

**IN THE ENVIRONMENT COURT
WELLINGTON REGISTRY**

**I TE KŌTI TAIAO O AOTEAROA
TE WHANGANUI-A-TARA ROHE**

ENV-2024-WLG-001

UNDER the Resource Management Act 1991

IN THE MATTER the direct referral of applications for resource consents by
under section 87G of the Act for the Mt Munro Wind Farm

BY **MERIDIAN ENERGY LIMITED**
Applicant

STATEMENT OF EVIDENCE OF JOSHUA JAMES HUNT

**ON BEHALF OF MANAWATŪ-WHANGANUI REGIONAL COUNCIL, GREATER
WELLINGTON REGIONAL COUNCIL, TARARUA DISTRICT COUNCIL, AND
MASTERTON DISTRICT COUNCIL**

LANDSCAPE

Dated: 23 August 2024



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STATEMENT OF EVIDENCE OF JOSHUA JAMES HUNT

A. INTRODUCTION

- [1] My name is Joshua James Hunt. I am a Landscape Architect and Director of Narrative Landscape Limited which was established in 2019.
- [2] I prepared a report on the application required by s 87F of the Resource Management Act 1991 (**RMA**) on behalf of Manawatū-Whanganui Regional Council (**Horizons**) and Wellington Regional Council (**WRC**) Tararua District Council (**TDC**), and Masterton District Council (**MDC**) (the **Consent Authorities**) dated 15 March 2024 (**s 87F Report**).
- [3] In my s 87F Report, I reviewed the application from Meridian Energy Limited (the **Applicant** or **Meridian**) for resource consent applications lodged with the Consent Authorities for the Mt Munro Wind Farm (**Mt Munro Project** or **Project**) in relation to landscape and visual matters. The s 87F Report provided recommendations to improve or further clarify aspects of the resource consent applications, including with regard to conditions, should the Court be minded to grant resource consents.
- [4] I confirm I have the qualifications and experience set out at paragraphs 5-7 of my s 87F Report.
- [5] On 14 and 15 July 2024, I undertook an additional site visit to properties requested by the section 274 parties during mediation. This included visiting a series of properties surrounding the Project site and having discussions with the section 274 parties as to the landscape and visual assessment undertaken for the Project.
- [6] I also participated in expert conferencing on landscape, resulting in a joint witness statement dated 2 August 2024 (the **Landscape and Visual JWS**). I confirm the contents of the Landscape and Visual JWS.

B. CODE OF CONDUCT

- [7] I repeat the confirmation provided in my s 87F Report that I have read and agree to comply with the Code of Conduct for Expert Witnesses contained in

the Environment Court Practice Note 2023. This evidence has been prepared in accordance with that Code. Statements expressed in this evidence are within my areas of expertise, except where I state I am relying on the opinion or evidence of other witnesses.

C. SCOPE OF EVIDENCE

[8] My statement will cover the following:

- (a) The extent to which issues identified in my s 87F Report have been resolved through mediation, Meridian evidence, and expert conferencing;
- (b) A response to section 274 party evidence; and
- (c) Conditions.

[9] In addition to the material that was reviewed for my s 87F Report, I have reviewed the following:

- (a) Statement of Evidence of Rhys Girvan (Landscape and Visual Assessment) dated 24 May 2024, on behalf of Meridian;
- (b) Landscape and Visual JWS;
- (c) Joint Statement of Planning Experts dated 9 August 2024 (**Planning JWS**);
- (d) Further Information provided by Meridian post-mediation dated 26 July 2024; – Additional Photosimulations (BM210418_V10-01);
- (e) The proposed changes to conditions filed with Mr Tom Anderson's evidence (the **Meridian conditions**);
- (f) Evidence of Janet McIlraith (s 274 party) dated 10 July 2024;
- (g) Evidence of Robin Olliver (s 274 party) dated 10 July 2024;
- (h) Evidence of Hastwell/Mt Munro Protection Society Inc. (the **Society**) (s 274 party) dated 10 July 2024;

- (i) Evidence (Social Impact Report) of John Maxwell (s 274 party) dated 10 July 2024; and
- (j) The draft conditions attached to the evidence of Damien McGahan (Planning) on behalf of the Consent Authorities (the **August Proposed Conditions**).

D. OUTSTANDING ISSUES

[10] My s 87F Report confirms that the landscape and visual amenity effects are well described within the Applicant's Landscape Effects Assessment¹ (the **LEA**). In particular, I note my agreement with the assessment of effects on:

- (a) the existing landform, ranging from low (during operation) to moderate (during construction) adverse effects, and low to moderate-high adverse effects on landscape character (based on proximity to the Project);
- (b) representative public viewpoints, with adverse effects ranging from high to moderate-low; and
- (c) on identified dwellings within 2km of the turbines, with adverse effect ranging from high to moderate-low, with four properties identified as having a high adverse effect.

[11] I also made a number of recommendations to ensure the Project was subject to appropriate conditions, to manage the potential adverse landscape and visual effects and to ensure the Project integrates into the rural landscape.

[12] There are no outstanding issues arising from my s 87F Report. All matters have been resolved through the additional section 274 site visits, the Landscape and Visual JWS, the Meridian evidence of Mr Girvan, and the August Proposed Conditions. In particular (and, in summary):

- (a) Meridian has confirmed the extent and location of the cut and fill proposed as part of the Project, with conditions to ensure that a

¹ Mt Munro Wind Farm – Landscape Effects Assessment, 12 May 2023. Appendix K to Application.

landscape assessment will be carried out for the fill disposal sites to confirm accordance with the assessed level of landscape effect,² along with a landscape treatment plan for the fill disposal sites and cut slopes.³

- (b) The level of effects on identified properties within 2km (and in some cases, beyond) has been confirmed through a further site visit, with the only change in effect being for one dwelling, where there is a slight increase from 'low-moderate' to 'moderate'.⁴
- (c) There is a range of level of effects, and properties which experience at least 'Moderate-High' effects will be offered offsite mitigation. As noted in the Landscape and Visual JWS, this was previously only properties which would experience 'High' adverse effects. The objectives for mitigation, and the offerings for the relevant properties are set out in Annexure B to the Landscape and Visual JWS, which was prepared by Mr Girvan, for the Applicant.
- (d) There are offsite mitigation opportunities for properties with identified high effects, which may reduce adverse visual effects. It is appropriate to consider these effects, given that a high adverse effect is a significant effect, in my opinion. The difficulty, as I discuss below, is providing mitigation which addresses the effects of concern, where agreements cannot be reached with the individual property owners.
- (e) In addition to those adverse effects considered 'High', the Applicant's Landscape Assessment identified 'Very High' adverse effects. Mr Girvan and I agree that 'Very High' would likely result in the level of effect being unacceptable.⁵

² Condition CM1(b)(2).

³ Condition CM1(a)(xii)

⁴ I note that one property owner advises that a stand of trees is to be removed, which would increase the level of visual effect from 'moderate' to 'moderate-high'.

⁵ Landscape and Visual JWS – at page 5, item 9.

- (f) As identified in the Evidence of Mr Girvan,⁶ Rangitāne o Tamaki nui-ā-Rua have clarified previous concerns around the placement of turbines on ridgelines and I consider this query in my section 87F Report⁷ now resolved.
- (g) Changes to conditions have occurred which reflect the recommendations within my s 87F Report.
- [13] Since my s 87F Report, I have also considered a memorandum prepared by Mr Girvan regarding alternatives for the Project (in terms of location/siting). As noted in the Landscape and Visual JWS:⁸
- (a) An alternative layout/arrangement of turbines within the consent envelope had been considered with five different scenarios; and
- (b) I agree with Mr Girvan that removal of 12 (of the proposed 20) identified turbines would reduce the overall level of adverse visual effect to a maximum of ‘moderate-high’, across all properties not associated with the Project site.
- [14] Mr Girvan and I also discussed the distinction between ‘High’ and ‘Very High’ adverse visual effects⁹ in the context of a proposed wind farm. We agreed that ‘Very High’ would likely result in unacceptable adverse effects.¹⁰ The descriptions of these effects ratings are contained within the LEA Assessment Methodology¹¹ and are as follows:

Very High: Total loss of key elements / features / characteristics, i.e. amounts to a complete change of landscape character and in views. Turbines would appear dominant and overbearing in primary views.

⁶ Statement of Evidence - Rhys Girvan (Landscape and Visual Assessment), 24 May 2024, at [109].

⁷ Section 87F Report - Joshua James Hunt (Landscape and Visual), 15 March 2024, at [85]-[86].

⁸ Landscape and Visual JWS – Annexure D, Point 9.

⁹ Landscape and Visual JWS – Annexure D, Point 9.

¹⁰ Landscape and Visual JWS, at page 6, item 9.

¹¹ Boffa Miskell: Landscape Effects Assessment – Appendix 1: Landscape Effects Assessment Methodology, Table 9-4: Determining the overall level of landscape and visual effects.

High: Major modification or loss of most key elements / features / characteristics, i.e. little of the pre-development landscape character remains and/or result in a major change in primary views. Turbines would appear prominent, but not necessarily dominant.

- [15] As noted in my s 87F Report,¹² I am supportive of the approach to offer off-site mitigation to neighbouring properties with a 'High' (now also extended to 'Moderate-High') adverse visual effect. For those four 'High' adverse visual effect properties, it is noted that *"we agree the offer of mitigation is beneficial and may reduce adverse visual effects"*.¹³ However, the assessed 'High' effect is likely to remain, which is considered a 'significant' effect.

E. RESPONSE TO SECTION 274 PARTY EVIDENCE

- [16] I have reviewed the section 274 party evidence of Janet McIlraith, Robin Olliver, Hastwell/Mt Munro Protection Society Inc. and John Maxwell. Much of the commentary around 'landscape' issues within these briefs of evidence reinforce points made in their submissions.
- [17] Additionally, as explained above at paragraph [5], I undertook further site visits to the properties of these section 274 parties. These visits provided opportunity for the landowner to discuss and ask questions relating to the LEA. We were also shown points of interest or concern from a potential landscape/visual effects perspective.

Janet McIlraith

- [18] Ms McIlraith raises concerns that *"The 160m tall and 135m wide turbines even singly would overpower the landscape, in combination they would replace the current landscape"*.¹⁴
- [19] There will be a change to the character of the landscape as the result of the Mt Munro Project. This issue has been traversed through the LEA.¹⁵ I also

¹² Section 87F Report - Joshua James Hunt (Landscape and Visual), 15 March 2024, at [90(c)].

¹³ Landscape and Visual JWS – Annexure D, Point 12.

¹⁴ Statement of Evidence of Janet McIlraith, 10 July 2024 at [15].

¹⁵ Boffa Miskell Landscape Effects Assessment.

noted in my s 87F Report that these concerns need to be weighed against the rural context, where, in my view, the scale of the Project can be integrated into the rural landscape setting. I agree with the LEA that the existing productive rural character will be retained following construction.¹⁶

- [20] There was also a concern raised around the interpretation of the panoramic simulations.¹⁷ This has been addressed within the Landscape and Visual JWS:¹⁸

We agree that the visual simulations have been prepared in accordance with best practice. The simulations are only a tool to allow us to interpret the likely effect. We acknowledge that the windmast had been lost due to an overexposed photograph. This has resulted in Boffa Miskell undertaking additional work.

- [21] Photographs captured during the further site visits, around Ms McIlraith's property, and the property she sold in 2021¹⁹ are included in the Landscape and Visual JWS annexure.²⁰ Following the further site visit the adverse visual effect rating from Ms McIlraith's dwelling area was increased from 'low-moderate' to 'moderate'.

Robin Olliver

- [22] Mr Olliver's evidence in relation to landscape and visual matters is consistent with the opinion expressed within the original submissions²¹ and I do not consider there to be any new issues that need to be addressed.
- [23] I note while the visibility of the proposed wind farm is well documented in the LEA, an update to the photo simulation from Mr Olliver's property was prepared following the further site visits (to include the existing mast and also include a single frame view).²² This updated simulation is to address concerns raised, during the further site visit, about reliability of the technical

¹⁶ Section 87F Report - Joshua James Hunt (Landscape), 15 March 2024 at [72].

¹⁷ Statement of Evidence of Janet McIlraith, 10 July 2024, at [18].

¹⁸ Landscape and Visual JWS – Point 8.

¹⁹ Landscape and Visual JWS – Annexure C: Viewpoint O (Sheets 30-31).

²⁰ Landscape and Visual JWS – Annexure C: Viewpoint P, Q and R (Sheets 32-37).

²¹ Submission No. 37 (Robin Olliver), and Submission No. 21 (Charmaine Semmens).

²² Meridian Further Information 26 July 2024: Appendix C Additional Simulations.

material provided. This has not however, resulted in any change to my initial assessment of this property.

Hastwell/Mt Munro Protection Society Inc.

- [24] The Society raise concerns that the scale (height) of the proposed turbines is at odds with the height of surrounding farm buildings and that their presence will result in negative effects on the landscape and their enjoyment of it (the landscape).²³
- [25] While local residents have clearly articulated (through submissions and evidence) their appreciation for the visual quality of Mt Munro, I agree with Mr Girvan that the project site is “*an area of modified rural landscape*”.²⁴ The Project site is an active and productive farming operation which has a notably lower landscape value than pristine nearby areas such as Pūkaha/Mt Bruce (which is identified as an Outstanding Natural Landscape).
- [26] Further, while wind turbines are not specifically a ‘rural’ component, in my view they are a compatible activity within the rural environment, as they do not limit the productive rural capacity of the farmland beneath and around them, nor do they necessarily diminish the appreciation of rural character and amenity.
- [27] While a matter addressed by Mr McGahan in his planning evidence,²⁵ I understand that windfarms are provided for within the rural zone by the district planning frameworks.
- [28] I also note that during the further site visit, Mr Girvan and I spoke to Chris and Jenny Clarke, and additional photographs from their property have been documented.²⁶ As with Mr Olliver, these additional photographs do not alter my conclusions as to the initial assessment undertaken.

²³ Statement of Evidence of Hastwell Mt Munro Protection Society Inc, 10 July 2024, at Section G, v and Section I, vi.

²⁴ Boffa Miskell LEA – 6.8.1.

²⁵ Statement of Evidence - Damien McGahan (Planning), 23 August 2024, at [16].

²⁶ Landscape and Visual JWS – Annexure C: Viewpoint G, H and I (Sheets 13-18).

John Maxwell

- [29] Mr Maxwell raises concerns as to the thoroughness of the original LEA accompanying the wind farm application, in particular about the consideration of the people who live in the area.²⁷ I note that an expert opinion is only one of the sources of information that decisions makers with have regard to,²⁸ with the evidence of lay witnesses (affected parties) and values anticipated by plan provisions also being important. In that respect, the role of a landscape assessor *“is not to repeat (or attempt to mirror) the views of others but to provide an independent professional opinion”*.²⁹ I am satisfied that Mr Girvan (in preparing the LEA) has followed an acceptable methodology, considered the sensitivity of the viewing audience and produced a reliable landscape and visual effects assessment.
- [30] I note the concern around the ‘missing’ mast within the original simulations provided to a series of private residential properties. During the further site visits, Mr Girvan and I spoke to captured additional photographs from this property,³⁰ and Mr Girvan has subsequently had the simulation from this location updated³¹ to include the existing mast on the project site. I agree that the simulation error (missing mast) is from an overexposed photograph.³²
- [31] Mr Maxwell has also raised ‘Visual Pollution’³³ as an issue, particularly for residents within 2km of a turbine.³⁴ These potential adverse visual effects have been identified in the updated visual effects assessment,³⁵ and I agree with the identified ‘Potential Visual Effect’ ratings.

²⁷ Statement of Evidence of John Maxwell, 10 July 2024, at page 10.

²⁸ Te Tangi a Te Manu New Zealand Landscape Assessment Guidelines – 6.29 (page 146).

²⁹ Te Tangi a Te Manu New Zealand Landscape Assessment Guidelines – 6.29 (page 146).

³⁰ Landscape and Visual JWS – Annexure C: Viewpoint K (Sheets 21-22).

³¹ Meridian Further Information 26 July 2024: Appendix C Additional Simulations.

³² Landscape and Visual JWS – Annexure C: Viewpoint Z (Sheet 53).

³³ Statement of Evidence of John Maxwell, 10 July 2024, at page 15.

³⁴ At [30].

³⁵ Landscape and Visual JWS - Annexure B: Updated Residential Visual Amenity Assessment.

Other section 274 properties visited

- [32] I visited a total of 17 properties in the vicinity of the proposed wind farm during the further site visits, as well as stopping at key public locations and returning at night time. As noted in the Landscape and Visual JWS, the identified level of visual effects on the surrounding properties was confirmed, with the only effects level change relating to the primary dwelling on Ms McIlraith's property (which was increased to a 'Moderate' adverse visual effect).³⁶
- [33] As I have noted already, a further change as a result of this additional site visit was an agreement that mitigation should be offered³⁷ to not only the 'High' effect dwellings, but also the 'Moderate-High' effects dwellings.
- [34] A key issue discussed was the prioritisation of dwellings for the location of visual effects assessment, as opposed to from viewpoints from working farmland. This has been addressed within the Landscape and Visual JWS.³⁸

In our opinion, views from people in dwellings and associated curtilage represent the greater sensitivity to visual effects. From a technical perspective, people's homes represent the heart of their properties through which occupants always return and experience their visual amenity related to rural outlook. Whilst other parts of rural properties may obtain more open views and therefore greater change, such views are typically incidental to the occupation or activity through which land use occurs and will continue (through which the observer will typically remain engaged).

- [35] I confirm that a series of additional site photographs were captured during the further site visits³⁹ from 25 locations (recorded as Viewpoints A to Y), with most of these locations capturing a wide angle photograph (24mm lens) and a standard angle photograph (50mm lens). These site photographs serve

³⁶ Landscape and Visual JWS, at page 4, item 6.

³⁷ Refer Planning JWS: New Condition VM1 and Schedule 2.

³⁸ Landscape and Visual JWS, at page 4, item 4.

³⁹ Landscape and Visual JWS – Annexure C.

two functions, firstly a as record for myself to consider viewpoint effects, and secondly to provide the section 274 residents a photo reference.

- [36] Following the visits, I reviewed the site plan for the soon to be located dwelling at 18 Hall Road. I confirm that the view from the laundry door (at the western end of the dwelling), as documented by the site visit photographs,⁴⁰ is consistent with what I had anticipated from my discussion on site with Shelly Ponder.

F. CONDITIONS

- [37] I have reviewed the August Proposed Conditions. I am generally comfortable with the conditions, with the original recommendations from my s 87F report have been adopted. I further note:

- (a) Condition WFL3 reflects the discussion, and recommendations made in the Landscape and Visual JWS.⁴¹
- (b) Importantly, there is a new proffered condition VM1 which requires the Consent Holder to consult with the properties identified as having a Moderate-High or High adverse visual effect (as identified in Schedule 2 of the Planning JWS). I confirm that the wording of this condition has captured the intention recorded in the Landscape and Visual JWS. As noted in the Planning evidence or Mr McGahan⁴², I consider that consultation should occur prior to the start of construction. The difficulties with relying on any mitigation offered, in the absence of agreement (as I discuss above), however, remain.
- (c) I anticipated in relation to the dwelling at 340 North Road that the Potential Mitigation column in Schedule 2 for this property would have included: *“Planting individual advanced grade specimen tree(s) to help define the curtilage area and foreshorten and refocus potential views in directions of individual turbines.”* This was a

⁴⁰ Landscape and Visual JWS – Annexure C: Viewpoint J1 and J2 (Sheet 19 and Sheet 20).

⁴¹ Landscape and Visual JWS, at pages 7-8, item 12.

⁴² Statement of Evidence - Damien McGahan (Planning), 23 August 2024, at [79].

recommendation included in the Landscape and Visual JWS,⁴³ and it remains my view that this is an appropriate addition to the Schedule.

23 August 2024

Joshua James Hunt

⁴³ Landscape and Visual JWS, at page 8, item 14.