



Project: TAUMATATOTARA WIND FARM - APPLICATION RM200019 Memo: 7/R1 Page: 1 of 3

Topic: Assessment of Landscape & Visual Effects– Review

Date: 27 September 2023

Attention: Chris Dawson – Consultant Planner for Waitomo District Council

From: Dave Mansergh – Consultant Landscape Architect for Waitomo District Council

BACKGROUND

Since undertaking my peer review of the landscape and visual assessment report prepared in support of an application to vary the consent granted for the Taumatototara Windfarm, the applicant has further amended the application as follows:

- (a) A further reduction in the number of turbines from 11 to 8 (removing turbines 2, 4 and 9);
- (b) A minor increase in the maximum diameter of the rotor area from 155m to 163m for the remaining 8 Turbines (an increase of 5%);
- (c) A corresponding minor increase in tip height of the turbines from the proposed 172.5m to 180.5 m. This represents a 5% increase in tip height compared to the Variation Application. This is to allow the ground clearance of 17.5m, as proposed by the Variation Application, to be maintained.

CHANGE OF THE LANDSCAPE CONSULTANT

It appears that WSP Ltd, who prepared the landscape and visual assessment report assessed in Memo 6, are no longer engaged, and Mike Moore Landscape Architect has been engaged by Taumatototara Wind Farm Ltd to provide landscape evidence in support of the application.

Mr Moore produced a Memorandum on 13 September identifying that, while he had not provided advice concerning the application, he had reviewed the application and had undertaken an assessment of the landscape (including visual) effects of the variation on the consented environment.

The memorandum was produced on a “will say” basis to inform the s42A report. In summary, the Moore memorandum identifies the following:

- a. The Waitomo District Plans (operative or proposed) do not identify the site as having significant landscape values. The plans focus on the rural character, influenced by low construction density, openness, and natural surroundings.
- b. The new wind farm design will have a smaller footprint, now affecting 3.5km of ridgeline compared to the initial 6.2km. The turbine count will drop from twenty-two to eight, but these turbines will be approximately 42% larger. Access roads will be shorter with no additional widening, and despite the bigger turbines needing larger bases, the total excavation will be less.
- c. In terms of visual effects, the wind farm is likely to detract from the area's rural amenity due to the size of the turbines. From the south, the new design is viewed as better because of a reduced ridgeline impact and more space between turbines. However, from the north, the new design may appear more prominent. Despite the size increase, the overall adverse effects of having fewer taller turbines is seen as being less than having more, shorter turbines. Generally, the visual effects of the new proposal are viewed as positive because of this.



In his memo, Mr Moore identifies that consultation has revealed that there are concerns about the effects of the proposed variation from the following locations, and provides the following “tentative” findings (paraphrased) while he finalizes his assessment:

- a. Taharoa Village: Low impact. Any visible turbines in the new design will seem larger, leading to a slight negative effect.
- b. 158 Coutts Road: The new proposal shortens the visible length of turbines, resulting in a positive/moderate effect.
- c. 227 Coutts Road: Landform barriers mean only a few turbines from the original design would be visible. The new design’s turbines remain hidden, resulting in a positive/moderate effect.
- d. 11 Taumatotara Road West and 83 Te Waitere Road: Neither design is visible, so the visual impact is neutral.
- e. 84 Te Waitere Road: The original design has most turbines visible, while the new design reduces this visibility but has larger turbines. The visual impact is negative/low.
- f. 176 Te Waitere Road: Evaluation for this location is still pending.

The Moore memorandum concludes:

Overall, it is my assessment that the landscape effects of the Variation Application and the Updated Variation Application will be positive. My preliminary assessment is that where there are adverse effects arising from the difference between the existing consent, and either the Variation Application or the Updated Variation from those places assessed, these effects will be no greater than adverse / low (minor).

Further details will be provided in my brief of evidence to be provided in accordance with the evidence exchange timetable.

PEER REVIEW OF THE INFORMATION CONTAINED IN THE MOORE MEMORANDUM

In terms of its recommendations for peer reviews, Te Tangi a te Manu identifies that:

- 6.57 *A peer review is an evaluation of an assessment by someone with similar competencies. Its weight relies upon the reviewer being impartial and having sufficient expertise and experience with respect to the subject of the principal assessment.*
- 6.58 *A peer review is a focused appraisal of the principal assessment, not a parallel assessment.*
- 6.59 *Peer reviews should be consistent with the professional role described in Chapter 2: The purpose is to assist decision-makers (and others) by checking an assessment’s method and findings. Peer reviews should:*
 - *be succinct and to the point*
 - *focus on the principal assessment*
 - *provide reasons to support the review.*
- 6.60 *No two landscape assessors are likely to carry out an assessment in precisely the same way. It is not helpful for a peer reviewer to demonstrate how they might have carried out the assessment differently or to dwell on unimportant details. However, if the reviewer considers the assessment method is not sound, or the assessment does not follow its stated method, or the findings are not credible, or there are gaps that are germane to findings, then additional assessment of part (or all) of the principal assessment may be warranted. Make clear where that is the case, explain the reasons for further assessment, and ensure that the additional assessment is reasoned and transparent.*



The differences in findings between the peer reviewer and principal assessment in such situations should be clear and reasoned.

6.61 *A peer reviewer will typically review the assessment report, make a site visit, and write a short report confirming (or not) that the assessment:*

- follows a sound methodology and method for the purpose*
- considers the relevant statutory provisions and any relevant 'other matters'*
- accurately describes, interprets, and evaluates the relevant landscape character and values*
- analyses the effects on landscape values (for proposal-driven assessments) in a balanced and reasoned way*
- reaches credible findings supported by reasons*
- makes appropriate recommendations with respect to findings (depending on the type of assessment).*

While it is recognised that the Moore memorandum is a “will say” document and that Mr Moore had not completed his assessment at the time of writing, from a peer review and reporting perspective, the memorandum does not contain sufficient information or detail to allow the “tentative” findings identified to be reviewed and independently reviewed or verified.

It is therefore strongly recommended that Mr Moore provides sufficient detail and analysis of the various landscape and visual assessment factors identified in *Te Tangi a te Manu* in his evidence (including sufficient detail to allow the matters identified in section 6.61 above to be independently reviewed). It is also recommended that he confirms the extent to which he has relied on the assessment undertaken by WSP.

If you have any questions, please contact me.

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