

BEFORE THE ENVIRONMENT COURT

IN THE MATTER of the Resource Management Act
1991

AND

IN THE MATTER of an appeal under clause 14 of
Schedule 1 of the Act

BETWEEN **GENESIS POWER LIMITED**
(ENV-2010-WLG-000159)

AND **MERIDIAN ENERGY LTD**
(ENV-2010-WLG-000149)

AND **TRUSTPOWER LTD**
(ENV 2010-WLG-000145)

Appellants

AND **MANAWATU-WANGANUI**
REGIONAL COUNCIL

Respondent

**STATEMENT OF EVIDENCE OF BRADDYN (BRAD) THOMAS COOMBS FOR
MIGHTY RIVER POWER LIMITED**

INTRODUCTION

Qualifications and experience

1. **MY** full name is Braddyn (Brad) Thomas Coombs. I am a Landscape Architect and Director of Isthmus Group Limited (**Isthmus**).
2. I hold the qualifications of Bachelor of Landscape Architecture (Hons), and Bachelor of Horticulture.
3. I have over 15 years' experience working as a Landscape Architect in New Zealand and overseas on a range of landscape planning, project management, and design projects. I am Registered New Zealand Institute of Landscape Architects (**NZILA**) Landscape Architect. I was a member of the elected National Executive of the NZILA from 2005 to 2009. I have completed the Ministry for the Environment's Making Good Decisions Resource Management Act training and have acted as an independent Resource Management Act Commissioner.
4. **Of** particular relevance to these proceedings, I have prepared, reviewed or project managed landscape assessment projects at catchment and District levels throughout the North Island. I prepared or led District wide landscape assessments for the Taupo District, the Papakura District (now part of the Auckland Council), the South Waikato District, and the Kapiti District to provide for the identification and protection of Outstanding Natural Features and Landscapes in accordance with section 6(b) of the Resource Management Act 1991 (**RMA**). I have prepared and presented to the Environment Court the multi-catchment landscape assessment in support of the Lakes A Zone Variation to the Rotorua District Plan. I have also assessed and presented a catchment wide landscape assessment of the Long Bay catchment to the Environment Court for the Auckland Regional Council for the Long Bay Environment Court case.
5. I have reviewed the District wide landscape assessments and the landscape chapters and schedules of a number of district plans throughout the North

Island and the upper South Island for Mighty River Power Limited (**Mighty River Power**).

6. I was part of a team that prepared and I presented the landscape and visual assessment evidence for the Long Gully Windfarm to the west of Wellington City. I contributed a landscape and visual effects section to a pre-consent feasibility study for the Puketoi Wind Farm, and I prepared and presented evidence to the Board of Inquiry for the Turitea Wind Farm.
7. **In** 2008 I was asked by Mighty River Power to review the landscape provisions, in particular Schedule F 'Regionally Outstanding Natural Features and Landscapes' and Chapter 7 'Indigenous biological diversity, and historic heritage' of the Proposed One Plan for the Manawatu-Wanganui Region. In 2009 I prepared and presented evidence in relation to that Plan to a panel of Commissioners. I have been involved with and attended a number of expert witness caucuses and Court assisted mediation sessions in relation to the landscape aspects of Mighty River Power's appeal.
8. I have given my opinion on many aspects of Schedule F and Chapter 7, rather than just those aspects that may directly affect Mighty River Power's interests within the region. The Commissioners took up a number of my recommendations in the Decisions version of the Proposed One Plan, including the deletion of the maps from Schedule F due to the lack of landscape assessment and the uncertainty of where the landscape values were located.
9. **The** Mighty River Power appeal relates to the inclusion and wording of items (da) and (ia) in Schedule F 'Regionally Outstanding Natural Features and Landscapes', which forms part of the Regional Policy Statement component of the Proposed One Plan. Items (da) and (ia) of Schedule F the skylines of the Puketoi, Ruahine and Tararua ranges.
10. I have read the evidence of Mr Clive Anstey, and relevant sections of the evidence of Ms Clare Barton, for the Manawatu-Wanganui Regional Council. Mr Anstey identifies the wording of items (da) and (ia) as 'minor issues', and

refers to the witness conferencing and the agreed witness statement which is also referred to in Ms Barton's evidence.¹

Code of Conduct for Expert Witnesses

11. I confirm that I have read and am familiar with the Code of Conduct for Expert Witnesses in the Environment Court Practice Note 20011. I agree to comply with that Code. Other than where I state that I am relying on the evidence of another person, my evidence is within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.

SCOPE OF EVIDENCE

12. **MY** evidence covers the following matters:

- (a) Wording of items (da) and (ia) of Schedule F in the Proposed One Plan;
- (b) Conclusions.

WORDING OF ITEMS (DA) AND (IA) IN SCHEDULE F 'REGIONALLY OUTSTANDING NATURAL FEATURES AND LANDSCAPES:

13. **As** set out at Attachment A of Ms Barton's evidence, Mighty River Power's appeal in relation to the wording of items (da) and (ia) challenged the identification of a 'skyline' as a Regionally Significant landscape or natural feature. The Decisions version of the Proposed One Plan identified the 'skyline' of the Puketoi, and Ruahine and Tararua Ranges and then listed a series of characteristics and values on the right hand side of the table which were a combination of visual characteristics (visual and scenic characteristics) and other values that were not inherently based around visibility (geological features, importance to tangata whenua, ecological values, historic values and recreational values).

14. **Table 7.2** of the Decisions version of the Proposed One Plan also contained a list of Assessment factors, with further detail set out in the 'Scope' column.

1 Refer to paragraphs 11 to 13 of Mr Anstey's Evidence in Chief, and Attachment A of Ms Barton's Evidence in Chief.

These factors have been generally referred to as the 'Amended Pigeon Bay' factors, and are recorded in Policy 7-7A as those factors that should be considered when assessing landscapes within the Manawatu-Wanganui Region, at both a regional and district level.

15. **Notwithstanding** the fact that a full regional landscape assessment has not been undertaken to confirm or discount the characteristics that are identified in Schedule F, it seemed nonsensical to me to identify a 'skyline' of a landscape area as regionally significant, in relation to the contents of Table 7.2, and then to list non-visual values.
16. I have advised Mighty River Power and the Manawatu-Wanganui Regional Council that it would make more sense for the landscape areas identified within items (da) and (ia) to be areas of land, rather than a purely visual concept of the line where the land is visible against the sky.
17. **In** summary, the picture of a skyline is a purely visual construct which relies heavily the relationship between where a person is viewing the landscape from, and what they can see from that location. It is not appropriate to assign non-visual characteristics and values to a visual construct such as the skylines of the Puketoi, Ruahine and Tararua Ranges. Functioning and perceptual characteristics of a landscape such as ecological values, historical and tangata whenua values, and geological values are unlikely to be interpreted from the view of a skyline. The visual appearance of a skyline is only one characteristic and should not be used to define what a landscape or natural feature is made up of.
18. I attended a witness caucusing session with Mr Anstey on 18 January 2012, and we agreed and signed the record of that expert conferencing. We agreed that the wording should refer to the ridge or ridges of the Puketoi and Ruahine and Tararua Ranges (respectively), rather than to a skyline as this is the physical landscape which contains the values that are identified in the characteristics and values column. A ridge is a physical landscape which can be identified regardless of the location or relationship of the viewer. In the case of the Tararua and Ruahine Ranges, the ridges are afforested, and contain not just scenic qualities, but also natural, ecological and recreational

values. In the case of the Puketoi Ranges, the ridge is not just scenic, but also contains identified geological significance. It is important that these characteristics and values are identified beyond what can be 'seen' from a distance.

19. **It** is appropriate for the skyline to be referred to in the characteristics and values column. However, it should not define the regionally significant landscape or natural feature itself as it is a characteristic or component of the landscape which is highly reliant on points from which to view it. The skyline will vary depending on where it is viewed from. Appendix 2 to that record contains the altered wording which Mr Anstey and I agreed to. I stand by this record and support the stance taken by Mr Anstey in his Evidence In Chief.

CONCLUSIONS

20. **The** identification of the skylines of the Puketoi, Ruahine and Tararua Ranges as regionally significant landscapes did not make sense in terms of the contents of Table 7.2 within Chapter 7 and the characteristics identified in items (da) and (ia) of Schedule F.
21. **The** wording now proposed by the Council better reflects the appropriate values which could be present within the higher ridge landforms of the Puketoi, Ruahine and Tararua Ranges.