Westpower Waitaha Hydro Scheme (Fast Track Application)
Proposed Hydro-Electric Power Scheme, Waitaha River, Westland District

LANDSCAPE PEER REVIEW

3 December 2025

Introduction

This peer review has been requested by the Department of Conservation (DOC) to assist it to prepare its report for the Fast-track Panel in respect of Westpower's Waitaha Hydro Scheme. My peer review relates to the Applicant's assessment methodology and findings regarding potential effects of the Proposal on landscape and natural character values as set out in the Applicant's landscape effects assessment prepared by James Bentley of Boffa Miskell (the 'Landscape Report')[1]. Visual effects[2] are also considered (a subset of broader landscape effects).

I have also been asked to provide comment on the draft Landscape Management Plan (Appendix 40 of the Application) prepared by Boffa Miskell for Westpower (10 July 2025).

My comments relate to the parts of the scheme that fall within DOC Stewardship land (which is the majority of the scheme)[3] and are in relation to the concession application. In addition, this peer review does not address the statutory environment as that will be covered by other DOC authors.

For ease of cross-referencing back to Mr Bentley's Landscape Report where I provide particular comment on a point made, I include the page number from Mr Bentley's Landscape Report in brackets [xx] throughout this peer review.

I understand that DOC has requested information from the Applicant on landscape matters, and that the Panel has also requested further information including additional visual simulations. At the time of writing this report, the Applicant has not yet provided this further information and so my peer review is based on the Landscape Report and draft Landscape management plan dated July 2025.

Peer Review Methodology

In late 2014, I was engaged by DOC to peer review Mr Bentley's landscape effects assessment for an earlier iteration of Westpower's scheme at the same location. At that time, I visited the site and also visited Westpower's nearby Amethyst hydro scheme.

The peer review methodology is based on that set out in Te Tangi a te Manu Aotearoa New Zealand Landscape Assessment Guidelines (TTatM) and utilises information lodged by the Applicant. As such this peer review is desktop-based and has not included a recent site visit. The

[1] Report dated 30 July 2025 (Appendix 27 of Application).

[2] 'Visual effects' are a subset of landscape effects. Visual effects are consequences of change on landscape values as experienced in views and are one tool to help understand landscape effects. Other senses contribute to amenity values such as sound and smell, however the visual is typically pre-eminent for most people.

[3] Other than part of the temporary river crossing, new concrete ford and the parts of the scheme on the true right of Macgregor Creek including Staging Area 3, disposal sites and transmission corridor which are outside DOC Stewardship land.

widely accepted NZILA Seven-Point scale of effects has been used to help describe the magnitude of effects, the same scale that Mr Bentley has used.

Desktop study of information provided by the Applicant has been utilised to assess the Proposal, site, and contextual landscape where an evaluation of the key issues and potential landscape effects of the Proposal, including positive effects has been made. This peer review forms an impartial and focussed appraisal of the Landscape Report and is not a parallel assessment.

On 1 December 2025 James Bentley and I discussed via Teams some of the content of his landscape effects assessment in order to clarify some points I had identified which was most helpful.

In terms of broadening my knowledge of the Proposal, this peer review also considers material observed in the below reports from the Application:

- **Appendix 3** Project Overview report prepared by Rodger Griffiths, (July 2025)
- **Appendix 9** Natural Character, Landscape and Visual Amenity Effects report prepared by James Bentley, Boffa Miskell (24 March 2014)
- **Appendix 34** Erosion and Sediment Control Plan (draft) report prepared by Campbell Stewart, Southern Skies Environmental (30 May 2025)
- Appendix 35 Vegetation Management Plan (draft) report prepared by Westpower (11 July 2025)

Summary of conclusions

I agree with a substantive part of the content and conclusions reached in the Landscape Report. As such, my detailed comments below are focussed on where I disagree with points made in the Landscape Report, consider that the information provided in the report or an aspect of the assessment is incomplete, or where further information is required to better inform the assessment, including the provision of additional visual simulations.

I agree with Mr Bentley's description of the existing environment (at all scales) and broadly agree with his values assessment. From speaking with Mr Bentley, I understand that his assessment of 'operational effects' considers the Proposal from the point at which construction has ceased where any construction materials, machinery and activity is no longer present, and that the visual simulations are shown approximating the Proposal's appearance ten years from 'day one' of the start of operations.

I also consider that Mr Bentley's assessment of the:

- temporary construction effects relating to the intake structures on natural character, landscape and visual amenity as initially 'High' (Significant) [48] is fair and reasonable. I understand from Mr Bentley that his 'High' level of effects is an *average* and depending on what is underway at any given time, construction effects may be greater or lesser than 'High'. Due to the sensitivity of the environment, in my opinion, construction effects will generate (on average) a 'High' level of adverse effect on natural character, landscape character and visual amenity values at a localised level until such time as construction activity ceases at any part of the site.
- operational (permanent) effects of the headworks structures on natural character and on landscape values at the local level will be 'Moderate-high' [43] – [44]; on visual amenity values ten years out as 'Moderate' [45] from viewpoint IN1; and 'Moderate-high' [45] from viewpoint IN2 on the swing bridge are fair and reasonable.
- operational (permanent) adverse effects of structures within the powerhouse site on natural character values to be 'High' (Significant) (for temporary events) and otherwise 'Moderate-

high' [50]; 'Moderate' on landscape values [52]; and depending on viewpoint location between 'Moderate-high' and 'Moderate-low' [53] – [54] on visual amenity values ten years out (so long as the existing walking track is re-routed away from the scheme and close-up views), as fair and reasonable.

- temporary construction effects at the powerhouse site as initially being 'High' (on average) (Significant) [57] is fair and reasonable (see my comments below regarding construction effects).
- I would add that Mr Bentley's effects conclusions would be at the upper end of these ratings, or in other words would be very close to tipping to a 'Moderate-high' and 'High' level of effect respectively – particularly at 'day one' if the various recommendations and design measures contained in the draft LMP were not carefully adhered to.

Table 2 – Construction Effects

In **Table 2** under 'Residual effects post *mitigation*', construction effects *reduce* following mitigation. I found this slightly vexing as construction effects 'are what they are' and can't be mitigated over time, although their effects levels will wax and wane during the construction period depending on what activity is underway at any given time. This accords with Mr Bentley's (on average) 'High' adverse effect rating which I agree is realistic here.

Mr Bentley clarified with me that his last column in Table 2 for construction effects actually means '*post construction*' when all the various materials, machinery, stockpiling and activity is no longer present. Or in other words, construction effects will simply be 'not applicable'. Post construction is synonymous with the start of the Operations phase (and its own effects). As such I am of the opinion that the last column of Table 2 regarding construction effects is not relevant and can be discounted. Construction periods have relatively abrupt ends.

By way of further explanation, construction effects are by definition 'temporary', in most cases adverse, and are usually at the upper end of the effects scale for a relatively short period of time. Such effects cannot be easily mitigated by additional works, such as vegetation which, by the time it had sufficiently established, construction would be complete. In my experience, landscape assessments simply report on the construction effects in terms of what will occur, when and for how long, with an assessed average effect rating applied.

Mr Bentley acknowledged through our discussion that the residual adverse effects he includes are based on there still being some visible sign of change to the localised setting immediately after the site/s have been cleared of construction materials, temporary roading etc. After which natural processes will gradually reduce the evidence of the construction period. I agree with this occurring but also believe that this is not a (reduced) construction effect – construction has ceased and so this is a natural remediation process that will run in parallel with operation effects.

Moving on, I differ from Mr Bentley's assessment in respect of the adverse visual effects of the power station access road and transmission route on conservation land as 'Moderate–high' reducing to 'Low' from distant viewpoints over time [58]. In my opinion the transmission poles and wires will be almost as visible at 'day one' as they will be over time from distant viewpoints and cannot be mitigated – they will always rise above the forest cover as a new built element in the natural scene and as such will more likely generate at least a 'Moderate-low' residual visual effect – even after the poles have weathered.

The various measures listed in Table 2 from [xvii] in the columns headed: '*Recommended effects management*' include aspects that in my opinion are essentially integral to the design of the Proposal plus any proffered conditions of consent, such as sedimentation control for example. From speaking with Mr Bentley, he clarified that this is largely the case, and that the 'Recommended effects management' column is intended to link with the draft Landscape

Management Plan. This is consistent with the AEE where it states at [6.18.3]: "*Westpower has incorporated various operational design features that materially reduce the residual level of effect…*"

In discussion, Mr Bentley agreed that the '*Recommended effects management*' column could be hypothetically moved to the left, before the '*Assessment of effects*' column and include clear reference to the LMP, and the '*Residual effects post mitigation*' column be simply deleted. In this way Table 2 could be effectively set out as: 'effect identified' + 'recommended effects management (including LMP)' = 'assessed effects'. This is because the last column appears to be largely redundant – essentially there will be no difference in effects over time, and construction effects will not change as discussed above under my comments on 'Table 2'. Any 'mitigation' will be part and parcel of the Proposal which also takes the LMP into account.

I understand from Mr Bentley that the current design is in response to earlier landscape effects reporting and discussions with other experts where various weaknesses were identified. This is an optimal approach, supported by TTatM where design and assessment are inter-woven helping to minimise adverse landscape effects from the outset, without having to rely on additional mitigation, which in this case is not particularly relevant, or possible. Mr Bentley acknowledges this as his operational effects findings are no different between 'day one' and 'post mitigation'. The physical effects of the changes will not reduce over time – the Proposal represents an obvious built change to a highly natural setting, where any effects on natural character and landscape will always be there and perceived, regardless of how visible they are.

I also consider that, at 'day one' (as opposed to 10 years out) the adverse effects ratings may be slightly higher at certain times. For instance, at 'day one' and / or when maintenance work is being conducted with the excavator in the river or a helicopter is in operation the effects of the Proposal on landscape and visual amenity values at the localised level may be at any given time 'High' or possibly 'Very high'. And so, while such effects will be essentially temporary, they will be part and parcel of the outworking of the Proposal.

Landscape Report Methodology

The methodology outlined in the Landscape Report at Section 1.2 is based on the concepts and principles set out in Te Tangi a te Manu: Aotearoa New Zealand Landscape Assessment Guidelines (July 2022) (TTatM). This document now forms best practice guidance for landscape assessors and is the methodology that I have used for my peer review, as noted above.

The widely accepted NZILA Seven-Point scale of effects has been used by Mr Bentley to describe his assessment of the magnitude of effects (below). A point to note is that the scale ranges from 'Very low' to 'Very high'. As the diagram included at page 74 of Mr Bentley's report shows, adverse effects described as 'Low' and 'Very low' in the NZILA scale equate to 'Minor' and 'Less than minor' effects, while effects described as 'High' or 'Very high' equate to 'Significant' effects:

Where Mr Bentley has assessed adverse effects as 'High', he has in some places also recorded the magnitude of effect in accordance with the above diagram as 'High (*Significant*)' (e.g. Table 2 on page xvii). In other places however, the high magnitude of effects is not described in this way. In Table 2 Mr Bentley clarifies whether his 'Low' finding is 'Minor' as 'Low' straddles both a 'less than minor' and 'Minor' effect which is helpful.

TTatM provides useful further guidance in describing levels of adverse effect, noting that context is important:

165. 'Significant' also has meanings that derive from 'signify' (indicate). For instance, a small difference may be 'statistically significant', people may exchange a 'significant glance'. Be conscious of such nuances. In landscape assessment, significant usually means of large magnitude and importance.

166. 'Self Family Trust (Crater Hill)' [2018] NZEnvC 49, paragraph 501. "Significant adverse effects are, like inappropriate ones, a matter of context."

6.42 Significant adverse effect means of major magnitude and importance. A significant effect can be characterised as 'high' or 'very high' on the 7-point scale[165]—the upper part of the minor-moderate-major scale. But as above, it is a matter of context.[166] Assess individual effects first in terms of their nature and magnitude against the 7-point scale. Then, assess whether the adverse effect is significant in magnitude and importance (significance) in the context of the relevant test and statutory planning provisions. Explain the reasons to justify your professional judgement.

[85] Seven-point level of effect scale. Source: Te tangi a te Manu, Pg. 15
[86] The term 'significant adverse effects' applies to specific RMA situations, including the consideration of alternatives for Notices of Requirement and AEEs, as well as assessing natural character effects under the NZ Coastal Policy Statement.

I consider Mr Bentley's assessment process is sound, with several aspects clarified through speaking with him directly. The assessment methodology is usefully and thoroughly explained in Appendix 1 of the Landscape Report. He notes other data sources that are relied upon. Several site visits are noted as having occurred, including with other experts which would have helped inform any landscape findings at the time.

An independent peer review of the Landscape Report was not sought. In my view an independent peer review would have been beneficial as it would have tested and provided further certainty as to the effects of the Proposal given the valued attributes of the area the scheme will be located within. I note however that Sue McManaway (Principal Landscape Architect at Boffa Miskell) and a highly experienced practitioner internally reviewed Mr Bentley's Landscape Report which is good practice.

Later in this peer review I make comment on the visual simulations that have been provided which partly relates to methodology, however in general I agree with Mr Bentley's assessment methodology.

I discuss various points under the three broad parts of the scheme; 'intake structures', 'power station and switchyard' and 'power station access road and transmission route' next.

Intake structures

The 'Intake Simulation (VS1): IN1 Proposed' in the Landscape Report simulates the changes ten years after construction and illustrates the main weir, training wall, sluice gate and upstream guide wall. Other permanent parts of the scheme are not included – i.e. the visible part of the 12 m wide access route and battered slopes between the headworks access portal and riverbed and the (potentially required) wingwall to the side/s of the headworks access tunnel mouth[4]. Mr Bentley is seeking clarification regarding the 12 m width requirement for the access route, given that the access portal for the same machine is proposed to be much narrower at 5 m wide.

The access route to the river may possibly be partly concealed behind much of the moss-covered rock in this image above and to the right of the weir structure, which in my opinion would be optimal. However, until the visual simulation is updated or confirmed and / or additional simulations are provided it is difficult to know with certainty how the access route would appear from this viewpoint. A 12 m wide, flat and steep (1 in 6) permanent track will potentially be quite dominant. For instance, some of the foreground rock along the shoreline may need to be removed or substantially altered. Additionally, given that regular maintenance work will be required in the river channel via the use of a 12 – 20 tonne excavator (**Figure 1**), it would assist if this machinery was also included in the simulation or a version of the simulation to ensure this element is not

[4] Appendix 3 Project Overview Report [3.57 (c)].

overlooked. It may be that Mr Bentley reconsiders his effects findings in this regard.

***Figure 1** - 20 tonne excavator*

At [66] in the Landscape Report it states that while shotcreting is commonly used for slope stabilisation it is not preferred in more sensitive situations such as this. Mr Bentley notes that alternative treatments 'may' be used which alludes to the LMP where better alternatives are listed. I would not recommend shotcreting be used where it would be readily publicly visible as it can look uniform in colour and texture and therefore unnatural. Through discussion with Mr Bentley he agrees and prefers natural rock be used which I fully support. There is some discussion in the application documents about wingwalls being used around the access tunnel entrance. Mr Bentley does not refer to this in his assessment. If raw concrete wingwalls were installed around the tunnel entrance, this would increase the amount of obvious built structures and level of visual effects. As above, it may be that Mr Bentley reconsiders his effects findings if concrete wing walls are required.

The 'Intake Simulation (VS2): IN2 Proposed' in the Landscape Report simulates the changes ten years after construction and illustrates the main weir, training wall, sluice gate and downstream guide wall. As mentioned above, part of the 12 m wide access road which would be visible at the left of the image is not shown. The instream bund - while not always in place will be visible at times[5] and should be included to show its visual effect. This part of the scheme is not discussed in the Landscape Report. The appearance of an in-stream bund with its crest 1 m above summer flow level will contribute to adverse effects as it is a contrived landscape element, however it would not be as obtrusive as a 'solid' built form as it comprises natural river aggregates albeit arranged in a less natural way.

Simulations in landscape assessments are often shown as a set of images: at 'day one' and when mitigation has established such as additional screening vegetation. Sometimes simulations include in-between stages in time too. However, TTatM cautions that 'worst-case' scenario simulations taken from a point where the effects are most visible can over-state the effects. The simulations in the Landscape Report however only show part of the potential changes made to the landscape and at one point in time. They depict a state where the concrete has weathered after ten years, appearing more visually recessive than it would at 'day one' alongside the natural rockwork which remains covered or has reestablished in natural vegetation. I agree that concrete in this landscape / climate could appear like this after ten years. However, at 'day one' the concrete would appear much brighter and it would be likely that some natural vegetation in the area and covering the rocks would have been removed or damaged during the construction process. Some of the natural

[5] Appendix 3 Project Overview Report [8.5] and page 50.

rock would have been presumably moved, removed or cut presenting bright unweathered surfaces. It is acknowledged that the simulations show the works in bright light, which is helpful, as the works here will at times be thrown into shade. However, images at 'day one' would assist in demonstrating the as-built effects of the scheme that will endure until weathering and naturalisation occurs, particularly as this part of the scheme will be clearly visible to recreationalists from nearby.

I agree with Mr Bentley that the scheme will *"…introduce semi-industrial features into a landscape virtually devoid of modification."* [45]. Mr Bentley assesses the operational (permanent) effects of the headworks structures on natural character and on landscape values at the local level to be 'Moderate-high' [43] – [44], and on visual amenity values ten years out to be 'Moderate' [45] from viewpoint IN1 and 'Moderate-high' [45] from viewpoint IN2 on the swing bridge.

At 'day one' it is likely and logical that these adverse effects ratings may be slightly higher than what is noted above. For instance, at 'day one' and when maintenance work was being conducted the effects may intermittently increase to 'High' (Significant). Consideration of additional visual simulation/s depicting the Proposal in these situations would provide better certainty of the potential effects.

Perceptual values include all of the senses, not just the visual. There will be sounds and smells associated with the works too (diesel engines, exhaust fumes) which may be perceived before recreationalists see the actual works underway. The Landscape Report notes that one can 'hear' the gorge [20] and after construction the soundscape will change where the noise of water flowing through the gorge will have a slightly reduced audibility [41]. As such, it is likely that the sound of maintenance work (a 12 – 20 tonne diesel excavator working in the stream bed) or helicopter may be heard from further away than if it was being used during construction while the river was still in its fully natural and boisterous state of flow.

In the Landscape Report at [34] 'key effects' are listed. Of note, the effects of construction and ongoing maintenance are not included. In my view the ongoing maintenance will be a key effect due to its inherent characteristics – an excavator working in a remote part of the West Coast landscape at any given time would not be anticipated in this location by those passing through.

The simulations, while useful, illustrate a defined view. There will be other parts of the scheme visible from or near these viewpoints too. Such parts of the scheme will include the temporary staging / laydown area. This area may include a range of temporary structures and activity areas similar to what is noted to occur in the staging area associated with the power station site in the Landscape Report [55]. Such items may include: an emergency hut, staff facility and amenity buildings, fuel tanks, storage of materials and equipment, machinery, spoil stockpiling and security fencing. There will be vehicles and workers in high-visibility clothing moving about. The Landscape Report notes that the 0.7 ha area will include 'contractors facilities, machinery storage and temporary stockpiling' and will be 'difficult to see' due to existing vegetation on the terrace edge [47]. The existing retained vegetation is not described anywhere in detail (height, density, general species type, condition). Nor has it been shown via site photograph and / or outlined on a plan as an 'area of vegetation to be retained and protected' at least until such time as the construction phase has ceased and the area has been cleared to revert back to natural condition. As such, it is difficult to be certain of the effectiveness of this potentially helpful and existing screening vegetation.

Mr Bentley assesses the construction effects on natural character, landscape and visual amenity to be initially 'High' (Significant) [48] which I consider is fair and reasonable and would not necessarily need to be altered in light of an additional simulation/s of this area. As I discussed above, in my view construction effects will remain at this level for the duration of the construction period.

I note that the permanent access road to the headworks is proposed to be 12 m wide and 60 m long. It would be helpful to better understand why this needs to be so wide as the largest vehicle to use it will be a 12 to 20 tonne excavator, both of which are substantially narrower in track width than 12 m. Given the highly natural valued attributes of the setting, it would be preferable that any permanent built changes were only as large as necessary. I note that the Landscape Report states that the final arrangement of this will be 'agreed on site' [43] which alludes to an opportunity for this to be constructed more sensitively than what is currently shown on plan and described. As I mentioned earlier, Mr Bentley is confirming the width of this accessway with the Applicant.

The excavator is proposed to be housed in the access tunnel. It is unclear how far back inside the tunnel this machine will be located. Nor is not clear whether or where a security gate will be located at the tunnel entrance. This is not mentioned or shown on the visual simulations. It would avoid a landscape effect if the machine (or any machinery) was concealed well inside the tunnel where it would be in full shade, as opposed to parked in the opening and visible.

Power Station and switchyard

The Landscape Report Powerhouse Simulation viewpoints VS3, VS4, VS5, VS6 and VS7 (all PH Proposed) are logically located. Viewpoints from the tracks would show little if anything due to vegetation cover.

The simulations show the powerhouse building clad in a recessive colour which appears like NZ Colorsteel '*Ironsand*' which would be highly appropriate in this setting in my opinion. The Landscape Report refers to the roof being a 'dark, recessive colour' [48] and the building to be finished in a 'darker material' [50]. For a better level of certainty while retaining some flexibility I would suggest that all the building's external cladding, roof and trim to be in one colour selected from the natural grey / green / brown hues with a maximum light reflectance value (LRV) of 12% maximum ('*Ironsand*' has an LRV of 8%).

The 15 m high power poles are not shown consistently in the simulations and, in my view, would appear more as they are depicted in 'VS4 PH2 Proposed' as they are proposed to be concrete.

However, Mr Bentley describes this aspect of the Proposal and its effects clearly. He states that: *"The scheme will modify this natural area, by introducing built forms and structures uncharacteristic to this setting."* [52]. He also comments that the scheme will extend '*rurally-based activities*' into natural conservation land [52] which I don't entirely agree with. In my view the scheme comprises 'semi-industrial activities' rather than rural activities.

Of note the approximately 15 m wide tailrace is minimally shown on simulation VS4 PH2 only (this is the only viewpoint location included where it would be visible from). To provide better certainty as to the effects of this substantial change to the riparian margin, it would assist if a simulation was included from the true left of the Waitaha River directly opposite this feature. While this viewpoint would not be a 'normal' location for the public, it would help to communicate the fullness of the effects of this part of the scheme on natural character and landscape, if not visual amenity. It is not clear whether Mr Bentley' assessment has included the effects of the tailrace and the associated fencing/railing and warning signs that will be installed there. However Mr Bentley assesses the operational (permanent) adverse effects of structures within the powerhouse site on natural character values to be 'High' (when the water plume is operating) and otherwise 'Moderate-high' [50]; 'Moderate' on landscape values [52] and depending on viewpoint location between 'Moderate-high' and 'Moderate-low' [53] – [54] on visual amenity values ten years out, so long as the existing walking track is re-routed away from the scheme and close-up views. Temporary construction effects are considered to be 'High' [57].

I consider these findings to be well-founded, fair and reasonable.

As discussed above under the 'Intake Structure' section of this peer review, at 'day one' it is likely and logical that these adverse visual effects ratings may be slightly higher than what is noted above, as any additional vegetation would not have established and built surfaces would not have had time to weather. However, it is also possible that the effects of the changes at 'day one' while being greater, may not be great enough to elevate the magnitude of effects to the next level up on the seven-point scale.

Power Station Access Road and Transmission Route

The proposed approximately 1.6 km access road between the power station and Macgregor Creek will require a cleared corridor approximately 17.5 m in width, or in other words will require the removal of at least 2.8 ha of native vegetation. Through discussions with Mr Bentley I understand that the route was carefully plotted to avoid large native trees and find an optimal alignment that minimised adverse effects on landscape and natural character.

Mr Bentley considers that there will be '*some vegetation loss*' [57] and concludes that any adverse effects during construction will be 'Moderate – high' reducing to 'Low' over time as vegetation '*softens the route*' [58]. In my opinion this 'Low' effects finding is a bit 'light', and in my opinion would be closer to 'Moderate'. The removal of 2.8 ha of vegetation and replacing it with a road and transmission route would potentially have adverse effects on natural character and landscape that would be more than minor. Visual effects would be at least minor as 15 m – 21 m high power poles would be visible above the fully natural forest cover forming a new element in the broader scene. I accept that over time, vegetation would gradually encroach along the margins into the soft road verges and soften the route visually but only when actually travelling on the access road itself. It is accepted that over time the concrete power poles will weather where they will present less of a contrast with the surrounding vegetation.

I understand that undergrounding (or partially undergrounding) the powerlines was considered during earlier development of the Proposal. It would be preferable that the power lines were under grounded from the power house to Macgregor Creek or thereabouts. In this way any adverse effects of the power station would be better contained to one discrete location and reduced in magnitude.

Landscape Management Plan

Section 5.0 of the Landscape Report '*Recommended Measures to avoid, remedy or mitigate adverse effects*' discusses the benefits of several design-integrated elements that help to reduce adverse effects on natural character and landscape values [64]. From speaking with Mr Bentley, the Proposal's adherence to the draft LMP and any recommendations in the Landscape Report is a critical part of managing the effects of the Proposal, or in other words if it isn't, the outcome may be worse.

In addition, in the accompanying 'Landscape Management Plan' (LMP) (Appendix 40) at [2.3] and [3.2] the design-integrated details are described more thoroughly. These features will go some way to reducing the effects of the Proposal at 'day one' and in my view must be adhered to. Chapter 4 of the LMP describes various recommended ways to rehabilitate the various aspects of the scheme in specific detail and includes cross-referencing to other experts' reporting. The Vegetation Management Plan (Appendix 35) is of particular relevance as it includes animal and plant pest control methods, not discussed in the LMP.

Some aspects of the LMP cover the placement of rocks and new landforms. Other aspects touch on how rough surfaces might be applied to various elements in the scheme to reduce reflectivity, encourage weathering and plant colonisation on surfaces. These aspects are important in reducing

any adverse effects of the built forms and should be developed further and supervised on site during construction by a suitably qualified person should the scheme be approved.

I am of the opinion that the design and remediation measures described in the draft LMP are appropriate, practical and workable and should be strictly adhered to as a condition of consent, should the Panel be of a mind to grant consent.

Other comments

In the Landscape Report at [vi] a comment is made that the area is not particularly different to other outstanding parts of the West Coast. Later, a comment is made that the scheme is not proposed within a National Park, Wilderness Area or World Heritage Area [vii]. While this is true, in my opinion it bears little relevance to the effects assessment. The West Coast is endowed with abundant natural landscapes, much of which is ONL. TTatM states at [8.06]: *"While 'outstanding' is a high threshold, it does not mean 'the best' or 'uniquely superior'. ONF/ONLs are not regulated by quota. A district may comprise a high proportion of natural landscapes of such quality as to be ONLs (for instance Queenstown-Lakes). Conversely, it does not mean 'the best of a poor choice': A district may contain few ONF/ONLs."* In my opinion, just because there are ample landscapes on the West Coast with similar levels of natural character and value as the site for the Proposal, it does not somehow mean the valued attributes of the site where the scheme is located is any less valued or where the effects of a change may be somehow more 'acceptable' due to the area's high albeit ubiquitous levels of landscape character.

One 'disclaimer' is made in the Landscape Report commenting that the simulations are illustrative of what the scheme 'may' look like [4]. While I accept that there will doubtless be small design changes from this point in the process, and that the 3D reality will always appear different to a 2D photograph, I would expect the appearance of the scheme if approved to fairly accurately follow what is depicted in the simulations, which have followed a thorough technical survey (as opposed to an 'artist's impression), and doubtless incorporate design features outlined in the LMP.

Existing vegetation between Staging Area 1 and the river is important to be retained as it will provide immediate screening of much of the staging area and its contents. At [xi] in the Landscape Report a comment is made that this vegetation will be retained '*as much as is practicable*'. In my opinion, genuine efforts should be made to retain and protect enough of this vegetation from damage in order to best screen what may be a series of buildings, machinery, stockpiles and general activity.

At [66 – Table 2] of the Landscape Report additional 'suggested' rehabilitation vegetation is discussed as it 'would' assist with reducing visual prominence of the built forms at the power station site and 'could' include *Coprosma spp* etc... I suggest the term should be 'will assist' and that the species list provided is recommended to be drawn on for any required detailed landscape plan in the future.

In my opinion, Mr Bentley's suggestions and recommendations both in his Landscape Report and LMP are sound and appropriate and should be firmed up and considered as firm recommendations, to be included as part of the Proposal and form a condition of consent should consent be granted.

Peer Review Conclusion

I broadly agree with the content and conclusions reached in Mr Bentley's Landscape Report and LMP. For the most part, and other than where some recommendations are made in this peer review, I consider his effects findings on the seven-point scale to be fair and reasonable.

In his conclusion at Section 6.0 of the Landscape Report [71], Mr Bentley states: *"Overall, it is considered that the Scheme is appropriate with respect to natural character, landscape and visual amenity despite the fact that at more local levels the natural character, landscape and visual amenity effects are assessed as being moderate to high (or more than minor under the RMA). At a broader scale the effects are, at worst, moderate- low (or minor under the RMA). Conditions are recommended, including development of a Landscape Management Plan, to avoid effects being to a degree or scale which are inappropriate to the landscape, features and setting within which the Scheme is located."* I agree with this comment in principle, however in my opinion the Proposal cannot be easily considered '*appropriate*' in the local context in such a highly natural setting. 'Appropriate' by definition means: 'suitable', 'apt' or 'fitting' where in RMA terms any adverse effects will be generally less than minor. The adverse effects concluded for the Proposal are greater than this locally. In my opinion and from reviewing Mr Bentley's landscape report and the draft LMP, measures have been taken in the design, which also relies on the draft LMP to '*minimise*' any operational adverse effects as much as possible, which is different.

The Proposal represents semi-industrial activity being introduced into a near-pristine and highly natural setting. Even after some time (10 years+) parts of the scheme will remain visible with enduring adverse visual effects. It will never be fully mitigated to view, although over time the built introductions will weather and revegetate which will help. However, there will always be a physical change to the landscape's elements, patterns and processes and so any adverse effects on landscape character and natural character will prevail so long as the scheme is in place.

This will be particularly obvious at the entrance to the gorge where natural elements, patterns and processes are concentrated in one place. Any built intervention in landscape 'focus points' such as this will be far more acute than in other less dynamic locations.

The ongoing in-stream maintenance work using an excavator and at times helicopters ferrying supplies and personnel to and from parts of the scheme means the scheme will always be 'active' to a degree where the levels of perceived naturalness will be reduced – at times greatly. Some people who appreciate the area for its remoteness and naturalness may be discouraged from further accessing this part of the West Coast's hinterland via the gorge once they know it has been modified, due to the effects of the Proposal on perceptual and experiential values.

Because of the high levels of remoteness and naturalness of the site where the Proposal is located, and the nature of the proposed activities that would be introduced to the area, it is of my opinion that genuine efforts should be made to minimise the effects of the Proposal in multiple ways, as suggested and recommended in the Landscape Report, and draft LMP.

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