

F RECREATIONAL AMENITY IMPACTS

RMA considerations

1. We submit that the Turitea wind farm application fails to comply with requirements of Section 7(c) and 7(f) of the RMA as it does not have particular regard to

‘the maintenance and enhancement of amenity values’

and

‘ maintenance and enhancement of the quality of the environment’.

2. Furthermore, the proposal is contrary to the Palmerston North City (“PNCC”) planning documents: Kahuterawa Outdoor Recreational Plan (“KORP”) (<http://www.palmerstonnorth.com/YourCouncil/NewsAndViews/MediaReleases/Detail.aspx?id=39595>) and Draft Recreation Strategy (<http://www.palmerstonnorth.com/content/54871/Recreation%20Strategy%20Draft.pdf>).

3. As the Board of Enquiry members will be aware, Part 1, Section 2(1) of the RMA defines ‘Amenity Values’ as such [emphasis added]:

*Amenity values means those natural or physical qualities and characteristics of an area that contribute to people’s appreciation of its pleasantness, aesthetic coherence, and cultural and **recreational attributes***

and defines ‘environment’ as [emphasis added]:

- (a) *Ecosystems and their constituent parts, **including people and communities**;*
- (c) *Those **physical qualities and characteristics of an area that contribute to people’s appreciation of its pleasantness, aesthetic coherence, and cultural and recreational attributes**;*
- (d) *The **social, economic, aesthetic, and cultural conditions** which affect the matters stated in paragraphs (a) to (c) of this definition’*

4. Furthermore, Schedule 4, Section 2(d) of the RMA requires [emphasis added]:

Matters that should be considered when preparing an assessment of effects on the environment:

Subject to the provisions of any policy statement or plan, any person preparing an assessment of the effects on the environment should consider the following matters:

- (d) *Any effect on natural and physical resources having aesthetic, **recreational**, scientific, historical, spiritual, or cultural, or other special value for present or future generations:*

PNCC Recreation strategy

5. The draft PNCC recreation strategy (page 25, <http://www.palmerstonnorth.com/content/54871/Recreation%20Strategy%20Draft.pdf>) outlines a clear vision for nature-based recreation:

‘to focus our efforts on developing and enhancing the recreation opportunities related to the City’s rivers, streams and areas of scenic and natural beauty; to develop an integrated outdoor recreation sector and network, to facilitate the trend towards informal, nature-based activity and to help maintain the ecological integrity of these areas so that their recreational value is not lost.’

and

The links that this integrated network will produce open the region, from the Kahuterawa through Hardings Park and the Turitea to the Manawatu Gorge, up to the establishment of a national park area in the Manawatu’

6. There are considerable benefits of recreation in promoting healthy lifestyles (<http://www.palmerstonnorth.com/content/54871/Recreation%20Strategy%20Draft.pdf> page 79):

Our increasingly pastoral, urban lifestyles have lead to high levels of inactivity that we have not seen before in history on such a scale. Inactivity and a lifestyle that does not include exercise leads to the increased likelihood of certain types of disease. The cost to the public health system related to such avoidable diseases is huge. Recreation acts not only to keep people involved and socially interactive, but helps to keep us fit and healthy. This, in turn, can act to prevent many avoidable diseases and take pressure off the health system. In recent years New Zealand has seen a shift from preventive health meaning “saving up for the next operation”, to a more pro-active approach to help and encourage people to achieve positive health outcomes and to lower the risk of disease. This approach may lead to increased pressure on public recreation domains and solutions within the urban environment.

and as a solution to social problems

Recreation is increasingly seen as providing solutions to social problems. The presence of green spaces and recreation opportunities has been linked to positive mental health outcomes; countering disadvantages of people on low incomes or with disabilities; the reduction of youth crime through targeting at risk youth and to break down ethnic divisions.

Benefits related to outdoor recreation

7. The Palmerston North City Council (“PNCC”) Draft Recreation Strategy (<http://www.palmerstonnorth.com/content/54871/Recreation%20Strategy%20Draft.pdf>) describes the ‘benefits related to outdoor recreation’ (pages 23-24) as such:

Health *Regular moderate-to-vigorous physical activity reduces the risk of a number of physical health issues, such as diabetes, obesity, heart cancer and falls and injuries amongst older people.*

Mental Health *Medical research concludes that regular-to-moderate aerobic activity plays an important role in the prevention and management of depression, anxiety, and emotional distress. In fact, “There are even claims from some studies that physical activity can be as successful as medication in treating some cases of clinical depression, particularly in the long term.”*

Education *Outdoor recreation opportunities provide a context for learning, thinking and problem solving skills, and help develop life skills such as co-operation and interpersonal communication.*

Social Development *Stakeholders have claimed that outdoor recreation provides a fundamental forum for human interaction, and for developing family and community connectedness.*

Environmental *Stakeholders reported that contact with nature-based recreation provides an avenue to educate people on the value of interacting with our environment and preserving it.*

Pride *The relationship of tangata whenua to the land (turangawaewae) is central to the traditional way of life for Maori, where the land is a protector and provider and people have a guardianship (Kaitiakitanga) role, ensuring the land and its natural resources are cared for.*

New Zealand’s identity as an outdoor nation is built on the values of some of the most revered and respected New Zealanders – most notable Sir Edmund Hillary and Sir Peter Blake – both renowned for their outdoor achievements.

Economic Opportunity From tourism packages right through to the manufacture and retail of outdoor recreation related goods and event related spending, outdoor recreation provides significant economic benefit to the country. This is something that can be built upon in the Manawatu region – especially given forward planning that is designed to develop the outdoor recreation opportunities in the Manawatu and national strategies (e.g. 100% Pure New Zealand).

Outdoor recreation, in all its forms, has a number of benefits to the community of Palmerston North. The City is in the position to further develop this growing area of interest and to become national player in this market further down the track.'

8. Furthermore, recent data outlining rates of obesity (<http://www.socialreport.msd.govt.nz/health/obesity.html>), cardiovascular disease (<http://www.nhf.org.nz/index.asp?PageID=2145828139>) and Type 2 diabetes (http://www.diabetes.org.nz/resources/docs/research_and_reports/Type_2_2008_Update.doc), highlight the need for regular physical exercise in conjunction with healthy diets to reduce the deleterious effects of these conditions.

Our position

9. We believe that the Turitea wind farm proposal is contrary to the planning documents outlined in para 2. The Kahuterawa Road section from Old West Road to Greens Road is proposed as an access route to the western area of the proposed wind farm for large trucks (40 tonne) which are barely able to pass each other on the 5.5m wide road. This area is well-utilised by cyclists and mountain bikers accessing the 'K-loop' mountain bike tracks at the end of Kahuterawa Road. No information has been supplied by the applicant of how many cyclists utilise this road for access to the K-loop tracks but it is likely to be several hundred a week.
10. Other recreational opportunities associated with the Kahuterawa area include, horse-riding, tramping and 'general cycling'. What the applicant has failed to acknowledge is that the Kahuterawa Road area currently offers recreational opportunities where cycling can occur relatively safely along a rural no-exit road. No other area close to Palmerston North offers the same opportunities for safe recreational cycling in the absence of high levels of through traffic. The Kahuterawa Road offers relative isolation for general cycling for those that do not wish for whatever reason to cycle on busy roads.
11. Another area highlighted in the recreational planning documents in para 2 is the Turitea Road, Greens Road, Kahuterawa Road which is an area heavily utilized by mountain bikers (day and night), cyclists, walkers,

runners and horseriders. The submission of the Sunday Morning Riders (submission number 165) described how:

'The serenity and enjoyability [sic] would be lost for recreational horse riding if the Turitea application proceeds at the Kahuterawa Greens Road end. Both these roads will become unsafe for horse riding while construction traffic is using the area.'

12. The recreational amenity values of this area were highlighted by the submission of Cycle Aware Manawatu (submission number 660):

'The cycling route up the unsealed section of Turitea Road and through onto Greens Road is a popular ride for mountain bikers travelling to the Kahuterawa Valley and 'K-Loop' facilities, or completing a circuit close to Palmerston North. It is particularly valuable for novice and intermediate level mountain bikers for whom the nearby designated mountain bike trails are too difficult. This route is the only cycling amenity of this type in the area and is of great importance to Manawatu's many dedicated cyclists who are able to ride from home without the need for motorized transport. This easily accessible ride allows cyclists to escape from the city to the peace and tranquility of the quiet hills. For many this is a major advantage of living in the Manawatu.'

and

'Other mountain bike routes in the region for example, the North Range Road rise, have already been affected in this way, and the Scotts Road rise would be affected by the consented Motorimu scheme.'

13. It is likely that several hundred cyclists a week also use this loop to avoid through traffic and to make good use of the closed off track between the end of Turitea Road and Greens Road. Since being blocked off to vehicular traffic due to unsafe areas of the road, this track has been enhanced in its overall amenity values because of the lack of traffic on the closed-off section and the relatively unchecked growth of regenerating native bush. There are spectacular views up towards the reservoirs through mature primary native forest which then eventually gives way to some farmland, forestry and regenerating native bush. Generally, as the path is cut into the valley side above one of the Turitea Stream tributaries which joins the main stream below the dams, all views from this recreational area are focused up and towards the ridge and Tirohanga to the South East. Several turbines including 054, 055, 056, 0123, 0124, 0125, 0127, 0128, 0129, 0130, 0131, 0132, 0133, 0134, 0135 and 0136 are all within 1 to 2.75km and would significantly adversely affect visual amenity values associated with this recreational area.

Other sites of recreational amenity impacted by proposal

14. The Te Araroa (The Long Pathway) (<http://www.teararoa.org.nz/>) is a 3,000km tramping trail from Cape Reinga in the North to Bluff in the South. One section of the Te Araroa walkway extends up the Turitea valley, through to the Greens Road. However, the applicant has indicated that one of the access points for construction is to be via Greens Road. Site access at this point would have significant adverse effects on what is described as 'one of the world's longest walking trails' (<http://www.teararoa.org.nz/index.cfm>). However, the applicant fails to acknowledge its presence in the relevant transportation effects evidence, and makes no attempt to 'avoid' adverse effects on amenity values associated with a three year construction period.
15. All of these aforementioned areas of recreational interest have been highlighted as key assets by PNCC in the **Kahuterawa Outdoor Recreational Plan ("KORP")**. Goal 3 of the KORP outlines 'Outdoor Recreation' and defines Hardings Park, the 850 ha Scenic Reserve directly South West of the Turitea Catchment access road as being '*remote experience zone*' and states '*avoid activities that detract from the natural features and setting*'. Hardings Park is accessed from the end of the Sledge Track and offers unique and unrivalled views back to Palmerston North with foothills in the foreground. There is no other elevated area within the Palmerston North area where one can obtain such breath-taking views of native bush back across the Manawatu Plains to the Tasman Sea. Furthermore, the current loop tracks that include the Platinum mines offer a unique perspective on the indigenous vegetation associated with altitudes of 500m plus. A number of proposed turbines sites lie within Hardings Park (033 and 046), several lie adjacent to its border (034, 035, 036, 037, 0115, 0116, 0117 and 0118), and many others (including, but not limited to, 047, 048, 0111, 0112, 0113, and 0114) are within 1-2km. These turbines will significantly and adversely impact the amenity values associated with those that take advantage of the Hardings Park '*remote experience zone*'. Indeed, proposed turbine 046 is approximately 100-150 metres from the current Hardings Park loop track.
16. Therefore it seems incredible that Mr Pollock can describe (para 111) [emphasis added]:

*Mr Wyatt also notes that in relation to the experience with the Tararua State Forest Park, **Harding's Park** and other nearby areas, **once consideration is given to topography and the screening effect of vegetation, any adverse visual effect will be appropriately low.***

Indeed, the evidence of Mr Wyatt makes no mention of Hardings Park, neither does it adequately describe any mitigation of adverse effects associated with recreational areas.

17. In addition to loss of landscape amenity values, the remote experience feeling associated with Hardings Park will be further eroded due to noise associated with the proposed turbines. Figure 43 from the evidence of Neville Hegley clearly shows that much of the Hardings Park track network, and in particular the Red Rock Knob viewpoint are within the 40 to 45 dBa contour. Thus those taking advantage of this recreational area will be exposed to both excessive noise and loss of visual amenity.
18. We maintain that the intrinsic natural features, setting and those unique amenity values associated with the Hardings Park access tracks will be lost if the Turitea wind farm is consented in its current form. Over a dozen turbines including (032, 033, 034, 035, 036, 037, 045, 046, 047, 048, 052, 054, 055, 056, 057, 058, 059, 0110, 0111, 0112, 0113, 0114, 0115, 0116, 0117, 0118, 0119, 0120, 0121, will adversely impact both recreational and visual amenity values from Hardings Park.
19. The Sledge Track was officially opened by the then Prime Minister, the Rt. Hon. Helen Clark on 6th April 2003 (Appendix 1). It is situated at the end of the Kahuterawa Road and is an extremely popular walk-way that runs parallel to the Kahuterawa Stream. Initial sections are suitable for all ages and fitness level. Whilst proposed turbines may not be visible from the Sledge Track itself, noise from the turbines is likely to lessen the 'natural features and setting' of the Kahuterawa Stream and the Sledge Track. Indeed, the proximity of consented Tararua 3 turbines to the Manawatu Gorge Track and the adverse effect, both visual and audible, is evident. The noise of specific turbines adjacent to the Manawatu Gorge Track are amplified in the normally peaceful and quiet native bush setting, and thus, a stretch of the track over several hundred metres long is associated with the 'thump, thump, thump' noise like clothes in a dryer (Figure 1).
20. Despite a clear request (Section 92 Requests for further information, Section 3, item 57) by PNCC for

'viewpoints and simulations to be provided from Hardings Park (Platinum Ridge area), Kahuterawa Reserve, Sledge and Back Tracks and the far eastern end of Scotts Road'

To our knowledge none have been forthcoming and none have been made available to the community. With these not being available, it is impossible for the community to assess the possible impacts associated with these specific proposed turbines. Ultimately, it leads one to consider what the applicant is trying to hide.

Social development

21. Many residents readily identify with a 'real sense of community' within their respective rural neighbourhoods. For the Turitea Valley, in particular, this feeling of inclusion and belonging is reflected in their eager attendance at regular "valley" social gatherings. Many actively take part in events organised by the Turitea Action Group's social committee. The social committee was formed seven years ago by a small team of enthusiastic individuals who sought to foster the fellowship that already existed in the community. Annual events such as the "Brains of the Valley" quiz night, Big Shed Movies and the Turitea Valley Duck Race and Picnic attract a large number of local residents from the Valley and beyond. Because of the common love of the local native bush and our attempts to revegetate the Valley, native plants grown at a local nursery are often given as prizes at the Duck Race as well as other competitions and social events in the valley. The Duck Race and Picnic has been held both on Green Corridors land and privately owned farmland on the banks of the Turitea Stream over its seven year history. The Duck Race serves as an opportunity for families to socialise together, play together and form new friendships in their unique rural community. As they watch their rubber duck win the Duck Race or encourage their kid in the gumboot toss, people often remark "how great is this?"
22. Whilst the Kahuterawa and Turitea areas have been recognized as a key recreational asset by PNCC, other recreational areas within Palmerston North city proper have a clear view to some or all of the landscape areas where turbines are planned. Because of their further distance from wind farms, more turbines are visible over a larger area from recreational areas in the city such as Ongley Park. Here there are currently views towards the consented Te Apiti, Tararua 1, 2, 3 and Te Rere Hau wind farms. However these views of wind farms under construction or completed are tempered by the remaining ridgeline cloaked in native bush which is free of turbines. It seems certain that if this proposal receives consent there will be no remaining vistas or ridgelines free of turbines visible from recreational areas within the City. This will erode the affinity that some local people have with Palmerston North through loss of a 'sense of place'.
23. Similarly, runners, joggers, walkers and strollers use the footpaths and streets of Palmerston North proper as a highly convenient recreational area. Many streets from Maxwells Line to Riverside Crescent that run parallel to Fitzherbert Avenue have their own unique vista of a section of the Turitea Reserve and surrounding environs. These vistas are framed by the sky, the road and trees associated with the neighbourhood. These vistas also give residents a 'sense of place' with regard to where they live. It seems certain that if this proposal receives consent there will be no remaining vistas or ridgelines free of turbines visible from many of the roads that run parallel to Fitzherbert Avenue. Those people that enjoy the current local wind farms and who generally consider wind turbines

graceful and aesthetically pleasing will be satisfied, but those people that enjoy particular views or vistas of the landscape free from wind turbines will be left with nothing.

24. Recreational areas and the health and wellbeing opportunities that they offer the public should be protected and respected whenever and wherever possible.
25. We submit that the construction of the Turitea wind farm will have significant adverse effects on the local and wider communities recreational opportunities around the proposed wind farm site.
26. We consider that any assessment of environmental effects of this proposal on recreational amenity has been completely overlooked. The general Turitea wind farm site conflicts in totality with an extensive recreational amenity area focused at the end of the Turitea and Kahuterawa Valleys, identified by PNCC as a key city asset and an area for future recreational growth, and consumes the remaining free ridgelines visible from the City.

Summary

27. In summary, it is our assertion that this application is contrary to Section 7 of the RMA and fails to protect specific aspects of the amenity values of the environment outlined in the PNCC planning documents outlined in para 2; namely

people's appreciation of its pleasantness, aesthetic coherence, cultural and recreational attributes and naturalness (native fauna and flora) associated with the Turitea Reserve ("the reserve") and surrounding environs.

28. Furthermore, we are concerned that the recreational amenity values of the local and wider communities have been woefully neglected by the applicant in its assessment of environmental effects and subsequent evidence.
29. This application should be declined in full as we believe that if consented, the Turitea wind farm would adversely impacts on the freedom and enjoyment of individuals to access and utilise recreational areas.

Figure 1. Tararua wind turbine visible from native bush of Manawatu Gorge walkway (see para 19).

