HER HONOUR: Yes. We are happy to. Thank you.

MR MAASSEN: Thank you. I now want to take you please to 39 Guyland Avenue, RVP13, please.

30 MR WYATT: Sorry, what was that number?

MR MAASSEN: RVP13.

35 MR WYATT: 13.

MR MAASSEN: Again, this is a property located in Ngahere Park?

40 MR WYATT: Correct, and it has got on page 97 of my report there is a photograph of the rear elevation and the deck from which this photograph was taken. It is a well used area adjoining the house and in fact the day that we were there it was quite nice and sunny and the people were outside enjoying the views from that particular deck.

45 MR MAASSEN: And in your table 19 you have given a rating of medium based on distance to the nearest turbine?

MR WYATT: And a more than adverse effect in the landscape mitigation, which was recommended. As you can see in the photograph on the photo montages – you cannot actually see it on the blow ups of the photo montage but on the panorama which is on behind me that people  
5 have already started to plant along that boundary.

The landscape sketch – and I did not recognise the species, so I did not go down and identify them so please do not take this as my view as to what that garden will look like – but the landscape sketch shows that  
10 planting reaching some degree of maturity and screening some of the wind turbines really across to the right but leaving the major group visible and possibly suggesting a couple of trees to the left.

Now, again I did not speak to the residential owners about that particular design but it seems to be somewhat reflective of what they are doing in their own landscape and I have deliberately kept higher vegetation away from the left of that garden to make sure that the views to that major clump of wind turbines were actually retained on that  
15 orientation view at about 85 degrees.

20

**[10.45 am]**

MR MAASSEN: If one looks at figure 79 and looks at the photo montage 90 through to 120 is that the vegetation degrees – is that the vegetation you  
25 are referring to?

MR WYATT: They have started the vegetation I think if you go onto the photograph, it sort of came in around 95 where it was higher.

30 MR MAASSEN: Right.

MR WYATT: So I left the – if you like, the turbines to left, visible because the owners have not planted any garden further to the left of that fence and I only showed one tree on the left.  
35

MR MAASSEN: Are you in a position to describe the species that you can see in that photo montage?

MR WYATT: Not a chance. A) I would be hesitant to do so and B) I do not know whether it was – I did not think it was cypress, it was not pines, but I did not really go down and look at them. It could have been pittosporum or other New Zealand species or it could have been imported species, I am not sure.  
40

MR MAASSEN: If they indicate pittosporum and ti kouka would that be something you would be familiar with?  
45

MR WYATT: I am not familiar with that name of it. I may be familiar with the species. Is that a **(INDISTINCT 10.46.38)**, the botanical name?

5 MR MAASSEN: The cordyline australis.

MR WYATT: I know the cordyline, yes.

MR MAASSEN: And the pittosporum.

10

MR WYATT: Yes. Pittosporum are used as screen vegetation quite frequently around these houses in the ranges.

15 MR MAASSEN: And the tree that we see in figure 80, is that – how old is that tree do you think?

MR WYATT: It is a sketch showing a tree, I am not – I would say that is a very old tree actually by the look of it. I am not suggesting that we transplant something that size, it is just simply there is a tree on the left so that it shows the view through, so as you came down the garden you would still have the view up underneath that canopy to the hills beyond. I did not want to show a hedging, if you like, and also a view across into the valley.

25 MR MAASSEN: But if you were a 50 year old owner of this property now you might not get that level of screening until you were 80?

MR WYATT: Oh, no, not that, but you would get screen in three, four, five metres so you could put, for example, a larger eucalypt there or a larger acmena or other species and you would see it. It would not have that trunk size but what I was trying to show is the canopy.

30

I guess what my initial landscape response would be to retain the views out across the farm land and so by having a higher canopy that is all that was suggesting, it was not saying that could be done day one. But if you had trees running around that boundary you would be able to see underneath it and my initial response was to retain that long distance view from the deck.

35

40 MR MAASSEN: Did you have any impression of how long it might take to grow a tree of that sketched size in this location?

MR WYATT: If you are talking about trunk calliper, quite a time, but if you are talking about height, I do not know. It depends on your starting point in the species.

45

MR MAASSEN: Fairly substantial canopy cover in this particular sketch, is it not?

5 MR WYATT: It is not actually all that substantial in terms of its width of canopy. I would agree with you the trunk size is substantial but the canopy width itself could be – probably out of 100 millimetre trunk calliper you could get a canopy of that width.

10 MR MAASSEN: If we would now refer to RVP16 on Greens Road.

MR WYATT: No, that photograph was taken from the rear shed. If you have a look at the photograph on figure 89, it is view back to the house. It has a small window looking back in the direction of the wind farm and the garage is at that direction so I said from the living areas it would be  
15 nil because the courtyard living areas would look the other way. Just looking at the photograph there are no windows to look back this way.

[10.50 am]

20 But we went up behind that shed into the garden, near the edge of the vegetable garden, and took a photograph looking back out from this property at Greens Road, back to the ridges. That is the panoramic view, the wire frame and then the wind turbines on that hill behind.

25 MR MAASSEN: This property is 1.1 kilometres from the nearest wind turbine?

MR WYATT: Correct.

30 MR MAASSEN: In many respects it has some features reminiscent of the Motorimu area in terms of close proximity of houses and a strongly elevated ridgeline. Have you made a comparison between - - -

35 MR WYATT: Sorry, it cannot be – it may have a similarity to a house in the Motorimu case which I have not seen.

MR MAASSEN: Yes.

40 MR WYATT: But I have done no comparative studies.

MR MAASSEN: No.

45 MR WYATT: It does not have the ranges behind. It is the foreground hill that creates the skyline if you like on which there are proposed wind turbines. I do not know what degree of similarity that has with houses within the Motorimu case. I do know, however, that wind turbines here

are much more widely spaced. They are not nearly as cluttered as what the Motorimu one was where there is often the call that those smaller wind turbines which you can see very clearly on the map.

5           When you look at the density of the Motorimu wind turbines on the landscape and if you are looking up to a hill above them, even though they are smaller, they are much much closer together and those wind turbines are often referred to as a “picket fence” on the hill. I do not think that has the same view.

10           MR MAASSEN:   And in terms of the size difference in the turbines in Motorimu and in this case, are you able to comment on that?

15           MR WYATT:   The Motorimu ones were 85 from memory. Sorry, I – and these are obviously - - -

          MR MAASSEN:   That is about right and these ones are 125.

20           MR WYATT:   Correct. I know that sounds like it becomes a larger impact but in reality I think that is the reverse. I think that is evident when you go and look at the existing wind turbines in the 212223 and see the change and the improvement in visual impact is in fact they got higher.

25           MR MAASSEN:   And you have said in relation to this property that it is a high impact.

          MR WYATT:   Correct.

30           MR MAASSEN:   But then minor de minimis with mitigation.

          MR WYATT:   And also living areas. There was no adverse effect because as you can see from the photograph there is no windows looking back in this direction, but from the garden more than minor.

35           MR MAASSEN:   Yes.

          MR WYATT:   And yes, it is possible to do something and there is already planting establishing at the base of that hill.

40           MR MAASSEN:   And do you know what the size of that property was?

          MR WYATT:   I do not know, but it could be quite large. I do not know whether they are just a hobby lot on a very small allotment or they are larger rural land ownings. I am not familiar with that detail.

45

MR MAASSEN: Finally, if I take you to RVP2 – sorry, I will just find it.  
The one at the end of Pacific Drive. 22.

5 MR WYATT: Sorry, which one?

MR MAASSEN: Yes, 22. Thank you.

[10.55 am]

10

MR WYATT: And this was taken from, when we say the end of Pacific Drive, it is actually in a paddock past the end of Pacific Drive. We were advised that there was a proposed subdivision to be built as a continuation of Pacific Drive, stretching into that paddock. And in fact if you look at RDP02 that is at the end of what is currently Pacific Drive, just underneath a power pylon in that location.

15

20

RDP22 is located as I said into this paddock. We took the view and at that point it is about 2.17 kilometres to the closest wind turbine. There the houses were not – the road was not in. The houses obviously are not built. And I gave it a minor impact because in designing a house that is orientated towards the ranges, or you purchase that property if the Turitea wind farm was constructed, you would design your house either because you liked the view to the wind turbines, or if you did not like the view to the wind turbines it was obviously possible to design a house that made the most of what you thought were positive attributes.

25

30

And so on a subdivision that has not been done, unless people really orientate their house to look at something they do not want to, the effect I think can be designed to make a minor impact.

MR MAASSEN: Okay, so - - -

35

MR WYATT: Particularly also from that view, the better views were to the north across the plain, with the sun.

MR MAASSEN: Mr Registrar, if the witness could be shown PNCC map booklet.

40

MR WYATT: I was aware of the subdivision but I think the reasons are set out in clause 11.206. “My reasons for this conclusion include the ability of a house designer to reduce the visual impact by orientation and design. Landscape mitigation is also possible to design. Lastly it must be assumed that any purchaser will purchase in full knowledge of the Turitea project”.

45

MR MAASSEN: Thank you for bringing that to our attention. I just want to get clear in the Board's mind as to what this area is and what the district plan provides for it. And the way to do that is to show you this booklet.

5 MR MAASSEN: Map 3. Can you find Pacific Drive in that map? It is approximately in the centre of the page, about third from the top. And it says, "refer to map 2" as an inset.

MR WYATT: Yes.

10

MR MAASSEN: Can you see the notation, "RDP22"?

MR WYATT: I can.

15

MR MAASSEN: That is the site we are referring to is it not?

MR WYATT: Yes.

MR MAASSEN: For this photograph.

20

MR WYATT: Yes.

MR MAASSEN: Around that, is it your understanding that the land is zoned residential and indicated by the caramel colour?

25

MR WYATT: I do not know the exact limits of that land but that does not seem different from what I was assuming.

**[11.00 am]**

30

MR MAASSEN: So if the district plan has identified that land as suitable for residential - - -

MR WYATT: That is why I went right over to that southern border.

35

MR MAASSEN: Right, your expectation is that at some point residential development will occur?

MR WYATT: Expectation. My understanding is that that could happen, yes.

40

MR MAASSEN: Yes. Now leaving to one side what people might do with residences that are constructed on this property.

MR WYATT: There are no residences constructed on this area.

45

MR MAASSEN: When they do.

MR WYATT: Sorry, yes.

5 MR MAASSEN: And considering the effect on this area as a residential enclave identified for that purpose, what would you say would be the degree of effect of turbines proposed being approximately 2.4 kilometres away?

10 MR WYATT: I think they will be visible from their gardens. Whether or not that is singularly inappropriate, I am not convinced. I noticed in a booklet that was advertising residential in the Manawatu, there is a sale photograph of a house with a turbine right behind it. Now I cannot find the photograph. But I should have tagged it. But there will be people that actually quite like that juxtaposition and I think that is proven by  
15 some of the – sorry, I cannot find it. There was a photograph of a white house on the bottom of a hill not dissimilar with a turbine sitting, it seemed to me, at about the same distance as what you are referring to.

20 MR MAASSEN: Well, the fact that you have seen a photo of a house with a turbine behind it, what can I logically draw from that?

MR WYATT: I think you can draw from that that the people that will be buying here if the turbines are in place will either like or be able to screen views if such is what they require. And they can do that by, (a)  
25 the house design, or (b) landscape after the fact.

MR MAASSEN: No, what I am asking you to think about is the fact, there is a submitter who owns all of this land and he has had that land rezoned for residential purposes.  
30

MR WYATT: That is correct.

MR MAASSEN: And he has gone through a process with the council and the council has identified this as appropriate for residential development.  
35

MR WYATT: Yes.

MR MAASSEN: What I am asking you to do is convey an impression to the Board of what impact you think this proposal will have on his intended development.  
40

MR WYATT: I do not think it will have a great deal of impact on his intended development. I think you will have many people who will quite like that but I think you are orientated northwards from that area. The sun and the view over the Manawatu plain is quite superb. You will be able  
45 to orientate your houses and your open space to enjoy that aspect. But

to ask me to comment on – I do not even know what the density that is proposed here, but if it is similar to what is done in the rest of Pacific Drive I think there will probably be around, what, 600, 800 square metre allotments.

5

MR MAASSEN: Yes.

MR WYATT: If they are in that area you will find that the houses that are affected obviously from this view are the ones that we have already shown in VP02 which is the one right on the edge, but as soon as you go two houses back, or a house back, the house in between often screens the views so it would be very limited.

10

MR MAASSEN: What do you think would be the cognitive landscape of people who lived in this area? How would that change?

15

MR WYATT: I think they will definitely be aware that this is a wind farm rural landscape.

20

MR MAASSEN: And would you agree that the turbines, particularly those in Bryant's Hill will have a dominating impact in that area?

MR WYATT: I think it will be a very evident impact. Whether it is a very dominating impact, I think at that distance you are probably not dominated by these. I think the ranges still stand out and I think the photomontage behind me shows that.

25

MR MAASSEN: What is the elevation difference between the land as present and the higher turbines in that location. What is the difference?

30

MR WYATT: RVP2 – sorry I will work it out - is about an elevation of about 100 metres, say somewhere in there. The closest turbine are up at 220 metres. Approximately, that is going off the memory map figures, so I am not saying I have not got an RL from the engineers, but just going off memory map it is about 122 at that point.

35

MR MAASSEN: Right.

MR WYATT: Bryant's Hill itself is higher, that is at 345.

40

MR MAASSEN: 345. So there are 245 metres difference between the residential land roughly, and the peak at Bryant Hill?

MR WYATT: Yes, that is about 116 and 345. 200 metres in approximately, just one second, the distance there is about 2.3 kilometres.

45

MR MAASSEN: And you have on top of that a turbine which is approximately half the size of the difference in elevation again.

MR WYATT: Yes, that is shown on the photomontage.

5

MR MAASSEN: I suggest to you that that is an extraordinarily dominating impact of turbines.

MR WYATT: I disagree. I think if you were closer to them, yes, it is very dominant, and I think at this distance they are – I am not saying they are not noticeable or evident or a very much part of your visual – I would be silly to say that, but I don't think they –

10

MR MAASSEN: I don't think – hopefully you would say they weren't noticeable and then I could sit down.

15

MR WYATT: Yes, you would have a blind landscape architect. But I think they are very evident and they are obviously part of that view but so too are the ranges and the valley landscape.

20

MR MAASSEN: I now want to put a document to you which is an analysis of your RVPs. It is not all of them. I think it is 20 that are identified. And what I have assessed or put in a table is those which you rate as medium or high or low. You see that?

25

MR WYATT: Yes. You mean more than minor or medium?

MR MAASSEN: Yes. Now of this number, these 20 that are identified here, do you agree that 17 are recommended for landscape mitigation?

30

MR WYATT: I have not been through the analysis myself, but that does not surprise me. I mean we did go out and ask the community for the most affected residential locations close to the wind farm so I would believe that that is - I would expect nothing else.

35

MR MAASSEN: Well, I only have what you have produced to the Board as being your RVPs.

MR WYATT: Correct, and we didn't take photographs from places that had screening vegetation around it or had topographical hills between the wind farm and here. So we went to worst case but you cannot do mathematics on the worst case selection and then multiply it out by the number of houses. That would be totally incorrect.

40

MR MAASSEN: Let us deal with this question of the worst case. What we can deal with is what you have assessed.

45

MR WYATT: Yes, which I say in the report is the worst case. They were selected and requested to be the ones with the highest potential impact.

MR MAASSEN: Requested by whom?

5

MR WYATT: I requested MRP, and MRP I believe asked TAG and other groups what they thought were the worst affected houses and we went to see those. That is how I understood the process went. I did not approach the community myself, it did come through MRP and their - -

10

-

**[11.10 am]**

MR MAASSEN: What do you personally know as opposed to what you think other people did?

15

MR WYATT: I personally know that I went to many residents which I believe had the greatest potential impact in the area around the Turitea wind farm.

20

MR MAASSEN: So you went to 25 locations and you assessed them?

MR WYATT: Yes.

25

MR MAASSEN: Yes. And in relation to those locations do you agree that up to 85 percent were recommended for landscape mitigation?

MR WYATT: I would not be surprised about that at all.

30

MR MAASSEN: And in relation to this number here, would it surprise you to hear that 55 percent were rated by you as having a high impact?

MR WYATT: Do you mean more than minor?

35

MR MAASSEN: No, high – before - - -

MR WYATT: As in distance?

MR MAASSEN: Yes, as rated as having a high impact.

40

MR WYATT: I did not think I used the word “high”, I said more than minor was the category so I do not think that is correct.

45

If you are talking about distance, if you are saying that 80 percent or 50 percent of them were within 1.5 kilometres that could well be the case they were the ones I was after.

MR MAASSEN: Right. And the cut off point as we said was 1.5 kilometres?

5 MR WYATT: Yes, approximately. I am not saying at 1.501 all of a sudden something changes, I have said that point before.

MR MAASSEN: Well, when you assessed the impact did you take into account the number of turbines that were within the viewpoint?

10 MR WYATT: I did take into account the number of turbines, but as I said earlier I do think the major impact from a wind farm comes from the closest wind turbine that is visible and the others do add to it, but it is almost if you have got a group of 10 wind turbines in front of you and the closest is, say, two kilometres away the impact comes from that  
15 closest one, the others add to it, but not nearly as greatly as if you go back 3.5 kilometres, or 5 kilometres, or 8 kilometres. Does that make sense?

20 You have got a group of wind turbines, whether it is 10, or 15, or 20, and they range from two kilometres to let us say 15 kilometres away, it is the impact of the ones that are close to you on probably the nearest ridgeline that create the greatest impact.

25 MR MAASSEN: Well, I do not really understand it because, for example, there was a turbine in Wellington on Brooklyn Hill, which is a single turbine.

MR WYATT: That is an easy calculation.

30 MR MAASSEN: It is an easy calculation but a factor in terms of visual impact I suggest is the number that are visible from the location?

35 MR WYATT: Yes, it is and as I said about that Touralga (**PH 11.12.53**) Court case hearing the Court ruled then, and I totally agree with that decision, that the difference between a view that has 70 wind turbines in it and a view that has 80, it does not exist. If you asked me as a landscape architect to take out 10 randomly, say, of a wind farm that had 70 and say, "Well, now Mr Wyatt the impact should be one-tenth less", I would say, "No, it is exactly the same if the nearest wind turbine was  
40 still the same distance".

45 So when you are talking about a wind farm not a single wind turbine then some of those calculations on numbers I do not believe have the effect that just doing it in mathematical calculations support.

MR MAASSEN: And in terms of viewing angle the total part of your viewpoint that is absorbed with these features, is that a significant factor?

5

MR WYATT: It is a factor and that is one of the reasons why we have shown both the panorama and those – so we did not say that was not significant, obviously if it is along the entire width of the ranges it does have more impact and I would be wrong to say anything else but that is why we then went down to a 60 degree view and said that this will be your major impact and it is exacerbated by that.

10

MR MAASSEN: Yes, so - - -

MR WYATT: But not to the extent that you would probably consider.

15

MR MAASSEN: And I suggest to you that when you look at those residential viewpoints – are you okay?

MR WYATT: Yes, I am fine.

20

MR MAASSEN: If you would like a break, we can - - -

MR WYATT: No, no, that is fine.

25

MR MAASSEN: In relation to the residential viewpoints where you have rated them as more than minor, as being a high impact or more than minor?

MR WYATT: Correct.

30

MR MAASSEN: I suggest to you that the appropriate rating in those cases is actually a high and unacceptable impact.

35

**[11.15 am]**

MR WYATT: I do not believe that is the case. I do believe that it is possible for landscape mitigation. I do not – can I compare it? If you were doing a chicken shed that was 120 metres high, or something that was on the boundary that blocked the view, then as a landscape architect you would come and you would say, “Well, you have got a permission for a farm shed across your rear boundary or the neighbour has”. You would come along and suggest, “Well, we will screen out the farm shed”.

45

5 The complicating factor with wind farms are that they do not actually destroy the view, you still have the view, they have another element in it and so initial response to say, "Okay, we will treat it like a chicken shed or a large tilt slab or an adjoining residence and just totally screen it out", may not be the most appropriate way of approaching landscape in that instance.

10 And with wind farms you can do it much more delicately and it can sit much more lightly on the landscape than if it was an instance of a very large building of this sort of proportion suggested on the boundary.

15 So I think it is an effective tool, I think it is a very effective tool and it is also one that can be very fine tuned to people's preferences.

MR MAASSEN: Did you identify any characteristic about those turbines that you say created a more than minor effect? Was there any - - -

20 MR WYATT: I think the closeness would be the major determinant of that. Most of them are obviously higher than the residential properties around them as you have pointed out and so they settle back into the landscape, they silhouette into the sky.

25 MR MAASSEN: Your Honour, I am not sure how much time I have further, it will be probably only 20 to 30 minutes. Is this a convenient time?

HER HONOUR: Yes, by all means. We will give you a break, Mr Wyatt.

30 MR WYATT: Thank you very much, your Honour.

**ADJOURNED [11.16 am]**

**RESUMED [11.37 am]**

35 HER HONOUR: Yes.

40 MR MAASSEN: Thank you, your Honour. Mr Wyatt, one of the things that I think you did agree with your fellow colleagues, landscape architects in caucusing was the usefulness of the K2Vi programme which Mr Van der Leden worked on.

45 MR WYATT: He said that the K2Vi and memory map which is behind you now both enables a 3D representation of the site, and it was useful understanding it from that perspective.

MR MAASSEN: Yes.

5 MR WYATT: I don't know whether I went further than that and from – I did make a comment having seen the K2Vi simulation in Ms Lucas's supplementary evidence in which she put it underneath some photographs from Red Rock Knob. I believe that particular example very, very, very much understates the vertical nature of the existing landscape, and I would not use it as a – from that example I would not use it as a tool for doing visual assessment.

10 MR MAASSEN: Right. Well I'm going to ask Mr Van der Leden to approach and come to two viewpoints which we have discussed in the course of the RVP cross-examination. And perhaps for the sake of the Board to get these two items back in their consciousness, if RVP22 could be shown again to the Board, that's at the end of Pacific Drive.

15 MR WYATT: It's at the end of the proposed Pacific Drive, or do you want the one at end of Pacific Drive, is that - - -

20 MR MAASSEN: No, proposed Pacific – the proposed – the residential - - -

MR WYATT: I see, in the residential subdivision?

25 MR MAASSEN: Yes. So if we just get that location again in front of the Board. There's one version of that which is just - - -

MR WYATT: The panorama, this particular one?

MR MAASSEN: The panorama, that might be useful.

30 MR WYATT: That is not a very good indication of visual impact however. It shows the state.

35 MR MAASSEN: Well, either that or someone needs to help this lady present the material. Thank you very much.

**[11.40 am]**

40 And finally, the RVP07 which is located at the corner of Ngahere Park and Oram Drive and members of the Board you will remember that Mr Low has been present throughout, his property is at 107 Ngahere Park so it's very close to this intersection.

45 Now ask Mr Van der Leden to approach and operate his machine and show you, can you turn around?

MR WYATT: Yes, just.

HER HONOUR: Mr Wyatt, would you like to come forward and - - -

MR WYATT: Yes, I might – yes, your Honour.

5

MR MAASSEN: Now mind your back. Now members of the board, Mr Van der Leden will give his evidence in due course and has a script that he will take you through. But I've asked him for the purpose of this cross-examination to go to the two locations that I've just identified for the purpose of being entirely fair and putting to Mr Wyatt the case for the council in terms of visual effects. So Ngahere Park, Mr Van der Leden.

10

Mr Van der Leden, can you just indicate which property you understand this to be scripted from?

15

MR VAN DER LEDEN: **(INDISTINCT 11.43.10)**.

MR MAASSEN: Okay, that's fine.

20

MR VAN DER LEDEN: This just pans around from the property and I can stop and start at any time. Just panning past Te Rere Hau wind farm coming onto views of the Turitea turbines and that's as far it goes before – sorry, I'm just having a bit of trouble here.

25

That was from the house at the end of Ngahere Park Drive down in there. I don't know the property number, I'm sorry.

MR MAASSEN: Right. So can you just get the viewpoint from the location identified as the Low property?

30

MR VAN DER LEDEN: Yes.

MR MAASSEN: I think it's around this location here is it or?

35

**[11.45 am]**

MR VAN DER LEDEN: Yes, something like that. It's a little bit – slightly different from the photomontage because the photomontage was taken from back up on the road. And we've done this one from the backyard of the property. Apart from that it's a similar sort of one.

40

So that's looking back down to the north towards Te Rere Hau wind farms, and the other ones - - -

45

MR MAASSEN: All right. So pan back to the turbines, just stop there for a moment.

5 Mr Wyatt, the evidence of the council will be that this level of visual impact is a representation of, for example, would be experienced by properties in Ngahere Park. Would you like to make any comment about the dominance of those turbines and the impact of those turbines?

10 MR WYATT: Well, I have not seen this before. I have done no comparison on angle. It does not appear to be done with a 60mm lens and nor does it appear to be done at a distance on the ground. It seems to be elevated. So I would like to see it done with a wider angle lens that better represented the field of view. That could be well the case if you are  
15 looking through a 200mm telephoto. I am not sure what the lens size is, but it seems to be closer than what I would have expected it.

So, without having that information and comparing it, I really cannot make any further comment. The photomontages, the way they were  
20 done set out a - - - (PH 11.46.52)

MR DAVIDSON: Your Honour, it is important to make this point now. We have not seen this before and the accuracy of the representation is obviously an important factor so any questions Mr Wyatt answers are  
25 really subject to that. We have to go to our technical people and our own people, and it is a difficult thing to suddenly ask questions about misrepresentation. As an example of the matters already to be raised, the speed of the turbine as represented will be challenged, as one issue. So it is early days to ask questions about the representation to Mr  
30 Wyatt.

HER HONOUR: Well, I think Mr Davidson – Mr Maassen I think this witness should be given an opportunity to look at the lens size and all those technical measurements and then to give you an opinion. Can  
35 that happen overnight maybe?

MR MAASSEN: Yes, that would be useful. I had understood – it was my understanding and it may have been an incorrect assumption, that this was discussed at caucusing and this information was available. If that  
40 is not the case – could I just check - - -

MR WYATT: Could I clarify, I was at the caucus?

MR MAASSEN: Yes.  
45

MR WYATT: Yes, we had a demonstration and there was agreement amongst us that both K2Vi and Memory-Map which I can do a 3-D view of as well are useful assistants in, if you like, visualising the landscape. As far as using that particular image that we have above us as a form of representation, the mathematics behind it, the angle of view, what lens it is taken from, none of that was given, none of that has been discussed, and I have not had a working copy of K2Vi on my computer that I can play around with and it is possibly not something that I am going to say I will be familiar with.

I saw the number of parameters. I know the degree of difficulty in 3-D max and for me to pick up a new programme overnight I think would be just – I am afraid that I am not going to say that by tomorrow I would be an expert in K2Vi, even given the software and all the stuff on my computer. I have not had a copy of it.

MR MAASSEN: Your Honour, it appears that they did actually have a demonstration at their caucusing. That is what is indicated which is my understanding and I would have expected that if there were any concerns in relation to that representation then they would have been discussed at caucusing and noted and identified.

So you can understand why I have come today with the assumption that the record of the caucusing notes which is that they are a useful representation, is in fact Mr Wyatt's view. It is the first that I have heard from my friend that in fact that is not the position. So, I am not quite sure how we deal with that since Mr Wyatt has indicated that he is not in a position to consider the programme and all its dimensions overnight. That is the difficulty I confront.

**[11.50 am]**

HER HONOUR: When is Mr Wyatt returning to Australia?

MR DAVIDSON: I think he we was hoping to go today actually, ma'am, but we are going to talk to him about that now. We have to get past this impasse. I do want to make it clear. I have had no discussion with my friend to indicate this was going to be put this way. Had I - - -

HER HONOUR: With respect Mr Davidson, the representation as put by Mr Maassen is quite correct. If it is in the caucusing notes, if it has been identified as generally acceptable then that is the record.

MR DAVIDSON: I am not disputing that, ma'am. My understanding - - -

HER HONOUR: I think may be your junior might be.

MR DAVIDSON: Well, yes I think – no, I am not disputing it is in the record. My understanding is, and Ms Price will immediately clarify if I am  
5 wrong, that what Mr Wyatt has said and what was squared at caucus that these are tools which are useful. But the accuracy of the representations in question, not having seen them, not having been provided them by the Palmerston North council, means that we are in  
10 no position to have made our own assessment of them.

It was not that the representation that you are seeing was accepted as being a useful representation, at all. So I mean I would have thought – and there is no point in getting into a jostling match over it, we have got to get past the point, but if we had been consulted that this was to be  
15 used for cross (examination) then we would have made quite sure that we were satisfied it was appropriately used. At the moment there are two levels of response: one is, is it representative and I have made a point already about that; (2) qualitatively what should be drawn from it if it is representative?

And we have to get past and I am thinking on my feet, but it seems to me that one of the first ways – or one way which is potentially a compromise is to let it go on with all those qualifications expressed and let Mr Wyatt make his responses as we go now. But it will not be on  
20 the basis that this is an accurate representation, necessarily.

HER HONOUR: May be the fallback position is that it is one of the tools. We see many tools.

30 MR DAVIDSON: Yes.

HER HONOUR: I think we are very grateful for the large scale maps that Mighty River Power have produced. We find them very helpful and very closely, I suspect, accurate to what is going on. So Mr Maassen,  
35 how do you feel about having them as one of the tools?

MR MAASSEN: That is exactly how the council sees it and the reason I am doing this is because I think it is important to be fair to this witness and put the council's case to him so that he can comment on it, which is  
40 why I am raising it in cross-examination. I am putting the evidence which the council has and testing his opinion of it, and as I say I do not need to repeat it, there was no qualifications in the caucus notes that would have alerted me to the need to take that any further. So I am happy to proceed on my friend's basis.

45

MR DAVIDSON: May I just have one minute without the Court retiring. I just want to take an instruction, ma'am, please.

5 HER HONOUR: Yes, thank you.

MR DAVIDSON: Ma'am, we agree to proceed and it is subject to, of course, deducing whatever evidence we need to do with regard to the representativeness of model.

10

HER HONOUR: Well, Mr van der Leden has, as MR Bunting pointed, already noted at paragraph K at page 8 of his evidence, "I will now run the script demonstrating the model of the proposed wind farm." And I would have thought if there had been any challenge it would have been coming in on cross-examination maybe of Mr van der Leden.

15

MR DAVIDSON: Mr van der Leden?

HER HONOUR: Yes.

20

MR DAVIDSON: Well that is true.

HER HONOUR: From your point of view.

25 MR DAVIDSON: We need to cross-examine on that issue, yes. Yes, when that evidence is given. But to make a cross we need a copy of the document, of the model that has been used.

HER HONOUR: I think we will leave it.

30

MR DAVIDSON: It is in the mix, ma'am. I have got to pass it on. I am told we requested a demonstration, it was not provided, so. But that becomes argumentative but we are happy to proceed on the basis I have described.

35

HER HONOUR: Thank you.

MR MAASSEN: I understand that the representation or the scripting was provided to the expert. Mr Wyatt who was the landscape architect in question, as part of the caucusing and he has acknowledged that fact. So that is the person who ran the script, is that your understanding?

40

MR DAVIDSON: We asked to see it as counsel.

45 MR MAASSEN: When was that?

MR DAVIDSON: The 6<sup>th</sup> of July.

5 MR MAASSEN: All right, if we proceed Mr Wyatt you can observe this picture? So Mr Wyatt, as I understand the position, your counsel are going to cross-examine Mr van der Leden on his model but the caucus notes reveal that you accepted it is a useful tool - - -

10 MR WYATT: But you are asking me now to use it as a visual assessment tool. We use CAD 3-D max, we use CorelDRAW, we use half a dozen programmes.

MR MAASSEN: Right.

15 MR WYATT: And then we go to considerable lengths to get those representations that we showed, the 60 degree by 15 degrees, we try to standardise it, we make sure of the lens sizes, we put the GPS coordinates in it, they are taken at 1.4 metres above ground line. That appears to be – well, it is obviously not 60 by 15 degrees because it is a square, one to one and a half proportion. The angle is wrong.

20 It appears to be from an elevated location, not at ground line. So therefore it is not, it is a bird's eye view. It appears to be partly a telephoto lens but I do not know what the lens size is, that is not given to me down the bottom. It does not say this is done with a 60, 90, what is the angle of view. Is that a cross 15 degrees, 60 degrees, 12 degrees? I have no idea.

25 MR MAASSEN: I realise that you did not prepare this programme.

30 MR WYATT: I have never used K2Vi in my life.

MR MAASSEN: Right.

35 MR WYATT: I have not got a copy of it, I have not got any of the data that is within it, and we have given every bit of information. Memory-Map was also useful as a tool. I can do 3-Ds of this landscape on the computer now, in front of me, but it is a helpful guide when I am going around a new area to have that and I help – you know understand the landscape if you like. Where the ridges run and how they join in with major ranges.

40 It is a useful tool. But to then turn it and say, this becomes the visual assessment tool, I find that jump, I do not agree with without a lot more information which I have not got and which I have not had a chance to play with. I do not know whether I can tweak K2Vi to give me what I

want. I do not know whether this is doing it, but I can say now from the look of that photograph, it is not accurate.

5 And the other example in K2Vi was given in Ms Lucas' statement of supplementary evidence and I found it absolutely flattened the landscape and we did a photomontage from that same location so that that could be made clear. And in that particular view, which seemed to be very much a wide angle view, K2Vi again did not represent the dramatic landscape that was apparent from there.

10 So in the two instances, this one and the one I have seen in Ms Lucas' evidence, I expressed strong doubt about its veracity as a visual assessment tool. As an ability to understand the landscape, yes, it is one of the tools that landscape architects can use.

15 MR MAASSEN: Right, well you have given a very complete answer and now I want you to simply answer the questions I am asking you. Let us assume, for present purposes, that that is an accurate representation. My question to you is, is this the type of scale of effect that you contemplated when you were assessing visual impacts from Ngahere park area?

20 MR WYATT: From the Ngahere Park – no, I did not go up as a seagull. No, I did not use a telephoto lens. No, I did not do this.

25 MR MAASSEN: My question was, if the Court finds that this is a useful representation, an accurate representation of the visual impact of turbines on Bryant's Hill from Ngahere Park, is it the same or similar to the level of impact that you assessed using photomontages?

30 [12.00 pm]

MR WYATT: No, it seems dissimilar.

35 MR MAASSEN: In what respects does it seem dissimilar?

MR WYATT: I explained that. It seems to be taken from an elevated viewpoint, not at ground level. It is not a photomontage in the fact that it is a model landscape so it is not picking up the heights and depths of vegetation. I am not sure of the lens size but it seems to be maybe 12 degrees, 15 degrees, I am not sure. I do not know. I do not know how – I do not even know whether the absolute accuracy of the turbines – is there a wire frame view, how do you measure how accurate they are?

45 Yes, it is a tool as a quick guide. I can do a 3-D run around on Memory-Map in 30 seconds and we showed that at the caucusing but I

have not put that up as evidence here. It is a useful tool for the Board and the Commissioners and her Honour to go around the area, but it is not – I am not suggesting that is the – I base my assessment on it.

5 MR MAASSEN: Right. So if we go back to my question and start with the assumption that the Board finds this to be a useful tool and an accurate representation of the turbines on Bryant's Hill in view from Ngahere Park, are they the same or similar results to what you obtained in your photomontage?

10 MR WYATT: It does not appear to be, no.

MR MAASSEN: Is it correct to say that the dominance of the turbines is greater on this representation than you seem to have identified?

15 MR WYATT: From where you stand, potentially. I mean, I have to do a comparison, you're asking me to remember the one that I – I mean, I've done 25 of them or 30 of them. I mean, I can't - - -

20 MR MAASSEN: I'm very happy if you want me to refer to a document, to take you to a document. And I ask you to go to your copy of photomontage - - -

MR WYATT: So viewpoint 22?

25 MR MAASSEN: RVP07.

MR WYATT: Isn't it 22?

30 MR MAASSEN: No, this is from Ngahere Park. 22 is the end of Pacific Drive.

MR WYATT: Well comparing those photomontages with the picture behind, you can see that it is very much an enlargement, it hasn't got the vegetation in the foreground, it hasn't got the – the vegetation you can see there is one very small component, the ridges here like they're right in the foreground. So comparing those photomontages with that, I don't agree with it.

40 MR MAASSEN: All right. So - - -

MR WYATT: I'm not sure, as I said I'm not sure of the angles. I mean, that we are (**INDISTINCT 12.03.29**) the modelling of the turbines. I mean I haven't seen any of that data, I think - - -

45

- MR MAASSEN: No. I understand that you haven't, and the position is that the council has put forward a brief of evidence from Mr Van der Leden and made the script available to you - - -
- 5
- MR WYATT: No, they didn't. I have not had the script. I have not had the programme at any time. I had a 10 minute demonstration at the caucus.
- MR MAASSEN: That's all it is.
- 10
- MR WYATT: That's all I've seen. I haven't - - -
- MR MAASSEN: That's all the script is.
- 15
- MR WYATT: But I haven't got a copy of it.
- MR MAASSEN: No, no, no. But you have seen it.
- MR WYATT: I've seen 10 minutes of a fly around of almost the entire wind farm that day, not just from individual locations. I saw nothing on this -
- 20
- -
- MR MAASSEN: I don't want to get into an argument with you. You've made your point about the reservation - about the veracity of it. It will be a matter of submission whether or not you should have taken the opportunity to challenge that by way of statement of evidence. But for present purposes, I understand the point that you don't accept it. And my questions are proceeding on another assumption. So can we work on that assumption and acknowledge that you don't accept it. So if we go to the next script which is for the end of Pacific Drive which equates to your RVP22, just in that location where the earthworks are.
- 25
- 30
- [12.05 pm]**
- 35
- So just pause there for a moment. What you see in this representation in front of you is clearly Bryant's Hill, do you agree with that?
- MR WYATT: If you say so, yes.
- 40
- MR MAASSEN: And Mr Van der Leden has taken us to the end of Pacific Drive, which is the residential area which is undeveloped at the end, do you recall that?
- MR WYATT: Yes, I do.
- 45

MR MAASSEN: Now assuming that the Court finds this a useful tool and a reasonably accurate representation of the effects of turbines in that location - - -

5

MR WYATT: RVP22 is taken at an elevation of approximately 89 metres/90 metres.

MR MAASSEN: Right.

10

MR WYATT: That's taken at 297 metres. That is what it says on the bottom line.

MR MAASSEN: Mr Wyatt, I'm not going to - - -

15

MR WYATT: I'm sorry.

MR MAASSEN: I want you to accept an assumption and then your counsel can when they cross-examine Mr Van der Leden, talk about whether that was accurate or not and even in re-examination ask you questions about that. But I want you to do is to hear my assumptions and answer some questions.

20

So assuming that the Court finds that an accurate representation, is that similar to or different from the visual impact that you assessed based on the photomontage?

25

MR WYATT: That's different from – if you have a look at the photomontages they have a lot more foreground in them. They have a lot more detail in the height of the ridges and the foreground it seems to me to be almost a telephoto view of one small section of that.

30

MR MAASSEN: And another difference is that we see in the model the movement of the turbines, the blades?

35

MR WYATT: Right, granted.

MR MAASSEN: And that's one thing that you don't get an impression of when you look at photomontages.

40

MR WYATT: Yes, we haven't yet worked out technology to do that.

MR MAASSEN: And the movement is another factor which makes turbines something of a focus point when looking at a landscape, don't they?

45

MR WYATT: Yes, they attract your eye.

5 MR MAASSEN: Yes. And so whereas without the turbines your eye would be drawn more to the landscape, with the presence of turbines the movement changes your focus?

10 MR WYATT: You are drawn to that moving object, but whether or not you don't – I don't think that object just becomes the only thing you see in the landscape. I would believe you would still see the ranges and the vegetation et cetera, so I don't – I just don't accept that is an accurate representation of a viewpoint.

15 MR MAASSEN: Yes, okay, that is fine. So, Mr Van der Leden, if you will just make a note of what you have done and we can explain to the Court the basis for the validity of the assumption or otherwise that I have put to Mr Wyatt. So, Mr Wyatt, that concludes the questions I have in relation to K2Vi. I now want to – thank you, Mr Van der Leden - I now want to - - -

20 MR.....: Yes, thank you.

MR MAASSEN: - - -turn back to the topic of mitigation.

MR WYATT: Litigation?

25 MR MAASSEN: Mitigation.

[12.10 pm]

30 MR WYATT: Oh, sorry.

MR MAASSEN: We're on mitigation.

MR WYATT: I thought you said "litigation."

35 MR MAASSEN: We've all got - - -

MR WYATT: Sorry, I thought I had been into that.

40 MR MAASSEN: In the summary of caucus differences that you gave in the overhead yesterday, you identify one of the differences is, is the appropriateness of mitigation and planting as a measure, and that had an impact on also the residential impact rating that would be given by some landscape architects in the caucusing in your assessment.

45 MR WYATT: That is correct. I think they took the view that landscape mitigation was not possible or not offerable, if you like.

MR MAASSEN: Not “offerable”?

5 MR WYATT: I don’t know. I didn’t understand to be honest why landscape mitigation could be dismissed out of hand. It has been a plank in all wind farm approvals to which I have been party for the last 10 years.

10 MR MAASSEN: And in relation to those wind farms how many of those occurred in New Zealand?

MR WYATT: None.

15 MR MAASSEN: How much experience prior to giving your evidence have you had with the Resource Management Act?

MR WYATT: None.

20 MR MAASSEN: Were you made aware when you prepared your evidence that submitters or people who might be affected have a statutory mechanism by which they can consent to an effect?

MR WYATT: I think I was vaguely aware of that, it did not come into any consideration of mine.

25 MR MAASSEN: No. Under section 94 of the Resource Management Act a person can consent to an effect and that is often done as part of an arrangement between the applicant and a private landowner?

30 MR WYATT: It is not dissimilar to arrangements in Australia.

35 MR MAASSEN: In the absence of such an arrangement what reliable conclusions can we reach about whether or not an effect is accepted or not and whether or not landscape mitigation is accepted by a party as appropriate? What conclusions can we draw in the absence of consents from parties about landscape mitigation?

40 MR WYATT: You can draw conclusions from the fact that landscape is effective on screening objects around the boundary. That historically landscape has been used to improve the amenity of residential properties. That such improvement can be, if you like, offered by the proponent for affected properties, whether it is 1.5 or 3.5 kilometres, and given a timeframe that extends past the completion date of the wind farm, all of those are able to be offered, and in some cases, and in surprisingly few to be honest, have been taken up in past projects. All  
45 of those, I think, give some credibility to the usefulness of that offer.

MR MAASSEN: But what is your understanding of – if - MRP was free to negotiate with individual landowners prior to its application to provide for landscape mitigation, was it not?

5 MR WYATT: Yes, but to be honest in all our Court - and in all my evidence  
in any Court case we have always made that offer extend a year past  
construction so that people can actually see what they are getting.  
There is a large number of undecided. Some people actually tell us  
10 when we go there, “Look, we thought we would screen the whole lot,  
we just want to put one tree down the back because, actually, I kind of  
like getting up in the morning and looking out my kitchen window and  
I can see how the wind is going or the climate has changed”. It has  
been surprisingly less taken up than what we thought. So that offer that  
15 extends past has been fairly standard in Australian permits for wind  
farms and, I might add, for many other sorts of developments, it has not  
only wind farms.

MR MAASSEN: All right, well, this moving perhaps into an area beyond  
your expertise, but the position, as I understand it, is this. You were not  
20 given any advice from the applicant as to the appropriateness or  
otherwise of mitigation being taken into account in your assessment?

MR WYATT: I would not have listened. I take my own advice on whether  
landscape mitigation is effective and, I must admit, my view is that it is  
25 something that can assist residential impacts and I have had that view  
consistently for about 25 years so I do not think MRP would be able to  
convince me otherwise.

[12.15 pm]

30 MR MAASSEN: That is fine.

MR WYATT: They have not come and said “We are not allowed to use  
landscape mitigation” but I must admit I would not have listened.

35 MR MAASSEN: Okay. Now, another subject which you addressed in caucus  
differences was grouping?

40 MR WYATT: Yes.

MR MAASSEN: Do you recall that the Court in the Motorimu decision also  
dealt with grouping?

45 MR WYATT: I recall they mentioned, I have not done an analysis of what  
groups they use within Motorimu and if it was an additional area and  
they went into those, maybe that makes some sort of sense I do not

know. I have not done any analysis, I am not commenting on Motorimu, I have not looked at it in any detail.

5 MR MAASSEN: Well, I suggest to you that the lines might be arbitrary but they are a useful tool to analyse the components of a particular wind farm, particularly in a case like this where it extends over a long distance?

10 MR WYATT: I do not like “arbitrary” in the same sentence as “useful tool”. If it is arbitrary it, by definition, I do not think is useful and there lies my problem with the arbitrariness of grouping chosen from a bird’s eye view perhaps or from any other position in the landscape. And, as I showed in my rebuttal evidence and in the PowerPoint presentation which I commenced, you could do almost an infinite number of groups  
15 that would appear logical from whatever viewpoints you were looking at and each of them could be shot down.

I think a much better approach is to look at the photomontage behind and say, “You can see these turbines, they are numbered, you have  
20 bearings on them”. It enables a very clear understanding of what they look like in that landscape and it does not rely on groupings. I do not like them.

25 MR MAASSEN: But is it not appropriate for landscape architects to identify from key viewpoints groups of turbines that have similar characteristics in terms of their effects from viewpoints?

30 MR WYATT: Yes, in each case, that is exactly what Ms Lucas does in some of her evidence and so do the others. In this viewpoint there is part of group K, some of group J, a little of group G and there might be some group H in the background. Well, to my mind, that is not helping your analysis. Is it not better to say, “The closest turbine is 247, it is 2.1 kilometres away, its bearing 70 degrees, the next one is out of these, this is what they look like”. I mean the analysis has to be done down to  
35 the turbines. It is lazy to be perfectly honest, I would not use it.

MR MAASSEN: Well - - -

40 MR WYATT: I can’t state it any more clearly than that I am afraid. I do not find it a useful tool.

MR MAASSEN: Would it be one of the reasons that you did not like it is that it required a more finely grained understanding of the site than perhaps  
45 you had?

MR WYATT: I think it proveably shows a far less of a finer grained appreciation. Group D, for example, raises, what, 22 kilometres or 13 kilometres along the other face and then there is a group of four across one kilometre. Now, how can you say that is grouping similar effects? That you are honestly assuming that a group that is 12 or 13 kilometres long of 23 turbines, or whatever the number was, has a similar effect to a group of four turbines over one kilometre, it is demonstratively not logical.

5

MR MAASSEN: But the long line of turbines have the same characteristic of being on the ridgeline, do they not, on South Range Road?

10

MR WYATT: Which ridgeline?

15

MR MAASSEN: The Turitea Reserve ridgeline.

MR WYATT: So as you drive along South Range Road these are the ones you see. As I said, you can divide the groups up into any numbers you like, I think it is lazy assessment.

20

MR MAASSEN: Well - - -

MR WYATT: I do not believe it is valid and I do not think it helps understanding and I have never used it and you can look in all past cases of mine.

25

MR MAASSEN: I have no doubt about that.

MR WYATT: And I would have the same view if it was asked of me.

30

MR MAASSEN: But I suggest to you that, for example, the group that you just described have a common characteristic which is that they are located on the ridgeline?

35

MR WYATT: And from the eastern edge of the ridge there is another group in front of it, so some of those do not have the common characteristic because some of them are behind turbines in the front, I cannot remember the grouping numbers. So some of them are seen in the background, some of them seen in the foreground, some of them are seen from roads, some of them are seen from a helicopter maybe. But its arbitrariness just stands out, I do not think they are useful, I really do not think they are useful.

40

MR MAASSEN: Okay. Now, we had established that your experience with wind farms is entirely Australian until this example?

45

[12.20 pm]

- 5 MR WYATT: No, it also includes Hong Kong.
- MR MAASSEN: But none in New Zealand?
- MR WYATT: No, none in New Zealand.
- 10 MR MAASSEN: And what other landscape evidence have you given in the New Zealand context before this case?
- MR WYATT: I have not given any evidence in the New Zealand Court system but I have given evidence across a wide number of jurisdictions in Australia - from Western Australia, South Australia, Tasmania, Queensland, New South Wales – and many of them are at least similar distance and with as much disparity in their legal systems, if you like, as between Australia and New Zealand.
- 15
- 20 MR MAASSEN: The field of landscape architecture is a little bit different from hard sciences like physics and chemistry. Whether you are an Australian chemist or a New Zealand chemist has no difference to the data or the information that you would gather from your studies, do you agree with that, it is a hard science?
- 25
- MR WYATT: No, I do not. One of the things that we have slightly different from what has been used in Court has been field perception studies and I do not see that in past cases to any extent in New Zealand. And the other thing is the photomontage, the way that we have gone about it and the testing of it, and maybe it is just a simple – you know, it has been built, we have been out and we have had a look at it and said, “No, we are not happy” and changed it, but that is slightly different so there are differences.
- 30
- 35 MR MAASSEN: What about one’s acuity of perception of landscapes and their significance? Would you think it a difficulty for you perhaps dealing with an Australian landscape to - - -
- MR WYATT: I think you are drawing a very long bow to say that all Australian landscapes are the same, that I have dealt with an Australian landscape. I have dealt with landscapes in Tasmania, I have dealt with landscapes in the dry arid areas of South Australia, I have dealt with them just on the edge of the Blue Mountains in New South Wales, I have dealt with projects that are in Queensland, and across in Port Douglas, I mean I have dealt with a fairly wide range of landscape types.
- 40
- 45

5 To say that Australia is all the same and New Zealand is different, yes,  
but I think there is differences between every wind farm. Some of them  
are subtle like say, for example, three around Ararat. But the difference  
between Ararat and the one that you point up the Gullen Range and the  
one near Sydney in the Blue Mountains they are very different.

10 MR MAASSEN: All right. Now, I will just take you finally to some  
conclusions that you have in your evidence. So I am referring to your  
statement of evidence, page 147, subparagraph (c), “However, I do not  
consider that even taking into account this context the Turitea wind  
farm’s visual landscape effects will be unacceptable. I have reached  
15 this conclusion in particular having regard to the small section of the  
ranges that will be affected, the landscape sensitivity and capacity to  
absorb further change and so forth”, do you see that?

MR WYATT: Yes, I see that.

20 MR MAASSEN: When you say “a small section of the ranges” why do you  
say that?

25 MR WYATT: Because if you look at the – if I can just get rid of the turbine  
locations. That is not going out very far but the ranges stretch all the  
way from north and south as a central spine. In this area, as you can see  
in that topographic map behind, the ranges flatten out somewhat near  
Palmerston North but the ranges themselves, the Ruahine Ranges to the  
north, the Tararua Ranges to the south, they are a very long extensive  
feature. Even this flatter area from the gorge south to possibly around  
30 the Motorimu wind farm is one part of that whole experience. I was  
very much aware of it in my site visits driving, in a helicopter, it is a  
very large landscape.

**[12.25 pm]**

35 MR MAASSEN: And now to subparagraph (g) where you identify the  
greatest potential impact as being an impact on residential properties  
and then you say, “Appropriate landscape treatments will in nearly all  
instances reduce the visual impact from more than minor to minor or in  
some cases to de minimis impact”?

40 MR WYATT: Yes.

45 MR MAASSEN: Would you agree that to make that conclusion you would  
need to understand in detail the size of the property that is in question?

MR WYATT: I have probably been working on wind farms for a number of years, we have seen a lot of properties, as I said, some of it has been just a single tree planted in a rear yard, some of it has been quite small, others have been extensive. The example in the thing is from Portland wind farm where it is quite an extensive landscape on a rural-residential property. It does, it has varied, but I must admit I cannot think of an example where we have not been able to assist with landscape. I said I cannot think of an example, maybe it has occurred, I cannot remember.

5

MR MAASSEN: Would you not agree that some degree of sophisticated knowledge of the topography and the size of the property is essential to be confident about the scope of mitigation that is achievable?

MR WYATT: No, I think it is appropriate to have the knowledge to do anything valid. As I said, I do not believe there is a potato stamp landscape that I have got in the back folder that I will draw out and give to every resident and say you do this, everything is okay. That is not what I am saying. And yes, I do have to be cognisant of the people's topography but I also have to be cognisant of their requirements. What do they want in their rear garden? How do they relate to the landscape? What are they after? I mean the starting point is actually their requirements as much as any topographical, or soil, or environmental condition.

10

MR MAASSEN: And if I could just take you to the August 2008 report, page 116, eighth bullet point: there are limited locations from which long distance views to the Turitea wind farm are available from the township of Palmerston North. Based on a viewpoint analysis undertaken there is more than minor adverse effect on viewpoints from the city of Palmerston North including The Square and Fitzherbert Avenue.

15

Do you agree in light of Ms Lucas's evidence and the photographs which are in the council booklet that there, in fact, quite a few locations from which long distance views to the Turitea wind farm are available from Palmerston North?

20

MR WYATT: There are locations. I do not think – the council booklet is another issue and I do not think that has been put to me but it was done with all different sized lenses and zooming in and out depending on where you are and, yes, you can find locations but as I said in my evidence right at the beginning, when we came here, and I had not a memory map but another programme that I use, I thought there would be a multitude of views from Palmerston North and I was surprised that they were limited to the extent that they were and that comment reflects that and I noticed when I read Mr Brown's report yesterday he said

25

exactly the same thing – what is it? – three or four years ago. It was almost word for word and I can absolutely assure you there was no collusion between the two of us on that.

5 MR MAASSEN: Right. In relation to the fourth bullet point on page 117, so it is the fourth bullet point down from the top of the page.

MR WYATT: Yes.

10 MR MAASSEN: I put it to you that as at August 2008, when you had not assessed the 25 RVP locations, you were in a position to express an opinion with any confidence as to the likely impact - - -

MR WYATT: No.

15

MR MAASSEN: - - - of the proposal on residential viewpoints.

MR WYATT: I said for some of these reasons without screening there are occupants who dislike the presence of wind farms so it will be a more than minor effect. That is a significant effect that may be able to be mitigated or remedied so I stand by that, I do not see that there is anything in that that I need to withdraw, I think that is an appropriate response.

25

**[12.30 pm]**

MR MAASSEN: But the magnitude of those effects and your assessment of them only occurred after this report.

30 MR WYATT: No, it did not occur – as I said, I have driven around these streets, I have stopped outside a lot of houses, I saw the vegetation around the boundaries like the one in this earlier report, one of the examples in the residential section. I saw other houses that did not have that vegetation and I have done other wind farms in windy areas where  
35 vegetation has been planted around houses. I do not see that that conclusion I could not reach on the basis of my site visits.

MR MAASSEN: Right. I will just – if your Honour pleases, just check my notes, but I think I am pretty much at the end. Thank you, Mr Wyatt.

40

MR WYATT: Thank you, Mr Maassen.

MR MAASSEN: Thank you, your Honour.

45 HER HONOUR: Mr McClelland?

MR McCLELLAND: Thank you ma'am.

**<CROSS-EXAMINATION BY MR McCLELLAND [12.31 pm]**

5 MR McCLELLAND: Mr Wyatt, you have actually been asked points of the  
questions that I was going to ask you, so, so long as you listen to the  
question and actually answer the question and don't sort of wander off.  
And just for the purposes of my questions, I am going to assume that all  
10 the documentary material, all your photomontages and all of that are  
technically accurate.

MR WYATT: Thank you.

15 MR McCLELLAND: Just probably something totally not relevant, but just as  
a matter of interest for me, where is the wind farm in Hong Kong?

MR WYATT: There was a proposal by - - -

20 MR McCLELLAND: No, just where? I don't need to know - - -

MR WYATT: It is up on - sorry, it is up above the hills to the right. It was a  
demonstration project by CLP.

25 MR McCLELLAND: On the old Kowloon site?

MR WYATT: Yes.

30 MR McCLELLAND: I understand. And you describe that as wilderness did  
you?

35 MR WYATT: Oh it was absolutely incredible. It was granite slopes. You  
know how on the far side it was really steep. It actually makes these  
hills look flat. It was very dramatic landscape and whether it was  
wilderness or not, it definitely appeared like it hadn't been touched. It  
probably had, like all parts of China, but it was definitely a dramatic  
landscape. I don't think that project went ahead, actually.

40 MR McCLELLAND: And Mr Maassen clarified this. This is your first foray  
into the New Zealand landscape market is it not?

MR WYATT: Into New Zealand, yes.

45 MR McCLELLAND: Yes. And you don't need to sit any exams or do  
anything like that before you can practise here?

5 MR WYATT: I believe it was reciprocal. I used to be on the committee for the Australian Institute of Landscape Architects and I know New Zealand Landscape Architects had an automatic right of practice in Australia. So I assume it is reciprocal, I am certainly hoping so.

10 MR McCLELLAND: I am not going to dob you in. But how do you bring yourself up to speed? What sort of – when Mighty River asked you to come over and have a look at this, how did you - - -

15 MR WYATT: I drove and drove and drove and at one time went in a helicopter and fly from Wellington up.

MR McCLELLAND: Sorry, how do you bring yourself up to speed with the law as it applies to landscape in New Zealand and those sort of things?

MR WYATT: I think that is the one, or the two or three background files I had. I have read and read and read.

20 MR McCLELLAND: Yes, and you were briefed by Mighty River?

MR WYATT: I was briefed by counsel, yes, and by Mighty River.

25 MR McCLELLAND: As part of that briefing, were you ever told about the series of cases involving Unison up in Hawke's Bay?

MR WYATT: I have been advised of – I might even have the decisions here. I am not – I have read, but I don't remember the exact examples. I could probably find it.

30 MR McCLELLAND: Because that deals with cumulative effects does it not?

MR WYATT: I can't remember details of it, I am sorry.

35 MR McCLELLAND: You cannot remember?

MR WYATT: I have read a lot of them and they tend to – unless you have been dealing with them personally, individually I can't – I could look it up if you could refer me to where you are talking to.

40 **[12.35 pm]**

45 MR McCLELLAND: The latest Unison case involving Te Waka, have you been to that area or have you been to Hawke's Bay?

MR WYATT: No, I haven't.

MR McCLELLAND: Have you been to – where have you been in New Zealand apart from here?

5 MR WYATT: I've been – I've driven quite a considerable distance around this area.

MR McCLELLAND: Yes.

10 MR WYATT: And down – I have driven both sides of the ranges, up and down for a considerable distance. But it has basically been all on the North Island. And I have been in Auckland and around that area as well.

15 MR McCLELLAND: Cape Kidnappers? Been there?

MR WYATT: No.

20 MR McCLELLAND: So your knowledge of other areas that have been designated or are considered to be outstanding natural landscapes is limited?

MR WYATT: It's not great, no.

25 MR McCLELLAND: Well it is minimal.

MR WYATT: It's minimal, yes.

MR McCLELLAND: Yes.

30

MR WYATT: I would agree with that.

35 MR McCLELLAND: Unison was a case where you could see the range from Napier, which is a city on the east, and it was some – Napier was some 35 kilometres from this ridge. And the port there observed that although they were 35 kilometres away, there was certainly a presence or there would be a presence, they were visible from that distance.

40 MR WYATT: Visible barely, in very good lighting conditions.

MR McCLELLAND: You see, that is – and I do not want to go into that, but that was not the evidence.

45 MR WYATT: I can't help that. I have seen many, many windfarms from 35 kilometres and they are very, very indistinct. And as soon as you get any degree of atmospheric haze or sea haze or anything between it,

they disappear.

5 MR McCLELLAND: And the really interesting thing about Unison, well I found it interesting, I was involved in that, but the interesting thing about that was there was a Telecom latticed tower, which was about I think from memory 30 metres high, stuck on the end of the stern of the waka. And from 35 kilometres away you could see it, simple as that, easily.

10 MR WYATT: I haven't had that experience, I haven't seen that particular tower on that landscape, but I don't know, I mean I would have to see it.

15 MR McCLELLAND: Yes. You should see it, it is quite a - - -

MR WYATT: I would love to see more of New Zealand.

20 MR McCLELLAND: So come time for caucusing you dug your toes in and said I am not budging on the group, is that right?

25 MR WYATT: No, before that I think there was a letter which I received through counsel which asked if I would contribute to grouping. And I went back and set out my reasons in a memorandum to counsel to say no, I would not, I do not agree with that approach for the reasons that I have discussed today.

MR McCLELLAND: You were not prepared to listen to what the others had to say in the New Zealand context? You just wanted - - -

30 MR WYATT: What do you mean, grouping in the New Zealand context?

MR McCLELLAND: Yes. Maybe the New Zealand landscape experts had a different dimension on it that might have been quite helpful for you to listen.

35 MR WYATT: I have not seen that in any of the evidence that I have seen.

40 MR McCLELLAND: No, that was not the question. I am asking you whether you did not think it might have been helpful to you, to the port or the Board to have actually sat and listened to the others' discussion about it?

45 MR WYATT: I did listen to the others at the caucus and I also had before that the range of turbine groups and I was not impressed by their logical nature. I thought they were totally illogical.

MR McCLELLAND: And I think as you said in your opening you just declined to participate in the - - -

5 MR WYATT: I did give reasons to counsel and I have expressed those reasons again today.

MR McCLELLAND: Now, you say somewhere in your statement that your – well it is actually paragraph 2, no it is not, sorry. Have a look at paragraph 1.3 of your statement? Do you have that there?

10 MR WYATT: I do.

MR McCLELLAND: You say you have got extensive experience in the master planning detail design documentation.

15 [12.40 pm]

You were not involved in that part of it for this one were you? You were not involved in detail design or anything like that?

20 MR WYATT: No, well I was given a design but I was asked to comment a number of times if I found any turbines or components of it unacceptable and I said no. I think what is before me is reasonable. It wasn't from lack of Mighty River Power asking me.

25 MR McCLELLAND: No, I was not – do not get me wrong, I certainly was not suggesting that. Now, you came and gave some sort of seminar in New Zealand earlier this year did you not?

30 MR WYATT: I gave a seminar at the New Zealand Wind Energy Conference.

MR McCLELLAND: Yes.

35 MR WYATT: Or not a seminar, a presentation.

MR McCLELLAND: And that presentation was on photo montages?

MR WYATT: On photo montages.

40 MR McCLELLAND: That was on behalf of your company, was it?

MR WYATT: I suppose so, yes. It was also on my own behalf. I think what we have done is interesting and useful.

MR McCLELLAND: And at the end of the day, just like that K2Vi photographs, photo simulations, photomontages, photo whatever – they are all just guides, are they not? They are all tools?

5 MR WYATT: Well to say they are all just guides is a bit like saying well I can go out there with a camera and take one picture and draw a crayon on it of where the turbines on it of where the turbines are and say that is a guide.

10 MR McCLELLAND: Yes.

MR WYATT: Then you can move through a whole spectrum of accuracy where you try to show things and they are all guides. What we are hoping with these and we have explained to the Court, that these can be  
15 tested by going to the locations we have taken and hopefully the existing landscape will look the same on those photo montages as what exists in your mind when you look across that landscape.

If that is the case we have something that is still a guide but I think it is  
20 a very good guide as to the extent of the visual impact in that particular landscape.

MR McCLELLAND: But in many respects the best guide is for the port or the Board to actually go and have a look for itself, is it not? That is why  
25 they do site visits?

MR WYATT: Yes, and that is why I am saying that these are actually quite useful because you can compare the existing landscape with the existing landscape in the photo montages. With a K2Vi you cannot, it  
30 is a draped aerial essentially taken from above and it has a degree of inaccuracy in it. So they are different and they are both guides, but I think one has a greater degree of accuracy and that is why we use it.

MR McCLELLAND: And in this case the Board is fortunate, is it not, because it just needs to – or the members just need to get up in the  
35 morning and have a look around and they can get a good idea looking at all the other turbines.

MR WYATT: That is correct, yes.

40 MR McCLELLAND: You have been asked about Mr Low's property and that is a property I am familiar with, but just to give you a description, he is on the edge of a valley which he looks directly across to Bryant's Hill, the top of which is about 100 metres higher than his property. And on  
45 top of that there are going to be – if this goes ahead – up to 11 turbines directly in his view.

So he has got 100 metres of Bryant's Hill above him and then on top of that 125 metres x up to 11, and he is - - -

5 MR WYATT: Probably not. I think they would go – is that then moved back down the ridge, so - - -

MR McCLELLAND: Yes, and he is about 1.5 kilometres away but there is no foreground because it is a valley so he just looks. Now, when you think  
10 about that, you do not need computer modeling, you do not need K2, you do not need anything because it is very obviously, is it not, to anyone, that that will have a very dominating effect on his property?

MR WYATT: Yes.  
15

MR McCLELLAND: Now, Mr Davidson, when you were shown those K2Vi model things, he objected on the basis that you were disadvantaged because you had not seen them before.

20 MR WYATT: I think it goes – I have seen it demonstrated.

MR McCLELLAND: Yes, okay, well we do not – let us not go through that again please.

25 MR WYATT: I can show you on this.

MR McCLELLAND: No, I do not – look, I just simply do not want to do it.

MR WYATT: On the one behind I can do a fly by too.  
30

MR McCLELLAND: Yes. No, that's cool.

**[12.45 pm]**

35 MR WYATT: And it is useful to understand the landscape. It is not - - -

MR McCLELLAND: Yes, it is more the disadvantage point that I was wanting to find.

40 MR WYATT: No, I have not had it on my computer. I have not been able to play around with the parameters. I have not had any of – all the data put into it.

MR McCLELLAND: Yes.  
45

MR WYATT: We gave Memory-Map to the Court. I do not whether you also got a copy, but - - -

5 MR McCLELLAND: That residential viewpoint number 2, do you know whose property that is? Can you remember?

MR WYATT: I do not have – I might have been told at the time. I deliberately do not put names into these.

10 MR McCLELLAND: No. Well that was Mr Mikkelsen’s property. Have you seen a statement from him at all?

15 MR WYATT: I have. I think the objectors are back in my office, I have not brought it with me. I ran out of room in my bag unfortunately.

MR McCLELLAND: No. That is okay because I have got it here at any rate. But what happened as I understand it, those residential viewpoints, they were taken after the application in the AEE was lodged?

20 MR WYATT: That is correct.

MR McCLELLAND: And these were not made available. These residential viewpoint photo simulations were not made available until after the closing date for the submissions, were they?

25 MR WYATT: I am sorry, I do not know that. You would have to ask MRP when - - -

30 MR McCLELLAND: Well his statement is effectively that the photographs on his property were taken on 23 January 2009, closing submissions were on 23 February 2009 and he first saw those on 9 March 2009.

35 MR WYATT: I cannot comment on that. I know we were preparing a number, there was an enormous amount of work to be done. I am not sure of the dates when we got them over to MRP or when they were distributed. I am sorry, I am not prevaricating, I just do not know the answer to those dates.

40 MR McCLELLAND: No, and the position that he says is: “I did not lodge a submission because I did not think that my property would be so affected but when I saw RVP2 I nearly fell of my perch” he says because it is only then that he just realised how enormous the impact on his property was. Can you understand that?

45 MR WYATT: If that is what has happened, yes.

MR McCLELLAND: Can you accept, from his perspective and from all the other people whose properties are represented – can you understand why they feel disadvantaged by this?

5

MR WYATT: Why they feel disadvantaged?

MR McCLELLAND: Yes, by - - -

10 MR WYATT: I can understand why some of them or many of them, or all of them have a few that they do not wish those wind turbines there. Yes, I can understand that.

MR McCLELLAND: No, sorry - - -

15

MR WYATT: You mean the process?

MR McCLELLAND: Yes.

20 MR WYATT: I do not have control of the process but I can understand that they would have liked it earlier.

MR McCLELLAND: Because by getting it earlier they could get a better understanding of the impact.

25

MR WYATT: I am not an expert in how that process should or was managed.

MR McCLELLAND: No, I am not saying that. But presumably you are in a position to accept that had these people got these photo simulations earlier they would have had a better understanding of the impact?

30

MR WYATT: That may well be the case. All I know is that we were going flat out to prepare the number of photomontages for this case that were required and my office was working incredibly long hours to prepare the number of residential photomontages which we did do. I can only say that we could not have produced them any faster. It was an enormous amount of work. Unfortunately they are not done in 10 or 15 minutes each.

35

40 MR McCLELLAND: No, but I suppose the problem is that without that knowledge a number of these people have not lodged submissions because it was too late.

MR WYATT: I cannot comment on that.

45

MR McCLELLAND: No. In the southern half of the North Island and all of the South Island are you aware of any buildings as big as 125 metres?

5 MR WYATT: I do not think that is a valid comparison, but I do not know – maybe in Wellington, I am not sure. What is that? 40 storeys high in Wellington? I am not sure. I do not know, but I would not compare a wind turbine with a building of any size.

10 [12.50 pm]

MR McCLELLAND: No. How many submitters in opposition were there? Do you know?

15 MR WYATT: I could add up those numbers on the screen I suppose but I - - -

MR McCLELLAND: I think it is about 500 or so.

MR WYATT: That could well be right.

20 MR McCLELLAND: At paragraph 5.14 - and I know you have been questioned about this, I just need to check for my understanding - - -

MR WYATT: Of the SOE, or the - - -

25 MR McCLELLAND: Sorry, of your statement. Your statement of evidence.

MR WYATT: Yes.

30 MR McCLELLAND: It is plain - or it is plain to me - that the public perception, as per those surveys, has played a major part in some of your determinations as to the effect or likely impacts.

35 MR WYATT: No. It has played a part but as a I said in cross-examination (and if you look at other visual assessment work that we have done whether it recently be for the desalination plant in Victoria or a transmission tower such as Basslink or the grid connections between New South Wales and Queensland), we have done exactly the same as we have done here.

40 MR McCLELLAND: Okay.

45 MR WYATT: The extra dimension that these add is only used within wind farms because as far as I am aware they are they are the only form of infrastructure that also elicits a positive response.

MR McCLELLAND: Just for example, just have a look at paragraph 10.18 of your statement of evidence.

MR WYATT: Yes?

5

MR McCLELLAND: Now, just that second part of that paragraph, you say: “However, in my opinion, such action that is mitigation is not necessary in light of the positive results obtained from various studies.” So there it is playing an important part in your conclusion there, is it not?

10

MR WYATT: But I assessed that view as more than minor – that impact – which is reasonably high. It is not an unacceptable level because I do not think it is, but - - -

15

MR McCLELLAND: Yes. Look, please - - -

MR WYATT: I have assessed it at that level, I have not put in minor, negligible, de minimis.

20

MR McCLELLAND: Mr Wyatt, I am not asking you that. I am just simply saying that the public perception results there have obviously played a big part in your decision and in your conclusion.

25

MR WYATT: And I am saying no, because the impact of that was more than minor.

MR McCLELLAND: Have a look - - -

30

MR WYATT: That is why I have given – if you look at the impact of viewpoint 1, that is what I gave. Now, I can say it is high or unacceptable because there are other wind turbines on the ranges.

35

MR McCLELLAND: Have a look at 10.52. It is the same point I am making, that in your assessment, the public perception there obviously you talk about primarily is playing a key part in your decision making and your opinion that you are forming.

40

MR WYATT: It is forming a component of it but I still say that I have assessed it irrespective of that and this comes after the fact, and I do not think you can read it any other way.

MR McCLELLAND: “Primarily given the evident public acceptance”, that is a key factor in that particular conclusion you are reaching, is it not?

45

MR WYATT: It is a factor after I had done an assessment of the visual impact as to the degree of modification that – that degree of change that –

sorry, I do not consider that mitigation is necessary as there is an acceptance of wind turbines in the landscape. It is a discussion on mitigation, not landscaping and not visual impact.

5 MR McCLELLAND: We will just move on. At 6.11 you talking about the A0 size.

MR WYATT: I am sorry, what ..?

10 MR McCLELLAND: 6.11 you talk about the A0.

MR WYATT: Yes?

15 MR McCLELLAND: It is a shame, is it not, that the Board did not have those available when it went on its site visit?

**[12.55 pm]**

20 MR WYATT: I thought some of them were available, they were taken out – I do not know. I think some were?

HER HONOUR: Yes, some were.

25 MR McCLELLAND: Sorry, Ma'am. I did not think they were. Thank you.

Now, over the next page to page 20 – and I do not propose to go through this at all in any detail – but you are talking about 3.5 to 8.5 as being potentially noticeable and then you say that the turbines will not dominate the landscape. That is at the top of page 21.

30

MR WYATT: Yes.

35 MR McCLELLAND: Have a look at RVP9, would you? And I am really just trying to understand what you mean by “dominate”. Are you saying that those turbines there do not dominate in that case?

MR WYATT: No, I think the ranges dominate.

40 MR McCLELLAND: So you do not see that the turbines do in that viewpoint?

MR WYATT: They are very, very noticeable. They are obvious in the view along that drive.

45 MR McCLELLAND: Yes.

MR WYATT: But I still think the ranges are the dominant element in that view.

5 MR McCLELLAND: Well that is good because I can understand what you are meaning there. Then you talk about visually insignificant, and I sort of touched on this with the Unison case, 35 kilometres. But you say, “In all but exceptional clear lighting conditions, they are imperceptible”, and that is between 8.5 and 19.

10 MR WYATT: 8.5 and 18, you had a range of views and then out to 35 potentially it has gone even further I think in the Sinclair-Thomas matrix, but I must admit - - -

15 MR McCLELLAND: And it is really just seeing what you mean by imperceptible. I just want you to have a quick look, please, if you would at public viewpoint 10?

MR WYATT: Oh, that is in the AEE?

20 MR McCLELLAND: No, it is in all the photographs that were attached to your statement of evidence. It is public viewpoint 10.

MR WYATT: Yes, that was in the AEE.

25 MR McCLELLAND: Yes, okay, good. So that to you is all but imperceptible is it?

MR WYATT: No, I have said that it's a – the distance at 9 is a low impact.

30 MR McCLELLAND: No, no, this is taken at 9.4 kilometres away.

MR WYATT: Yes, I know.

35 MR McCLELLAND: And I am just reading to you the visually insignificant bit and you say in all but exceptionally clear lighting conditions they are imperceptible.

MR WYATT: At this distance, the wind turbines are noticeable but will not dominate views in the landscape sense of the ranges.

40 MR McCLELLAND: Yes.

MR WYATT: It is reduced because of this distance. So I - - -

45 MR McCLELLAND: But they are not imperceptible are they?

MR WYATT: I have just said in page 79 at this distance the wind turbines are noticeable.

5 MR McCLELLAND: Yes, good. Well that - - -

MR WYATT: They are noticeable.

10 MR McCLELLAND: Well have a look at page 21 of your statement, that is where you say that they are not - - -

MR WYATT: At my SRE?

MR McCLELLAND: - - - they are imperceptible.

15 MR WYATT: Sorry.

MR McCLELLAND: And that is what, why I am struggling.

20 MR WYATT: If you go out to the end of that range, like that's at 9K. This goes out from 8.5, which is the beginning of that range to 18 kilometres. If you go 18 kilometres away, we haven't got a photomontage of those, but if you look on the - I was just thinking of some of the cumulative impacts that are down south and look back to the existing - if you go 18 kilometres away from the existing wind  
25 turbines, go south and just have a look at how small they are, I think imperceptible is a very good description of them.

30 MR McCLELLAND: You see I did that yesterday actually coming up and it was a lovely day.

MR WYATT: Yes.

35 MR McCLELLAND: And I did not think they were imperceptible. I had Ruapehu to my left, which was just stunning.

MR WYATT: That is beautiful.

40 MR McCLELLAND: And driving up from, what is it, Tokomaru, and there was Ruapehu, you could just see a little bit of Ngauruhoe, I think if I had stopped properly I could have seen Taranaki, but then you could see all these turbines on the ridgeline and to me, and I do not know how far away I was but I was some distance, they were not imperceptible.

45 MR WYATT: I said in that range they dropped down to imperceptible except in great light conditions. In the last few days we have had terrific lighting conditions up here. I have been here when the conditions have

been less than fantastic and I can say that in some of those they would be very imperceptible but in superb lighting conditions, yes, you can see quite a distance. But it is usually not at that level of the extent of the viewshed that such a proposal would fail.

5

MR McCLELLAND: Anyway - - -

HER HONOUR: Mr McClelland, you are not giving evidence in this hearing, please stick to asking questions.

10

MR McCLELLAND: Yes, I am sorry.

HER HONOUR: Thank you. We will adjourn for the luncheon adjournment, thank you.

15

**ADJOURNED** [1.00 pm]

**RESUMED** [2.02 pm]

20

HER HONOUR: Yes, thank you Mr McClelland.

MR McCLELLAND: Thank you, your Honour. Now Mr Wyatt, page 21 of your statement of evidence I think was where we were before lunch. And I am just going to move through some points quite quickly, subject of course to your cooperation. 6.15. At (b), have you got that?

25

MR WYATT: Yes, I have.

MR McCLELLAND: Yes, good. At (b) you talk about the areas in which section 6 of the Resource Management Act analysis and relevant district plan policy provisions will inform the visual assessment, but section 6 is not only visual is it?

30

MR WYATT: No, it is not.

35

MR McCLELLAND: No. I then want to take you please to page 29.

MR WYATT: Yes.

40

MR McCLELLAND: I am correct, I think, that in your statement of evidence you do not refer to the Turitea reserve management plan?

MR WYATT: Directly, I was aware of it. I do not know whether I have referred to or not. I will take it on board that I have not, but I was aware of it and I had read it.

45

MR McCLELLAND: And you do not refer in your statement of evidence to the Hardings Park, do you?

5 MR WYATT: No, not directly. The importance of the view from – I had walked the sledge track, but felt that the view was fairly confined because of the pepperwood and other trees along it. It was not really until the caucus the Red Rock Knob became an issue.

10 MR McCLELLAND: You do not refer in your evidence to the fact that the Hardings Park is a scenic reserve under the Reserves Act?

MR WYATT: I honestly cannot remember but, yes, if you have not found it I would agree with you. I cannot remember, but I have dealt with it  
15 when it was brought to my attention.

MR McCLELLAND: In rebuttal.

MR WYATT: Yes.

20

MR McCLELLAND: And you have actually got no, in your evidence, you have got no photographs of Hardings Park, have you?

[2.05 pm]

25

MR WYATT: No, because I was taking pictures from outside the area not from – but I have, as you saw in that opening statement recently, done a – completed a photomontage from Red Rock Knob.

30 MR McCLELLAND: And I think Ms Lucas sets out in her evidence does she not why under the Reserves Act, or what that means so far as Hardings Park is concerned, about preserving the scenic - - -

MR WYATT: Yes, but I do part company with her interpretation and also you  
35 have only got to look at the northern end of the existing wind farm to find that there is a scenic reserves besides the Manawatu gorge which is a walking track that walks up into that scenic reserve and is advertised in the local brochure to have superb views to the wind farm. And that is within the scenic reserve as well.

40

MR McCLELLAND: We are not talking about that.

MR WYATT: No, but there was an inference that the scenic reserve – not an  
45 inference, I think Ms Lucas stated that in her view the scenic reserve was meant to prevent any development that was adjacent to it, that would impact visually on the reserve. Well, I am saying at the other

end, at the Manawatu gorge, in that particular scenic reserve such an association is already existing.

5 MR McCLELLAND: That is helpful. Could you please turn to attachment 9 of Ms Lucas' attachments.

MR WYATT: Yes.

10 MR McCLELLAND: Have you got that there?

MR WYATT: Yes, the Turitea reserve. Ecological management areas.

MR McCLELLAND: And it shows Hardings Park does it not?

15 MR WYATT: The boundary is not right, but it does show it.

MR McCLELLAND: Is the boundary not right? How is the boundary wrong?

20 MR WYATT: The management plan for the Turitea reserve says that the boundary is 200 metres to the south of the ridgeline. In fact that ridgeline is very very close to that existing road. It differs from it 10 / 15 metres in places. And so the boundary is actually 200 metres to the south of where it shown, which is along the road.

25 MR McCLELLAND: So those turbines, for example 46, would that still be in Hardings Park according to you?

30 MR WYATT: 46. I cannot read it I am sorry. Let me go into this. You are talking about the turbines here which is turbine 46. No, that is not in Hardings Park. It is about 46 metres south of the crest and in fact 150 metres inside the boundary of Hardings Park in Turitea reserve.

MR McCLELLAND: What about 117 and 118?

35 MR WYATT: I would have to blow up the boundary, but I do not know the distance of the offset of those. I have not looked at those in detail.

MR McCLELLAND: No.

40 MR WYATT: I would assume they are outside of the reserve. I have been told they are outside of the reserve.

MR McCLELLAND: They may be outside but they must be very close.

45 MR WYATT: They are, that is why I did that panoramic and the photomontage which I showed in the opening statement.

MR McCLELLAND: And so if you were for example of Red Rock Knob which I understand quite a lot of people do that, if you are there you are going to look out are you not, out from the scenic reserve and you are going to see a lot of turbines?

5

MR WYATT: I have shown that in the photomontage. Yes, you will see a lot from Red Rock Knob. You do not see a lot as you approach it because you are in the – as I said you are in a pepperwood enclosed canopy and in fact in many locations you cannot even see the sky. The canopy completely encloses you. But when you get to Red Rock Knob and clamber up on the top, yes, you have a very – and Ms Lucas's photographs and mine, which are in that opening statement, support that.

10

MR McCLELLAND: And in effect when you look at Ms Lucas' attachment 9 and putting to one side that the boundary may be slightly wrong, but that north part of Hardings Park is really virtually surrounded or encircled by turbines is it not?

20

MR WYATT: Yes, if you just look at it from an aerial view but as I said, you have to come to Red Rock Knob. Even the distance which is from the road, the South Range road which is there called the Turitea Access Track, if you take that little track that leads up to Red Rock Knob from there, in that entire distance you are inside a canopy. You travel about 500 metres. It is not until you come out – yes, it is surrounded, but until you come out on Red Rock Knob you are not aware of that.

25

**[2.10 pm]**

MR McCLELLAND: And just while we have got that photograph or map before us, the blue dotted line is the summit watershed is it not?

MR WYATT: The blue dotted line is the walking track, is it?

MR McCLELLAND: No, the summit watershed.

35

MR WYATT: I have not examined it in that detail but it could possibly be. I am not sure. That is what they say, yes.

MR McCLELLAND: And we have got no reason to doubt that at this stage.

40

MR WYATT: No, I have not looked at that, no.

MR McCLELLAND: So, in terms of turbines being located on the top of ridges, by my calculation we have got numbers 1 right through to 46 along that ridgeline have we not?

45

MR WYATT: Which particular ridgeline – are you referring to the one along South Range road and Turitea Reserve access track?

5 MR McCLELLAND: Yes, and it keeps going along – if you follow the blue dotted line which is the summit watershed - - -

MR WYATT: Oh, yes.

10 MR McCLELLAND: - - - you have - - -

MR WYATT: You have got them on the ridge, yes. Because the road follows the ridge. Yes.

15 MR McCLELLAND: For those people – no, look I will come back to that, sorry. So you do not have a problem do I take it with the fact that although the turbines are not actually in Hardings Park, they encase and surround and encircle?

20 MR WYATT: They do not encase, surround and encircle in anything but a bird's eye view, or from the view from Red Rock Knob. And if you are walking through Hardings Park within the parks you do not get views to the turbines because you are enclosed within the existing vegetation.

25 MR McCLELLAND: And what about if you are outside Hardings Park looking in?

MR WYATT: Well, it depends where you are.

30 MR McCLELLAND: But it still is encased or encircled, is it not?

MR WYATT: Well, no, if you are outside of Hardings Park in what location, if you are in the middle of Turitea Reserve, yes. If you are east of the west of the ranges, no, I do not think you - - -

35 MR McCLELLAND: You do not think so.

MR WYATT: You have to look at it at each individual viewpoint.

40 MR McCLELLAND: So is it your evidence that the turbines have no impact or effect on Hardings Park?

MR WYATT: No, that is not what I said. I said if you are in the tracks on Hardings Park you will not see the turbines but when you come up to –  
45 and Red Rock Knob is one example and I think there is another one further down towards the Sledge Track, and there are probably others as

5 you come out of the vegetation, and you will have views to the turbines. Red Rock Knob is the closest to that and you will have a panoramic view from that location of the turbines, which is demonstrated in the photo montage I did, and is very similar to the one that that you get from the north walking track that goes up along the gorge.

MR McCLELLAND: Do you accept that that will impact on those that go there for recreation purposes their appreciation of the panoramic views?

10 MR WYATT: Yes, and it may well be a positive. As they say in the walking track guide for the northern end, come along this trail and enjoy the superb views of the wind farm. So it is advertised as a positive in the council's own literature.

15 MR McCLELLAND: Now, over the page - - -

MR WYATT: I am sorry, on Ms Lucas' statement?

20 MR McCLELLAND: No, sorry, page 30 of your statement. You are talking about the Pigeon Bay criteria, 7.27, and F you have identified as one of those criteria being value to tangata whenua?

MR WYATT: Yes.

25 MR McCLELLAND: Now, could you just quickly please turn to your August 2008 report and it is chapter 6 where I think you do your Pigeon Bay analysis and - - -

30 MR WYATT: That is landscape units within a viewshed, I do not think it was that but - - -

MR McCLELLAND: Is it not chapter 6? You have got a table - - -

35 MR WYATT: I am just trying to find it myself. It is on page 39.

MR McCLELLAND: 39, is it, yes. I have not quite got it in front of me at the moment but I am getting it, but there is a table there, is there not, that sets out the Pigeon Bay?

40 **[2.15 pm]**

MR WYATT: That is correct.

45 MR McCLELLAND: Could you just read out to me what it says for tangata whenua issues?

MR WYATT: “The ranges as well the watercourse are important elements, Hardings Park, in particular Arowahu, (ph 2.15.10) are important to the tangata whenua and were excluded from the area in which turbines could be located”.

5

MR McCLELLAND: Yes. Now, obviously when doing your Pigeon Bay assessment to whether in your view it is an outstanding natural landscape those are issues that you needed to take into account. Could you just tell me what the tangata whenua issues were that you took into account?

10

MR WYATT: I asked that question and got that response. I am not an expert in those values and I would bow to other people to put values into that. I am not, in any form or fashion, an expert on those values so I will claim I got given that information, I put it into the assessment.

15

MR McCLELLAND: I see. So who gave you that information?

MR WYATT: I cannot remember at the time, we probably discussed it with counsel because it was an area of which I was not in any way an expert.

20

MR McCLELLAND: So you are not aware of those concerns or issues that informed that?

25

MR WYATT: No, I am not.

MR McCLELLAND: Now, can we move please to your page 33.

MR WYATT: Of which report?

30

MR McCLELLAND: Of your statement of evidence.

MR WYATT: Of SOE. Yes, I have got that.

35

MR McCLELLAND: And here you are talking about the regional policy statement, are you not?

MR WYATT: Yes, and also just at the bottom on the Horizons One Plan.

40

MR McCLELLAND: Can I ask you please to look at your cumulative viewpoint No. 1?

MR WYATT: Yes.

45

MR McCLELLAND: I am just making sure I have got the right one. Sorry, look I will come back to that.

Now, can I take you please to your page 38, this is page 38 of your statement.

5 MR WYATT: Yes, I have got that.

MR McCLELLAND: I think you said before lunch that you had not visited many of the outstanding natural landscapes in New Zealand?

10 MR WYATT: No, that is correct.

MR McCLELLAND: Your paragraph 8.26, you say, "It has obviously been modified by human activities and therefore does not qualify as an outstanding natural landscape". You are not saying, are you, that to  
15 qualify as an outstanding natural landscape there can be no human activity?

MR WYATT: No, that is correct.

20 MR McCLELLAND: So what is it about the human activity in this case?

MR WYATT: Oh, I think, as expressed in the modified Pigeon Bay criteria, the idea of it being a natural landscape is one that I would regard as not containing obvious signs of clearances of pine plantations, of rural, of  
25 housing et cetera. So it would be what I would regard as a natural landscape as the ranges appear further to the south and further to the north in there.

MR McCLELLAND: So what about if the area is being farmed, would you  
30 say that that would exclude it from being an outstanding natural landscape?

MR WYATT: I would have to look at that in the context of what made it outstanding. There is an argument for some cultured landscapes to be  
35 within that and I think, for example, in our situation the Yarra Valley may rate as such a landscape. But the "outstanding" and the "natural" together are the combination you are looking for. So I cannot say that given a farm landscape I would not give it a high rating, I mean you would have to look at it in the context. But in the context of the drive  
40 north and south along the ranges on the east and west side I believe that this area is not an outstanding natural landscape.

[2.20 pm]

45 MR McCLELLAND: Because of the human activity?

- MR WYATT: And because of its rounded peaks as against the steeper peaks in terms of the topography, as I showed in just the map that is on the board at the moment. So there are many elements, the “memorableness” of it, a lot of things come to bear.
- 5
- MR McCLELLAND: I want now to just look at page 63 of your statement please and here you are talking about mitigation, are you not?
- MR WYATT: That is correct.
- 10
- MR McCLELLAND: You have already been questioned about that but can you tell me what research you have undertaken in respect of New Zealand native planting?
- 15
- MR WYATT: I use them quite a lot in Australia.
- MR McCLELLAND: Yes, what - - -
- MR WYATT: Pittosporums, I have used hoheria and other species, cordyline.
- 20 We are doing a project at the moment with those as a dominant backdrop species. So, yes, I am reasonably familiar with some of the more common, probably you would define as “weed species” or “hardy species”, but I am not an expert in New Zealand native plants by any stretch of the imagination.
- 25
- MR McCLELLAND: Did you notice in your travels around the area that a lot of people who have done planting, it has tended to be native planting?
- MR WYATT: I noticed that and I also noticed – well, I did not know it was all native, that would be untrue. I noted that some plants appeared to be native and I was not familiar with them. I also noticed a lot of plants that I knew were New Zealand, whether they were native to this area or indigenous to this area or just native to New Zealand I was not sure. I also noticed quite a lot of planting of the cypress and the golden cypress and the chamaecyparis as well.
- 30
- 35
- MR McCLELLAND: Did you make any inquiry as to the speed of growth of these various plants?
- 40
- MR WYATT: I have talked to our ecologist about that and also took some views myself on - related to ages of housing. I said between 1 and 2 metres a year, I think, in my report at one stage. In some of the more exposed sites it would be around the lower figure for the more, if you like, weedier species such as the pines and cypresses. They would probably gain that amount of size, but others would be slower and I believe that pepperwood is particularly slow.
- 45

MR McCLELLAND: When you were being questioned previously, in respect of paragraph 40.2(d).

5 MR WYATT: I am sorry, which one?

MR McCLELLAND: At page 145 of your statement. And it is paragraph (d) on page 145.

10 MR WYATT: Yes.

MR McCLELLAND: And you are talking there about mitigation and you say that, “mitigation will reduce the visual impact from more than minor to minor or to de minimus in most if not all instances.” And you were  
15 questioned about that and you talked about deciduous trees.

MR WYATT: Yes.

MR McCLELLAND: Now my understanding is that deciduous trees tend to  
20 lose their leaves at winter time.

MR WYATT: They lose their leaves but they do by no means become  
invisible. You still have the tracery of branches and in many respects it  
works as a – it captures the eye in the foreground. I mean you look out  
25 around your parks and your streets of Palmerston North, the deciduous  
trees, even in winter, add a great deal of beauty to the neighbourhood.  
And some of that just allows your – it is like a lattice. You can see  
through it but you tend to look at the lattice in the foreground. In some  
respects that is all you need in some instances and that has been done in  
30 the past.

MR McCLELLAND: It certainly – I do not think you are saying this – but I  
had better check, but when they drop their leaves they do not have that  
mitigation effect as a tree with full leaves.  
35

MR WYATT: No, they do not have the same, granted, but they do not  
disappear either. They are still there and in many instances, the trees I  
would be recommending would be open foliage anyway and would not  
be a cypress hedgerow. I do not think I would normally recommend a  
40 complete dense screen.

**[2.25 pm]**

MR McCLELLAND: Just in (d), it would seem to me reading that that you  
45 are hanging your hat, so to speak, on the ability to plant to mitigate.

- MR WYATT: I do not know whether I am hanging my hat. I have said that there is a more than minor impact that can be reduced if landscaping is used, but if people do not wish to have landscaping that impact will remain as I have stated.
- 5
- MR McCLELLAND: But that is your answer to everything though is it not? If there is a more than minor visual impact then it can be planted out.
- MR WYATT: If there is a more than minor impact it can be reduced to a level that may make it acceptable to the owners by landscaping and that has been my experience over a number of years, and not only for wind farms.
- 10
- MR McCLELLAND: Now, can I take you to page 100, please.
- 15
- MR WYATT: Of the statement of evidence?
- MR McCLELLAND: Yes, please.
- MR WYATT: Yes, I have got that.
- 20
- MR McCLELLAND: Now, this is a Mr Coote. He is the owner of this property. And if you turn to figure 83, you have done the photomontage.
- 25
- MR WYATT: That is right.
- MR McCLELLAND: It is correct is it not that much closer than those turbines is a pylon. It is proposed to have a pylon there.
- 30
- MR WYATT: They've (**IND 2.27.13**) proposed a pylon there?
- MR McCLELLAND: Yes, as part of this.
- MR WYATT: I do not know where the pylon is in that view.
- 35
- MR McCLELLAND: You see the suggestion is that it is at least within 50 metres of that wire fence. Do you know that?
- MR WYATT: If it is along that route line it does not necessarily mean a pylon has to be in that view. You can microside a pylon 50 or 100 metres on either side. It is quite easily done and it would be behind the cypress hedgerows. I do not know, I mean – no, I have not looked at that in detail, but I believe that microsiding of pylons is readily done to mitigate such a narrow view corridor as that.
- 45

MR McCLELLAND: In fact none of your depictions have pylons in them do they?

MR WYATT: No, we have not modelled the pylons.

5

MR McCLELLAND: Why is that?

MR WYATT: I do not think, unless we have got accurate locations for them and some of that is done on a site by site basis – for example like that you could put a pylon, you are right, right in the centre of that viewline, but you could also in micrositing move it 50 or 100 metres either side and make it – you would not observe it from that viewpoint. So when we have only got an alignment, where do we put the towers? When we have done towers in some projects we have put them right in the middle of that view and then recommended mitigation by moving them. I think in this case the major impact is from the turbines and that is what we have concentrated on.

10

15

MR McCLELLAND: Just bear with me for a moment. Just going back if I can to – it is always the way is it not, you have a reference and then you find out it is the wrong reference. Which is just what is happening to me at the moment. No, look I cannot find it. It was in relation to the definition of skyline in the RPS.

20

MR WYATT: Would that have been in the AEE?

25

**[2.30 pm]**

MR McCLELLAND: That is at page 33 of your evidence.

30

MR WYATT: That is in the AEE report or?

MR McCLELLAND: No, it is your evidence page 33.

35

MR WYATT: Yes.

MR McCLELLAND: And I was going to put it to you that there is reference to a particular photograph and it is that reference that I cannot find. But it seems to me that when you look at some of the photographs taken from Palmerston North and that sort of area that this whole wind farm appears to be on the skyline.

40

MR WYATT: Yes. And so too do the existing wind farms if you are on the skyline from further to the north.

45

MR McCLELLAND: Sorry?

MR WYATT: So too the existing – well, the skyline is still there and it has got existing wind farms to the north.

5 MR McCLELLAND: Yes, but when you look at what the RPS provides in respect of the skyline and I am not interested in the other ones, I am talking about this one. Do you not see that if the skyline is regarded as an outstanding natural landscape as far as the RPS is concerned, then when you view it from Palmerston North and places like that, the wind  
10 farm is located right there in what is regarded as the outstanding natural landscape?

MR WYATT: I do not believe a skyline by itself becomes an outstanding natural landscape.

15

MR McCLELLAND: No, but we have got – we know what it means according to the RPS do we not?

MR WYATT: No, I do not. The skyline is not defined. There is not a  
20 diagram. The figure does not – as was pointed out to me, you have views of the existing wind farm and the skyline, on the skyline, from walks within Palmerston North now. That skyline has not disappeared. That skyline accommodates wind farm, wind turbines. I do not think it is defined and I do not think by and in itself it is a ONL.

25

MR McCLELLAND: Well, there are two issues. Just dealing with the RPS at the moment which says that the skyline is an ONL, does it not?

MR WYATT: It says an outstanding natural feature. Or landscape of regional  
30 significance.

MR McCLELLAND: Yes. So I am only talking about this wind farm application. So from all your photomontages and all of that, do you accept that when it is viewed from places like Palmerston North it is on  
35 the skyline?

MR WYATT: Yes, but that is an almost – that is where the whole problem with skylines as a line - - -

40 MR McCLELLAND: Well - - -

MR WYATT: - - - no, I will answer the question. From Bryant's Hill - - -

MR McCLELLAND: First of all just say yes or no. "Yes" I accept. "No" I  
45 do not.

MR WYATT: No, I do not.

MR McCLELLAND: You do not accept that it is on the skyline.

5 MR WYATT: Yes, but what skyline? At Bryant's Hill the foothills become  
the skyline. It depends where you are looking at them. If you move  
backwards and forwards, your skyline line changes dramatically. It  
varies. It is not a fixed point. It is not like a ridge top. You looked at  
10 the photographs in the K2Vi. Even from a higher elevation or the work  
that we have done, your skyline there is Bryant's Hill. That is not what  
is referred to here.

MR McCLELLAND: But you see, you are answering your own question, Mr  
15 Wyatt. I did not ask you any of that. I said, from Palmerston North  
looking over, is that not on the skyline?

MR WYATT: Yes.

MR McCLELLAND: All I want is yes or not.  
20

MR WYATT: Yes, there is a skyline, yes.

MR McCLELLAND: Sorry?

25 MR WYATT: There is a skyline.

MR McCLELLAND: Yes, I know there is a skyline. I have asked you, are  
the turbines on that skyline?

30 MR WYATT: Yes, they are on the skyline.

MR McCLELLAND: That was not too difficult was it?

MR WYATT: No, that was fine.  
35

MR McCLELLAND: Yes, thank you very much, that is helpful.

HER HONOUR: There are two submitters I think, Mrs Bailey. Mrs Mildon.

40 **<QUESTIONING BY MS MILDON** **[2.35 pm]**

MS MILDON: Thank you. Good afternoon.

MR WYATT: Good afternoon.  
45

- MS MILDON: When you are at the end of the line it is a bit difficult to know what has been answered or not answered in a list of questions, but I will do my best.
- 5
- HER HONOUR: Would you be more comfortable sitting down, Mrs Mildon?
- MS MILDON: Is that okay?
- 10
- HER HONOUR: Yes, of course.
- MS MILDON: Thank you. I have quite a long list of questions and I thought perhaps it might be useful to try and shorthand some of those by looking at some specific maps and figures which are in your evidence in chief. We will be looking at figure 10 which is the viewshed of the Turitea wind farm.
- 15
- MR WYATT: In the original AEE?
- 20
- MS MILDON: That is in your May 2009 – it was sent to me in May 2009. And I will also be making reference to 6.13.
- MR WYATT: Sorry, is that figure 7.2?
- 25
- MS MILDON: Figure 10, page 20.
- MR WYATT: Figure 10 and?
- MS MILDON: Turitea viewshed.
- 30
- MR WYATT: Yes.
- MS MILDON: And 6.13 which follows that.
- 35
- MR WYATT: Yes.
- MS MILDON: I also might make reference to figure 23 which is the areas of potential wind turbine visibility. That is on page 41. And I will also be referring to table 32 which is on page 134. And public viewpoint 01.
- 40
- HER HONOUR: Could you repeat that? Page 134.
- MS MILDON: And public viewpoint 01 and table 32 on page 134. I just want to clarify something with you. If you understand what I mean by the Palmerston North district which includes Palmerston North city as an urban area, and the Manawatu district. If not, if you look at figure
- 45

10 it is essentially that area that moves from the ridgeline,  
approximately north and north-west.

5 MR WYATT: Yes, it goes out to Fielding - - -

MS MILDON: Out towards the coast.

MR WYATT: - - - and Ashhurst. Yes.

10 MS MILDON: Yes. Looking at figure 10. And looking at public viewpoint  
01, and the little insert map.

MR WYATT: I am sorry, which viewpoint?

15 MS MILDON: Figure 10.

MR WYATT: And cumulative viewpoint 01?

20 MS MILDON: And public viewpoint 01 in front of you.

MR WYATT: The one from the top of the – the one from the Kingsgate.

MS MILDON: The Kingsgate, yes. And the insert map.

25 MR WYATT: Yes. That is on the screen behind me -

MS MILDON: Yes, that is it. I just want to ask you, those red, sort of uneven  
circles, they are the distance bands, is that correct?

30 MR WYATT: That is set from the closest wind turbine, so it is just a mapping  
of the, if you like, 1.5 to 3.5, 8.5 and - - -

MS MILDON: Okay, so there could be an easy explanation - - -

35 MR WYATT: They just give you a guide when you are looking at different  
viewpoints as to where they lie.

40 MS MILDON: So if you look at the 8.5K line as it runs through Palmerston  
North.

MR WYATT: Yes.

45 MS MILDON: On the insert map, it appears to go through the Square, let us  
put it that way, Palmerston North city square, and that seems to tie in  
with the 7.8k distance.

[2.40 pm]

5 MR WYATT: The 7.8k is generated in the computer from the distance from the actual GPS coordinates. This is an illustrative diagram where it is taken from – it is you know reasonably accurate. It is not as accurate as the dimension that we get from the centre line of the turbine to the actual GPS coordinates of the viewpoint.

10 MS MILDON: Well, I do not understand. Is that meant, that map, should that map tie up with figure 10 because in figure 10 the 8.5k line runs through the intersection of Rangitikei Line and Tremaine Avenue which is quite some distance.

15 MR WYATT: Away, yes I do not – it should actually have been the same. I do not know why one is slightly different but I can give you the accurate dimension from that if you would like.

20 MS MILDON: It is sort of quite important because all of Palmerston North city virtually, the urban area, seems to come into the 3.5 to - - -

MR WYATT: To 8.5k.

25 MS MILDON: - - - 8.5k zone. But according to this it does not, so I was not quite sure which was which.

MR WYATT: I think all the dimensions on each of the viewpoints were done accurately, very accurately, between a GPS coordinate and the coordinates of the wind turbines.

30 MS MILDON: So then I just have to take it that figure 10 is a sort of a generalisation?

MR WYATT: It is an accurate – it shows the bands but the actual distances are shown on each of the viewpoints.

35 MS MILDON: I guess you can see my problem with that. If people looking at this material, people like me, cannot be sure what relates to what it is - - -

40 MR WYATT: The distance from viewpoint 1 to the closest wind turbine which is on the photomontage.

45 MS MILDON: That is not the issue that I have. It is not the distance from viewpoint 1 to the nearest turbine that I have an issue with. It is when I look at your distance bands and the text that you write about those distance bands and then apply it to the place in which I live, and ask me

to understand it, I feel it needs to be accurate because Palmerston North city as in the urban area is quite a big place.

MR WYATT: Yes.

5

MS MILDON: And to shift the distance bands some - - -

MR WYATT: All I can say is the distance band on that includes a lot more of Palmerston North than, say, the figure behind me.

10

MS MILDON: Okay, well, I guess it is stuck on a single point. It remains uncertain then.

MR WYATT: I think from the viewpoints that we have taken, they are very accurate distances.

15

MS MILDON: No, I am not talking about the viewpoints. I am talking about the physical place in which I live – the entire place, not just specific viewpoints, but the whole place in which I live and move around. That is what is of greatest concern to me. Not just specific viewpoints.

20

MR WYATT: I understand.

MS MILDON: I hate to revisit this business of landscape assessment, but in order for you to undertake an assessment of effects, is it correct that you are making an assessment of effects on the existing landscape as it is now?

25

MR WYATT: That is correct.

30

MS MILDON: And in order for you to assess the effects and the magnitude of effect, you need to understand the values of that existing landscape. Is that correct?

35

MR WYATT: That is part of it, yes.

MS MILDON: And you have clarified for us that the perception studies that you refer to are not an assessment of values, of the existing landscape. They confirmed for you that you felt you had got it about right.

40

**[2.45 pm]**

MR WYATT: I think they go further than that. They give a reality check if you like. Landscape visual assessment attempts to understand the landscape, the magnitude of change and the effects, and says through that process we can say that the community or the values that the

45

community holds have a large effect or a moderate effect or a small effect. This then asks the community what they think of wind turbines in this landscape and so therefore it cuts right through a visual assessment to an end conclusion.

5

MS MILDON: But these perception studies were about wind farms, turbines.

MR WYATT: That is what I mean it cuts to the end.

10 MS MILDON: Have you done any perception study on the values people hold regarding the existing landscape?

MR WYATT: No, I have done it – well, I did not do the perception studies, but they point to the acceptance of wind turbines within that landscape. They were not orientated towards transmission lines in the landscape or a road in the landscape or a development in the landscape. They particularly addressed the issue of wind turbines in the landscape.

15

MS MILDON: So when you acknowledge in 2.3 of your rebuttal evidence that you acknowledge that professional landscape assessment must take into account community values, and given that you say your perception studies were not on wind farms, were not a landscape assessment to identify existing values, can you tell me how you arrived with community consultation at an understanding of the existing values to the community of the existing landscape?

20

MR WYATT: I did not do it through a community consultation process. I did it through an examination of the site when I came here and that is fairly common in most landscape assessments, that I have undertaken and I have seen undertaken, then those are put into an assessment modelling and it is based upon that.

30

MS MILDON: I understand what you are saying. You are saying you came into the area for a certain period of time and made your professional assessment of the values of the existing landscape without any consultation as to what people thought.

35

MR WYATT: There has been a lot of consultation studies done around the world on what people think of their landscapes and a lot of that informs that judgment, but yes you are right, I did not do it for this one. I did not do a community consultation study on landscape values for the landscape types around the Turitea wind farm.

40

MS MILDON: Well, in the absence of a formal landscape assessment for Palmerston North as a district, or for the Manawatu district, were you aware of the number of written records et cetera that would be

45

5 submissions to hearings processes such as the change of purpose of the reserve, through the Motorimu hearings process and the Environment Court process and for Te Rere Hau and for T3 and for Kahuterawa outdoor recreation area, for one plan, the submissions process, and the community consultation for that. All of those things are on record and you could have referred to those to get some sense of what the community valued about this place where we live. But you did not do that.

10 MR WYATT: I read extensively on past decisions on Motorimu for example and other studies, but I have not read every one of those that you have referred to, no.

[2.50 pm]

15 MS MILDON: Okay. So basically what you are saying is it is your assessment of effects with some consultation with people about wind farms that – but based on your personal opinion, that's arrived at your assessment of effects?

20 MR WYATT: No, I do not think it is based up upon my personal opinion. I think a lot of what I say is supported by both past decisions, Motorimu for example, decisions to put other wind farms on the ranges, have supported the view that the ranges can accommodate wind farms. That therefore supports a view that it is not an ONL and there are some logical conclusions that one can draw from existing cases. There are also some conclusions one can draw from past experience which I believe is fairly extensive and which I believe is appropriate to draw on in this particular case. So it is not a personal opinion. I do try to test my views whenever possible.

25 MR WYATT: No, I do not think it is based up upon my personal opinion. I think a lot of what I say is supported by both past decisions, Motorimu for example, decisions to put other wind farms on the ranges, have supported the view that the ranges can accommodate wind farms. That therefore supports a view that it is not an ONL and there are some logical conclusions that one can draw from existing cases. There are also some conclusions one can draw from past experience which I believe is fairly extensive and which I believe is appropriate to draw on in this particular case. So it is not a personal opinion. I do try to test my views whenever possible.

30 MS MILDON: I will just pick up on one thing that you said there about the landscape. Because there are wind farms, that indicates to you that previously it has been considered that the landscape could support wind farms. Take that through a sequence of application proposals.

35 MS MILDON: I will just pick up on one thing that you said there about the landscape. Because there are wind farms, that indicates to you that previously it has been considered that the landscape could support wind farms. Take that through a sequence of application proposals.

40 Is there any point at which a landscape in which people live, the landscape that they see on a daily basis so that general view of the Tararua range, whether it is from a distance of one or three or ten or twenty kilometres that view, is there any point at which because an original consent was granted on the grounds partially at least, that the landscape, the landform of the Tararua range could support it, is there any point at which it cannot support any more?

45 MR WYATT: Yes.

MS MILDON: Is that the point at which that view is completely filled?

MR WYATT: Well, I do not know what you mean by “completely filled” but there are very many cases where wind farms have been refused because of effects on the equivalent of an ONL, outstanding natural landscape, to the north and to the south. I think it is probably common to all landscape experts that they definitely formed an ONL. I do not believe that it would be possible to erect a wind farm on either of those areas.

So to answer your question I do not think that a response that the Tararuas have a wind farm on it therefore you can extend them indefinitely north and south. It is not an argument that I would like to use but if there is a wind farm here and wind farm there that have been approved, and there is a space in between, it seems to me that the landscape can, based upon those decisions, that intervening landscape can accommodate. It is not immediately ruled out of having a wind farm on it because of its ONL or landscape characteristics. I think that is a reasonable logical conclusion but it would not extend it further north or to the south without doing a lot more detailed study. And I think the evidence supports it and so too do I think the community perception studies support it.

MS MILDON: So if I am looking at the landscape, say I am 20 kilometres away from the Tararua Range looking towards it, say that I am on the area that is called Mount Stewart, which is just outside your 18 kilometre line. My view of that, when I look at it, is that it is a natural landscape. From that distance I cannot see houses et cetera but I see the landform, I see the skyline and I see the existing turbines very clearly from that distance.

MR WYATT: There is a map behind you. I think Mount Stewart, as I have been able to locate it, is north, probably nor'-nor'west of Palmerston North, north-west of Palmerston North.

MS MILDON: If you look at figure 10 and you see Feilding, the township of Feilding.

**[2.55 pm]**

MR WYATT: I am sorry, what page is that? Yes.

MS MILDON: Which is right on the 18 kilometre line and you sort of move left really almost following that 18 kilometre line. That is just north of that, that is roughly what we call Mount Stewart.

45

MR WYATT: Okay, I understood on the map it was located at – there is a map on the screen behind you, is that the correct location?

5 MS MILDON: And if Rongotea, another small township, was actually on the map but it is not marked, it is roughly the area between Rongotea and Feilding, and I am not quite sure why Rongotea is not there given that Linton is and Bunnythorpe and - - -

10 HER HONOUR: Mrs Mildon, do you think you could confine your questions please just to questions, not statements and questions.

MS MILDON: All right, I am sorry, yes.

15 HER HONOUR: That is all right.

MS MILDON: Do you accept that from that area the 18 kilometre line roughly, which is roughly Mount Stewart, that there is a clear view of the Tararua Range and the area of current wind farms, from Te Apiti moving south to the Turitea site and then to the Motorimu site and then out of the Palmerston North district south, and that is my view, and I am asking you if there is any point at which the march of ad hoc wind farms across that skyline, that piece of the landform which is the view would not be able to support more or absorb more turbines on the skyline in your view?

20

25

MR WYATT: I have not done a study but I would believe that north and south of the existing wind farms, northwards would be difficult, if not impossible, because of the status of that landscape and south, beyond Motorimu, would also be very difficult because the landscape there, I think, becomes an ONL. I have not - - -

30

MS MILDON: I am not talking about an ONL, I am talking about the view, the view of - - -

35

MR WYATT: What I am saying of the view lines outside north and south, the black lines, would, I believe, but I have not assessed but I believe that would be very difficult if not impossible.

40 MS MILDON: Okay. Do you accept that that sort of view as you come closer across the Manawatu plains, more or less to the north-west of Palmerston North urban area, also has those extraordinarily clear views, panoramic views, of that area?

45 MR WYATT: Yes, there are panoramic views as you come closer in.

MS MILDON: Okay. I am going to get back to the questions on my list or I will get - - -

5 You said, I think in your evidence, the verbal evidence today, that you have driven for miles and you have been all over the place. Can you tell me how many hours perhaps you were on the road?

MR WYATT: I think it would be in days, it is not in hours.

10 MS MILDON: Days, and - - -

MR WYATT: It has been both in days and days, I have probably spent more time around this particular wind farm than I think I have done for any wind farm that I have ever worked on.

15 MS MILDON: Okay, and that was at every time of the day from sunrise to sunset?

20 MR WYATT: I do not know about sunrise, I am not saying I started that early. I will be quite honest and say I am fairly lazy because I am taking photographs, about 9 o'clock was my starting time, sometimes earlier, and I finished around sunset, which at the moment is around 6 o'clock, but I have driven around in those timeframes quite a number of times.

25 MS MILDON: And in every season of the year?

MR WYATT: What every? I do not know about every season - - -

30 MS MILDON: Well, let us say autumn - - -

MR WYATT: - - - I would have to check my diary but I have seen it in leaf and without leaf at least up to that extent.

35 HER HONOUR: Mrs Mildon, please just ask the question you want to ask. Do not, please, go on an excursion around what may or may not have been.

[3.00 pm]

40 MS MILDON: They were on my list of questions.

HER HONOUR: Yes, but you were asked to reduce them to six and I think we have had six questions.

45 MS MILDON: Sorry? I have had no request to reduce to six.

HER HONOUR: Well, I wonder if you could - - -

5 MS MILDON: I have had no feedback regarding the questions that I submitted.

HER HONOUR: Well, I have got a list of them here and I asked that they be reduced to six because there were many that overlapped and we need to move along with this hearing.

10 MS MILDON: Well, I - - -

HER HONOUR: So I think if you could just ask the questions that are most important to you arising from this gentlemen's evidence.

15 MS MILDON: I have to say, your Honour, and I do not want to be disrespectful.

HER HONOUR: Yes, of course.

20 MS MILDON: But they are all important questions to me, they all come from the standpoint that has perhaps not necessarily been represented from counsel for other parties. I am asking as a citizen of this area. I submitted my list of questions and I know there were a lot. I had no feedback as to what I could or could not ask on that list and - - -

HER HONOUR: Well, Mrs Mildon, one of the questions you asked was, "Have these comprehensive visual consequences been prepared in any format that we can see?".

30 MS MILDON: No, that was not a - - -

HER HONOUR: Now, we have had production of these AO's today and yesterday which very clearly depict the visual consequences.

35 MS MILDON: Was that a question on my list?

HER HONOUR: Yes, it was.

40 MS MILDON: Could you read that out again?

HER HONOUR: "Have these comprehensive visual consequences been prepared in any format that we can see?". And it is number four down. I am not going to argue with you, Ms Mildon. But we need to move through.

45

MS MILDON: But those are not my questions, ma'am. Sorry.

HER HONOUR: Well, it is has got up here, Alison Mildon.

5 MS MILDON: I am not sure these are the same questions. All right. I will just quickly look through my notes and pick out some key questions.

HER HONOUR: Thank you, thank you very much.

10 MS MILDON: Can I ask any sequence of questions that comes to a point? Regarding the urban landscape, if you have distance view of what people perceive as a natural landscape, so a framed view of the Tararua Range, from an urban viewpoint. Does the existence of the long view shaft, the end of the view shaft to you have any significance in the  
15 sense that you have said because there are view shafts to the Tararua Ranges from urban areas, only some turbines from the total are visible. Are those views to you, in an urban context, important. So, a view shaft view, is that important do you think in terms of people's appreciation of the view?

20

MR WYATT: Yes, it is, and I stated that in my viewpoint 2 I think it was. Where I said in my summation, given the way the axial view is focused on wind turbines it would increase this rating. So, yes, I have taken that into consideration.

25

**[3.05 pm]**

MS MILDON: And do you accept that the extent of this wind farm is such that all the streets and that all views that have contained in them a  
30 section of skyline or a broader area of the range itself, will potentially have turbines in it?

MR WYATT: If you are talking about the ones that are orientated towards the ranges, and they are viewing towards a location where Turitea is  
35 proposed, yes.

MS MILDON: Do you think that is quite significant for urban views?

MR WYATT: It, as I said, reinforces the wind energy plan, rural landscape  
40 that is part of the area surrounding Palmerston North. I do not think it is of very - it is a change, but I believe it is an incremental one.

MS MILDON: And do you accept that from the flat plain and it is a pretty flat  
45 plain, views of the Tararua Range when you are not in an urban area, are very important to those people living on the flat plain?

MR WYATT: I think if you have views to the Tararuas, yes. It is a lovely backdrop to the city.

5 MS MILDON: It has been raised but your distance band with a limit of 18 kilometres and the comment about visual imperceptibility of turbines, and given that you have driven all over this place so many times, do you stand by your observation that in anything but almost, it sounds like, the rarest moments, turbines are not visible on the skyline? So- - -

10 MR WYATT: I believe you should build up a picture of turbines on the skyline as you move around the area, that is what I have said. And there are a combination of views that you get from in town and outside of town that includes the existing wind turbines and the inclines of the Tararuas.

15 MS MILDON: Did you see at 18 kilometres that individual turbines from one of the existing wind farms could be clear, clear enough to see the individual rotors and clear enough to see the rotors turning?

20 MR WYATT: In good lighting conditions, yes. You will see that. I didn't say 18 kilometres was the limit of visibility.

25 MS MILDON: No, but that was the outer limit of the imperceptible range.

MR WYATT: I said beyond that it was, they were very, very tiny elements in the landscape. And I would stand by that.

30 MS MILDON: Beyond 18 kilometres they were imperceptible?

MR WYATT: Not imperceptible, you can see them in some lighting conditions, from quite a considerable distance.

35 MS MILDON: Can I ask a question on mitigation, your Honour, and then a question on design?

HER HONOUR: Yes, by all means.

40 MS MILDON: Is it correct that something like a tree or a building, some obstacle we will put it that way, an obstacle does not screen the object of the distance turbine. The obstacle screens the viewer from that object?

45 **[3.10 pm]**

MR WYATT: I am sorry, if you have an object between the viewer and the  
say the turbine, it can screen, filter or not.

5 MS MILDON: But in the sense that the viewer only needs to move a fraction  
perhaps to left or right or a slight amount of elevation and whatever that  
object screened from view, that can change?

10 MR WYATT: Well, it depends what object, if you are talking about for  
example, a hedgerow that stretches maybe, two, three, four, five  
hundred metres, then no, that isn't the case. If you are referring to one  
tree, yes, that is the case. So, it varies depending upon what you are  
talking about.

15 MS MILDON: And people are on the move all the time.

MR WYATT: In residential properties they tend to stay within, they don't  
climb the fence into their neighbours, so they are in a, if you like, a  
restricted area. But yes, they are on the move along roads and streets in  
20 the area all the time.

MS MILDON: And on their properties.

25 MR WYATT: If it is a rural property, yes.

MS MILDON: Et cetera. Were you invited by Mighty River Power at the  
beginning of this project when they were putting their total proposal  
together to contribute to designing an aesthetically appealing  
development?

30 MR WYATT: At the beginning I was not engaged when the initial layout was  
done.

35 MS MILDON: And in visual terms, is good design aesthetically pleasing?

MR WYATT: I think in visual terms and I think the diagram behind me on  
the wall very much supports it and the new turbines going in T3  
underline that the higher and more widely spaced wind turbines are  
actually a better response.

40 MS MILDON: I am not talking about specific developments, I am asking you  
a question about design. Is good design aesthetically pleasing?

45 MR WYATT: It has components that are aesthetically pleasing. Yes.

MS MILDON: And does good design strive to respect existing aesthetic values?

5 MR WYATT: Yes.

MS MILDON: Given the period of time that you have spent travelling this area, and in the knowledge that -, are you aware that in the consents process here, wind farms are consented on an ad hoc case by case basis?

10

MR WYATT: I would never say that.

MS MILDON: So you are not aware that the wind -, are you aware then, do you consider that the wind farms that have been, are built in this area, have been built in terms of an overall design?

15

MR WYATT: No, they obviously haven't been built in an overall master plan sense, no.

MS MILDON: And in your opinion, do you think good design in an overall sense, not individual wind farms, but in an overall sense, do you think good design, you could describe the collective wind farm of the Manawatu as good design?

20

MR WYATT: I would like to change the existing turbines, the lattice tower ones, the two bladed ones, so I would have reservations about blanketing the entire selection, but this has been developing over, what, '98 I think it was, the original turbine construction near Ashhurst, and it is 11 years ago. Technology and the way we do things have changed dramatically in that time.

25

30

MS MILDON: In a sense that was just a yes no question. I mean it was, do you think- - -

35

MR WYATT: No, I wouldn't -

MS MILDON: - - -good design.

MR WYATT: - - -classify the entire range as good design.

40

MS MILDON: And do you think Turitea will add or improve on the design overall design of wind farms in this area?

MR WYATT: I believe Turitea is a much better example than the existing ones. And a better example than the one that was consented Motorimu.

45

5 MS MILDON: I think you have misunderstood the question. I am not talking about individual wind farms. I am talking about the collective visual wind farm development, and you said that, I think you said that, in the overall sense it doesn't exhibit characteristics of good design?

10 MR WYATT: No, I said individual elements within some of the existing wind farms, and even within Motorimu, I don't believe exhibit best design in today's practice. But I have made no assessment of the overall design of the final.

15 MS MILDON: Well, you are a landscape architect and I guess that you are taught looking at good design all the time I would imagine. And that you would have some sense of whether or not the Te Apiti Te Rere Hau collective wind farm development displayed overall what in an overall sense, what you would call good design? In that it is aesthetically pleasing and respects the values of the landscape?

20 HER HONOUR: Mrs Mildon, he has answered your question twice, if not three times, by saying there are some elements within it that are not good. He thinks this design is a good and competent one.

MS MILDON: I wasn't talking about bits, ma'am.

25 HER HONOUR: I know that, I know that you were talking about the overall development.

MS MILDON: Thank you. Thank you, Mr Wyatt.

30 HER HONOUR: Thank you. We will take the afternoon adjournment.

**ADJOURNED** [3.17 pm]

35 **RESUMED** [3.32 pm]

HER HONOUR: Yes, Mrs Bailey?

**<QUESTIONING BY MS BAILEY** [3.32 pm]

40 MS BAILEY: Thank you for the opportunity to question. Can I refer you to resident viewpoint 11 please. And could Mr Omar show the board.

HER HONOUR: The AOs, yes.

45 MS BAILEY: The AO 11. Resident viewpoint 11. Could you put figure 70 up?

MR OMAR: I have got the photomontage behind us on the screen now. That is the one you want? It is the photomontage from RVP11.

5 MS BAILEY: Yes, but could you put figure, oh sorry. Figure 69.

MR OMAR: Is that the one, the wire frame?

MS BAILEY: I want the wire frame anyway, but -.

10

MR OMAR: Oh, your house, no I haven't got your house.

MS BAILEY: Yes, my house.

15 MR OMAR: The Court can refer to the picture on page 91.

**[3.35 pm]**

MS BAILEY: The picture on page 91, which is figure 69.

20

MR OMAR: Sorry, I haven't got those linked into the computer.

MS BAILEY: Okay. Thank you. Can you look at figure 70. How far do you think the pine trees are from the house?

25

MR WYATT: Um, probably five or 10 metres I would have thought.

MS BAILEY: They are actually about 20 metres. And they are about two to three metres below the floor level of the house as well.

30

MR WYATT: Yes.

MS BAILEY: You state that I intend to remove the pines in figure 70, it is actually not 69 as you have stated, as there are no pine trees in that picture.

35

MR WYATT: I am sorry, yes, it is 70.

MS BAILEY: That is okay.

40

MR WYATT: I thought you had said that at the time, that you had wanted to remove - - -

MS BAILEY: You are right about that, and replace them with natives, you are correct in that.

45

MR WYATT: Yes.

MS BAILEY: But you also say that it will be an extension to the house. So how can trees 25 metres away and about two metres below- - -

5

MR WYATT: I am sorry, I meant as part of the house that you are doing is part of, so that you can create a -, you said that you were going to put a patio area out there.

10 MS BAILEY: There is a patio area but no trees.

MR WYATT: I am sorry, I thought you said at the time that we had the site visit that you were taking down the pines and planting other vegetation around there.

15

MS BAILEY: Yes, we are taking down the pines, which are about 20 metres away, and two metres below, and replacing with natives. The intention is that they won't grow up as they will be slow growing natives, to replace the view. I just thought I would like to make that clear. Because I looked at Mr Wyatt's report and in particular in my place and found some what I think to be inaccuracies in it. And so I wanted to be able to address Mr Wyatt and clear that up.

20

25 Next, do you think a house built for the easterly view would wish to have that view lost?

MR WYATT: If the view – back towards the ranges – you mean from - - -

30 MS BAILEY: No, do you think the view of a house built for an easterly view would wish to have that view lost?

MR WYATT: No.

35 MS BAILEY: Thank you. Do you think that trees planted for mitigation, i.e. to hide the turbines, that also obscure the view and the morning sun into a house built for that said sun and view, is an acceptable solution?

40 MR WYATT: If you mean are there no landscape solutions, there may well be but it depends a lot on your individual preference. If you wish no trees on that boundary, then obviously that is not an acceptable outcome for you.

45 MS BAILEY: Okay. Did you try to elicit from me or any other residents for that matter - - -

MR WYATT: No.

MS BAILEY: - - - our views?

MR WYATT: No, I haven't.

5 MS BAILEY: And I was there at the time was I not?

MR WYATT: You were but we didn't have a design or I didn't even have the turbine layout. We took the photographs to get the turbines in. Normally we would come back with that or at completion say now what  
10 you can do.

MS BAILEY: But you knew which direction the turbines were in?

MR WYATT: We knew what direction they were in, yes.

15 MS BAILEY: So you had some idea.

MR WYATT: But I think the mitigation design would be post that sort of assessment. Well that is how I have always done it in the past.

20 MS BAILEY: Okay. That is actually just a little side step there. Do you not consider resident's views early on in a project?

MR WYATT: There are siting that takes into account resident views, yes, but not to the level of detail that requires a – that would be required in a landscape proposal for that particular resident.

MS BAILEY: Okay. Right, okay, I will just get through my questions. Bearing in mind that I object to the addition of turbines to my view, should not the rating of the overall visual effect in table 17, that one, RPV11, be high and have an adverse effect, not just more than minor?  
30

MR WYATT: More than minor is higher than can be mitigated. If that was a view, for example, to a, as I said, a chicken shed on the boundary or something that you wanted and you were wanting to get rid of it, you could use landscape to mitigate it. In this case it is possible to mitigate it if that view is totally unacceptable to you.  
35

MS BAILEY: But more than minor is like – where's a word, whereas – it's a word to get you out of a tight spot.  
40

**[3.40 pm]**

MR WYATT: I probably agree with you on that in that regard. It was, I understood, a classification that had been accepted consistently by the Courts here.  
45

MS BAILEY: No, but do you not have a more affirmative term?

MR WYATT: There's probably more affirmative terms, but - - -

5

MS BAILEY: Anyway, okay. Right, should you insist that the mitigation still be a valid option, then would it not take some time period, in fact of some years, for that mitigation to be effective mitigation and how long would you expect?

10

MR WYATT: It depends too on whether or not you do it before or after removal of the pines because often people plant vegetation in the foreground and use the pines as protection of that establishing native vegetation. It is a strategy that I've seen quite commonly done in some of the properties around this area.

15

So if you had that 20 metres between the pines and your house, then if landscaping was done in that, you might get a faster response rate than what you would if you took the pines down and planted - - -

20

MS BAILEY: How many years would you expect?

MR WYATT: It depends on the choice of species. I said one to two metres a year, being one at the lowest, and if you said - - -

25

MS BAILEY: That is probably it.

MR WYATT: - - - you were two metres down you would probably need at least five metres, so you are looking at five, six years before you have something up of a reasonable size, working at one a year.

30

MS BAILEY: I suggest your knowledge of native trees, New Zealand native trees is not that – they do not grow that fast, Mr Wyatt.

35

MR WYATT: Well some of the pittosporums I believe do grow that fast.

MS BAILEY: Pittosporums, yes.

MR WYATT: And they are New Zealand native trees I believe. So there are some species that grow, some of the – I said pepperwood, which I quite like, is a very slow growing species as I understand it. So too are other of the New Zealand species, but there are a range available both from New Zealand and non-native.

40

MS BAILEY: There are, but the species we are planning on planting are not fast growing.

45

MR WYATT: Oh, that may well be the case.

5 MS BAILEY: So I would expect about 20 years and we might just start to have some mitigation, should we choose that mitigation.

MR WYATT: I can't comment on that.

10 MS BAILEY: Okay. All right. Does it come into your brief in considering mitigation how close you plant the trees to the house?

15 MR WYATT: I have said all along I have not done a proper landscape plan for your house or any other house. Normally – with some people we have planted trees inside of rooks(PH 3.42.37) for example, immediately outside a house and had them coming up. We have had decks go out around existing trees in similar situations. We've also been cognisant of fire in Australia, we've moved them some distance away.

20 So I think a lot of those responses come back to the particular requirements of the resident in question and I would not give a blanket – no, I would never plant a tree within so many metres of a house or yes, I would plant trees within so many... I think it has to be an individual preference, it has to be driven by your requirements, not by mine.

25 MS BAILEY: Are you aware that the houses up there collect water from their roofs for their water supply?

30 MR WYATT: Yes.

MS BAILEY: And therefore to plant trees close would be quite impractical?

35 MR WYATT: There are leaf guards, et cetera.

MS BAILEY: Leaf spoil.

40 MR WYATT: It depends how far the tree, how much it overhangs. If you are meaning a metre out and you are getting a larger tree with wind blown leaves like your eucalyptus coming into the gutters, but you can put tree guards on the gutters. There are – what I am saying is that there are a range of options, it doesn't preclude trees at that distance.

45 MS BAILEY: Okay. You appear to make many assumptions about how residents, including me, could or should mitigate adverse visual effects. Do you accept your mitigation suggestions are often undesirable and

impractical in the views and visual aspects that are the very - when the views and visual aspects are the very reasons we live there in the first place?

5 MR WYATT: I believe that for some people that is definitely the case.

MS BAILEY: Thank you. Apart from tree planting, are there any other solutions to prevent the negative impact of turbines on the properties of residents like myself?

10

MR WYATT: There are but I don't know whether they are more acceptable. You can - - -

MS BAILEY: Well can you tell me?

15

MR WYATT: - - - use screens and shutters, et cetera, you can divide it by fencing and screen walls. There are other methods that we sometimes use. I don't know whether they would be appropriate in your situation. I would believe that - - -

20

MS BAILEY: But we do not want to lose the view, that is my point.

MR WYATT: Oh no.

25

MS BAILEY: And the rising sun. The sun rises in that direction.

MR WYATT: Yes.

MS BAILEY: Do you think I should put up trees or walls?

30

MR WYATT: No, I am not saying - you asked if there are other measures.

MS BAILEY: You are suggesting.

35

MR WYATT: I said yes, there are, but I think they would be less acceptable.

MS BAILEY: So what would you see as an acceptable solution for a person in my place?

40

**[3.45 pm]**

MR WYATT: I would suggest planting of open - - -

MS BAILEY: I have just said planting is not acceptable.

45

MR WYATT: Then I don't know, I can't suggest a mitigation option for you.

MS BAILEY: You are a landscape architect, do you not have solutions for people?

5 MR WYATT: But if you have said that you don't want planting, it is difficult for a landscape architect. That is the medium in which we work. I am not suggesting – I mean I work in topography and design and walling, but none of those answers I think in your case are the least bit appropriate.

10

MS BAILEY: What would you say is the answer in my place?

MR WYATT: I would believe landscape tree planting is a possibility.

15 MS BAILEY: And if I say no, it is not?

MR WYATT: Well then I can't assist as a landscape architect in the mitigating round here.

20 MS BAILEY: Right, thank you. I think that is all the questions I have, in fact it is.

HER HONOUR: Thank you, thank you very much. Mrs Percy?

25 **<QUESTIONING BY MRS PERCY [3.46 pm]**

MRS PERCY: Thank you. Sorry, I am a bit nervous. Good afternoon. I am from 'mokamok' if you recall, Mako Mako.

30 MR WYATT: I am sorry, I thought I'd got that one right.

MRS PERCY: Okay, I am from the other side of the ranges, from the Tararua, and I would like to ask you some questions regarding pages 109, 110 and 111 of the main evidence.

35

MR WYATT: Yes.

MRS PERCY: And the RVP17. And if I could also direct your attention to figure 93.

40

MR WYATT: Yes.

MRS PERCY: On page 109.

45 MR WYATT: Yes.

MRS PERCY: Do you recognise figure 93, Mr Wyatt?

MR WYATT: I did take that photograph.

5 MRS PERCY: You did take that photo. What is that photograph of, Mr Wyatt?

MR WYATT: The rear of the existing house.

10 MRS PERCY: Okay. Do you recall being inside my house enjoying a piece of banana cake with chocolate icing and coffee?

MR WYATT: I think the answer to that is yes.

15 MRS PERCY: Excellent. Do you recall the layout of that part of my house, Mr Wyatt?

MR WYATT: No, I can't recall the layout.

20 MRS PERCY: Okay. Just to refresh your memory, Mr Wyatt, that is actually in fact a large open plan living area consisting of dining room, kitchen and living room.

MR WYATT: Mm'hm.

25

MRS PERCY: In point 11.1.5.8 - - -

MR WYATT: 1.5.8?

30 MRS PERCY: Yes. On page 110, you state "the living areas will not have views to the proposed wind farm and therefore the proposed wind turbines will have no adverse effect on the views from these living areas".

35 MR WYATT: That is what I remembered. If that is not the case, I apologise.

MRS PERCY: Okay. Can I just direct your attention please back to figure 93?

40 MR WYATT: Yes.

MRS PERCY: The rear view of my house.

MR WYATT: Mm'hm.

45

MRS PERCY: Can you see two large windows there?

MR WYATT: On the left hand side, the veranda being to the front and then these on the side?

5 MRS PERCY: No, the two windows that face directly north-west.

MR WYATT: Sorry, are they on the left hand side of that photograph?

MRS PERCY: Yes, they are.

10 MR WYATT: Yes, and the veranda is around the corner?

MRS PERCY: Yes.

15 MR WYATT: Yes.

MRS PERCY: Okay. Can I also direct your attention please to figure 94, the photo montage?

MR WYATT: Yes.

20 MRS PERCY: Which also faces directly north-west.

MR WYATT: That is correct, more towards the west.

25 MRS PERCY: Sorry?

MR WYATT: More towards the west, but north-west, yes.

30 MRS PERCY: Okay. Could you please explain to me table 23, the summary assessment of RVP17 on page 111, that says "living courtyard area view towards wind turbines - no".

35 MR WYATT: I thought there was no view from inside your house. I thought it orientated out through that front veranda which you can see on the side of the property. If I have that incorrect I apologise most humbly.

MRS PERCY: Okay. I would like to clarify that that is incorrect, and I do clean my windows often. Thank you.

40 MR WYATT: And I would not doubt that.

**[3.50 pm]**

45 MRS PERCY: Thank you. Regarding point 11.1.5.6, you state "figure 94 shows the view west of the rear garden towards the proposed wind farm in a gap within existing vegetation".

MR WYATT: Yes. I think we went down to the back corner where there was a panoramic view.

5 MRS PERCY: Yes. I am 152 centimetres tall, my hedge is 156 centimetres tall because that is the height at which I can operate a hedge trimmer. I take it Mr Wyatt you are taller than 152 centimetres - - -

10 MR WYATT: Is that because we are looking over trimmed line?

MRS PERCY: Over that trimmed hedge. I actually would question you on the gap in the vegetation, because the only actual gap in my vegetation along there is actually a gate.

15 MR WYATT: I think we went down to that gate. That is where the photographs were taken. I was balancing the camera on the gate post, I think I remember, or the GPS.

20 MRS PERCY: I am sorry, I recall that slightly differently, that you took it to the left of the gate.

MR WYATT: Oh.

25 MRS PERCY: Okay?

MR WYATT: Okay.

30 MRS PERCY: Regarding 11.1.6.0, “additional planting as mitigation, if possible, is required. Additional planting along the garden perimeter will assist in filtering views of the proposed wind turbines”. Now, the hedge I mentioned, apart from the fact of my lack of height, that I do keep it at 1.56 metres, is also to actually allow for views and sun, because as you will appreciate that is our winter sun and that assists in keeping the house warm.

35 How desirable do you think planting trees along that hedgeline would be?

40 MR WYATT: I would have to look at it in detail, but I believe that, for example, deciduous trees may be suitable, allowing extra winter solar access and break up the massing of the wind turbines across that view. It may not be necessary to do a screen hedge, but if you broke up the wind turbines what remained may be more acceptable or less of a visual impact.

45

- MRS PERCY: Okay. Thank you. Regarding 11.1.6.1, how close from memory of course, do you remember that hedge being to the back of my house?
- 5
- MR WYATT: I am sorry, that is not a measurement that I took or can remember.
- MRS PERCY: Well, it is your lucky day, Mr Wyatt, because I did. It is exactly 11.6 meters.
- 10
- MR WYATT: Mm'hm.
- MRS PERCY: When we were outside discussing the possibility of mitigation I drew to your attention and Mr Omar's attention who was there at that time, the eighty year old macrocarpa trees in the neighbouring paddock.
- 15
- MR WYATT: Yes.
- MRS PERCY: And I believe you can see the edge of one up there.
- 20
- MR WYATT: One on the left hand side.
- MRS PERCY: And the adverse effect of the shadow cast by those trees when you were there in very late January. The planting of trees that close to a house that relies on collection of rainwater as its one and only water source, I personally believe you did not take into consideration.
- 25
- You have also just mentioned the planting of deciduous trees. If you recall, I am directly downwind of the strongest wind in the country. How logical and sensible do you actually think it would be to plant said deciduous trees 11.6 metres from a house that relies on the collection of rainwater and clear drains?
- 30
- MR WYATT: I have done that, and I have planted within distances that are closer to properties than 11.6 which I think is a reasonably generous set back, and there are many, many examples of houses that do collect rainwater that have trees, both deciduous and evergreen, within distances that are closer. That is something that has to be designed in. It could also be a choice of the species being more upright and columnar than spreading and wide, and there are some options that do exist in both deciduous and evergreen trees that could filter the views to the wind turbines, and I don't believe impact, given that distance away, on the collection of rainwater. I would be comfortable with that.
- 35
- 40
- 45

**[3.55 pm]**

MRS PERCY: With all due respect, Mr Wyatt, was that in New Zealand or in Australia?

5 MR WYATT: No, but it has been in very windy areas of Australia.

MRS PERCY: With the - - -

10 MR WYATT: It hasn't been in New Zealand, no.

MRS PERCY: With the wind that I experience at Mockamoc (**ph 3.55.25**)?

15 MR WYATT: I am sorry, I don't believe so. As you said, you are one of the strongest wind resources in the world, and I think a lot stronger than what I have seen in Australia. But we have designed and seen built other gardens within this area that seem to suggest that such is possible.

20 MRS PERCY: Okay. With regard to the damp, dark, cold resulting effect that any such planting even as is experienced in January, how fair and reasonable do you think that is, the fact that we have listened to our government and we are taking the most advantage of natural sun and natural heating to keep our houses warm, how reasonable do you think it would be to allow that then said property to become dark and damp and then to have to rely on electricity?

25 MR WYATT: I don't believe that you would design it so that you did make it dark and damp. As I said, if you used open canopy trees or deciduous trees that allowed some filtering of the view, lessened its impact, but still allowed you to view through to the hills, I wouldn't s a designer suggest that you put a cypress hedgerow across there and make it dark and dank. I would like to see it open and possibly with seasonal change, protect the gutters, put planting out there.

30  
35 There are some options that I would like to talk to you about in terms of copping (**ph 3.56.56**) and clumping plants together that may well provide a variation in that view and to some extent mitigate the impact of the wind turbines at that distance. But I don't think I would like to end up with a design that resulted in a dark and dank back yard. I wouldn't find that acceptable irrespective of the country I was in.

40 MRS PERCY: Thank you. Thank you for that. Thank you, you are welcome to have some more banana cake and a couple of teaspoons of rat poison this time. Thank you.

45 MR WYATT: Thank you very much. That is the best offer I have had.

HER HONOUR: Yes. Any re-examination?

<RE-EXAMINATION BY MR DAVIDSON

[3.57 pm]

5 MR DAVIDSON: Mr Wyatt, just one or two matters in re-examination.  
Could you look at RVP14 which I think is at page 100 of your  
evidence. I think this is the property of Mr and Mrs Coote. Is that  
right?

10 MR WYATT: I don't know the name - - -

MR DAVIDSON: You were asked some questions about this, do you recall?  
(INDISTINCT 3.58.14) figure 82 at page 101 of your evidence?

15 MR WYATT: Yes.

MR DAVIDSON: You were asked about whether there was a pylon being  
placed there, and you had difficulty recalling exactly the placement of  
the pylons?

20

MR WYATT: I don't think the pylon locations were given to me when I did  
the photo montages.

25 MR DAVIDSON: Right. Well, can you just explain what the pylons are in  
the context of this windfarm? Are we talking about those grid pylons  
we associate with the main transmission lines or what?

30 MR WYATT: I believe they are poles in this instance. The transmission line  
batters (ph 3.58.46) towers are only in the areas where I think they  
were being air lifted in in the centre of the Turitea Reserve.

MR DAVIDSON: Right. Now poles being what? Is this a design that you are  
familiar with?

35 MR WYATT: Yes, I am. And in fact following this case I actually  
incorporated it into a project in Australia. So it has had a flow-on effect  
into the Australian policy decisions. But poles are a clean line, not  
dissimilar I suppose to the wind turbine base, and at a distance they  
appear similar to the poles that we all drive past and see every day.  
40 They don't stand out nearly as much as the batters (ph) towers do.

MR DAVIDSON: Now, just while we are on this – I will try to meld the  
couple of questions I have got around the table 20 which appears at 102  
of your evidence, it is the same property.

45

MR WYATT: Yes.

MR DAVIDSON: Where you have a mitigation sketch there.

MR WYATT: Yes.

5

[4.00 pm]

MR DAVIDSON: Now, Mr Maasson, quite some time ago, asked you about the assessment criteria that she used, and he began by going to the publicly accessible viewpoints and that appears at page 54 of the assessment of the August report. And he took you through pages 54 and 55 with some care, to look at minor adverse effects. He took you to, at page 55, the more than minor adverse effect, and then moving to the high or unacceptable adverse effect.

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15

MR WYATT: This is in the original AEE?

MR DAVIDSON: Yes, sorry. Yes, I went to the wrong one.

20  
MR WYATT: Yes.

MR DAVIDSON: Now, I just want you to explain, because I think it was left a little in the air – when you say high or unacceptable, are you putting those as separate expressions, distinct expressions? How is the Board to read your high or unacceptable adverse effect, before it qualifies for that description by you?

25

MR WYATT: I believe it becomes, as I state, a highly sensitive landscape viewed by many people with the development in close proximity, and I gave an example of a well frequented national park with wind turbines located in close proximity overlooks what appears to be a natural, pristine, unmodified landscape.

30

35  
MR DAVIDSON: Right.

MR WYATT: And that, I believe, has been my, for a publicly accessible viewpoint, a high or unacceptable - - -

MR DAVIDSON: Right. Now, Mr Maassen then quite comprehensively took you to your evidence with regard to the residential viewpoints which appears at page 59 of your primary evidence. And on a number of occasions you answered him, and indeed Mr McClelland, with regard to the visual effects assessment described at page 59, 11.2, and you describe the assumptions made of high sensitivity to change in the landscape and the other matters dealt with at 11.2.

40  
45

Then, and this is the real point of the question, at 11.3 you were provided with locations of the participatory landowners residences and non-participatory, you have set them out at the next page.

5 MR WYATT: I do.

MR DAVIDSON: But did you have any part in selecting the residential viewpoints that you have provided to this Board, you personally?

10 MR WYATT: Yes, originally when we looked at the residential viewpoints they were mainly around the western edge of the ranges and I said that I think we needed to look at areas along the other side of the ranges, and so we went and found and MRP went and searched, and I also had a look at it in terms of the overall visual catchment.

15 MR DAVIDSON: Well, a couple of times in your evidence, in response to questions, you referred to going to what were understood to be the most sensitive areas,

20 MR WYATT: That is correct and we asked the - - -

MR DAVIDSON: Essentially viewpoints.

25 MR WYATT: - - - I think TAG was asked and so too were other people that Mr Omar had contacted.

MR DAVIDSON: What I want the Board to understand is do you consider that you have taken a decision as to what may be the most affected residential areas based on advice from the landowners?

30 MR WYATT: Correct, and my own assessment as well which supported that.

35 MR DAVIDSON: All right. Now, you recall Mr McClelland asked you some questions about the property owned by, I am not sure whether or not it is Mr and Mrs Mikkelsen, but the Mikkelsen property?

MR WYATT: I do not know the name but what viewpoint was that?

40 MR DAVIDSON: Well, you will recall the thrust of the questions. If we look at RVP2, this is 126 Pacific Drive.

MR WYATT: RVP2, 126 Pacific Drive?

45 MR DAVIDSON: Yes.

MR WYATT: Yes.

MR DAVIDSON: So that has been prepared after notification, has it not?

[4.05 pm]

5

MR WYATT: That is correct.

MR DAVIDSON: And Mr McClelland's questions I think were directed to the fact that – I am not sure if this was the landowner who “fell off his perch” or words to that effect – but in any event - - -

10

MR McCLELLAND: Yes, it was.

MR DAVIDSON: It was that affected landowner?

15

MR McCLELLAND: Yes.

MR DAVIDSON: Thank you. Who did not see this as the question was put to you until later because it came after notification. Now, would you look at public viewpoint 6 and I want you to, if you can, identify the extent to which that public viewpoint 6 bears on the property perspective shown in RVP2, Pacific Drive.

20

MR WYATT: VP 6 is approximately, I would have to measure it, but it looks a few hundred metres further towards Palmerston North in basically a north-westerly direction. At that location it is a view from Aokautere Drive and south back towards the ranges.

25

MR DAVIDSON: Well, what I want to know is, given the questions from Mr Maassen, does public viewpoint 6 reflect to a degree the perspective obtained from RVP2, Pacific Drive?

30

MR WYATT: It does in part but I think the photograph from RVP2 – yes, it shows the range of turbines and it is further away, it is not quite as close as what RVP2 looks to examine, it is probably 500 metres away.

35

MR DAVIDSON: Thank you. Now, would you go to RVP7, you were asked some questions about this. And this is a viewpoint where the use of the expression in your evidence “over dominant” came in, do you recall this?

40

MR WYATT: I do.

MR DAVIDSON: Where does that put in your scale of effect, as you assess the visuals, where does that put it? If you describe it as over dominant where do you go to from there?

45

MR WYATT: It is seen from 1.9 kilometres away.

MR DAVIDSON: Yes.

5

MR WYATT: It is a fairly major element in that landscape and I think considering the degree, the distance away, I think the more than minor adverse effect is a reasonable conclusion.

10 MR DAVIDSON: I am trying to get that answer you have just given in the context of the answer elicited by Mr Maassen of being over dominant.

MR WYATT: I do not believe they are over dominant at that distance. They are a very visible element in the landscape and they are very, very evident on that range and if they were slightly closer they would definitely overpower but they are part of that panoramic view. I think that 60 degree photomontage shows that very clearly.

15

If you look at that photograph the power line in the foreground is approximately the same size as the wind turbines in the background. Now, I know they are not the same element, and the power line is down in a valley and these are on the ridge and they are silhouetted, but they are not a dissimilar size and nobody would say that the power line at that distance was a dominant element in that landscape even if there are – so the size of the them is relative to the land (**INDISTINCT 4.09.36**).

20

25

MR DAVIDSON: All right.

MR WYATT: It is not, I do not think, a dominant element. Yes, very evident, very visible.

30

MR DAVIDSON: You are talking about the power pole, are you?

MR WYATT: The power pole on the left hand side of that photomontage.

35

MR DAVIDSON: At about 85 degrees?

MR WYATT: Yes, that is right.

40 MR DAVIDSON: Okay, can we put 07 up there as opposed to 07A please?

**[4.10 pm]**

MR WYATT: Yes, it is up there on the – that one. The correlations are not the same and I think you could overly state things, and I think it is possible you are drawing a long bow, but at that distance that power

45

5 line is approximately the same size measured across. It is not a dominant element in the landscape. These will be more so because they are turning and they are visible but it does not dominate the landscape, I think there is a distinction there that can be drawn from those two elements in that particular picture.

MR DAVIDSON: Now, would you go to RVP2B. This was the viewpoint that was put to you as having a “lovely view”, do you recall?

10 MR WYATT: Yes, I think it does have a lovely view.

MR DAVIDSON: And you acknowledge that?

15 MR WYATT: Yes.

MR DAVIDSON: Now, you were asked about then, in that context and with that answer, about legibility and coherence of the view. Does the expression “lovely view” incorporate those elements of coherence and legibility? I just want to see whether - - -

20 MR WYATT: Well, maybe in this particular case it is the juxtaposition of different elements that are adding to the lovely view rather than it just being very subtle changes, there are quite dramatic changes in that landscape.

25 MR DAVIDSON: What I want the Board to understand is when you make that sort of assessment of a perspective from a viewpoint, and there is a range of viewpoints here of course, how does that figure in the assessments we see in the boxes where you have assessed high, high-medium, low and so forth, where does that figure?

30 MR WYATT: I think one of the aspects that particularly comes to mind with residential properties is the amount of change that that landscape has. And if you are looking at a view into a national park or into something that is all native, natural, and you compare that with a view across a landscape which has changes in vegetation, its cropping patterns change, changes in vegetation because of hedgerows and different landscape patterns over time, planting along the rivers edge or the road side.

40 All of those and the houses and the buildings within it – and this particular view looks down into valley views - you have got a whole lot of changes there, a lot of elements that together still make up a lovely view, it does not require coherence of being one and the same thing. A flat plain running across with one tree up on the hills coming down with another for it to be classified as a lovely view as the mixtures of all

45

those elements still can comprise that and I think this is a good example. It is not the first change in that landscape.

5 MR DAVIDSON: When you come into the boxes where you have got your figures for any of these properties, including this one, where does that description or that analysis you have just put to the Board, where does that fit?

10 MR WYATT: It comes into the sensitivity but into the description of your landscape. It is possibly more in the description. It talks about the visibility of the landscape and what is part of that view. It still gives it a high sensitivity because it is a residential property.

15 MR DAVIDSON: Now, just a small point came up, RVP3 please.

MR WYATT: Yes.

20 MR DAVIDSON: It has occurred to me, as you were asked questions about this, if we look at the turbines that are visible there, apart from the proximity to the camera, the ones on the right hand side seem to stand out. Is that a product of the preparation of the photomontage or is that just the light of the day?

25 MR WYATT: No, it is a preparation. We try to get as much contrast as we can between the turbines by putting a shadow on to it so we actually attempt to bring them out of the landscape when we are modelling them as if they were in bright sunshine.

30 MR DAVIDSON: To emphasise them at their most apparent?

35 MR WYATT: To try to maximise the contrast against the sky. In a couple of the photomontages we have taken out the sky and changed that to a deep blue to better make that contrast, we have not done it all the time, it has been a range.

**[4.15 pm]**

40 MR DAVIDSON: Just wait there, Mr Wyatt, please. Thank you, Mr Wyatt, the Board will have some questions.

Ma'am, I just note that I was going to ask about RVP16 but we have had a letter through the Board advising of the withdrawal of the submission relating to that so I am not asking questions about that.

45 HER HONOUR: Thank you.

MR DAVIDSON: And a section 94 approval, as well, ma'am, in relation to that.

HER HONOUR: Thank you.

5

MR DAVIDSON: I think it is the Ferry's. Ferry is the name. Thank you.

HER HONOUR: Thank you. Mr Heerdegen?

10 MR HEERDEGEN: Mr Wyatt, on page 21 of your evidence you have what is effectively a table describing visibility and you refer to different distances, closer to 1.5 kilometres, 1.5 to 3.5, 3.5 to 8.5 and 8.5 to 18 kilometres. And given your statement this morning, in response to another question, where you said that you considered the words  
15 "arbitrary" and "useful" not to be the right thing to use in the same sentence. When I view a table like that I sense arbitrariness in terms of the scale.

MR WYATT: Okay.

20

MR HEERDEGEN: And so what I want to ask you is, what is the basis for these limits in that table?

MR WYATT: It is explained in the appendix of the AEE document and I  
25 would like to say that they were not arbitrary. At least I can say that it is consistent that in - I am just getting the appendix now, it is never there when I need it.

30

In appendix B, particularly on paged B4 and B5, what we have done and what we have done consistently for many years when looking at developments to get some sort of range of distance lines, we have judged it on either the horizontal line, the horizontal width, expanse of an object or its vertical.

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When you do it on the horizontal it does not seem to work for wind farms, it gives you answers that ran out at hundreds of metres, it is not appropriate. When you do it on the vertical distance as the wind turbines increase you have different zone ranges and at least it keeps it consistent. I am more than happy for somebody to invent a better way  
40 of doing it.

45

What we have done is say, well okay if it takes up - if your vertical field of view is about 10 to 15 degrees then that is given in all the anthropometric data. I say it is 10 degrees while sitting and 15 degrees while standing for some reason but they give that - what we are saying is if it takes up, one would have said less than .5 of a degree, in other

5 words it is five percent of 10 degrees. So if it is taking up five percent of that view it is becoming a very small element in the landscape. If it goes between 0.5 degrees and 2.5, so it is up to 25 percent of that it ranges into the middle, I have given some distance there that is three and half to 17. Arbitrarily we went out to 18, 18 and a half and then broke that into two to give a different distance zone. So there is some science behind it.

10 MR HEERDEGEN: Yes.

15 MR WYATT: I would be the first one to admit that I would love an improved model. It enables me to move from one development to another and retain consistency in how we set out view sheds because to be perfectly honest sometimes you just see a line drawn around it and you wonder how that was ever derived. If somebody comes up with a better way of doing it I will be the first one to copy it.

20 MR HEERDEGEN: I am not disputing that it is not good but there might be a better one, I was just purely interested in the basis on which they - - -

[4.20 pm]

25 MR WYATT: That was the basis. It was done on - that eye diagram has been in our reports for about 25 years.

MR HEERDEGEN: Right.

30 MR WYATT: It is reasonably unusual although I have been advised by counsel that other landscape architects use such in New Zealand. I think it gives us a good starting point.

35 MR HEERDEGEN: Yes. I am happy with the answer. The second one relates to the same table, if I will call it that, on page 20 and 21 and also in reference to in the AEE, page 54.

MR WYATT: So are you referring to the statement of evidence?

40 MR HEERDEGEN: Yes, in the AEE page 54 and in your evidence the same table that I have just referred to, pages 20 and 21. In the AEE you have a list there of the scale of effects and - - -

MR WYATT: I am sorry.

45 MR HEERDEGEN: That is on page 54 of the - - -

MR WYATT: Yes, I've got it in the AEE, yes.

MR HEERDEGEN: You have a table there which lists the scale of effects ranging through from de minimus through to high or unacceptable. To what extent is that scale inversely related to the scales on here of visual impact or the zones of visual impact?

MR WYATT: That's right.

MR HEERDEGEN: Is it a direct?

MR WYATT: It is direct.

MR HEERDEGEN: It is a direct inverse relationship?

MR WYATT: Yes.

MR HEERDEGEN: Okay.

MR WYATT: It has a – the one consistent factor that every landscape architect will agree with or every visual assessment will agree with, as you go further away the impact becomes less, we all decide to set some ranges. I think this is a reasonably logical way of doing it. But, as I said earlier in my evidence, it doesn't change abruptly if you go from 1.5 to 1.51. It is setting some broad ranges.

MR HEERDEGEN: Right, thank you. Now one of the submitters asked you some questions about screening as a means of mitigating effects. And I listened carefully to that and am happy with the explanations. The question though is that if a householder wants to have a view then, if I heard you correctly, you said that there is no way of mitigating the effects of something that is further in the distance?

MR WYATT: No, I didn't say that. I said if they don't want any landscaping I can't do anything, but I don't necessarily, especially in the case of wind farms, require screening, like to block off all of that view, I don't think is an appropriate answer in many, many cases.

But breaking up the view, of putting in either deciduous or open foliated canopy structures that you can see through, whether it's a eucalyptus or an open – I don't want everybody to live in a wall of vegetation stretching around their boundaries. I don't think that would be appropriate.

I think you can do a lighter response in landscaping that still allows views through and reduces the impact to a much more – to a lower level for those particular residences. And it is a judgement call and you

would have to come to that with discussions with the resident concerned and make it responsive to their needs, but I do think that is possible and I do know that we've actually done it.

5 So it's not – it's not something I'm making up. We've been to places and they've had the wind farm built at Portland and we've talked to the owners and our people from the office have done sketches, one of which is in here, of solutions. And I said one lady wanted one deciduous tree and was really happy.

10 So they don't mind, they just want to get rid that from this view from the kitchen. And she was – she thought it was great. We put in about a three metre, one three metre deciduous tree and it was – Portland's pretty wild and woolly too and she was very impressed with it. So, we  
15 got a letter of thanks.

MR HEERDEGEN: Thank you for that. In 10.52 of your evidence on page 58, in part of that statement you say, "Given the evident public acceptance of the presence of wind turbines," that's not my reference,  
20 "in all but the most sensitive of locations ..."

MR WYATT: Yes.

MR HEERDEGEN: So you use the word 'sensitive'. And, if I refer as you suggest there to figure 4 in section 5, am I correct in assuming that sensitivity is analogous to distance, or other there other factors that come into sensitivity?

[4.25 pm]

30 MR WYATT: No, I think sensitivity in that respect refers to the sensitivity of the landscapes. In our studies, with the earlier one that was done by the western coastal council, looking at studies on – next to headlands along the Great Ocean Road, which is kind of a - - -

35 MR HEERDEGEN: I know what it's like.

MR WYATT: - - - pretty sensitive area, that result came in at about 68 percent acceptance. In later studies that were done for residential properties, the figures have come in at 67/70 percent, almost exactly the same figure. And when we've asked how would you approve of wind farms in national parks, the level has been the same. So it has been really funny. And the Sounds, the one in the North Carolina study, that was also around the 65 percent acceptance, I think 60 maybe, around  
40 the same figure for their most sensitive landscapes. So whether the sensitivity is measured by a residential, whether it is measured by what  
45

you would regard as an ONL and we would regard as an ONL or whether it is in a national park or – they are all coming up with a similar acceptance rate, which I actually find very surprising and I cannot explain it, but that is the way the figures go.

5

MR HEERDEGEN: So in essence, sensitivity really has to do with people's acceptance of something.

MR WYATT: Yes.

10

MR HEERDEGEN: So if it is not accepted, it's sensitive, and if it is accepted, it isn't sensitive?

15

MR WYATT: And the acceptance levels increase as people move into landscapes that are further away like the ones up in the country, they've had a 67 percent acceptance within one kilometre of my house. And that's – I wouldn't personally be in that category, but that's the most sensitive location I can think of. And yet there are a vast majority of studies that all of them show the same sorts of figures. And, as I said, I do find that surprising but it is very consistent across the world, and it is unusual for wind farms.

20

MR HEERDEGEN: That is fine, thank you very much.

25

MR WYATT: Unique to wind farms I should say.

MR HEERDEGEN: My last question relates to page 91 and, again, you dealt with it in reply to one of the submitters questions. This is RVP11 and you say that you took the photographs from the first floor scaffolding at the level of the upper storey window.

30

MR WYATT: Yes.

35

MR HEERDEGEN: And my question is, given your insistence that photomontages are taken at 1.4 metres or thereabouts, can you please explain why it is acceptable to take these photographs at that sort of level and it is not acceptable to take them at anything other than 1.4 or whatever it is in montages?

40

MR WYATT: I was actually trying to be fair to the owner. We went up, the house was under construction. At the conservatory level, which I did take some photographs, the existing pine trees were in the way I felt, and the lady said that she was going to take those down. So I went up to try to get as much as I could above the pines.

45

5 It was really just trying to maximise the view and, as you came up the stairs, there was an open foyer area there with windows out. If I had have taken them from the window I would have had all the scaffolding in the foreground so I climbed out on the scaffolding and I tried to take it from about the same level as if I was standing in the inside of that foyer or that upper stairs landing above the stairs. That was why I did it. The pictures I took at the conservatory level were just looking into the pine trees.

10 MR HEERDEGEN: All right, yes. That is all, thank you, for your answers.

HER HONOUR: Yes?

15 MR BUNTING: Thank you, Mr Wyatt. I have got a couple of questions on landscaping and I am seeking your advice on a matter. We, obviously, have to at some stage evaluate the effects of these turbines on residents and you have proposed landscaping as the primary mitigation measure.

20 MR WYATT: Yes.

MR BUNTING: What we do not know, of course, is whether the residents accept landscaping so we have no certainty. So how do we go about doing this evaluation when we do not have any level of certainty as to what they might wish to do?

25

MR WYATT: I can only offer the experience that I have had within Australia over very many wind farms and in that the offer has been made and, as I said, made for a year after construction of the wind farm so people have a year in which they can approach the developer for remediation landscaping to be done around their residence. That seems to have worked.

30

35 What we have actually been surprised at, and this is particularly from the Portland example, is how few people have actually taken that on board and they have done letter drops, they have had meetings, they have gone back out, and people have said, "Actually, we do not mind them. They are not as bad as I thought they were", and that has been the case.

40

**[4.30 pm]**

45 But all I can say is it has been offered. It has been offered in many- it is almost a standard condition now within Australian wind farms and I think it is an appropriate one that offers people the opportunity to come to terms with that new element of the landscape and decide, if it really

does annoy them, can something be done about it and this is one measure in which it can be done.

5 MR BUNTING: I am thinking the decision authority does not know that when it does its evaluation - - -

MR WYATT: I suppose it is built up on experience, that it has worked, that it seems to have been a successful strategy.

10 MR BUNTING: And the decision authority has accepted that?

MR WYATT: Yes, and in fact it is - - -

15 MR BUNTING: When it has done its evaluation?

MR WYATT: I do not know of a wind farm decision that does not incorporate such a condition. And, in respect of those, it has increased as the turbine heights have increased. The original ones were about one kilometre and I think they went out to 1.5. We have been  
20 recommending to the 3.5 range and it has varied down to 3 and 2.5 as wind turbines have increased in height but that range, we have gone out to the next band.

25 The Courts have, in probably 50 percent of the cases, decided on the inner band, the one - I think Bald Hills was mentioned in cross-examination, I think that had a one kilometre band around it for residential properties to be offered landscaping. We have always been a little bit more conservative in promising somebody else's money to be spent but it has been out to the equivalent of the 3.5 band.

30 MR BUNTING: Okay, and I have got here a copy of the decision on West Wind, which is the Makara wind farm. And part of para 5.20 there is a comment made that trees are ephemeral, there can be storm damage to chop down, and given that you know we are looking at a project with a  
35 long life, over 20 years, screening vegetation for turbine mitigation is something we cannot necessarily rely on. Have you got any comment on that?

40 MR WYATT: Yes, I agree with that statement. Yes, you can't rely on it. Somebody can come in and chop down trees, but it is on the residents' property. There is a fair degree of certainty. I mean we, landscape has been used as I said, to define views in residential properties. If you are designing your rear yard, you are designing your house, you use landscaping as part of that. Now you can say well this is not going to  
45 work I won't do it because in five or 10 years time I am going to chop it down or it is going to blow over. Yes. That could happen. But you

still go ahead with the design, we still spend an inordinate amount of money landscaping our areas around our houses and our residences.

5 And I think it is an unduly pessimistic view that, yes, you can chop it down. If it is achieving its function, you would probably look after it I would think. And it is on the residences affected, but if the resident changes and the person buying the property has a view - oh this looks all right I want to chop down the tree well, yes, in that extent, landscape is transitory.

10 And I suppose landscape is always transitory, but so too are buildings, so too are developments, and so too ultimately are the wind farms. But I think we all go ahead with the expectation that the landscape will survive and be there to give us pleasure and beauty for some number of years.

15 MR BUNTING: And a third thing, on this landscaping or blocking of view in some way. If it is unacceptable to a resident, you know, and that is the only mitigation option, is the other mitigation option not to put the turbine there in the first place?

20 MR WYATT: Yes, you can remove turbines. And that is obviously an option. But I believe that landscape is also an option, and if we are looking at a very large infrastructure project to say that a large infrastructure project has to be, whether it is a large road or freeway, transmission line, without affecting anyone, you can't move a road, or you can't get rid of - you do some siting, but eventually it does affect some people along any large infrastructure project. And what I guess I am looking for is a solution that at least attempts to mitigate those impacts. I think that is the best I can do.

[4.35 pm]

25 MR BUNTING: Okay, thank you for that. Just a couple of other things. I noticed in the caucus notes there was a comment made about a community of interest analysis that none of you had thought had agreed to do or something. Can you just discuss what that is about?

30 MR WYATT: Yes, I think there is a - in some areas, if you are doing a road corridor or a transmission line corridor, you sometimes divide it up into zones which are based upon maybe an urban area. Goes through different communities and sometimes that comes about because of a social analysis.

45 Sometimes communities of interest refer to the division in Australia between the traditional owners and say a development of a mine or whatever, and that is sometimes used -, all we said was none of us have

5 done that social analysis and none of us thought that it was appropriate to do so. There didn't seem to be a need to carry such analysis out as a basis for this assessment. So I think there was just agreement from all of us that we weren't going to try to divide the communities in - I think in one of the reports from maybe the council there was a community's of interest analysis which seemed to fairly arbitrary.

10 MR BUNTING: Okay. And one last question, this is the third leg of the trifecta in a way. Page 101 of your statement of evidence, this issue about transmission tower, about a lattice structure or a pole structure. This is a 220 kv line, what about the actual transmission lines themselves and their impact on the- - -

15 MR WYATT: The wires?

MR BUNTING: The wires, yes.

20 MR WYATT: They are visible if they are in the middle distance, you see them. And they are thicker and glisten more I suppose in the sunshine than the smaller ones.

MR BUNTING: So what about the impact on the view say- - -

25 MR WYATT: You will see them if they are across that landscape, definitely.

MR BUNTING: What about the affect of that on the landscape?

30 MR WYATT: I don't know. It is one of those interesting things, isn't it, because when you go out and drive around roadsides and see the wires, it is usually the towers specially the lattice towers that draw your attention. And the pole landscape it was interesting because in the recent desalination plant there was poles going across a road and the farmer said I have been coming down here for years and we said we have been using poles like on either side of the road. He said I have been there 10 years, there is no poles there. We said, yes there are. 35 And he came in the next day and said I just went back, I never noticed them before. And so there was these wires and the poles, draped across the road that he had been travelling on. And we seem to if you like, the model in our head, because they are so just everywhere, that we sort of almost erase it out. Unless we are specifically looking for it. So, I 40 think the level of impact from the wires and the poles are fairly low, because you almost filter it out of your view.

45 MR BUNTING: So if you had a view that has been there for a long time, which hasn't - - -

MR WYATT: I don't think it is a large, it is definitely visible you can see it on photographs, but I don't think it does it justice. I think a lot of the times you don't really notice them.

5 MR BUNTING: Okay, thank you then. Thank you, ma'am.

HER HONOUR: Yes, Mr Shenton?

10 MR SHENTON: Just questions in terms of - I want to understand how you develop the landscape sensitivity issue and how you can deal around measures I guess at the end of the day. You mentioned in your dialogue with Mr Martin about memorability and I think you talked about how you have travelled around, you have seen the ranges in various ways and there are certain things that stick in your memory or  
15 are significant to you.

Now what I was really wanting to ask about is what is the process in terms of how you balance I guess those types of things against concept of a sense of place that a person who is resident in the area and lives in  
20 this area, looks at the ranges on a daily basis. And how their values may be reconciled against you know, memorability that is based upon an impact of a person who has been here for a short amount if time I guess.

25 MR WYATT: I think the major impact in my experience is actually just that. The people that have been here for the shortest amount of time are generally the most vocal in objecting to changes, because they have bought a particular view at this particular moment and said this was the best place on earth and I have bought it. But somebody that has been  
30 there longer in all the studies that we have done urban design studies across Australia, the people that have been there longest have been more accepting of change, because they have seen so much of it.

[4.40 pm]

35 They have seen so many changes in the landscape and in their towns. How you balance it? I think you do an assessment based upon what you think is right, but one of the nicest things about the wind farm assessment is when you do at least go out and ask the community, and  
40 ask them what their view is of wind farms in the landscape.

So we have gone through the process, but then at the end of the day we can have a validity, a reality check and say, what do you think about wind farms in this particular landscape. And I think that gives us some  
45 assurance that we are on the right track.

MR SHENTON: I was just thinking about it in terms of say my own experience. I live in a town where there is a river right through the middle of it, and sometimes if you go away from that place and you might have been travelling doing whatever, and you go back to it, that sense of place, that sense of belonging when you go back to it, is based on the view you might have of the river when you see it, or whatever.

MR WYATT: Yes.

MR SHENTON: Now in terms of the ranges, I am sure that that is a similar thing for a lot of residents.

MR WYATT: I am sure it is.

MR SHENTON: And I am just wondering how the change that can occur based on development such as this, impacts on that sense of place, that sense of belonging, and how you have, again it is that balancing and weighing it up against maybe a more dramatic seeing it the first time. More your experience because, of course, you have come in to do this work and if you say you have cited the Tararua forest park area as being significant to you, that the Ruahine Ranges as being features that maybe more memorable to you than say just Bryants Hill or something like that.

MR WYATT: They are definitely more memorable than that particular, the foothills. But that would apply all the way down the Tararua Ranges to Wellington. I think you are looking back at that peak and the ridges and the – especially when it gets those snow-capped ridges above. It is a wonderful view. There is so much - - -

MR SHENTON: And I suppose have you looked into that, have you looked into that sense of place, that sense of belonging?

MR WYATT: Yes.

MR SHENTON: But was that part of your assessment and your process?

MR WYATT: I called it, for want of a better term, a cognitive landscape it is referred to in some jargonistic landscape architectural research. But I think it has validity here. I said that you remember a landscape, like you said you come back to it.

And even here when you are not looking at the Manawatu River or not looking across the plain or not looking at the ranges, you have still got a picture of it in your head that you have built up from your experience from the years that you have been here. And I guess one of the things

that it did support my view is that this is a rural – it does have a rural wind energy edge to the plain in this location.

5 And you see it in all the literature that you see around here and the pictures on the walls of the hotel and in the hotel rooms there is a wind turbine in each room, in photographic form I mean. You see the advertisements for housing with wind turbines above them. It has already a connotation of being bounded by a wind energy rural range landscape. I think the real question here is does Turitea add or change significantly to that and I am firmly of the view that I don't think it does.

10 It is part of this area's landscape, it's part of this area's cognitive landscape for residents now and I think Turitea makes a smallish addition to that and admittedly down some of the streets like Fitzherbert, Bower and new areas that you haven't seen yet. But as you go further down as you are aware to Massey University and look back up, you do get views across the Manawatu River to the existing wind turbines on the hill.

15 Now, it is part of that landscape. How much does it add, how much does it change? I think it is still a rural wind energy range edge and I think that will continue. And I think Turitea makes a fairly minor addition to that.

20 MR SHENTON: The only other point I make is what about the issue of say just the simple fact of when somebody looks out of their window? You know, the time spent in your house - - -

25 MR WYATT: Yes.

30 MR SHENTON: - - - where you look out your window or you look over the fence, or – is greater than maybe when you are driving down the road.

35 MR WYATT: Yes, I agree with that.

**[4.45 pm]**

40 MR SHENTON: And that is, I would, in some cases, a significant impact.

45 MR WYATT: Yes, and I think that is what we have said all along, that the most significant impact is from residential properties closer to the wind turbines. And I think that is reflected in people's comments and the particular concern that we all have about our own houses. I think that is correct.

MR SHENTON: Is it a concern to you that the predominance of your mitigation is to screen out those views when maybe that sense of view in places is significant to residents?

5 MR WYATT: I don't think my first point in doing any of the designs would be to screen, it would be to filter definitely and to break up. And I think too when you are looking at that, you have also got to consider that maybe there is a positive in that. You think of the amount of money that we all spend on our backyards and tree planting.

10  
Because as a result of this you might get some landscaping done that you might want to do anyway and you may wish to break the winds or you wish to have shelter in your garden. There are some positive outcomes that come about because of the landscape mitigation that may be offered as a result of this.

15  
So it is not all negative and I think just pulling up cypress hedgerows, I would be the – that would be the, I think, probably one of the worst solutions I could imagine. So, as a designer, I think there are many options that people can work with.

20  
MR SHENTON: Okay, thank you, Mr Wyatt.

HER HONOUR: Mr Hudson?

25  
MR HUDSON: Good afternoon, Mr Wyatt, end of a long day - - -

MR WYATT: It seems that way.

30  
MR HUDSON: - - - and a half for you. I do not think you are going to be getting the plane back to Australia today.

MR WYATT: I think I gave up on that very early in the week.

35  
MR HUDSON: Good. It sounds as though you have had extensive experience, not only in Australia, but in other places, is that correct?

MR WYATT: That's correct.

40  
MR HUDSON: Where else?

MR WYATT: I've done work in China, Hong Kong, Malaysia, Thailand, India, a large number of projects across India. They were design projects, master planning. We just won an award for one that we finished in Delhi about six months ago, which was nice.

45

MR HUDSON: You are well travelled.

MR WYATT: So, yes, we have done a number of projects, but also I have worked across Australia from Cairns right down through to Western  
5 Australia.

MR HUDSON: And these are not only wind farms I presume?

MR WYATT: I would like to say probably the largest percentage of my practise is design and visual assessment is probably 30 to 40 percent of  
10 our practice. So a lot of it, for those projects, were not visual assessment. I visual assessed in Hong Kong. We did the South Soko oil and gas terminal, LNG terminal I should say. That was completed last year.

15 We have done some work for CLP Power in Hong Kong, sorry, China Light and Power, CLP, in Hong Kong for a small wind farm. And I have done other work for, ultimately for the Hong Kong government, some urban design and planning work there, and I have set up an office  
20 in Hong Kong, a landscape practise there. Yes, I am reasonably well travelled I think.

MR HUDSON: Well it is always refreshing to get the experience of somebody else coming into our little country and offering some  
25 techniques.

MR WYATT: Well I don't know if I offer much in the way of techniques. I would like to think our photomontages are something that I am quite  
30 proud of, I suppose, developing.

MR HUDSON: And in preparing those photomontages I note that you use a technical reference with the human dimensions.

MR WYATT: There's two that we've used. One I purchased in about 19 –  
35 early 70s I think or when I – might have been early 80s when I first started doing visual impact assessments. About two or three years ago I thought well that is getting a bit long in the tooth, maybe I had better go and find another book and I found another one and human vision angles hadn't changed. So we haven't evolved in the last 20 years.

40

**[4.50 pm]**

MR HUDSON: What were those two references? What was the first one?

45 MR WYATT: I am just trying to think of the names. I can get the names. I can have through counsel tomorrow if that is all right? It's human

dimension in interior space by someone, someone and someone with very long names. And the other one is again an anthropometric metric data book, which has just the eye angles in it.

5 I must admit when I first started doing visual assessment, it was the first thing I went to look at, what vision data was available. And we've used that eye diagram or something very similar to it for a long, long time.

MR HUDSON: And does that come out of one of those references?

10

MR WYATT: It came out, yes, I think it has been – might have been slightly amended over the years, but I think it is very, very close, those references. It might have even been a trace off originally.

15 MR HUDSON: Right.

MR WYATT: It's 25 years ago. I can give you the references, I can even have them scanned in the pages from those books and have them shot across, so that is not a – I can't remember what they are off the top of  
20 my head though.

MR HUDSON: Right, well that would be appreciated if you could.

MR WYATT: Yes, I can get those. By all means I can get that tonight.  
25

MR HUDSON: That would be helpful to come from counsel.

MR WYATT: Yes, I can get it to counsel tonight.

30 MR HUDSON: That would be most helpful, thank you.

MR WYATT: So I will get the cover of the book, the front page of it and just a couple of diagrams relating to vision. It's an anthropometric data book so it also talks about table heights and design of seating and all the  
35 rest of it.

MR HUDSON: Right.

MR WYATT: So I will take those particular pages out on vision.  
40

MR HUDSON: And is that both books you are able to get the reference for?

MR WYATT: Yes, I've got both. I've still got the original one that I  
45 purchased.

MR HUDSON: Right, a bit ragged, well used?

MR WYATT: It's ragged but it's probably not all that well used because we have only used – we used some of the other anthropometric data for bench seats and detailed work.

5 MR HUDSON: Right.

MR WYATT: It has still got much the same figures in both books, they are very consistent.

10 MR HUDSON: And they are by different authors?

MR WYATT: Oh, yes, different people, 20 years apart.

15 MR HUDSON: Right. Would you be able to get that?

MR WYATT: I will ring the office as soon as I get out of here and they should be able to scan the pages and the front pages and shoot them across to me as a PDF file.

20 MR HUDSON: Right, and would counsel be able to forward them to Caroline this evening?

MR WYATT: This evening should be fine.

25 MS.....: I am emailing now.

MR WYATT: You are emailing Hayden, thank you very much. But you do not want the whole book is that the – test the email.

30 MS.....: I have got human dimension and interior space.

MR WYATT: It is another one, it is anthropometric data, I think it is called. I honestly cannot remember the titles.

35 MR HUDSON: That would be most helpful, thank you. Now, I notice, too, that you are using the 90 millimetre lens?

MR WYATT: Yes.

40 MR HUDSON: Can you tell me about that?

45 MR WYATT: It was actually, as I said earlier, it was a response to having done Chellakim (**ph 4.53.04**) Hills and also the original gas plant in the Otways. When we did them they were very early. We went back down when they were built in both cases with our photomontages and went “Oops, they are in the right location but they are all too small”.

5 And then one of the guys in the office was given the task over about three months of going backwards and forwards to Chellakim Hills and we just retook the photographs. We went from, as I said, about a 60 millimetre lens to the 90 millimetre lens until we finally came up and went “Yes, that looks about right” and then we came back and found the 60 by 15. As I said, it is probably something that I should have been able to work out but I had never used it.

10 The reason we used four photographs with a 90 millimetre lens is that when I take a 28 millimetre, even with a very good Nikon lens, and blow it up it up in 3DMax I get distortions at the edges. It does not allow me, as you saw in those wire frames, how they really lined up quite nicely with the existing topography and there was a great degree  
15 of consistency across the entire view.

Well, the only way I can get consistency by taking a 28 millimetre lens and then blowing up a section, which I know is meant to be the same, but when I do that my model in the computer will not match. It gets  
20 distorted and I have got to stretch bits of it and stretching bits of the model worry the living daylights out of me to be honest, I want it to go bang if it is has got a – because otherwise, once you start stretching things you are starting to get into really dangerous territory and the very way of creating this model verifies that the turbines are in the right  
25 location.

So the way that it is prepared using those four cameras when I would love to be able to take one and I am not saying that next time, if you  
30 ever do see me again, I will not be using one single shot. If we can get a camera that does not have distortion it will be a huge benefit to our practice because it takes so long to do the four but when we do that we get very good registration, it is spot on, it matches the topography. We put it out as a verification on every one of our photomontages so that people can say, “Well, okay, he has not cheated” and we, as I said to  
35 you at the beginning, we asked the Court to go and stand and do that simple test and if we are telling the truth it should be a reasonably good approximation of what you see in the existing landscape as against what you see on the photomontages. Irrespective of all the theory it really came about because of an empirical search to make sure that what we were showing Courts and Boards of Inquiry were, as much as we could, responsive and accurate, and I think we have got there.  
40

[4.55 pm]

45 And that lens size may well change. If I was doing a single development within a national park I might it up to 200 millimetres if it

5 is some distance because if it makes a change to a pristine landscape we  
would have to – so I am actually wondering whether there is sort of a  
logarithmic scale. If you are doing work in streetscapes the 50 and 60  
millimetre lens is still appropriate but that seems to match but once you  
10 go to that one, one and a half kilometre distance it does not seem to  
work. So I am wondering whether there is a kind of sliding scale of  
things, that is probably the subject of another conference and a little bit  
more research. But I am happy that in the distances that we are  
showing it seems to be consistent and shows something that is testable,  
15 it is always testable.

MR HUDSON: And are you happy that they are accurate at the edges as well  
as in the middle?

15 MR WYATT: Yes, that is one of the reasons we have kept the four  
photographs. That is the only reason we have kept the four  
photographs. Just remember I take them here with handheld and so  
some of them are like that so that the poor guys doing the computer  
20 model have to do four and get all angles right so that it matches. It is  
easier if I use a big tripod and do it 11 degrees each and they are  
wrapped, but it takes another 20 kilos of luggage and I am sometimes a  
bit lazy and somebody else has to do more work, but it does actually  
give very good correspondence.

25 MR HUDSON: And how does it compare to the 50 millimetre lens which has  
been used?

MR WYATT: I believe very, very strongly that the 50 ml lens really  
understates the presence of wind turbines within the landscape. They  
30 show them as very small elements but we used to use 60 and I think  
some of the Scottish, some of the English, are the same 60 but we were  
just very unhappy with them. We went out – there is a cypress  
hedgerow half a kilometre away and on the photograph it looked like a  
green smear. When you stood out on site it was a large element and  
35 saying, “Well, that is not right, it is just not correct”. So we would  
invite you validate what we are doing by doing that test and if we are  
right we are right, if we are wrong I would want some advice on how  
we can improve it.

40 MR HUDSON: So was it items in the sort of middle distance, one and a half  
kilometres you said?

MR WYATT: Yes. About from one - - -

45 MR HUDSON: Was a problem?

MR WYATT: Yes, it seemed to be just smaller, the images were not showing them in a way that I felt was realistic.

5 MR HUDSON: And were you splicing the 50 millimetre photographs together in the same way that you do the 90s or are you just - - -

10 MR WYATT: Yes, sometimes. There was less precision back – we have really cut it down so we do the panorama and then do the 60 degree views and we really cut in and showing both so that on panorama you can see the extent of the wind farm across. So, in this instance, the ranges and then the 60 degree views we are saying better represent the impact of what you see. So in the earlier days I think some of the 50 millimetre stuff was a little bit vague and the lens size changed and it was not standardised and it was not nearly as both robust nor as repeatable as what we are now doing.

15 MR HUDSON: So I presume you have done a comparison now between your 50 and your 90 on the same spot to - - -

20 MR WYATT: Not only us but when we did one project on the coast we went to a community workshop and it was near where the gas plant had been done and one of the residents stood up and said, “Well, Mr Wyatt, the last time that people did photomontages down here they got them all wrong”. They have seen the thing built now and they blame Maunsells, said, “Maunsells did them and they got them all wrong” and we said, “Actually, we worked as a subconsultant to Maunsells and we did them and I agree with you they were wrong and now we are doing them this way”.

25  
30 [5.00 pm]

MR HUDSON: Right.

35 MR WYATT: So I think they had come to the same conclusion that we did and that was on a 60 millimetre lens, it just was not right.

MR HUDSON: So they had problems with 60 millimetres?

40 MR WYATT: Yes. We had done them on a 60 millimetre lens and that was one of the two projects that we did a verification on and went back to have a look at and went “it is just not right”. So it was those two projects that led to this search for what we are doing so if it is somewhat different, as I said, it is something that I think I am very proud of and I think it reflects really what you are going to see.

45

HER HONOUR: Mr Wyatt and Mr Hudson, I think it is 5 o'clock and we have been sitting still for long enough. Mr Wyatt, thank you.

5 MR WYATT: Thank you very much.

HER HONOUR: We will see you in the morning at 9.30.

10 MR WYATT: Thank you.

<THE WITNESS WITHDREW

[5.01 pm]

15 **MATTER ADJOURNED AT 5.01 PM UNTIL  
FRIDAY, 14 AUGUST 2009**