

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of a Board of Inquiry appointed under section 146 of the Resource Management Act 1991 to consider applications by Mighty River Power Limited for resource consents to construct, operate and maintain a wind farm at Turitea

SUPPLEMENTARY EVIDENCE OF BRAD COOMBS

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1. INTRODUCTION

- 1.1 My name is Brad Coombs. I am an Associate, Senior Landscape Architect, and the Tauranga Manager of Isthmus Group Ltd.
- 1.2 I prepared a statement of rebuttal evidence for this hearing.
- 1.3 I hold the qualifications and have the experience set out in my statement of rebuttal evidence.
- 1.4 I have been asked to respond to the statement of supplementary evidence prepared by Diane Lucas.
- 1.5 I will address one topic, being the identification of outstanding natural features and landscapes within the Horizons Regional Council Proposed One Plan (*One Plan*).
- 1.6 I have read the Code of Conduct for expert witnesses contained in the Environment Court Practice Note and I agree to comply with it.

2. THE IDENTIFICATION OF OUTSTANDING NATURAL FEATURES AND LANDSCAPES WITHIN THE HORIZONS ONE PLAN

- 2.1 I assisted Mighty River Power with the preparation of their submission to the One Plan. I have since been involved in a number of meetings and witness caucusing sessions with the Horizons Regional Council and their advisors relating to Chapter 7 and Schedule F of the One Plan. I presented evidence and addressed questions raised by the panel on Chapter 7 and Schedule F of the One Plan on 28 July 2009.
- 2.2 I re-iterate the statement in my rebuttal evidence that a full landscape assessment of the Horizons Region has not been undertaken in compiling the list of proposed Outstanding Natural Features and Landscapes (ONFLs) described and mapped within Schedule F of the One Plan.
- 2.3 Ms Lucas has addressed the issue of ONFLs within her supplementary evidence as if they are to be given full weight under the Manawatu – Wanganui Regional Policy Statement (RPS). The One Plan is well advanced through the consultation and hearing process and will result in a number of changes to the location and status of ONFLs within the region. It is possible that ONFLs will be different in both definition and location to the areas identified within the most recent version of Schedule F.
- 2.4 The inadequacies of the identification and definition of a ‘skyline’ as an ONFL have not been addressed within Ms Lucas’ supplementary evidence, in fact the catch all

nature of a 'skyline' has been highlighted. I refer to paragraph 4.11 of my rebuttal evidence where I state:

*"The concept of a 'Skyline' is dependent on the consideration of both the landscape which is under assessment and also the location of the viewer. Given the vast area covered by the Tararua Ranges, the infinite number of viewing locations throughout the region, and the comments of the Environment Court in the Motorimu decision, in my view it is problematical and therefore poor practice to identify a 'Skyline' as an ONFL. As noted by a number of witnesses (including Messrs Brown, Wyatt and Anstey), the Tararua Ranges contain a number of characteristics and values represented within the Amended Pigeon Bay criteria, which will make parts of them outstanding. In my opinion, relying on the identification of the 'Skyline' weakens the identification and protection of the ranges as they are represented in Schedule F."*¹

2.5 At paragraphs 19-22 and 31-33 of Ms Lucas' supplementary evidence it is suggested that ONFL's can be identified outside a full consulted district or region wide landscape assessment. In principle, I agree that there are landscapes within the Horizons Region (and other areas) which can be confidently assessed as outstanding without the need for such an assessment. These are clearly outstanding landscapes such as the section of the Tongariro National Park that is within the Region. Then there are those, such as the application site, that are contested, which require a greater level of assessment and consultation to determine their status.

2.6 Based on my experience with the One Plan, I confirm that the Turitea site has not been assessed within the context of the balance of the region's landscape resource as an ONFL, nor has any proposed ONFL classification been confirmed for the site. Based on the various specific assessments undertaken for these applications, no other landscape architect other than Ms Lucas has suggested that the subject site should be treated as an ONFL.

Brad Coombs
3 August 2009

¹ Rebuttal Evidence of Brad Coombs.