

BEFORE THE COMMISSIONER ON BEHALF OF THE DUNEDIN CITY COUNCIL

UNDER

the Resource Management Act 1991

AND

IN THE MATTER OF

an Application for Resource Consent to
establish three wind turbines and
associated infrastructure on Porteous Hill,
Dunedin.

Landscape Evidence of Jeremy Everett Head

Jeremy Head Landscape Architect Ltd

Poynton House
68 Oxford Terrace
Christchurch

PO Box 17664
Sumner
Christchurch

Ph. 03 379 6313
Mob. 021 308 048
jeremyhead@xtra.co.nz

May 2016

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INTRODUCTION

1. My name is Jeremy Everett Head. I am a Landscape Architect.
2. I acknowledge that I have read the code of conduct for expert witnesses contained in the Environment Court's Consolidated Practice Note 2014. I have complied with it when preparing my written statement of evidence and I agree to comply with it when I give this oral evidence.
3. I hold a Bachelor of Landscape Architecture degree with honours. I am an Associate member and a Registered member of the New Zealand Institute of Landscape Architects, and have been practising since 1993. For the last ten years I have operated my own landscape architecture consultancy. Before that I worked with Di Lucas in the area of environmental policy and planning and design. Most of my work since graduation and to date has involved landscape assessment and design at various scales nationwide. I also teach regularly into the landscape architecture programme at Lincoln University.
4. I have visited the site and the contextual area in general. I have also familiarised myself with the application documents and the Council Officer reports (landscape and planning).

SCOPE

5. I have been asked by Ms Geraldine Tait to prepare evidence assessing the effects on landscape and visual amenity - largely focusing on the wider contextual setting arising from a proposal to erect three up to 125m tall¹ wind turbines on the summit of Porteous Hill.

¹ There is some ambiguity as to the proposed height of the towers when reading the various expert reports lodged by the applicant. I note that Mr Farrell's report [para 27] relies on the description of the proposal included in the original application documents which reads "*Blueskin Energy Limited (BEL) is proposing to construct and operate a wind farm at Blueskin Bay, to the north of Dunedin, Otago. The*

6. In my evidence the following matters are considered.
- The extent to which the proposal will affect the rural outlook, quality of views and amenity generally with regards to the contextual landscape to the south of Porteous Hill.
 - Consideration of the proposal in relation to existing rural character and what is expected by the operative Dunedin City District Plan (DCDP) and proposed Dunedin City Plan (2GP).
 - Why the proposed mitigation measures will be ineffective.
 - This evidence is based on a May 3, 2016 visit and is considered against the prevailing weather conditions at the time.
7. In my evidence I have assessed the potential effects of the proposal against the operative Dunedin City Plan's assessment matters – and objectives and policies where they concern landscape character and amenity - chiefly Section 6 (Rural) and Section 14 (Landscape). I have also assessed the proposal against the relevant (landscape) objectives and policies proposed in the 2GP.

EXECUTIVE SUMMARY

8. Regarding landscape and associative² adverse effects, it is my opinion that these will be significant for the following reasons:
- The structures are not compatible and lack cohesion with the landform and landcover patterns of Porteous Hill.
 - There are no other structures of this magnitude present or visible within this part of the Rural Zone (coastal) existing environment.
 - A Coastal Landscape protection Area (CLPA) extends over part of the site (but excludes the turbines) and in the 2GP a Significant Natural Landscape Overlay covers the entire site. So it can be inferred from this that coherence of the existing environment is intact and maintains anticipated rural character very well. In other words, in terms of expected environmental results, landscape integrity of this part of the Rural Zone is very high. The proposal will otherwise diminish this integrity and introduce ambiguity, where the structures will appear out of keeping with existing landscape character.

proposal is for a small-scale energy development comprising three (3) turbines (800kW to 900kW) located within the development envelope of 24ha. While a final choice of turbine model has not been made, each turbine will easily fit within a height envelope of 125 metres to blade tip". [Blueskin Energy Ltd: Resource Consent Application October 2015 Pg 7, para 6].

² *Associative effects* being those which focus on the question of whether an activity is in keeping with its setting based on what people would commonly and reasonably expect to occur.

- The elevated location of the site and the turbines' elevation above the ridgeline occurs centrally in the outlook for many residents and visitors to Blueskin Bay including travelers on State Highway 1.
 - Porteous Hill forms a distinctive landform and backdrop to the bay. The turbines would be visually prominent - located on the open convex summit of the hill and because of this siting, will generate the greatest potential adverse effects (located on a peak).
 - The turbines would constitute over-scaled character predominantly arising from height, but also through incongruity of form attributed to what will be clearly three very large, artificial looking built forms, whose moving turbine blades will be eye-catching.
 - Earthworks volumes associated with the construction of an accessway to the site to accommodate large transporter vehicles is likely to be high with significant adverse landscape effects (visible cut faces and fill batters and potentially retaining wall structures)³. In addition trees are indicated as potentially requiring removal to form parts of the access. In this regard, large trees - possibly being relied upon as mitigation by the applicant may not remain in place (and providing ongoing mitigation of visual effects) following the implementation of the proposal.
 - The proposal is contrary to several policies and objectives for the Rural Zone. This is exacerbated by the ineffective mitigation being proposed.
 - For the above reasons the proposal does not maintain or enhance existing rural character and the amenity derived from it.
 - Both the operative and proposed Dunedin City Plans promote an expectation that the rural environment will be free of large buildings. Consequently, such an outcome informs community expectations – namely that the rural environment will be devoid of large structures, where rural activity and rural landscape patterns of built development will prevail.
9. I conclude that the development as proposed is inappropriate - where the adverse effects on the specific rural character and amenity on Blueskin Bay and nearby coastal areas to the south generally, are more than minor to a significant degree.

PROPOSAL

10. In preparing my evidence, I have based my comments on the original application document and the later May 4, 2016 officer and expert reports.
11. At the time of preparing this evidence I understand that Mr Stephen Brown has been engaged to prepare landscape evidence on behalf of two submitters in

³ The access route to the site has not been illustrated / adequately detailed in the application and so an accurate assessment of the effects of this part of the proposal is not possible.

opposition located adjacent to the site, on Pryde Road. To avoid unnecessary duplication, my evidence is largely concerned with the effects on the wider contextual setting (and audience) located generally to the south of the site.

12. I understand the proposal includes The proposal includes three, 3-bladed up to 125m tall 'Gamesa G58' (or similar) wind turbines located in a 'cluster'. It will also include the formation of a vehicle access road – the effects of which have not been described adequately in the application.
13. I understand that this type of activity is not specifically identified in the Dunedin City Plan as permitted, discretionary or controlled. For this reason I understand the proposal attracts 'Non-Complying' activity status.

RECEIVING ENVIRONMENT

14. The immediate setting that the proposed turbines falls within (the receiving environment) is described so that it can be tested as to how compatible the proposal might be. The location and extent of what I consider the receiving environment is shown mapped in **Attachment 1**. Assessing the landscape qualities of the receiving environment and the site also helps correlate how the anticipated outcomes of the zoning have been met.
15. The receiving environment I have shown overlays part of a much wider visibility study included in the earlier planners report⁴. While the viewshed analysis model was based on a 108m building height⁵, it can be safely assumed that there would be some expansion to the extent of the viewshed with 125m towers modelled.
16. As already discussed, my evidence considers the receiving environment that extends generally to the south of Porteous Hill and the site. The proposal will potentially have a broader *viewshed* (as per Figure 3 of the planners report). For clarification, the viewshed indicates the parts of the landscape where the proposal would be *visible* from and does not discern between visibility and adverse visual effects. The receiving environment that I have mapped to the south of Porteous Hill indicates the area where the landscape and visual effects of the proposal would be more than minor.
17. It is understood that while the proposal would be visible beyond the receiving environment, the effects from these areas would likely be minor. It is also acknowledged that minor topography, occasional trees and buildings may obscure views to Porteous Hill and the proposed turbines within the mapped receiving environment.
18. The receiving environment that I have identified comprises the following characteristics:
 - Undulating, rounded volcanic derived topography with generally bare upper slopes and summits.

⁴ See Figure 3, D. Sycamore 7 April 2016 Council Planners Report Pg. 11. It is noted that the visibility study was assuming a structure height of 108m.

⁵ I have assumed that this was to the tip of the rotor, although this could be clarified.

- Substantial vegetated patterns including woodlot, forestry, shelterbelt and amenity on lower slopes and valley floors.
 - Crenellated coastline contributed by Blueskin Bay estuary, Purakanui Inlet and Warrington sandspit.
 - Small scale buildings and structures generally nestled into patterns of established indigenous and exotic plantings.
 - Small crib-style settlements including Warrington, Waitati and Purakanui.
 - Part of State Highway 1 and the coastal railway, including transmission lines.
 - Blueskin Bay estuary and coastal margins.
19. Within the receiving environment there are several public viewpoints where the site and proposed wind turbines would be visible. Chiefly these viewpoints are from the roads located on the Waitati flats and the meandering roads that skirt around the hills south of Blueskin bay. These roads include Mt. Cargill Road, Blueskin Road, Doctors point Road, Purakanui Road, and Heyward Point Road. I understand Orokonui Ecosanctuary, located at the top of Blueskin Road is a popular attraction. These roads are largely elevated and afford fairly regular viewpoints to the north including to Porteous Hill. At times the roads veer away from a northern aspect. At other times roadside vegetation, dwellings and associated outbuildings preclude views. As the roads extend eastward toward Heyward Point, the landscape becomes wilder, and less settled and any effects of the proposal from these distances would likely be to an acceptable level. I have included a series of viewpoints on **Attachment 1** that correspond with the photographs included in **Attachments 3-5**.
20. There are several places where the public currently enjoy largely unencumbered views to Porteous Hill. These include:
- When travelling in a northerly direction along State Highway 1
 - From the Main Trunk Line⁶
 - From the stony beach at Doctors Point
 - From the carpark at the head of Purakanui Bay
 - From the Warrington sandspit / recreation reserve
 - From the waters of Blueskin Bay⁷
 - From offshore⁸

MS LUCAS'S AEE and LANDSCAPE EVIDENCE

21. To follow I identify, in summary, the key observations and conclusions I agree with.
- **Land Typing** [Section 6 of AEE] and in particular the following observations:

⁶ I understand there are regular tourist trips from Dunedin to Palmerston or Oamaru where views of Porteous Hill from the cliffs above Doctors Point beach around Blueskin Estuary through to Omimi and Seacliff are possible.

⁷ Not assessed

⁸ Not assessed

“Volcanic formations provide the landform character that largely defines the coastal Dunedin District”. [para 3, pg. 5]

- **Coastal Landscape** [Section 7 of AEE] and in particular the following:

“One of a series of successive volcanic knolls north of Blueskin Bay, Porteous Hill extends above the coast of Ōmimi, Warrington and Evansdale to make an important visual contribution to the Waitati-Karitāne coastal landscape”. [para 6, pg. 6]

“Between Doctors Point and Potato Point, the view from Pūrākaunui Mouth over Mapoutahi to Porteous Hill is a very important attribute of the coastal experience. The more simple gentle knoll landform is clearly viewed above the complex and steeper country below”. [para 4, pg. 7]

“The slopes above the Waitati – Heyward coast provide important views across Warrington and Blueskin Bay to an array of coastal and inland hills including Porteous Hill. With elevation, the open summit of Porteous Hill is more on display and the knoll form flattens....Viewed from Blueskin Road above Don’s Creek, the more open summit is evident and less clutter interferes, providing more visual prominence to the summit landform”. [para 5, pg. 7]

“Excepting for the slopes toward Blueskin Bay, the utilitarian farm patterning of the slopes does not extend onto the Porteous summit. The summit landform is entirely pastoral”. [para 4, pg. 8]

“Addressed at the broad scale as a coastal landscape, the summit to Porteous Hill can be considered to be contribute to the coastal environment. As experienced from the wider coastal context, the windfarm on the summit can therefore be considered in terms of its effects on the natural character, natural landscape and natural features of this broader environs”. [para 67 of final evidence, pg. 13]

DISTRICT PLAN MATTERS

22. To follow I consider both the operative and proposed District Plan matters where they are relevant to landscape outcomes.

RURAL ZONE DESCRIPTION (FROM THE DISTRICT PLAN)

23. The DCDP considers the Rural Zone as being enhanced by “...ecological, landscape and recreation values arising from the natural resources of the rural area, including indigenous vegetation, wildlife, wetlands and other water bodies, and values arising from the coastal environment.” And that while a diverse range of primary

activities are anticipated to occur, “*Built structures that are located in the rural area are of a **small size***”.⁹ (my emphasis)

RELEVANT OBJECTIVES AND POLICIES FROM THE OPERATIVE DUNEDIN CITY PLAN

24. I consider the following objective, policy and assessment matters relevant to the proposal:

Objective 6.2.2:

Maintain and enhance the amenity values associated with the character of the rural area

Policy 6.3.5:

Require rural subdivision and activities to be of a nature, scale, intensity and location consistent with maintaining the character of the rural area and to be undertaken in a manner that avoids, remedies or mitigates adverse effects on rural character. Elements of the rural character of the district include, but are not limited to:

- a) **predominance of natural features over human made features,***
- b) high ratio of open space relative to the built environment,*
- c) significant areas of vegetation in pasture, crops, forestry and indigenous vegetation,*
- d) presence of large numbers of farmed animals,*
- e) noises, smells and effects associated with the use of rural land for a wide range of agricultural, horticultural and forestry purposes,*
- f) low population densities relative to urban areas,*
- g) generally unsealed roads,*
- h) absence of urban infrastructure.*

(my emphasis)

Policy 6.3.6:

Avoid, remedy or mitigate the adverse effects of buildings, structures and vegetation on the amenity of adjoining properties.

25. Objective 6.2.2 recognises that rural character contributes amenity and states that it is essential that this is maintained and enhanced.
26. Policy 6.3.5 lists what is considered contributors to rural character, and of note includes a “...*predominance of natural features over human made features*”. The combination of the presence of the elements listed provides amenity in my opinion. It goes on to state that rural characteristics (which contribute amenity) include **small building sizes**. The following objectives (discussed next) also recognise that the retention of rural amenity (provided by rural character) is a unique and essential element of Dunedin and among other things expresses caution that rural amenity can be sensitive to ‘one-off’ effects. (My emphasis)

⁹ DCDP, Chapter 6 Rural, Pgs. 6:1, 6:2.

Objective 14.2.3:

Ensure that land use and development do not adversely affect the quality of the landscape.

Objective 14.2.4:

Encourage the maintenance and enhancement of the quality of Dunedin's landscape.

Policy 14.3.4:

Encourage development which integrates with the character of the landscape and enhances landscape quality.

27. Objective 14.2.3 acknowledges that significant aspects of a landscape's quality are not adversely affected by land use activities and developments and that a harmonious combination of land use and development is achieved.
28. Objective 14.2.4 is concerned that 'high profile' landscapes - ones where residents and visitors have clear views to and across them via key transport corridors need to be carefully considered. These landscapes strongly influence ones appreciation and perception of the visual quality of the City.
29. The proposal, located on the summit of Porteous Hill would not be consistent with the above Objective and Policies for the following reasons:
 - The three structures clearly and significantly depart from what is anticipated in the District Plan in terms of height¹⁰ and overall scale. Because of this, it is impossible that current levels of amenity are able to be maintained or enhanced should the wind farm be implemented – particularly for those residing on adjoining and nearby properties. This is clearly evident in the various photosimulations prepared by the applicant – even at a lesser height of 90m.
 - Porteous Hill is highly visible from SH1 across Blueskin Bay. SH1 is a well-used scenic corridor frequented by locals and visitors. The addition of the three towers would significantly impact this view and peoples appreciation of the visual or scenic quality of the Blueskin Bay landscape.
 - Porteous Hill, while generally acknowledged as a working rural landscape¹¹ (and which I agree with), is not dominated by buildings. Buildings are generally confined to the lower slopes, associated with vegetation cover. The top of Porteous Hill where the turbines are proposed is devoid of buildings altogether. The rural landscape at the summit appears 'austere' and uncluttered - its volcanic origins clearly visible in scattered surface rock, supporting thinner soils, with the flanks of the summit crest clothed in well maintained and tidy pasture. As a result it currently exhibits a high degree of visual coherence.

¹⁰ 10m maximum height.

¹¹ Meaning the pre-human natural landscape has been largely modified for farming purposes.

30. In my opinion, Porteous Hill is predominantly natural. In considering the outcomes anticipated by the objectives and policies, I do not agree with Ms Lucas's assertion that the general patterning of rural development including the layout of paddocks, planting and such things is considered a 'human-made feature'. Rather I consider these elements to be human-induced *changes* or *modifications* to the natural landscape, none of which involve appreciable alteration of landform. Further, in my opinion, additions to the landscape such as amenity planting, pasture, shelterbelts, woodlots and so forth are more appropriately considered natural rather than 'human-made' or artificial features which in my opinion refers to such things as buildings, roading and communications infrastructure. This is an important distinction when considering the baseline environment.
31. At paragraph 17, Ms Lucas states that structural elements occurring on Porteous Hill (houses, farm buildings, yards, fences, overhead utility structures and signage) are highly dispersed, and "...*jostle for attention and dominance*". I do not agree with this statement. From my own observations I observe that Porteous Hill supports a mosaic landscape where built forms occur in sympathy with generous vegetated patterns. Further, it is evident that patterns of natural elements and green open space prevail over built forms. This can be seen in the images in my **Attachments 2, 3 and 4**. A situation where structural elements 'jostle for attention and dominance' would better describe a relatively dense hill suburb in my opinion.
32. The proposed location and oversized scale of the proposed turbines on the summit of the hill will dominate appreciation of this gently domed volcanic landform - much more than they would if located in a saddle or crease in the landscape with a landform backdrop – essentially where any built additions to the landscape were not the tallest element in the vicinity. A key contributor to the adverse effects of the proposal will be the towers' degree of elevation above the ridgeline.
33. It is noted that there are no significant structures located atop hills in the vicinity other than the transmission mast on Mount Cargill. I understand that this mast is of a similar height to the proposed towers¹². However this structure is of a latticed construction type and as such has a level of transparency. Of note Mount Cargill rises to 676m, and so the mast height is 16% of the height of the hill. Notwithstanding this, the mast is still reasonably prominent atop Mount Cargill. Other than this mast there are no tall structures in Dunedin's rural landscape. As a comparison, Dunedin's tallest building is the First Church of Otago at 56m tall¹³ located on Moray place. This church is the South Islands fourth tallest building¹⁴ (the other three are located in Christchurch). The proposed wind turbines will be two and a half times the height of this building.
34. The proposal would more or less constitute a 'one-off' effect, which will give rise to an incongruous addition to the Porteous Hill / Blueskin Bay landscape. Consequently, in my opinion, it will have the potential to generate significant adverse effects on rural amenity. In comparison with the mast-hill height ratio of Mount Cargill discussed above, the proposed turbines height would be 22% or 31% of the height of the hill depending on whether they are 90m or 125m tall respectively.

¹² Mast is around 105m tall. Mount Cargill is 676m tall.

¹³ From Wikipedia.

¹⁴ Presumably the type of buildings that can be occupied.

35. Ms Lucas at paragraph 10 under 'Proposal' states that the height of the towers has been reduced to 90m. However that does not accord with the Council Planners report which relies on the original application where a maximum height of 125m is proposed. I note that there is no amendment to the application document itself with regards to tower height. This needs to be clarified. A difference of 35m in height is significant. I am concerned that the photosimulations being presented are based on the lower (90m) tower height. However, for the purposes of this assessment I have assumed that the proposed height of the structures will be a maximum of 125m tall. Whether the towers are 90m or 125m tall does not alter my conclusions, particularly with regard to the character and amenity outcomes anticipated by the objectives and policies that I have identified.
36. Ms Lucas states at paragraph 18 that the turbines would "...emphasise the hill summit feature" and "enable the hill to retain its integrity as a natural feature and its predominance as the core of this landscape". I disagree for the reasons already discussed above. In my view the presence of the three turbines atop the hill will degrade the summit hill feature through a striking and unavoidable contrast in scale. The height of the turbines are more or less one quarter the height of the hill itself¹⁵. This can be demonstrated in **Attachments 2, 3 and 5**.
37. Due to the height of the turbines, and their operating requirements (located on open ground), there is scant opportunity for mitigation of effects. Ms Lucas proposes a colour gradation and surface coating to reduce reflectivity. This would mitigate the impact slightly, however it is the overall scale of the turbines that is unable to be mitigated in any meaningful way. Notwithstanding this, there is an inconsistency in the proposed structure colours, in that CAA require that all structures be painted 'white'¹⁶.
38. At paragraph 40 Ms Lucas accepts that for the eight properties adjoining the site, the turbines will affect their amenity, through a change in rural character, but that depending on the viewers' attitude, the presence of the turbines may contribute to their amenity. I understand that of these eight neighbours, six¹⁷ are opposing the proposal, two of which are employing expert advice¹⁸. This fact suggests that for these landowners the proposal is not anticipated to contribute to their rural amenity values currently enjoyed.

COASTAL LANDSCAPE PROTECTION AREA (CLPA)

39. The North Coast Landscape Protection Area (CLPA) extends partially across the site, but does not include that part where the turbines would be located. Notwithstanding this, the turbines will be very tall – well above what would be anticipated in the coastal part of the Rural Zone¹⁹. The CLPA overlay differentiates

¹⁵ Porteous Hill extends to 401m at its summit. The proposed structures are stated at a 90m maximum height in the applicant's landscape evidence and in the original application document are stated as up to 125m in height.

¹⁶ CAA letter to Blueskin Energy Ltd, February 1, 2016 (Appendix BF4 to Mr Farrell's planning Evidence for the applicant).

¹⁷ Information provided by Ms Tait.

¹⁸ Owners of 22 and 90 Pryde Road.

¹⁹ 5m maximum building height.

parts of the zone which contribute “highly visible coastal areas which have significant natural landscape features and characteristics”.²⁰

40. The part of Porteous Hill where the turbines would be located cannot be visually separated from the CLPA overlay due to their size. The proposal cannot be visually contained within a landscape buffer which would provide a legible edge to development and afford a better contrast between land-use activities. The landscape and visual effects of the structures would ‘spill over’ into the CLPA, which in my opinion falls within the receiving environment. The highly visible coastal area would be adversely affected for the same reasons discussed and to follow. I understand that this coastal landscape would be viewed by many - including passengers of cruise ships²¹.

RELEVANT OBJECTIVES AND POLICIES FROM THE 2GP

41. I consider the following objective, policy and assessment matters relevant to the proposal:

Objective 2.2.2: Energy resilience

Dunedin is well equipped to manage and adapt to any changes that may result from volatile energy markets or diminishing energy sources by having:

1. *increased local electricity generation;*
2. *reduced reliance on private motor cars for transportation; and*
3. *increased capacity for local food production.*

Policy 2.2.2.3:

Enable renewable energy generation through policies and rules that:

1. *enable renewable on-site energy generation; and support the development of small and large scale renewable energy generation in **appropriate locations**. (My emphasis)*

Objective 2.4.4: Natural landscapes and natural features

Dunedin's outstanding and significant natural landscapes and natural features are protected.

Policy 2.4.4.1

Identify and assess natural features and natural landscapes based on the following values:

1. *natural science factors;*
2. *aesthetic values and memorability;*
3. *expressiveness and legibility;*
4. *transient values;*
5. *whether values are shared and recognised;*
6. *value to takata whenua; and*

²⁰ Landscape Management Guideline One, 2006, Dunedin City Planning report.

²¹ According to the tourism website ‘DunedinNZ’ 217,000 people are expected to have visited the Dunedin area by cruise ship during the 2015-2016 season.

7. *Historical associations.*

Policy 2.4.4.2

Classify and map natural features and natural landscapes as:

1. *Outstanding Natural Features (ONFs) and Outstanding Natural Landscapes (ONLs) where features and landscapes have exceptional values; and*
2. *Significant Natural Landscapes (SNLs) where landscapes have values of high significance.*

Policy 2.4.4.3

Protect the values in identified natural features and natural landscapes (ONFs, ONLs, SNLs) by listing these values in Appendix A3 and using rules that:

1. *limit land use activities that may be carried out on ONFs;*
2. *manage land use activities that may be carried out in ONLs and SNLs;*
3. *restrict the scale and design of development in ONFs, ONLs and SNLs; and*
4. *Restrict forestry activity in ONLs and SNLs.*

42. The above objective and policies clearly state that while renewable energy is encouraged, it must be located in appropriate locations. In my opinion, for the reasons already discussed, this site is not appropriate for such activity as that proposed. Of note the 2GP has 'upgraded' the status of much of Porteous Hill including the site with a significant natural landscape (SNL) overlay. The SNL rating denotes the landscape has values of 'high' significance, which requires protecting, or at least being developed in a sensitive and appropriate manner. One of the mechanisms to protect these values are through rules controlling 'scale' and 'design'. The scale of the proposed turbines and consequent adverse visual and landscape effects in this significant landscape overlay area is inconsistent with the above objectives and policies.

Objective 2.4.6: Character of rural environment

The character and visual amenity of Dunedin's rural environment is maintained or enhanced.

Policy 2.4.6.1

Identify the important character and visual amenity values of different rural environments that should be maintained, and use these as part of the determination of rural zones that require different management approaches. Identify and list these values in Appendix A7 based on the following:

1. *landform and naturalness;*
2. *open space characteristics;*
3. *nature, scale and design of buildings;*
4. *density of development;*
5. *nature, scale and types of productive uses; and*
6. *presence of indigenous vegetation and habitats for indigenous fauna.*

Policy 2.4.6.2

Maintain the identified values within different rural environments through mapping rural zones and using rules that:

- 1. limit the density of residential activities;*
 - 2. manage the bulk and location of buildings;*
 - 3. manage the form and design of development associated with large scale activities such as factory farming; and*
 - 4. manage the pattern, scale and design of subdivision.*
43. The above objective and policies are consistent with Objective 6.2.2 of the operative plan previously discussed.

Objective 16.2.3

The rural character values and amenity of the rural zones are maintained or enhanced, elements of which include:

- a) a predominance of natural features over human made features;*
- b) a high ratio of open space, low levels of artificial light, and a low density of buildings and structures;*
- c) buildings that are rural in nature, scale and design, such as barns and sheds;*
- d) a low density of residential activity, which is associated with rural activities;*
- e) a high proportion of land containing farmed animals, pasture, crops, and forestry;*
- f) significant areas of indigenous vegetation and habitats for indigenous fauna; and*
- g) other elements as described in the character descriptions of each rural zone located in Appendix A7.*

Policy 16.2.3.1

Require buildings, structures and network utilities to be set back from boundaries and identified ridgelines, and of a height that maintains the rural character values and visual amenity of the rural zones.

44. Potential mitigating factors that Council can consider are adequate terrain backdrop, and setback from ridgelines. The proposal departs from the above objective and policy as the turbines will be located on top of the hill, are tall, and are artificial in character. The artificial character that would be introduced by the proposal would diminish levels of naturalness which is prevalent in the area. A land backdrop cannot be achieved. Therefore rural character values and visual amenity values will be adversely affected.

LMA (LANDSCAPE MANAGEMENT AREAS) REVIEW

45. The LMA Review was prepared for Dunedin City Council by Boffa Miskell Ltd in April 2007 and identified eighteen different landscape character areas for the Dunedin City Council area. The site falls within the 'Waikouaiti Coast and Hills' landscape type. The review also identified areas of outstanding landscape, areas

recommended for coastal landscape preservation and conservation. As already discussed, part of the site falls within the CLPA.

46. Part of the study included community consultation to better understand Dunedin's rural landscapes. The following landscape values were identified:

- *'Natural landscape' features are typically made up of the geological, ecological and dynamic components of the landscape. They form an important part of the cultural and aesthetic values of Dunedin's representative LCAs and what makes them distinctive and important to different people. These important natural features include:*
 - I. *Landmark landforms – volcanic peaks, ridgelines and high country ranges*
 - II. *Native vegetation cover – native forests, grasslands and bush*
 - III. *Natural character and natural habitats and environments (and associated wildlife) – coast, rivers and mountains*
- *Cultural and historical values are based on traditional land uses such as farming and food gathering practices, traditional settlement patterns or other social patterns of a time, architectural periods, or notable landmarks, events or figures. They are typically represented either as specific sites of significance, or areas that reflect a high degree of unity or integrity as a setting for historic sites or activities. Individuals and communities leave their different marks on the landscape. From our choices of architecture and land use to our memories of events, landscapes can tell stories of from where and from whom we came and why we have responded to the physical environment in the ways we have. The cultural and historical associations of Dunedin's coastal landscapes, which have retained a strong maori influence, are different for example, to those of the interior landscapes, some of which have more visible European heritage associations.*
- *High amenity and aesthetic values relate to memorability, pleasantness, naturalness, the scenic qualities of landscapes and features, and the provision of public access and recreational opportunities within them. Prominent and highly legible landforms, views, natural vegetation patterns, historic features, and the absence of development or in some cases a settled landscape, all contribute to aesthetic and amenity considerations. **Much of Dunedin's modified farming landscapes currently provide attractive, core rural amenity values of open space, rural outlook and privacy while other areas such as the Peninsula coastline encapsulate the scenic qualities of a wild, natural landscape.***

(my emphasis)

47. The character of the Waikouaiti Coast and Hills landscape type is described in the report and includes the following characteristics that are relevant to the site and receiving environment:

- *extensive coastline sequence of rocky cliffs, headlands, sandy bays and wide river estuaries....*
 - *main settlements are located on the coast, around sheltered estuaries and bays, with the elevated backdrop of traditional pastoral farming....*
 - *evidence of early European settlement within the preserved agricultural landscapes, which include field boundaries of deciduous exotic hedgerow plantings in addition to mature macrocarpa shelterbelts and traditional stone walls.*
 - *Prominent coastal features include Warrington Spit....*
48. Visibility and intervisibility is then addressed in the report. The following is relevant to the site and proposal:
- *Coastal and sea views are possible from many locations within the elevated inland slopes including from sections of SH1. However, while expansive views and vistas are afforded across the wide bays and estuaries of Blueskin Bay and Karitane from these places, visibility is also locally restricted from some locations by enclosing hillsides. This generates a sense of expectation for the viewer travelling through this landscape on SH1.*
49. And under 'Sense of Place / Identity':
- *Other than local residents, the Waikouaiti Coast & Hills landscape is most commonly experienced by motorists travelling along SH 1 north of Dunedin City. This arterial transport corridor also provides a link between the northern and southern extents of the Waikouaiti Coast where the repeated sequences of coastal bays and estuaries between ranges of coastal cliffs are key unifying features. These sheltered bays and estuaries and the many small communities (Waikouaiti being the largest) of both permanent and holiday homes that are located around them, contribute to a strong sense of place.*
50. The report finds among other things the depositional landform of Blueskin Bay and the regenerating native bush within Orokonui Valley as holding 'medium-high' natural factors and legibility and thus of regional importance.
51. Cultural associations (these inform associative landscape effects) are found as 'high' and 'important citywide' and includes the traditional crib-style coastal settlement at Warrington and Waitati and important feeding areas associated with estuaries including Blueskin Bay.
52. Under 'Aesthetics and Amenity' a diverse coastal morphology supporting scenic perspectives of the coastline is identified including an extended rural coastal character and outlook and that *"The Waikouaiti Coast and inland Hills are also valued as a scenic corridor to the arterial SH1, which forms the northern gateway to Dunedin City. The Waikouaiti coast is made accessible by SH1 to both residents and visitors. In this way the existing aesthetic and amenity values of this landscape have both Citywide and Regional importance.*

53. The report concludes that the overall significance of this landscape type is *‘Medium-High with Regional and Citywide importance’*.
54. A key threat to landscape character is identified in the study, where it states:
- *“Showcased by the SH1 corridor and local coastal settlements, this is generally a **visually sensitive landscape**. The aesthetic appearance of the land is therefore important, as is the maintenance of key views and vistas from public viewing locations across it. **The inappropriate siting of large buildings and structures or forest plantations could significantly impact upon the perceived quality of this landscape**, particularly if important views of the coast are obscured.* (my emphasis)
55. It is clear from the discussion above that the landscape values of the site and receiving environment require careful consideration with regards to future development. Key issues identified with relevance to the proposal are that large structures could impact valued landscape qualities and that SH1 is considered an important scenic corridor. Despite the report now being over ten years old, the baseline environment has remained largely unchanged apart from the modestly scaled rural residential development at Dons Creek.
56. I do not accept the Council Planners comment [para 26]²² that “....there are no matters of national importance or locally significant features/values affected by the proposal, unless you determine the subject land is located within the coastal environment”. The details and character descriptions in the LMA review discussed above carried out by a highly-respected landscape architectural consultancy accords with my own (more limited) study of the area. In addition Porteous Hill is proposed to have a ‘Significant Natural Landscape’ overlay which will be discussed in the next section.

ASSESSMENT MATTERS

57. I consider below assessment matters where relevant to the proposal.

6.7.13 Visual Impact

- i. *The visual impact arising from an activity on the character of the rural landscape, visual amenity and significant views.*
 - ii. *The potential effect of structures on significant views from public viewpoints, including visibility from State Highway 1.*
 - iii. *The effect of an activity on the open amenity of the rural area.*
58. At paragraph 45, under ‘rural character’, Ms Lucas describes Porteous Hill as forming an important skyline feature. I agree with this statement. Ms Lucas then considers the character of the rural landscape and coastal settlement patterning in the contextual area as ‘intricate’, ‘complex’, ‘mosaic’ and ‘utilitarian’. A conclusion is then reached where the overall character is of ‘lesser naturalness’ due to ‘myriad structures sprinkled around’. I disagree with this conclusion. The area in my opinion has a pleasant ‘settled’ character where dwellings and other buildings

²² Evidence of Mr Farrell, planner for the applicant.

nestle amongst substantial vegetated patterns. Patterns of existing built development are low, and small-scale, crib-like. This can be seen in **Attachments 2, 3 and 4**. I agree with Ms Lucas that the three turbine structures will be highly visible from viewpoints within the contextual rural landscape setting. However, in my opinion, the three turbines would have much more than a 'negligible effect' on specific rural character as Ms Lucas states.

59. Turning to matters of visual amenity, in my opinion, the proposal would introduce three highly visual and anomalous forms to the landscape. The visual character of the hill will be changed as discussed next.
60. Porteous Hill is gently rounded with few tall trees on or near its summit. This affords it a relatively smooth, uncluttered and highly legible skyline. When Porteous Hill is viewed from the south from the many public and doubtless private²³ viewpoints extending from Waitati towards Heyward Point and including Doctors Point, Dons Creek and Purakanui, backlit in low angle sunlight, the form of the hill can be thrown into 'hazy silhouette'. The textures and mosaic landcover of the lower slopes then become harder to discern and appear little different to the more open slopes. During these weather conditions the three turbines would also be thrown into silhouette. This would cause their upright moving 'twiggy' forms to appear in stark contrast to the inert rounded hill landform below them. This is indicated in **Attachments 2, 4 and 5 (photographs)**.
61. I accept that there are countless weather/environmental conditions where the visibility of the structures will range from almost nil (under cloud cover) to highly visible. As stated, visibility will be exacerbated by eye catching turbine movement and so draw attention to their presence. I have included a series of images of Porteous Hill in various seasons and times of day to help illustrate this. The key issue is that there is a large viewing audience including locals and visitors located south of the site. Porteous Hill is a key part of their north facing aspect rising above Blueskin Bay. For this reason it is inextricably linked with the wider coastal environment of the application site and setting.
62. I do not agree with Ms Lucas's assertion that while the turbines are visible, they will change the visual character of Porteous Hill from 'indistinct' to a 'landmark'. At least not in a positive sense. I do not consider Porteous Hill to have an 'indistinct' character for the reasons discussed above.
63. I also disagree with Ms Lucas that the turbines will be 'elegant' and that they will complement and accentuate the broad cone form leading her to conclude that any adverse effects on aesthetic coherence will be minor. The turbine design appears no different to others that have been installed around the country. The proposed towers are not especially thinner or smaller for example²⁴.
64. The backdrop topography to Blueskin Bay including Porteous Hill comprises gentle, rounded volcanic landforms extending down to the water. Porteous Hill is the most prominent landform within the receiving environment. Because of the lack of any foreground topography, structures and significant trees, the landscape has low

²³ Viewpoints from private properties have not been assessed.

²⁴ I understand from Ms Tait that proposals discussed with the community in 2011 included a smaller overall structure height of 46.6m (Windflow 500).

visual absorption capability for the three proposed turbines. The turbines would appear to 'stick up' well above, and separated from the landscape. Consequently they would be highly prominent from many vantage points in their vicinity and from the point of view of neighbours, dominant.

65. This effect would be the case where views across Blueskin Bay to Porteous Hill from SH1 are achieved. Blueskin Bay opens up to views from the lower slopes of Mount Cargill and SH1 when travelling north and passing through the valley floor/estuarine flats. From SH1 the general orientation of views is across the water. It is a 'new' and interesting coastal environment after descending the Northern Motorway. The proposal would have an adverse visual effect on these significant views and scenic quality. Photographs from these viewpoints are shown in **Attachments 4 and 5.**
66. A landscape that would have better visual absorption capability for such structures would have qualities including upthrust, irregular and pointed landforms clothed or partially clothed in trees (plantation forestry for example), rather than smoothly rounded essentially bare skyline forms with close connections to coastal landscape patterns and processes. Landform backdrop would also assist in mitigating views from south of the site which is not possible in this case.

CONCLUSION:

67. In my opinion, the proposal in its current form is contrary to those objectives and policies concerning landscape outcomes of both the operative and proposed Dunedin City Plans. This is particularly so with regard to the maintenance and enhancement of the character and amenity of the Rural Zone and Dunedin's coastal landscape for the reasons already discussed. In general, the adverse effects of the parts of the proposal²⁵ discussed in this evidence are, in my opinion, more than minor to a significant degree. The proposal is incompatible with the specific rural character and amenity of the zone in which it is located.
68. The levels of visual amenity currently enjoyed from locations to the south of the site including Blueskin bay, surrounding settlements, roads and from SH1 will be significantly affected by the proposal. This is firstly, because the proposed structures – which are tall and often in motion would be highly visible, and therefore lack cohesion with the modest scale of activity which currently informs existing rural character. Secondly, the size and location of the proposed turbines precludes mitigation sufficient to counter adverse amenity effects to what I consider an acceptable level.
69. The proposed turbines are not anticipated in this part of the rural zone that is highly 'lived in' whose character and amenity is enjoyed by locals and visitors alike. The proposal would be more acceptable in a much less populated and visited rural landscape. For this reason the three tower structures will appear incongruous and out of harmony with the existing character and amenity of the contextual rural environment.

²⁵ Earthworks, roading and the alignment of the transmission corridor have not been assessed in this evidence.