

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

REBUTTAL 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. I hold qualifications of Bachelor of Landscape Architecture (Hons), and Bachelor of Horticulture. I have 12 years experience working as a Landscape Architect in New Zealand and overseas on a range of design, project management, and landscape planning projects. I am an Associate member of the New Zealand Institute of Landscape Architects (NZILA), and a Registered NZILA Landscape Architect. I was a member of the elected National Executive of the NZILA for the 2005-2007 and 2007-2009 terms.
- 1.2 I was one of the authors of a Variation underpinned by landscape and natural character principles, to the Rotorua District Plan in the Lakes A Zone, a sensitive lakes environment. I have undertaken extensive work in the coastal environments of the North Island including projects and district and regional plan policy review in Northland, Auckland, Waikato, Coromandel Peninsula, Bay of Plenty, Poverty Bay, Manawatu, and Wellington. I have undertaken a number of projects in the Manawatu-Wanganui Region.
- 1.3 I have completed or led broad-scale landscape assessment projects at a catchment or District level for the Rotorua District Council, the Taupo District Council, the Papakura District Council, and I am currently working on a District wide assessment of the South Waikato District. I have also reviewed and submitted on national planning legislation and National Policy Statement reviews for energy sector clients and professional institutes.
- 1.4 I have advised Mighty River Power Limited (*Mighty River Power*) regarding aspects of its submission to the Horizons Proposed One Plan (*the Plan*) and have since reviewed the submission lodged by Mighty River Power in respect of the Plan. I have attended a prehearing meeting held by Horizons Regional Council (*Horizons*) on the Landscape Chapter (7) and Schedule F of the Plan, and a subsequent expert caucusing session. I have also prepared evidence to be heard on the Landscape Chapter and Schedule F of the hearings for the Proposed One Plan.
- 1.5 Specific to the Manawatu-Wanganui Region and the Plan, I have undertaken the following tasks and document reviews:
- Visited many of the areas within the region, especially those where Outstanding Natural Features and Landscapes (ONFLs) have been identified within Schedule F of the Plan;

- Reviewed the relevant sections and provisions of the Plan, as notified, in particular Chapter 7, and Schedule F (Appendix D to Mr Hindrup's evidence);
- Reviewed the submission of Mighty River Power;
- Reviewed a number of submissions in relation to Chapter 7 and Schedule F, in particular the submission from the Tararua Aokautere Guardians (TAG);
- Reviewed the further submission of Mighty River Power;
- Reviewed the 'Tracked Changes' versions of Chapter 7 and Schedule F, both dated 18 March 2009 (Appendix E to Mr Hindrup's evidence);
- Reviewed the Section 42A Report by Clive Anstey in relation to Chapter 7 and Schedule F, both on behalf of Horizons (attached as **Appendix 1**); and
- Reviewed other relevant information in relation to the Manawatu-Wanganui Region and landscape matters as they relate to the Mighty River Power submission, and other submissions and further submissions.

1.6 I have been engaged by Mighty River Power to provide rebuttal evidence that comments on, and responds to, the matters raised in the evidence of Mr Philip Hindrup on behalf of Horizons regarding the identification of the Tararua Ranges as an ONFL in the Plan. In particular, I will address:

- (a) relevant assessment criteria for determining ONFL;
- (b) the process undertaken for identification of ONFLs in the Plan; and
- (c) the specific provisions relating to the skyline of the Tararua Ranges (and the proposed Turitea Wind Farm site in particular) under the Plan.

1.7 I have reviewed some of the evidence presented in support of TAG, the Palmerston North City Council, Horizons, and Mighty River Power on the proposed Turitea Wind Farm project. I have not fully considered the proposed wind farm myself or the range of components which will comprise the project. I have been asked to review and present the work that I have undertaken in relation to Mighty River Powers' submission on the Plan. I do not have a detailed understanding of the proposed wind farm project, however do consider that I have a good working understanding of Chapter 7, and Schedule F, and the process that has lead to their evolution within the Plan.

1.8 I have read the Code of Conduct for expert witnesses contained in the Environment Court Practice Note and I agree to comply with it. I have considered all of the material

facts that I am aware of that might alter or detract from the opinions that I express. This rebuttal evidence is within my area of expertise.

2. RELEVANT ASSESSMENT CRITERIA FOR DETERMINING ONFLs

2.1 Court decisions and years of development of practitioner based best practice assessment techniques have led to the development of a strong understanding of landscape and natural character issues under the Resource Management Act 1991 (the RMA).

2.2 As outlined in the evidence in chief of both Mr Brown and Mr Wyatt, the seminal case regarding landscape under section 6 RMA is *Wakatipu Environmental Society Inc v Queenstown Lakes District Council*¹, in which the Court outlined what are referred to as the 'amended Pigeon Bay criteria'. I note, however, that the criteria are not specific to the assessment of outstanding landscapes and natural features, but should be applied to the assessment and evaluation of all landscapes. It is likely that the application of such criteria (or factors) could lead to the identification of outstanding natural features or landscapes, amenity landscapes, or 'other' landscapes.

2.3 The Court also identified that the criteria were not exhaustive and could be improved with further use. This point is important, as it is clear that the Court had never intended for the list to be used as a static template for the assessment of landscape under the RMA. The list requires some level of interpretation every time it is used for the assessment of landscape. Therefore the reference to the dynamic nature of the list should be incorporated into any further use of it under the RMA.

2.4 I have reviewed the analysis of the appropriate usage of the amended Pigeon Bay criteria for the identification of ONFL's and amenity landscapes in paragraphs 28-40 of the evidence of Mr Brown, and I concur with his description and summary.

3. IDENTIFICATION OF ONFLs UNDER THE PLAN

3.1 As noted by Mr Hindrup (at paragraph 45 of his evidence), Schedule F of the Plan (as notified) identifies 13 ONFLs within the Manawatu–Wanganui Region, including the skyline of the Tararua Ranges. Maps for each of the 13 ONFLs are also included within Schedule F, indicating the location and boundary of the area considered to be outstanding.

¹ [2000] NZRMA 59.

- 3.2 I have found it difficult to accurately assess the location and boundaries of some of the ONFLs identified in Schedule F due to the scale and graphic quality of some of the images presented within the Schedule. I have therefore cross referenced the images in Schedule F with NZMS 260 Series 1:50,000 scale topographic maps for the same locations. This has allowed me, in conjunction with the field work that I have undertaken, to better understand the topography, vegetation and land use patterns throughout the region. The 1:50,000 scale maps provide a sound basis and scale for understanding the spatial extent and characteristics of areas identified in Schedule F.
- 3.3 The table in Schedule F lists a series of 'Characteristics/Values', and 'Other Values' which presumably have lead to the area being identified as an ONFL. It is not clear from the information included in Schedule F why there is a differentiation between the two columns labelled 'Characteristics/Values', and 'Other Values'. It could be that Schedule F suggests that what is listed under 'Characteristics/Values' are what makes the identified ONFL outstanding, and 'Other Values' also attribute some importance to the ONFL, without contributing to the determination of the area as an ONFL. It seems appropriate that the characteristics and values listed within the two columns should be aligned with the criteria which have been developed for the identification of ONFLs within the region, which I have outlined above as an expanded version of the amended Pigeon Bay Criteria.
- 3.4 In each of the descriptions of the Characteristics/Values for the Scheduled ONFLs the first characteristics or values attributed are "visual and scenic" characteristics. The criteria listed under 'Other Values' which have been developed for the identification of ONFLs throughout the region, largely based on the amended Pigeon Bay criteria, identify such factors as natural science factors, aesthetic values, expressiveness, transient values, whether the values are shared and recognised, value to tangata whenua, and historical associations: which acknowledge a deeper functioning and perception of landscape than is inferred by visual and scenic characteristics.
- 3.5 As proposed to be amended in accordance with Officer's recommendations, only three Scheduled ONFLs (the Skyline of the Ruahine and Tararua Ranges, the Manawatu Gorge and the Coastline of the Region) identify characteristics or values other than "visual and scenic" in the "Characteristics/Values" column. The Skyline of the Ruahine and Tararua Ranges ONFL descriptions list 'importance to tangata whenua' within the Characteristics/Values column. Within the 'Other Values' column, values such as recreational, scientific, ecological, intrinsic, importance to tangata

whenua, and historic heritage are identified. These values all align with both recognised characteristics or values associated with landscape assessment, and also the amended Pigeon Bay criteria. Therefore it is evident that the 'Other Values' column also presents values which are intended to add to the identification of the individual areas as ONFLs.

- 3.6 The heavy reliance on visual and scenic characteristics appears to largely downplay the recognised criteria which have been established for the identification of ONFLs within the Plan, within best practice landscape assessment, and within established case law. In the case of the Tongariro National Park (a World Heritage Site), for example, the value of the ONFL appears to be understated by reference to only visual and scenic values, and the exclusion of scientific value, ecological value, importance to tangata whenua and historic values from the description of the Characteristics/Values of this ONFL².
- 3.7 The logical conclusion from this analysis of the Schedule F descriptions and the actual values which are contained within the ONFLs within the region is that ONFLs within the region have been identified largely based on visual and scenic values. Visual and scenic values clearly contribute to and are recognised by some of the amended Pigeon Bay Criteria, for example as a contributor to aesthetic values. However visual and scenic values are not sufficient on their own to satisfy the test of an outstanding landscape in RMA terms.
- 3.8 The identification of ONFLs can only be undertaken once a full appraisal and assessment of the district or region's landscapes has been undertaken in relation to each other. In the *Wakatipu* decision, the Environment Court held (at paragraph 85) that:
- “... what is outstanding can in our view only be assessed – in relation to a district plan – on a district-wide basis because the sum of the district’s landscapes are the only immediate comparison that the territorial authority has. In the end of course, this is an ill-defined restriction.”*
- 3.9 Likewise, the assessment of the regionally important landscapes, as described in Schedule F, can only be undertaken with both knowledge of and comparison with the rest of the region's landscape resource.

² Chapter 7: 7.1.3 Pg 7-2. The Living Heritage Chapter of the One Plan identifies the natural values of the Tongariro National Park as having significance and states that:
“Natural Character is a sliding scale and varies from a low degree of naturalness, such as urban environments, to a high degree of naturalness (for example, Tongariro National Park).”

3.10 The assessment of the district and regions landscapes should be undertaken utilising the criteria or factors discussed above. Appropriate assessment and identification of ONFLs in a regional context cannot be undertaken without the use of the appropriate criteria, and the broad comparison with the appropriate landscapes. In the case of the Manawatu-Wanganui region's landscapes have not been assessed using the criteria which have been established.

3.11 This has been confirmed in the Section 42A Report of Mr Clive Anstey (advising Horizons Regional Council) where (at page 4) he states:

“In my view all of the areas scheduled as Outstanding Natural Features and Landscapes would satisfy the criteria generally accepted by the Environment Court as ‘outstanding’, although some boundaries may be more indicative than precise. It is therefore my view that a systematic landscape assessment would confirm the scheduled landscapes as outstanding at a regional level but there would be some boundary refinements. Many of the scheduled outstanding natural features and landscapes would undoubtedly qualify as nationally outstanding. A systematic assessment would enable this to be confirmed and would enable refinement of the boundaries.”

3.12 The Schedule F Maps have not attempted to map the skylines of the Tararua or Ruahine Ranges, however Attachment 3a to the Section 42A Report of Mr Anstey includes a purple line to the north east of the Tararua Forest Park boundary, largely incorporating the site of the proposed Turitea Wind Farm, with a notation describing the line: *Area considered for addition to Outstanding Natural Landscape.*

3.13 In response to questions regarding the accuracy and locations of mapped areas within Schedule F, an introductory note has been added:

“Note: Table F1 lists the regionally outstanding natural features and landscapes in the Manawatu-Wanganui Region and their associated characteristics and values in narrative form. The Figures in Schedule F are intended to provide an indication only of the spatial extent of the landscapes and natural features described in Table F1. As such the Figures are in the nature of “value envelopes” identifying the geographic area within which the characteristics and values described in Table F1 will likely be present. They are intended to assist Plan users in determining the general location of the

*characteristics and values of the regionally outstanding natural features and landscape listed in Table F1.*³

- 3.14 Mr Hindrup further explains at paragraph 47 of his evidence that the areas of outstanding natural features and landscapes extend beyond the areas which are mapped in Schedule F. Therefore, as explained by Schedule F and Mr Hindrup, the outstanding natural features and landscapes within Schedule F of the Plan contain a combination of characteristics and values which are either inside or outside of the areas mapped in Schedule F.
- 3.15 No further work is intended to be undertaken by Horizons in respect of assessing or identifying ONFLs within the region. It is intended that Schedule F will provide guidance to districts within the region to further identify and refine ONFL's and their boundaries. It is then intended that ONFLs and any adjustments to their locations or boundaries, would be incorporated into the Plan via a private or publicly initiated Plan Change. This seems to me to be a cumbersome and resource-hungry method of updating a series of maps within Schedule F which may or may not contain a series of characteristics and values.
- 3.16 In reality the subtlety of the wording of the introductory note to Schedule F, and the very intensive policy analysis which has been undertaken to develop Schedule F and Chapter 7 will be all but lost when the Plan is confirmed. In its current state Schedule F of the Plan will contain a Table and a series of Maps which are titled 'Outstanding Natural Features and Landscapes'. The difference between being inside the line and outside of the line will be significant in land use restrictions and consenting terms. For large-scale projects this distinction is likely to be if not fatal, then a considerable burden to overcome.
- 3.17 Whilst I appreciate the difficulty in accurately mapping extensive areas of ONFLs at a regional scale, it is apparent that sufficient assessment work has not been undertaken to produce such maps for the Horizon Region with any confidence.
- 3.18 While some of the landscapes contained within the region will be undoubtedly outstanding in a regional, and even a national sense, (for example the areas of the Tongariro National Park which fall within the region), other landscape resources will be less well recognised, and in particular, the boundaries between what is outstanding and what is not, requires a more detailed level of assessment than has been undertaken to put together the list of ONFLs contained in Schedule F.

³ Horizon One Plan. Schedule F. Page F-1. Track Changes Yellow Version. 10 March 2009.

- 3.19 The identification of a series of criteria to assess landscapes in the Manawatu-Wanganui Region seems appropriate and logical, however mapping and setting boundaries to the region's landscapes without having completed a detailed study is inconsistent with case law and developing best practice under the RMA.
- 3.20 In my opinion, a full detailed landscape assessment of the Manawatu-Wanganui Region is required to be undertaken before ONFLs can be accurately identified and boundaries can be set. In the meantime the areas and boundaries identified in Schedule F should be treated as indicative only, and cannot be relied upon for a site specific application.

4. PROVISIONS RELATING TO THE SKYLINE OF THE TARARUA RANGES

- 4.1 The skyline of the Tararua and Ruahine Ranges were assessed and mapped as ONFLs in Figures F8 and F9 of Schedule F of the Plan as notified. Both areas have been retained in the 18 March Version, however a separate line has been included in Table F1 of Schedule F, indicating that the Tararua and Ruahine State Forest Parks are also identified as being ONFLs. Again, reference is made to Figures F8 and F9. This updated and extrapolated description suggests that Figures F8 and F9 are also intended to indicate the State Forest Parks of the Tararua and Ruahine Ranges. Descriptions of both the Forest Parks and the Skyline landscape units repeat the same or similar Characteristics/Values and appear to double count the same areas.
- 4.2 As outlined by Mr Hindrup (at paragraph 47 of his evidence), with respect to the skyline of the Tararua Ranges, the relevant Officer's Report has recommended that a definition of the skyline of the Tararua Ranges be included to provide clarification around the mapped areas showing the Ranges, and indicate that the ONFL extends beyond the areas which are mapped. Accordingly, the 18 March 2009 Version of Schedule F identifies:

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

- 4.3 As noted by Mr Hindrup (at paragraph 47), if this recommendation is adopted following the upcoming hearings on the Plan, the proposed wind farm site would accordingly be caught by this provision.

- 4.4 The definition of Skyline is discussed at page 5 of Mr Anstey's Section 42A report. The definition in the 1998 Regional Policy Statement was considered to be too limiting, and the definition outlined above was preferred. However, I do not consider that the current recommendation is appropriate or necessary, for the following reasons.
- 4.5 The definition includes references to the viewer being at a sufficient distance to detect the contrast between the land and the sky. In general the areas that have been identified within the Tararua Ranges as an ONFL are covered in dark green indigenous vegetation, and in places pasture. The sky backdrop to this landform is generally blue, white, or grey. Depending on the viewing conditions it is likely that there will normally (during daylight hours) be a high level of contrast between the Tararua Ranges and the backdrop sky, regardless of the viewing distance.
- 4.6 The reference to being viewed from a 'sufficient' distance does not help with the interpretation of what makes up the skyline, in my view. The word 'sufficient' provides an open-ended opportunity for interpretation of what an appropriate distance for the Skyline to be viewed from might be. The land/sky interface is either on the Skyline or it is not. This point highlights an inherent difficulty with identifying a Skyline as an ONFL.
- 4.7 The Skyline definition would capture land on the Tararua and Ruahine Ranges which includes at least parts of the sites of the Te Apiti Wind farm (Ruahines), and the Tararua 1, 2, and 3, Te Rere Hau 1 (built), 2, and 3 (under construction), and Motorimu (consented but unbuilt) wind farms. The Environment Court has previously considered applications for these projects, and concluded that locations are not outstanding when considered under the RMA.
- 4.8 Schedule F defines the 'Characteristics/Values' for the Skyline of the Ruahine and Tararua ranges as
- '(i) Visual and scenic characteristics including aesthetic cohesion and continuity, its prominence throughout much of the Region and its backdrop vista in contrast to the Region's plains, (ii) Importance to tangata whenua'.*
- 4.9 The reference to only visual and scenic values and importance to tangata whenua limits the consideration of the broader set of criteria which should contribute to the identification of ONFLs, as discussed above. ONFLs can only be assessed by consideration of the full suite of criteria identified. It is not necessary for a landscape

or natural feature to be considered to be outstanding in each of the criteria, however, similarly consideration should not be limited to merely visual, or indeed any other narrow set of values.

- 4.10 The decision of the Court in *Motorimu Wind Farm Ltd v Palmerston North City Council*⁴ provides further guidance, in particular in relation to the Tararua Ranges:

*“We agree with My Bray’s view that within reasonably close proximity to the site, the ridgeline will form the skyline for many observers and residents. However we do not consider that factor of itself can make the ridgeline outstanding. We further agree with Mr Bray’s observation that within the 4-5km distance he was talking about the skyline will be highly dominant and appear closer to the viewer. Again we do not consider that of itself makes the ridgeline outstanding in the sense referred to in s6(b) or identified in the Wakatipu decision.”*⁵

- 4.11 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.
- 4.12 The mapped boundary of the Tararua Ranges follows cadastral boundaries, and as such are largely ‘straight-lines’ from point to point, much like a surveyors map. The area mapped within the Tararua Ranges is the Tararua Forest Park.
- 4.13 While the Regional Council have made it clear that they have not attempted to map the Skyline of either the Ruahine or Tararua Ranges, large areas of land which are outside of the mapped areas are captured by the description of the Skyline in Schedule F.
- 4.14 At paragraph 37 of his Section 42A Report, Mr Anstey states:

⁴ W067/2008.

⁵ Ibid, at p27.

“It is relevant to point out that most of the Tararua-Ruahine ridgeline falls within the forest parks, ie. within scheduled outstanding natural features and landscapes. The only substantial section of the ridgeline that does not is between the northern end of the Tararua Forest Park and the Manawatu Gorge. The most significant landscape along this section sits between the Tararua Forest Park boundary and the Paihiatua Track. The elevation and vegetation cover is similar to that within the forest park. It is of similar character. Not to recognise the significance of this section of the ridgeline would be inconsistent with the more general approach to delineating outstanding natural features and landscapes within the Proposed One Plan. Areas neighbouring DoC land that are of a similar character should be acknowledged as outstanding natural features and landscapes (as reflected in the area identified in Figure F:10).”

- 4.15 Mr Anstey bases a considerable extension to the north east of the Tararua Forest Park ONFL landscape unit on the premise that the elevation and vegetation is similar to the land within the Park itself. I can find some limited agreement with the suggestion that areas within the extension to the north of the Tararua Forest Parks share similar land cover (in places); however the difference in elevation between the majority of the Forest Park and the proposed extension is marked. The Tararua Forest Park generally occupies land which is between 500m above sea level (asl) and in some places well over 1000m asl. The high point at the north east end of the Forest Park, closest to the proposed extension is Arawaru and is 767m asl. The land contained within the proposed Skyline extension to the Tararua Forest Park ONFL is predominantly between 300m and 550m asl, and contains large areas of working pastoral landscape. Parts of the proposed extension are below 300m asl and contain inner valleys, including the Turitea dams, including the Turitea Wind Farm site.
- 4.16 Based on the marked differences in elevation between the broad areas of the Tararua Forest Park and the proposed Skyline landscape area (as outlined further by Messrs Brown and Wyatt), I do not agree that the extension has a similar character to the Forest Park itself. In this regard, I note I am in agreement with all the other landscape evidence before the Board, except that of Ms Lucas.
- 4.17 Regardless of whether I agree with the suggestion that the Skyline extension did have similar vegetation cover and elevation, the identification of ONFLs should be undertaken giving full regard to the entire suite of the amended Pigeon Bay criteria. Given that the justification for the inclusion of the extension is based on vegetation

cover and elevation, the balance of the criteria have not been applied in assessing the proposed northern Skyline extension to the Forest Park ONFL.

- 4.18 On this basis, I consider that the identification of the Tararua and Ruahine Forest Parks as ONFLs is an improvement on the identifications of a Skyline as an ONFL, however represents double counting. My evidence on behalf of Mighty River Power for the upcoming hearing is therefore to the effect that the respective Forest Parks are a better fit for the Characteristics/values identified in Table F1, and should be retained. By contrast, the identification of the Skyline of the Tararua and Ruahine Ranges as ONFLs is flawed and should be removed. I also consider that the proposed northern extension of the Tararua Forest Park ONFL should be rejected.
- 4.19 Mr Brown has completed a sub-regional assessment of the landscapes of the Manawatu-Wanganui Region within his evidence which highlights the shortcomings in the process which has been adopted in the development of Schedule F within the Plan. In particular Mr Brown has been far more careful in his consideration of the full suite of the Amended Pigeon Bay criteria and appropriate boundaries for areas which are identified as ONFLs or amenity landscapes.

5. SUMMARY AND CONCLUSIONS

- 5.1 Case law and recognised best practice methods in relation to the identification and assessment of ONFLs have been developed over time in line with the focus of the RMA and within a New Zealand context. As far as is possible, the Plan should acknowledge, support and draw from the decisions of the Court and the best practice methods in order to achieve the purpose and principles of the RMA.
- 5.2 Schedule F provides a list of identified ONFLs and maps them. The Schedule and its supporting text and reports are not clear as to what process has been undertaken to arrive at the identification or the setting of boundaries of the ONFLs. There appears to have been undue weight placed on the scenic and visual values of areas which have been identified as ONFLs, as indicated by the characteristics and values described in the Schedule F table.
- 5.3 Areas which are considered to be outstanding within the region lie outside of those areas mapped in Schedule F.
- 5.4 An assessment of the region's landscapes using the amended Pigeon Bay criteria, or a recognised version of them, has not been undertaken to assess and identify the locations or boundaries of the regionally significant landscapes within Schedule F.

- 5.5 I have considerable discomfort with the process which has lead to the locations and boundaries of some of the areas identified in Schedule F and their subsequent recognition as outstanding natural features and landscapes.
- 5.6 The identification of a landscape area, such as a 'Skyline' is problematic in that it places predominant weight on the scenic and visual qualities of the feature, without acknowledging the balance of recognised landscape assessment criteria.
- 5.7 The concept of a 'Skyline' by its nature is inherently difficult to identify and protect due to the infinite combination of land and sky interface views which are generated by the complex topography of the landform and the locations of viewers throughout the region. In my view, the proposed Skyline northern extension to the Tararua Forest Park ONFL cannot be supported. My evidence to the relevant hearings panel on behalf of Mighty River Power in respect of this provision is therefore that it should be rejected.
- 5.8 In my opinion, because a full regional landscape assessment has not been completed, the lists of Characteristics and Values, and the mapped ONFLs contained in Schedule F of the Plan cannot be relied upon to provide any certainty of the actual values present, or their locations.

Brad Coombs
5 June 2009