

## VISUAL AND LANDSCAPE

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## VISUAL AND LANDSCAPE

### A INTRODUCTION

1. When Mighty River Power began consideration of this project it knew of the exceptional wind resource, and utilisation met the Government's policy for renewable energy. Mighty River Power has followed a natural order in advancing this Proposal. The linear placement of turbines on the ridgeline derives from the topographical **and** generational features of the site.
2. From two sources it gained evidential support, first from Allan Wyatt who has extensive Australian experience, tested for relevance, who also supported the entire project, placing weight on mitigation and experience of how people "read" and relate to turbines. MRP had the support of Stephen Brown in the context of landscape units relevant for assessment and ONL issues. Only under the Revised Proposal did he assess the effects of what was proposed, not in the orthodox sense an "effects based assessment" but patently he did consider those unacceptably adverse and delete or adjust for them. While it was suggested the redesign showed "starting from scratch", the structure of the land form leaves little room for this.
3. Caucusing witnesses agreed that Mr Wyatt's and Mr Bray's use of landscape units was helpful and the selection of Viewpoints was "fair and representative" – Caucusing report and T1499 40/43. The approach taken to viewpoint selection was to assess "worst case" visual impacts (Wyatt para 7.6). They were "deliberately chosen in areas of maximum potential visibility". Cumulative effects were also brought to account in viewpoint selection.
4. The residential viewpoints were selected on the basis of "more than minor" effect, **on the assumption of negative reaction from landowners**. There was no attempt to circumscribe or soften the evaluation of effects but instead to make a full analysis of what effects would be felt. Mr Wyatt accepted the potential for significant landscape and visual effects on properties in close proximity to the turbines.

### The judgment of adverse effects

5. The favourable response to wind energy and surveyed response will inform the Board as a guide to acceptability of effects and is strongly supportive of consent. Mr Anstey said that once significant adverse effects are identified, the question is in whose judgment they are adverse, and how significant is that adversity - T1523 20-35. He recognised a degree of ambivalence about wind farms with a "good side" and an "adverse side". How people balance these two dimensions depends on proximity to wind turbines, and the relationship with them – T1523 25-35.
6. In the search for that perspective Mr Anstey accepted the Focus Groups were not representative statistically – T1527 40-42 but still thought they were "a fair representation". Yet he did not know how they were asked to be there or why – T1528 7-9, with Mr Baker subsequently advising that he was responsible. Asked if there were any people in favour he said there were two people in that category, and about "a quarter to a third of people" who were "quite positive" about wind farming – T1528 25-30. Mr Anstey acknowledged at T1530 25-30 that the opposition was "emotional" and emotions "run high", and they "do influence me, yes", as did Mr Baker subsequently. So in summary ". . . none of what you heard surprised you, it was not representative in the scientific sense, and the emotion behind those responses has influenced the decision you have come to and evidence you have provided?" – T1531 15-20. "Yes, all of that is true".
7. The effect of scale was discussed with Mr Anstey at T1552 and T1553. His view, T1552 line 25 is that turbines viewed from PV2 change people's perception of that view and their understanding of it. He acknowledged that it would **add to the**

**effect that you already see**" – T1552 line 35. He acknowledged the strong community response generally to the notion of wind farms – T1552 line 37 and at T1553 1-5 he acknowledged it was a "*hard call to make*". The question is to him "*how much of the landscape do people want changed . . .*". It is a matter of degree, of perception, and the "*ability of those perceiving it to absorb the change*" "*without serious deleterious or adverse effect on their lives*" – T1553 20-22. It is a "*hard call*" – T 1553 30-35, and reference is made to the social scientists – T1553 35-36.

8. Mr Bray at T1983 35-45 stated that the landscape is a "*complex, emotive and often subjective subject*". While people may be in favour of renewable energy they struggle that a favourite view or cherished landscape would be "*radically altered*". Surveys cannot provide an accurate picture of how local people "*will perceive a particular proposal in a particular landscape*". The perception will be different based on how many individuals relate to the landscape in which they live and how they choose to interact with it. Mr Bray identified the potential cumulative effects of the proposal with (286) turbines already constructed or consented, and the saying "*you can have too much of a good thing*". How many turbines are "*too many*"? – T1984 1-10. (Motorimu has gone. This proposal has been revised down.) The "*lens*" through which effects are experienced has to be calibrated by not just direct effects to an individual, but also to reflect community perceptions of wind farms.
9. New Zealand **support** for wind farms is close to that observed in Australia, the United Kingdom and the US – Wyatt E5.8. There is some indication that support increases through familiarity once turbines are erected Wyatt E5.12 (qualified, see below). The positive community perception is a "*key factor in assessing visual impact*", and in contradistinction to the impact of e.g. transmission lines, major highways and large infrastructural projects. Whether this perception is based on the positive aesthetics, "*green energy*", or economic benefits, it is relevant – Wyatt E5.15.
10. In the public response there is an observation that people are not static in areas of public gathering, to observe the hills, but they are a **backdrop** against which all other influences must be set – T1555 15-20. Mr Anstey agreed. The question of "*relationship*", and a change in the landscape was the subject of focussed exchange between Your Honour and Mr Wyatt at T1452 15-40. T1453 25. For Mr Wyatt change is not just negative. A wind farm raises different responses. Mr Bray too regards it a "*challenging question*" where the visual stops, "*the cold lens of the visual perspective*" and the "*psychology starts*" and acknowledges "*we are still trying to find where that barrier is*". He puts it at T2012 25-30:

*"I think you have to begin your assessment on a very visual level, as what will be there, what will not be there and then I think the appropriateness of those becomes something that is perhaps much wider".*
11. Mr Bray recognises there is no formula to say how many turbines one "*should see*" – T2045 15-25. Questioned by Mr Hudson he said the effect on a few residents is not the issue. He says it is a "*small part of their view and therefore, whilst it would be relatively significant, I believe it was acceptable*" – T2098 5-10. A plan view does not demonstrate the visibility of turbines as such. Mr Bray acknowledged at T2005 1-5 that evidence came from submitters who were in reasonable proximity to turbines but could not see them.
12. The addition of turbines **as such** to the landscape is not the debate, (or else change = adverse effect), but the question of "*compromise*" of the landform is relevant in determining what is "*acceptable*". Mr Bray at E168 contrasts the landform of the wind farm site with the residential and lifestyle developments of Pacific Drive and Ngahere Park. Wyatt Rebuttal 3.17 considers that there is no evidence to find "*compromise*" because the rural character remains under and around the turbines.

13. An expression which seems to catch some of the questions posed here, is the genius loci – the distinctive atmosphere or pervading spirit of a place **where such can be found**. The compromised landscape is part of the MRP case. The place of the ridgelines as a **backdrop** to the city and Plains is for determination. These are rolling hills, spacious in extent but different from the main Ranges in this visual and "place" effect, well differentiated from the wind farm site.

### The redesign

14. At T1595 Your Honour referred Mr Anstey to Te Apiti and how the "bald hills somehow absorbed the turbines". ". . . It is well designed and comfortable in the landscape". Questioned further, acknowledging the effect of the size of turbines and scale, Mr Anstey at T1596 line 16-17 said "I do think playing around with location and scale would help".
15. The exchange at T1451-1452 between Your Honour and Mr Wyatt also referred to the Te Apiti turbines which "seemed to fit very comfortably in the landscape so that they did not intrude on the visitor looking at them. They just somehow fitted". Mr Wyatt said in his answer that "... they follow that ridgeline around above the (indistinct) there quite nicely and I think they do, I feel like reinforce the landscape form rather than fight it". Mr Wyatt then said he believed that is what is happening here (Turitea).
16. At T2438 Your Honour discussed with Mr Mildon, whose expressed concerns included ridgeline effect, bringing some turbines down "where they interface" with the landform, and might mitigate effect. Mr Mildon said, (with reference to Te Apiti) when the turbines come down to the front of the landscape, at a closer distance he can see a degree of interest and attractiveness, but he takes a different view from further away.
17. Mr Hudson asked Mr Bray a good deal about "doubling up" on T3 and Te Apiti. Mr Bray identified doubling up on South Range Road and then essentially two wind farms, "at the top" and "in front on the foothills" "two fairly distinctive wind farms on different land forms" T2100 35-40 and T2101 1-5 (Bryants Hill ABC and main ridgelines). Western Ridge is "a part of coming into the foothills" T2101 20-25. He does not consider Love Ridge and Western Ridge to be "doubling up" to the same extent.
18. Mr Brown was **not** given any instruction as to the number of turbine zones to "support" in undertaking the redesign, but he was asked to consider the proposal primarily from a visual/landscape perspective, and in particular:
- The effect of different turbine heights;
  - The potential cumulative effects of the Turitea wind farm with the proposed extension to Te Rere Hau – Brown OS para 2.
19. Mr Brown did not work only from limited viewpoints and locations. He went to the areas he identified of greatest concern, and the views for which the most meaningful changes could be made. He also resists any suggestion that this is a "numbers" game so that removal of few turbines has limited results.
20. Mr Brown when responding to Mr Bray, makes the point that topography and ecology dictate and constrain the layout of the wind farm within and around the water catchment. Mr Brown never assessed this proposal as it stood before the redesign, **and his objective was to make the layout more responsive to the site if possible – OS25**. He reviewed all evidence, submissions and comments by Board and submitters, the photo montages and made a further site visit of some length – Brown OS 3. His focus was on effects he thought particularly problematic and he did this against tests of "visual prominence/dominance", impact on specific

landscape features such as "notable knolls", intrusion into the foreground or near middle distance of views, visual overlapping and "jumbling of turbines", and cumulative effects relative to Te Rere Hau. Any notion that this was restrictive, when he could have re-designed to any number of turbines, is misplaced. The acid test is evaluation of his revision.

21. Removal or relocation of dominant and prominent turbines raises the question of whether to "peel back" the next layers of turbines – T2994 15-24. Ultimately the radical amendments needed to take that stage further are not necessary in Mr Brown's view – T2994 25-32. He makes the point that "numbers alone" are not a basis for assessing what is effectual or effective. He rejects an arbitrary 2km separation distance as an effects measure, by looking at turbine 78 on RVP7, the closest to the particular viewpoint but the least conspicuous of the turbines – T3001 40-45, as it is behind Bryants Hill and forestry.
22. A core proposition for MRP is that the redesign has had significant positive effects for closer viewpoints in relation to residential catchments and audiences around Harrisons Hill, Polson Hill, Ngahere Park and the Kahuterawa Valley/ Greens Road area. Mr Brown's OS (2010) paragraph 16 records his measure of "small" or "significant" improvement across 11 viewpoints.
23. What are clear errors in Mr Baker's understanding have to be corrected. Mr Brown has addressed this at OS46 and 47. Mr Baker first thought that a completely new and specific assessment proposal was required, but Mr Brown considers he gained a full understanding of the implications for the landscape setting, and various audiences. Mr Brown was compelled to respond in particular that:
  - He has never said that the wind farm will have no effect along the ridgeline of Turitea Reserve;
  - The significant part of the Tararua Range starts south of Hardings Park not Marima;
  - He has never said wind farms should be avoided on "very attractive landscapes".
24. Aside from the broad descriptive changes identified, the Commentary at paragraphs 17-22 of Mr Brown's Supplementary Statement summarises the effect of Revision:

**Paragraph 17 – Bryants Hill** - Removal of turbines 72, 73, 82-92 and 94 has dramatically reduced the visual intrusion and dominance in relation to Ngahere Park and has less obviously but "appreciably" reduced the presence / dominance of turbines when viewed from Polson Hill Road and Pahiatua – Aokautere Road. The remaining turbines have a "slightly more uniform scale and profile" without quite the same level of "forward projection" of some of the deleted turbines – see **VP5, RVP25, RVP2, RVP3 and RVP7**. In his Opening Statement, and under question, Mr Brown explained at T3001 10-25 that using VP5 and RVP7 the **removal** of turbines is obvious, but some turbines have been moved to make them appear less conspicuous, evident in RVP21. The remaining turbines seem to have "pushed more over and behind the ridgeline which you face as you travel down Kahuterawa Road". He describes it as subtle but significant.

**Paragraph 18** – The same modifications referred to above have helped reduce the dominance of individual turbines and overlapping to a degree when viewed from **Pacific Drive and Aokautere Road** but less pronounced – see **RVP02, VP6, VP4 and RVP25**.

**Paragraph 19** – The Ridgeline - "subtle improvements" achieved through relocation of turbine zones 108, 1-4, 8-10, 18, 38-41, 43, 97-107 and 109 viewed from the **eastern side of the Track** and in the vicinity of **Makomako Road**. The changes

are not "*immediately obvious*". The alignment and scale is slightly more uniform without turbines seeming to "*jump forward*" as **VP07 and RVP19** suggested in the original.

**Paragraph 20** – The **cumulative effects** are unlikely to be much altered.

**Paragraph 21 – Group H Brown’s Flat West** - Removing turbine zones 0122-0125 and repositioning 52 and 111-113 and 120-121 has "*very significantly*" reduced the impact on Kahuterawa Road and Greens Road, including the "*gateway*" to Kahuterawa Reserve - **VP6, RVP20, RVP21, RVP25**.

**Paragraph 22 – Group K – Love property** - The removal of turbine zones 132 and 133 and relocating 127-131 and 134-136 north of Browns Flat has reduced the encroachment on the middle distance ridge they follow. From most perspectives the relocation has pushed them into the gap created by the loss of turbine zones 132 and 133 without obvious gains in reduced visual presence. But Mr Brown’s conclusion is that these turbines have a much lesser level of intrusion than e.g. Bryants Hill, and there is little to be gained by removing 127-131.

### **Conclusion**

25. This revision has resulted in significant reduction or elimination of effects particularly in what is submitted is the most sensitive area, Bryants Hill, and on the Love property, Group K and in Group H Brown’s Flat West. While entirely for the Board, the MRP case and these submissions focus on the following broad topics.

**TOPIC 1** The warrant for the 45 turbines in Groups D and E as given in evidence by Mr Bray (and supported by Mr Wyatt and Mr Brown).

**TOPIC 2** The warrant for Residential Group A and Residential Group C Bryants Hill turbines.

**TOPIC 3** The warrant to go beyond turbine 27, "*south of Marima*".

**TOPIC 4** Groups F, G, H, J, K have their own features for individual consideration, including Kahuterawa and Greens Road observation.

**TOPIC 5** ONL (linked to Topic 3).

**TOPIC 6** The cumulative effects with other wind farms.

**TOPIC 7** The Reserve Areas.

**TOPIC 8** Mitigation.

26. This (Stadium) vantage point allows the Board to recognise that while focus inevitably falls on the **expanse** of the proposed wind farm, the wind farm site is part of a very large landscape. The turbines, well spaced, cover a large expanse of the ridgeline, but they also fall "*back*" a significant "*depth*" from the forward turbine groups and are not "*clustered*" or "*huddled*" as in Motorimu.

27. MRP seeks consent for all turbines in the Revised Proposal. It is human nature that anger and distress are encountered when effects are believed with sincerity to adversely affect people’s lives. Mr Anstey was frank about his reaction to the Focus Groups. MRP cannot draw on any equivalent emotion and must look to the dispassionate analysis of effects, addressed in the correct context. It does have valid evidence as to the "*reading*" of effects. The arbiter of such important decisions as this will bring to bear the perception and attitudes held towards wind farms in this City, its surrounding areas, and in region. If MRP evidence is held to be properly derived, it recognises not just opposition, local and community, but a balanced approach, even from those within reasonable proximity of the wind farm.

## B TOPIC CONSIDERATIONS

### TOPIC 1 The warrant for the 45 turbines in Groups D and E as given in evidence by Mr Bray (and supported by Mr Wyatt and Mr Brown).

28. Mr Wyatt is in agreement with Mr Bray in respect of Turbine Group D, (South Range Road, Primary Road) and Group E (South Range Road, Secondary Road), that they have less than minor effects on visual amenity (Mr Bray north of 27 in Group D and all of Group E). Mr Brown concurs. Mr Anstey accepts only a few (13) and Mr Baker while not an expert accepts 28. Ms Lucas is isolated in her view that there should be none.
29. There is more common ground between MRP and TAG through Mr Bray than with other expert witnesses or reporters. When he has reflected on the areas of difference some of his thinking is instructive of the tenable conclusions available to this Board. All is not "*black and white*". His reasons for rejecting the turbines "*south of Marima*" are in contest, which explains in part his response to removal of turbines 122, 123, 124, 125 in Group H Browns Flat West.
30. In this context, the **immediate** landscape – Brown E13 – is mostly "*cut over, high country, native forest and shrubland, with some areas of pastoral*". The native forest and shrubland cover is extensive along the main slopes and valley corridors facing the Manawatu Plains and in the higher hill country and the main range further south. "*However it is substantially restricted to lower level, shrub species around the main ridge crests and many of the proposed turbine sites. Areas of pasture and pine forestry exist around the edge of the Reserve on its western, northern and north-eastern margins.*" The same mixture of mature native forest, cut over bush, pine forestry and sub-alpine shrubland and scree are apparent moving south through Hardings Park and Browns Flat and into the heart of the ranges and the adjoining TFP – Brown E14. He describes the "*more rounded ridges and hills*" rapidly giving way to more dissected hill country (to accord to a degree with Mr Bray).
31. Looking west, at PVP7 Makomako Road Wyatt E10.22 acknowledges more than minor effects, the closest turbine 1.81km northwest, on an elevated ridge, and the 45 turbines visible. They cannot be mitigated, but Mr Wyatt considers most people driving along Makomako Road will find the wind turbines on the ridge an attractive element. Roadside planting will also obscure some views to the ridge. The two lines, fore and aft, can easily be recognised in the 2D form.
32. Mr Anstey's limited acceptance is in part based on his concerns with visual effects from the "*Palmerston North side*", and those he accepts are "*set furthest back*" T1506 15-25. That is using his test of "*intrusion*", both as to effect on a resident, and on the landscape as a whole.
33. The propositions that ecological considerations "*should shorten the line*", whether the change in landform at or beyond Turbine 27 is a sound reason to truncate, and whether the turbines south of Marima viewed from a distance are unacceptable.
34. At T1503 15-25 Mr Anstey distinguished his position from that of Ms Lucas. Visual impacts are a consideration in an overall judgment of landscape effects but Ms Lucas, it seemed to Mr Anstey, concluded that the magnitude of visual effects is not the primary issue as turbines are intrusive in a more comprehensive and fundamental way. While Mr Anstey agreed with Ms Lucas, as to the effect turbines can have on relationships and meanings in ways that are beyond mitigation, he did not agree with making judgments at such a level of sensitivity. What individuals see, and the significance of that, depends on the relationship they have with the view and what it means to them.

35. Mr Anstey's conclusion that his limited number of turbines would be acceptable seems to finally have rested on "*visual grounds*", but largely the character of the Turitea Reserve itself – T1590 20-30 is still "*very hard to objectify*". That perspective seems to be based on the character of the Reserve, roading and structures, T1590 40-45.
36. Mr Bray says that keeping turbines on top of the skyline connects with the existing wind farms, laid out in the landscape "*essentially the same*" T2008-2009. He talks of the "*aesthetic continuum*" – T2035 10-15. The turbines in Group D and E continue that. At T2032 Mr Bray observes that north of the Pahiatua Track there are no equivalent **foothills**, and development is limited to "*high on the main ridgeline and running down from the main ridgeline*". He said he was observing that and "*thinking about aesthetic coherence*". "*Off that main ridgeline, I would see turbines **coming off that main ridgeline** but I did not feel that they should be on those lower foothills*". He observed that turbines on the foreground ridges are of a different layout to those existing and would be noticeable and it would be "*more **noticeable particularly if there were no turbines at the back***" T2034 12-20.

#### **MRP Submission**

37. MRP submits that there is no "south of Marima" effect and there is no validity in the Anstey view regarding earthworks in the Reserve, and that nor is there an ecological imperative to truncate as Mr Baker and Ms Lucas contend. There is logical coherence in the ridgeline's development unless the ridgeline is precluded in itself.

#### **TOPIC 2 The warrant for Residential Group A and Residential Group C Bryants Hill turbines.**

38. From Turbine 82 in Group A through to Turbine 96 in Group C there was a span of something like 4.5 kilometres Bray T2003 15-20. He agrees that Groups A, B and C cover a large area of country with **very different relationship** values according to which turbine and which Group is being considered – T2003 20-30. Even **within** Group A there is a span of some 2 kilometres (or 1.7km) – Bray T2003 10-15.
39. Addressing Group C Mr Maassen at T3017 and T3018 used RVP23a to identify turbine numbers and put MSLs to Mr Brown. At T3018 15-17 he referred to the turbines registering as prominent up to 12kms out, by reference to Exhibit 9, Mr Brown's 2006 report. Mr Brown said they would be prominent but not dominant, and used RVP23 showing turbines to the right in this view have been deleted, as well as T94. It is not just a question of "*how visible*" but the relationship with those visible. Deletion meant the turbines as a whole had become "*much more recessive*". They **were** "*overly dominant*" - T3018 40-42.
40. For Bryants Hill West **Group A** Mr Maassen crossed on the basis of Mr Brown's evidence that he did not see it as his role to remove the wind farm in its entirety and did not think it was appropriate to try and remove all signs of the wind farm – T3022 5-9. But he had sought to ensure it did not become "*overly dominant*", a "*nuisance*" or "*nuisance effect*" so as not to impact to an excessive degree, to achieve a **balance** between the natural attributes of the landscape and the wind farm as a manmade addition – T3022 10-15.
41. Again addressing Group A, and using RVP1 and RVP1(a), as representative of the view to the Reserve from the City – T3025 30-35, Mr Brown agreed that to a degree these turbines will stand "*in front*". This was put as a "*remnant*" with a significant impact on visual coherence and how the Reserve "*reads*". Mr Brown's response at T3026 10-15 was that the viewpoint is not focused in this way but picks up the **whole stretch** of foothills from the Track through the Reserve land,

Ngahere Park etc. The image shows the mixture of open pastoral land, pinewood lots, shelter belts and native forests. With the foreground and suburban development he sees the diminution of any coherence as "pretty slight" – T3026 20-28. In essence, from different view points Mr Brown said that the wind farm would **add** to the human intervention, and the modification which exists already – T3027 1-3. He uses RVP1 and RVP2 to refer to the "extensively modified foothills". Turitea Reserve is "not generally perceived from without" – T3027 10-15.

42. RVP23(b) was used to further test Group A, looking south as opposed to east, and put at T3029 to register as an **isolated** pocket. Mr Brown at T3029 30-37 referred to the line of turbines retreating away, mainly on the upper ridges, more remote. That retreating line would have Group A not in isolation, but connected with a thin strand of turbines much more distant to the left of the grouping – T3029 40-45. The visual connection between turbine 12 and turbine 77 is approximately 2kms and that leaves a sense of visual connection between "the remnant" and the main spine – T3030 10-13. Mr Brown did not accept the "remnant", proposition because for the most part the turbines would be seen "beyond the edge of Bryants Hill itself" – T3030 35-38. That "over the ridgeline effect" is the way the turbines along the main part of South Range Road would be seen.
43. Mr Bray considers that Group A, Group B and some of Group C seem separate using eg RVP3, T2053 1-5. He groups collectively A and B, T2053 10-15. Groups A and B are seen by him as a separate lower foothill landform – T2053 35-38. Group C is separated from Groups A & B by a small gully, Bray T2054 30-35, slighter lower in elevation, and further forward, west of the turbines at 400 MSL Bray T2054 40-45. These, Group C are "**just below the ridgeline**" – T2055 10-15. They have a "**stronger connection to that main ridgeline**" – T2055 20-22. The linkage of Group C with Groups A and B creates the complexity for Mr Bray - T2055 25-35. He still considers they have an effect on visual amenities more significant that the ridgeline Groups T2056 5-10, and he admits to "struggling a little bit" with the turbines in this area T2055 35-40, amenity effects differentiating the main ridgeline.
44. Mr Shenton at T2084-2085 asked Mr Bray about what he called "gradual sort of elevation up to a point and it seems to me that they get absorbed into the landscape". Mr Bray agreed with the proposition, and said that the main ridgelines are much narrower and that limits the opportunity, while acknowledging there was "random spacing or somewhat random spacing and that turbines do tend to be located in relatively good locations". Mr Shenton then asked about the application of this approach in Group C into Groups D and E (maybe Group B) and viewing from the bottom looking up "does it have elements of that gradation in that area or not, in your view?". Mr Bray acknowledged that it did "to a limited extent". He added that the ridgeline dropped away very quickly.
45. Mr Anstey acknowledged he did not provide much in the way of "criteria for judgment" – T1540 10-15 for perspective from individual locations. Using the Stoneleigh Lane viewpoint, there were four houses with views of the proposed wind farm, the nearest turbines Bryants Hill East and West about two and half kilometres away across a flat terrace – T1539 40-45. At one to three kilometres such turbines are "highly prominent" by his table – Anstey E28. Turbines in his viewpoint were "highly prominent" but getting from that conclusion to the effects being such that consent should not be granted he said involved "a whole lot of unstated assumptions" – T1542 15-20. The danger of an arbitrary kilometreage as a yard stick to measure effects is shown by looking at turbines zone 078 within two kilometres of Ngahere Park yet PV5 and RVP07 show it as least visible and most recessive of the turbines that remain in view.

#### **MRP submission**

46. Turbines 074-078 in Group A are in contest but should not be excluded for the "breakaway" effect or for any other reason. While Mr Bray considers them isolated and of significant adverse effect. Mr Brown disagrees and considers they "sit down" further in the landscape and they appear smaller, less intrusive and more compatible with the landscape setting – RVP07 Oram/Ngahere Park and RVP25 280 Polson Hill Drive reflect this. Turbines zones 085-092 RVP23 were removed because they had an appreciably greater impact than the wider array generally visible from that quarter, RVP3 406 Pahiatua Track (and RVP3(c)). To remove all turbines which were visible, would require the essential core of the development to be removed and prominence does not equate with dominance – Brown OS31.
47. All of turbine Group C should be consented, able to be seen as connected to the ridgeline and otherwise of acceptable effect. Mr Anstey agreed that he was not suggesting "that you get a TKO because you managed to knock out a couple of turbines in the group, that the rest of the group follow". He answered "absolutely not" – T1537 1-5.

### TOPIC 3 The warrant to go beyond turbine 27, "south of Marima".

#### Skyline

48. Mr Anstey largely agreed with Mr Brown in the delineation of ONLs and amenity landscapes but made an assumption that Mr Brown accepted the skyline as an outstanding natural feature. (He rebuts that.)
49. Mr Anstey was cross-examined regarding the "14 kilometre section of the Ranges", and the importance to the people of Palmerston North City and foothill community. He described the ranges and foothills as "**a backdrop more than a view**" – T1538 25-45.
50. Ms Williams at T2165 said the number and scale of the large wind turbines would change the character of the skyline from predominantly natural. She said it is not a two dimensional construct but "it reads that way especially in distant views". Her view was that the perception is "of a single line". The opinion that character will change is met by Wyatt Rebuttal 4.14 who says, the ridges **remain** the dominant element of the landscape. The skyline is given further consideration below.

#### Groups D (28-33) F, G, H, J, K

51. For the Groups at the "Southern end" (D28-33) F G H J K Mr Bray at E205 says the turbines occupy a distinctly "new" part of the landscape and would lack coherence with the existing pattern of wind farm development. He considers them to be "beyond the natural limit of wind farm expansion on the landscape". There is no evidence of the "natural limit" unless this refers to the debate about the reason to draw the line at turbine 27, which it is submitted is nebulous and on the evidence an unnecessarily restrictive view.
52. Mr Anstey considered some turbines at the "southern end" set back from the city and rural-residents would be **partially contained** by the topography – T1508 39-43. These were not specified by Mr Anstey nor Mr Baker because we "did not get down to analyse them" - T1508 line 44. They included 115, 116, 117, and the southern end of Group H T1509 25-27. Groups H and F were never analysed at those levels. Broadly the reason for that was the alleged focus on these turbines from the City and Plains and in the Kahuterawa Valley, and those who sought to get away from the City. They were "very intrusive on Hardings" T1510 1-5. Potentially for consideration there were "four perhaps eight". Mr Anstey distinguished those in the north of Group H as "extremely intrusive of rural residential communities", T1510 30-33, now removed.

### **The "end point"**

53. In broad terms Mr Brown gave evidence that at a strategic level it was better to consolidate wind farm activity near an area *"more modified, more cultural than within part of the Tararuas, even the Ruahines, I regard as fundamentally natural"*. He wanted to get the wind farm into the *"modified landscape"* and Mr Bray agreed with this proposition – T2029 1-15.
54. At T1985 Mr Bray acknowledged that he is not surprised that he, Mr Anstey and Ms Lucas were unable to agree on the *"exact end point"* of the turbines in this part of the skyline. His end point is *"perhaps more based on a change in landform rather than cover"* – T1985-37. He recognised the ecological factors in the span between the Reserve boundary and the peak of Marima and said *"I consider that the wider context to the landscape could be appropriate to consider turbines in this location"*. He said they should be of the same design as the Te Apiti turbines. That was based at T1991 1-5 on such turbines having a more favourable appearance.
55. At T2008-2009 Mr Bray's reason for deleting the *"residual six"* (28-33) in Group D, and Groups F through K, was put as the *"foothills effect"* and the *"south of Marima effect"*.
56. Tested on his position as to the southern extent of development, Mr Brown put it at T3035 40-45 that there is a point *"where the central spine of the Tararuas starts to emerge from the foothills that encase it, further north"*. The *"emerging spine"* and the greater continuity of bush cover on the flanks is where the Tararuas become outstanding T3036 1-5. This was a view consistently held, as his cross-examination at T3035 24-35 indicates *"Hardings Park provides that interface"*. He thought Motorimu went too far and said so in 2006, and again in 2008.
57. Mr Brown acknowledged that south of Marima contained the most significant parts of the skyline within the proposed site, T3051 20-23, from the point of view of the Regional Plan. It was put to him that a parallel drawn between turbine 16 and 39, delineates shrubland and forest, and was the more significant part, T3051 40-43. Mr Brown said that most of the South Range Road has significant remnants of shrubland merging with bush and forest below but nothing is *"so significant"* that it should preclude the location of turbines on the ridge T3052 1-15. The continuum in effect exists most of the length of the site – T3051 line 45.

### **MRP submission**

58. There is no ecological reason not to extend turbines to Turbine 27 and no reason through topography not to extend to Turbine 33. Reference to viewpoints will support this submission. The other turbines in the *"Southern End"* fall for different evaluation below but are not to be excluded for this so call effect.

### **TOPIC 4 Groups F, G, H, J, K "local" Kahuterawa and Greens Road observation, and distant observation.**

59. Mr Bray was asked about turbines at Group G to K and the residual Group D turbines (T2006). Mr Bray sees these *"40 turbines"*, in this part of the landscape, as a significant contribution to a *"perceived excessive occupational of turbines in the landscape"* – T2006 15-25. He says there would be significant effect on local residents and the wider viewing audience.
60. The lineal effect from the northern most turbines in Group K and the southern most turbine Group F, is about 5.5 kilometres T2007 1-12. The span from turbine 125 in Group H to Marima is about 4.5 km Bray 2007 25-33. Mr Bray agrees it is a big landscape. But he explained this *"on a wider scale"* in terms of the **"whole"**

**landscape of the ranges**" and cumulative effects **with other wind farms** – T2007 37-44. So it falls for evaluation in that context. (How much is too much?)

61. Mr Bray treats Group K (Love) turbines as the most dominant turbines at the southern end of the wind farm – T2064 20-25. The turbines discussed with Mr Bray at T2064 40-45 and T2065 1-15 are those visible from Red Rock Knob. From the Plains these are "*largely screened*" by Tirohanga and the ridgeline West of Browns Flat, but at 13 kilometres they can be seen. In terms of visual amenity the **additional effect of these Groups** in conjunction with the more foreground turbines in Group K is **negligible**. "*At most they contribute to a degree of blade crossover*". So Mr Bray points to the "*outward view*" from Red Rock Knob T2065 20-25. Even from there, the turbines are spread over a broad distance.
62. The Group H turbines have a limited effect on visual amenity, but greater as part of an overall group. RVP16 shows residences about 2 kilometres from turbine 125 at the end of Group H. The impact on Kahuterawa and Greens Roads views is much reduced by removing 0122-0125 from residential and wider public viewpoints.
63. Group J is described as related to "*a small valley separating a dominant but short ridgeline that juts out into the Turitea catchment*" but for the most part they are located amongst the turbines in Group K and cannot be seen from locations on Greens Road or Kahuterawa Valley. They are "*largely screened from view, from external to the site*" - Bray T2068 5-15.
64. Group J Western Ridge was discussed at T3047 et seq. Viewed externally Mr Brown said it was less prominent than most of the other ridges T3047 30-35 but within the Reserve itself it is "*reasonably prominent*". Attachments 17 and 24 of Ms Lucas' evidence it was put that Western Ridge was distinct but a little less distinct than other parts of the skyline T3048 20-22.
65. Mr Brown identified an overlap with the Love property turbines, those on Browns Flat and those turbines viewed in the backdrop on and around South Range Road T3048 30-35. So they are not seen "*distinctly*". Mr Brown considered them "*visible*" but not easily distinguished or separated from other groups T3049 1-4.
66. Viewed "*from within*" Mr Brown's evidence T3049 20-25 is that looking down, within the Reserve and particularly from South Range Road a complete layout of the ridges within and around the Reserve becomes apparent and that is why the groupings become clearly apparent. The converse applies looking from Palmerston North where it is more difficult to distinguish or differentiate the grouping or line. There is not the same degree of layering.
67. At T2107-2108 Mr Bray acknowledged that with regard to the "*picket fence*" effect, and how far it extended, he did consider if the turbines were put on the foothills rather than the top ridgeline "*they would probably be more landscape-responsive*". He backed away from that because there are so many turbines already and it would be a "*dramatically different arrangement*" and there would be a greater discord between the wind farms. He also agreed that some turbines are certainly lower but some on Bryants Hill, from VP12 are effectively the same height as the main ridgeline. But the foothills will be seen in spatial depth T2033/45.

#### **MRP submission**

68. There are no local effects to preclude consent and there is other adverse effect sufficient to preclude consent.

#### **TOPIC 5 ONL (linked to Topic 3)**

69. The ONL exists, but at a disputed point. The experts have different views of the ONL "boundary". Mr Wyatt Rebuttal 2.8 Fig.1 works from where the forested range becomes visible from the surrounding plain LS and VA Fig.6.14. He and others (particularly Mr Brown and Mr Bray) accept the delineation of the northern boundary of the ONL is approximate, but that the wind farm is not within an ONL for the purpose of s6 RMA.
70. Mr Brown's involvement spanned the earliest proposed turbine layout, the modified proposal presented in 2009, and he has been the significant contributor to the revised proposal now before the Board. His 2009 evidence focused on identification of outstanding natural landscape features and amenity landscapes in the sub-regional catchment surrounding Turitea.
71. Mr Brown describes the extensive area of semi-mature pine forest to the west near the Ngahere Park sub-division buffering the hill country and bush of the Turitea Reserve proper – Brown E17. He acknowledges that the native forest cover of the Reserve merges almost seamlessly with the northern tip of the TFP but the slopes abutting these Reserves immediately east of South Range Road at the ridge crest, are notable for rapid transition, and a sequence of rolling farmland and open pasture broken by gullies, sporadic pockets of remnant bush / forest and the odd shelter belt – Brown E18.
72. A core description of the "transitional" values is in Brown E21, the landscapes subject to significant modification and displaying "significantly reduced levels of appeal".
73. The contrast between "wild nature" and "cultured nature" is discussed at Brown E26, who adds additional landscape "layers" identified by the Environment Court - Brown E28, to the "modified Pigeon Bay" factors. Status as "outstanding" is "self-evident", "exemplary", "conspicuous", "exceptional", "eminent", or "memorable". Their characteristics and some physical elements are visually dominant or very prominent and found the sense of distinction, expressiveness and unity.
74. **Amenity values** in their physical quality and characteristics contribute to the appreciation of pleasantness, aesthetic coherence and cultural and recreational attributes, Mr Brown E33 says that these may range in scope, **right down to the outlook to a single hill, ridge, stand of trees etc.** They are "**known**", and **appreciated, elements and features**. He calls character that which is "glued together" by a certain cohesion of expression and unity of elements to become "pleasant" and for having cultural or recreation appeal – Brown E36. The "sense of place" and that which is "distinctive" are elements of this. The amenity landscapes are those where such characteristics and physical elements are prominent and/or typical. Human modification may be readily apparent but will integrate reasonably harmoniously with the natural landscape patterns and structures evident.
75. Mr Brown began with a very broad palette for assessment of outstanding amenity landscapes - Brown E41. The Tararua Ranges have a significant number of components - Brown E51, and the observation at E52 is that from the Turitea Reserve southwards a narrow strip of native forest tops the ranges gradually climbs skyward to become more prominent, as an established dark mantle along the crest. From most perspectives this core sequence is buffered / screened and visually suppressed by the pastoral foothills on the western flank until close to Levin, when the serrated hills and mountain ridges of the Forest Park attain a much more visual presence in their own right. Analysis at Brown E54 runs through the sequence of hill country landscapes north of the Track through to the main body of the Tararua Forest Park.

76. Generally however Mr Anstey agreed with Mr Brown at T1556 15-45 that there is a merger or coalescence of a sequence of ridges and hilltops rather than any one being dominant, an amalgam of hilltop features – T1556 line 44.
77. Mr Brown E54 develops his reasoning. From Pahiatua the forest mantle atop the Tararua Ranges "*fingers*" down the pastoral slopes and ridges. The rural residential developments on the Palmerston North side further erode the native / natural qualities and the landscape is "*less than eminent or conspicuous*". But there remains a sense of distinction and sense of place.
78. He recognises the visibility of the hills as a backdrop to the City, Fielding, Pahiatua and other lowland areas. So he identifies an amenity landscape in the hill country, in this area.
79. From Browns Flat through to Mangaore on the western side of the Tararua Ranges much the same pattern is identified – Brown E54/3. The central swathe of bush on the increasingly steep hill country becomes more apparent and the Forest Park starts to emerge as a more distinctive and unified feature. Mr Brown identifies these two distinctive landscapes, with some compromise of the Tararua Forest Park by the rural foothills. The Park as an ONL generally emerges around the Tokomaru Conservation area southwards.
80. On the Eastern side of the Ranges, from Marima and Kopikopiko to Nireaha a similar situation is apparent, with less differentiation into two halves as on the western side of the mountain / hill chain. There is a slightly more graduated progression through the working lowland landscape into a natural montages landscape. South of Mangaore and Nireaha on **both sides** of the Ranges the steeply rising hills and mountains, forest cover and sub-alpine climes provide signature components.
81. The wind farm site lies **close to, but just outside** that part of the Tararua Ranges which is clearly outstanding - Brown E55. He acknowledges the **significant** amenity values because of the underlying naturalness, Brown E56, and does not shy away from the amenity significance of the Reserve lands. In his conclusion - Brown E71 he says that the closer to the vantage points assessed from key locations around the City and the State Highways, the more immediate landscape has a strong working / production quality.
82. He concludes that the Reserve, Hardings Park and the northern reaches of the TFP are highly significant, perhaps even outstanding when viewed from within, but the predominance of bare pasture, forestry and rural residential development and scrub remnants substantially erodes such landscape values, until well south of Browns Flat.
83. The contrast between the more natural forest-dominated internal qualities of the Reserve and its more modest periphery, being the landscape of and around the proposed wind farm site, means **as a whole** that it does not qualify as outstanding.
84. The essential point of difference seems to be dealt with at SR10 where Mr Brown identifies the point at which the central spine of the Tararuas and the cloak of remnant native forest starts to establish a "*certain primacy*" which outweighs the steep pasture and pine forested blocks. Specifically, sees that as coinciding with the steeply indented Patupaiarehe Stream Valley on the eastern side of the Tararuas and termination of the sequence of lots of pine forestry south of the Kahuterawa stream system on the western side.
85. Ms Lucas questions Mr Brown's assessment of the bush-clad summit of the range and "*amenity landscape*", as it is in her view neither typically rural nor residential and not a "*little local feature*". She sees it as a part of the main Tararua Range

natural landscape, involving protected natural ecosystems. In Mr Brown's rebuttal evidence SR5 he says this bush is part and parcel of a wider landscape with remnant forest and pine forest, cut over ex forestry land, open pastoral slopes and one sizeable pocket of rural residential land, so the 5000ha to which Ms Lucas refers is not a discreet entity in its own right. Its integrity has been affected, in aesthetic value and expressiveness. He refers at SR6 to the tests of "exemplary" etc.

86. Mr Brown identifies Ms Lucas' E35, where she says that she does not assess the site **in total** as within an ONL, contrasting with her E50, where "guided somewhat" by the statutory regime she assesses the site as within an ONL. Again, the "truly outstanding" element is missing according to Mr Brown.
87. On the point which seems to resonate through the evidence, Ms Lucas has identified the continuum of native forest stretching out from the main body of the forest park into Hardings Park and then the Reserve. The difference seems to come down to the fact that, addressed from East and West, the ranges around Turitea are highly modified – Brown SR9 - the "highly modified patchwork".
88. Port Hills analysis by Ms Lucas to support the Arawaru to Pahiatua Track area of the Tararua Range as an ONL is dismissed by Mr Brown at SR11-12 for what he calls an inappropriate attempt to correlate two quite different landscapes and forms.
89. In essence, the difference between Mr Brown and Ms Lucas is submitted set out at SR13-14 because Ms Lucas treats native bush as a landscape in its own right whereas Mr Brown sees it as a large scale **landscape element** or **component** of a **wider landscape**, which contains other elements. The "entire landscape or feature" must be addressed to determine the effect of subordinate landscape elements. There can be no presumption that natural elements always "outweigh" cultural elements when looking at landscapes which combine both "layers" – Brown SR24.
90. Mr Bray, essentially in agreement with Mr Brown, sees lower significance in the three landscape units incorporating the main ridge line and the ranges, running from South Range Road to Wharite Road. The skyline is at the higher end of significant amenity value. The foothill's minor landscape units are **significant landscapes, but not outstanding**, in their contrast to the productive plains. The foothills of Bryants Hill, Ngahere slopes and Te Mata form a dominant rural backdrop to residential and productive developments. These foothills contribute to the dominance of the Tararua Ranges.
91. Mr Brown says at SR26 (and again when returning to give evidence) that the area around Hardings Park is one of transition, away from the more modified landscape of his Landscape Unit 27 into the truly outstanding Landscape Unit 2.
92. Mr Anstey thought that the question of the boundary was "one of those silly situations where a boundary is inevitably going to be arbitrary . . ." – T1534 10-15. He also agreed that the "area" that had been "culturally altered" had been altered "in a major way" and most of it was "secondary growth – so I do not think – there is very little – there is some but not a lot of original indigenous forest, however, it has been in a state of recovery for some years" – T1534 20-25.
93. Mr Bray said that he found himself "in general agreement that the landscape around Turitea Reserve and Hardings Park has outstanding features and the skyline ridges are outstanding features, **but as a whole the landscape is not outstanding**". T1985 8-14. The landscape is "a significant amenity landscape, particularly when viewed from the Western side".

94. Put another way Mr Bray E73 considered that the "*minor landscape unit containing Hardings Park is close to being outstanding*". Mr Brown and Mr Wyatt say that even the most sensitive adjoining area "*of the ranges*", Hardings Park, would fall within a "*special amenity landscape character*", and not an ONL under s6 RMA. The landscape on which the wind farm is to be located is north of Hardings Park and would not be included within an ONL.
95. Mr Anstey at E31 agreed - "*I generally support the assessment Mr Brown makes and his conclusion that, although not outstanding at a regional level, on a regional scale, the landscape is an Amenity Landscape with values of considerable significance*" Anstey (paragraph 26). "*I agree with Mr Brown that the landscape may not be outstanding on the regional scale ...*" Anstey (paragraph 31).
96. Mr Anstey at E50 considered there were large parts of the Turitea Reserve that meet the criteria for ONL but he was wrong to draw Mr Brown into "*agreement*". Mr Wyatt has the same position as Mr Brown, reflected in Brown E72 and Wyatt Rebuttal 2.4.

*"For the sake of both clarity and accuracy it is important to repeat Mr Brown's conclusion, with which I also agree, in full. He states:*

*'There can be little doubt that the Turitea Reserve, the adjoining Hardings Park and the northern reaches of the Tararua are highly significant, perhaps even outstanding, when viewed from within. Yet, the predominance of bare pasture, areas of plantation forestry and rural-residential development, together with scrub remnants, across the external slopes of the Tararua Ranges very substantially erodes such landscape values and the integrity of the northern Tararua Ranges as a whole. This situation continues at least until well south of Brown s Flat, where the Forest Park starts to emerge as a more significant landscape entity in its own right. Because of this contrast between the more natural, forest dominated, "internal" qualities of Turitea Reserve and its more modest periphery, the landscape of, and around, the proposed wind farm site – as a whole – does not qualify as being outstanding in terms of section 6(b) of the Resource Management Act.'*

97. Mr Baker at E68 says "... *This debate does not figure highly in my evaluation*".

#### **MRP submission**

98. An ONL is submitted to "*stand out*". A boundary classification should respond to this. It should emerge when it is clear, as exemplary. This boundary has been carefully delineated by Mr Brown. There is no ONL preclusion to this proposal.

#### **TOPIC 6 The cumulative effects with other wind farms.**

99. Mr Bray, Ms Lucas and Mr Anstey found the proposal unacceptable based on their opinion that turbines would "*fill the last gap on the city's backdrop*" with a variation in turbine size either side of the Pahiatua Track, the degree of turbine rows and overlapping, registering "*dense groups from many viewpoints*" – T1500 43-45 and T1501 1-6. This is submitted not borne out by the montages, nor does it reflect the movement or distraction of the observer, nor the foreground effects.
100. Mr Anstey agreed at T1519 40-45, T1520 1-2 that "*the branding*" in part of this region as a wind energy capital of New Zealand, the fact that some Mr Baines interviewed thought there is about the right number of wind farms consented, developing or developed, who still found interest in turbines in the hills, are all factors in determining the impact of further turbines. At T1545, 6, and 7 Mr Anstey was asked about his evidence that wind turbines would be "*all pervasive in the lives of the city's people*" – T1547 12-15, and that the citizens were being

- "overwhelmed" by the turbines. In that statement he was speaking as a "psychologist or sociologist" – T1547 40-45. Mr Anstey saw the wind farms in place and Motorimu, peripheral to the City, and they are "a recurring theme in that experience of driving". So they are part of the rural character – T1585 20-30. But he does not think they as yet make Palmerston North a wind farm city (to Mr Hudson), "tipping the balance". T1586 1-14.
101. Mr Anstey acknowledged that while Motorimu was recessive, in sequential effect, wind farms would be apparent from just north of Shannon so **with Motorimu** wind farms would have had a "much stronger presence" – T1586 line 40.
  102. It was put to Mr Bray that a span of 11 kilometres of widely spaced large turbines matching Te Apiti, and T3 more so, with the blade length "right", would be "a more cohesive line of turbines than that which we see now, where we have at the end Te Rere Hau" – T2010 20-25, Mr Bray agreed. Te Rere Hau causes him problems with cumulative effects and ideally should not be there. Big turbines matching up is a positive and a negative to Mr Bray – T2010 40-45, T2011 1-5.
  103. The idea of Turitea and Te Rere Hau "overlapping" is in contest. Mr Brown – OS21 indicates turbines 0101 and 0102 might achieve this effect approaching the track along Makomako Road. Otherwise they would read as separate entities. RVP23 allows joint observation but in different viewing quadrants. Aesthetic coherence is important, and Mr Brown acknowledges the Turitea project would be more high profile and visible than Te Rere Hau but the linear profile of the hills and the physical separation around the Track, will lead to Turitea being largely read as a "stand alone entity". Ms Lucas misinterpreted Mr Brown's comments regarding cumulative effects with Te Rere Hau.
  104. Mr Anstey did acknowledge that his assessment of sequential effects was influenced by Motorimu's removal – T1559 1-5. While qualified in his answer he did acknowledge the effects of change T1559 19. The view with Te Rere Hau and Motorimu created a "fractured landscape" – T1560 10-12. Mr Brown, who could not support the proposal with Motorimu included, referred to a **sequence** of turbines under this proposal which stopped short of the Forest Park. Mr Anstey agreed that was a relevant consideration – T1560 25-26.

#### **MRP submission**

105. The expanse of skyline is by its length and 'delineation' well able to absorb all turbines proposed. The judgment must reflect the **whole** landscape, as focus just on this site is not the ordinary view.

#### **TOPIC 7 The Reserve Areas.**

106. Mr Brown at E52 put in context the narrow strip of native forest from Turitea Reserve southward climbing skyward to establish the dark mantle along its crest. He has evaluated the Turitea Reserve and Hardings Park and the land around them.
107. The **internal** forest landscape of the Turitea Reserve and part of TFP has a high level of coherence and integrity, but viewed from external locations the landscape is substantially dominated by open slopes, grazed, and pinewood lots. The bush and dissected terrain remain partly visible, but are enclosed and ultimately **suppressed** by the farm / forest landscapes which flank them – Brown E page 20 para 2. He does not minimise the high significance or outstanding quality, viewed from within.
108. The 868ha area of **Hardings Park** was gazetted Scenic Reserve in 2003. The "Local Purpose Reserve" has protection and management of scenic features as a "secondary objective" – Lucas para 97. The turbines are not within the Scenic

Reserve. S19 of the Reserves Act has no application. The "*Local Purpose Reserve*" is specifically amenable to electrical generation activities if they do not compromise the water supply catchment, and effects on other values are appropriately mitigated. Public access to the Local Purpose Reserve area is limited to seasonal hunting licensees - Wyatt Rebuttal 3.61 considers that Ms Lucas has "*grossly overstated*" the significance of the Scenic Reserve to landscape and visual analysis.

109. There is some accord. Mr Anstey at T1499 13-23 reported on caucusing for Hardings Park Scenic Reserve and the Turitea Reserve. Mr Brown was not at caucusing but Mr Anstey noted he agreed some parts of the Reserve **viewed from within** are outstanding. Mr Anstey considered there were significant areas outstanding but the quality was mixed at the upper northern margins where there was a "*transitional area*". All at caucusing agreed that areas of private land within the proposal, the foothills and front ridges, were high amenity landscapes.
110. Mr Wyatt gave evidence about the views from Hardings Park, the cover within that, and where views were available – T1562 (bottom) and T1563 1-5. Mr Anstey said there was a lot of low growth and there was more than one viewing point but he acknowledged there were many perspectives from within the park which were really "*inside the park, for the park?*" – T1563 10-14.
111. Mr Bray describes the Reserve and Hardings Park as located on the upper ridges and in the "*hidden gully*" (Bray E 53) agrees a lot of Turitea is tucked away although the skyline ridges are visible and a lot of Hardings Park is visible from a lot of viewpoints on the plains. But the "*hidden gully*" is "*hidden*" from the plains – T2024 25-40 156.
112. Mr Brown acknowledges the Reserve's forested area and says that the views from the Ranges to the plains, and south of Pahiatua, are mainly to the highly modified periphery and within those views the Reserve and even much of Hardings Park have insufficient visual presence to impose their natural values on the wider range landscape – T 2030 20-33. Mr Bray acknowledged T2031 1-6 that these reserve areas are not "*imposing*" on that perspective. Mr Bray considered (question from Commissioner Hudson) that the ecological aesthetic model would be more appropriate in the Reserve given restricted public access and that visibility from most locations is restricted – T2095 25-30.
113. Pressed on the impact of driving from Summerhill Drive to Turitea Road and up to Ngahere Park that the natural character became greater, and more dominant, Mr Brown did not agree. He thought the experience was of "*more rural character*". That is the "*dominant impression*" in relation to most of the foothills around Turitea Reserve – T3028 5-10. And he uses the example of travelling down Turitea Road and down to the lower terrace that the natural vegetation and native bush areas are visible but also the pines and the pasture. When tested on turbines 113, 114, 115, 116, 119, Group H, Mr Brown acknowledged that in some cases they would sit adjacent and in front of Hardings Park but his response at T3054 line 30 was that the landscape around Kahuterawa Road and the foothills around the Road Valley tend to predominate, in most views, although as you get further north you do get glimpses of the forest that makes up the backbone of the ranges, and Hardings Park.
114. Mr Brown was asked at T3034 lines 5-9 whether on the evidence the Reserve was not considered "*highly valuable*" and Mr Brown did not deny that. He recognised social attachments and values that were significant. He had not explored those, but had looked at the values of the landscape from established theory and methods. It involved professional judgment rather than public explanation of attachment. Mr Brown does acknowledge the associative values T3034 30-32.

#### **MRP submission**

115. The Reserve and Hardings Park have recognised value. The areas around them are compromised. The essential qualities remain other than the intrusion into some viewpoints. There is no discrete reason not to consent turbines for effect of these areas.

**TOPIC 8 Mitigation.**

116. Time alters character, based on the maturity of the subdivision – questions from Commissioner Hudson to Mr Anstey at T1582. Ngahere Park has older and newer parts and in the older parts there is conscious management of vegetation for the views. There is a lot of planting in the newer parts. At Polson Hill it is already more enclosed through vegetation, as a more mature residential subdivision. By preference people enclose the southern side of their property for shelter and maximise the north and northwest aspect – Anstey T1583 5-9. Sometimes the options are not available. And Mr Anstey, again to Commissioner Hudson, addressed the terraces looking out from Stoneleigh Lane and the fact that a lot of boundaries are planted and a lot of shelter created because of the wind. Mr Anstey was asked whether it was reasonable to expect these areas would mature the way that Polson Hill has, and answered "*eventually yes*" and it is at the periphery, that the "*open ones with the views*" will remain – T1584 20-22.
117. T1591 7-45 and T1598 1-2 – going down Fitzherbert Avenue to the foothills the turbines will become more prominent. Mr Anstey acknowledged people planted a lot of acacias and eucalypts, in which case there could be mitigation with eucalypts and acacias in a relatively short period of time T1591.
118. The evidence of Mr Wyatt should not be ignored. His mitigation drawings show what can be achieved.

**MRP submission**

119. Mitigation is a feature of Mr Wyatt's evidence. It is a proven, practicable (if desired) response, which will work in many cases. Mr Wyatt has demonstrated the way it can work. It falls for Board evaluation as to effect but it cannot be ignored as it is a real, and practical part of consent consideration.