

# I SUMMARY & RECOMMENDATIONS

## SUMMARY OF EFFECTS UNDER THE RMA

### Part 2 RMA

1. Part 2 of the RMA contains the purposes and principles of the legislation in a hierarchy of matters to be considered, culminating in the overall weighing of whether a proposal can be said to promote sustainable management of natural and physical resources,.

### *Section 5 – Sustainable management S5 (2) (c)*

2. The site of the application for the construction and running of a wind farm with up to 122 turbines, consists of a large expanse of regenerating native bush with its own intrinsic values, and also rural pastoral land. These sites will be drastically altered visually by building this wind farm. This site is visually prominent from many locations and elevations – both near and distant. Location of multiple turbines on this site will alter dramatically the current natural bush-cloaked, and general rural appearance of the site treasured not only by iwi and locals, but by residents of the wider Manawatu and Tararua regions and visitors to the area. We submit that the visual impact of such change is significantly adverse and unacceptable, especially in light of the considerable loss of visual amenity from consented wind farm applications. A key question to be asked is where should the weighting lie between the benefits for the wider environment and the dis-benefits for the local environment and those that live and working within it? Put another way, acknowledging that every desirable outcome comes at a cost, how much of the environmental cost of this outcome should the local environment and its inhabitants reasonably be asked to bear?
3. We submit that turbines within the Manawatu already have a significant cost, in terms of amenity values, health and wellbeing for the local environment and residents in terms of landscape and visual amenity, cultural values and adverse noise. However, this application threatens to cover the last remaining views of the Tararua Ranges with additional turbines, consuming views and vistas both locally and from the Manawatu Plains. We submit that in regards to this wind farm application, the imposed environmental cost is too high and the weighting required by S5(2)(c) is tipped in favour of the local environment.

## **Section 7**

### **(aa) ethic of stewardship**

4. This can be viewed in two ways:
  - That it be best achieved by preserving the landscape unaltered, and that change to it should be avoided, or
  - That we are stewards of the planet's resources for the benefit of future generations if we allow some compromise of amenity for the purpose of at least slowing climate change, by taking advantage of non-polluting and renewable sources of energy.
  
5. We submit that for THIS wind farm application, 'preservation of the landscape in its unaltered form' is essential, especially as so much of our local landscape has been lost to wind farms already. We believe that it is imperative that as stewards we preserve some "green space" in our region. Many residents have already sacrificed amenity, health and wellbeing and suffer the ill effects of noise from existing wind farms on the Tararua and Ruahine Ranges. The local ad hoc proliferation of wind farms from Whariti to the Pahiatua Track, constitutes a significant compromise of the environment and by the community for the purpose of contributing renewable energy production and albeit small contributions to climate change for the benefit of the nation and the planet. This wind farm is a step backwards when one considers the need to manage energy consumption, rather than a complete focus on energy production. Further, evidence presented by experts we have called demonstrate that the benefits to be derived in terms of renewable energy and climate change from THIS wind farm, are small and are no greater than can be expected of a wind farm located elsewhere. Thus, these turbines, should they be consented, will impose an unreasonable burden on the community, individual and the receiving environment.
  
6. We also ask for certainty around the likely effects of the project particularly in the areas previously mentioned but also with regard to construction effects, and end-of-life decommissioning provisions. The vagueness of the application in these areas is of great concern to the community.
  
7. We also ask for certainty should any consents be granted. Uncertainty is one of the hardest things to live with and we ask that any consent have a life of less than five years before being forfeited.

***(b) The efficient use and development of natural and physical resources***

8. We believe that the application is incompatible with the other two purposes of the Turitea Reserve. Key ecosystems with unique properties will be lost should this application proceed. We submit and offer evidence to suggest there is no certainty that the mitigation strategies outlined are at all appropriate for the moving of 680,000 cubic metres of soil and removal of 25ha native bush.

***(c) Maintenance and enhancement of amenity values***

9. There is no doubt that granting consent to this application will lead to significant diminution of rural and visual amenity for many properties and the wider public from the plains and in the recreation areas. It goes without saying that those collective values will not be maintained and less still, enhanced.
10. In particular we wish to note again the number of people who will be subject to greater than minor visual amenity affects and that these affects may impact the dwellings of up to 3,000 people.
11. We also wish to note the number of people whose health could be affected by adverse effects of noise. Our belief is that a 30 dB(A) footprint that not only covers some 3855 dwellings, but also Massey University and Linton Military Camp as well. In Para 5.28, Dr Thorne describes 30 dB(A) as “potential low risk of sleep disturbance or annoyance”. Adding the dwellings, Massey and Linton, the number of people potentially affected could be as high as 14,000. That is a very high number of people with a potential for health effects by this application<sup>1</sup>.
12. In addition, a further 900 planned or consented building sites are within a distance subject to more than minor visual and noise affects, and could be expected to be built upon if this application did not exist.

***(d) Intrinsic values of ecosystems***

13. The Turitea Reserve is home to an outstanding array of indigenous fauna and flora, unrivalled by any other biodiversity zone in the area. We submit that this application fails to protect significant habitats, especially the suppressed shrubland zone along the Turitea Catchment Access Road. Furthermore, the

---

<sup>1</sup> Assuming 3 persons per dwelling, 2,500 max persons at Linton and 1,000 on campus at Massey.

site layout is hazardous for the movement of birds, especially the New Zealand Falcon, in and out of the Turitea Catchment area. We also submit that the removal of native vegetation and the high rainfall, has the potential to exacerbate significant erosion on the site resulting from the large-scale earthworks to be undertaken on the ridge tops and hillsides (which are prone to erosion) to construct the turbines.

***(f) Maintenance and enhancement of the quality of the environment***

14. There appears to be two issues of relevance for consideration:
- The production of energy from a renewable source thereby contributing to the quality of the environment in the broad sense
  - A loss of the quality of the environment from a natural character/visual/landscape perspective, similar to the diminution of amenity.
15. Both these issues have been addressed elsewhere; however, we submit that the renewable energy benefits of the application are no greater than any other wind farm appropriately sited elsewhere. Further, that significant adverse effect on the quality of the environment arising from significant and adverse changes in the natural character/visual/landscape values, outweigh any renewable energy benefits derived.

***(g) Any finite characteristics of natural and physical resources***

16. While fossil fuels are a finite resource, and wind power generation has the potential to slow the rate of burning of fossil fuels to produce electricity, there is currently no substantiating evidence to support an increase in generation demand in the next few years that could reasonably support approval of this application at the expense of the considerable adverse environmental impacts. It has been argued previously that good quality wind is a finite resource. The plethora of wind farm applications across New Zealand clearly demonstrates that the Turitea site does not constitute a “finite resource” in terms of wind quality. Finally, the land on which it is proposed to build is a finite resource also, and that if decommissioned the above ground structures can be removed leaving little visual trace of their former presence, the visual scarring resulting from the access roads and foundation construction will be remain for decades.

***The benefits to be derived from the use and development of renewable energy***

17. The need to satisfy demand for new energy generation has not been substantiated and further wind farm development in the Manawatu region will lead to detrimental effects on grid stability and security of supply and increased costs to the System Operator and subsequently consumers. Alternatives exist for more renewable energy generation to meet requirements that have considerably less adverse environmental impacts. This position is covered in the evidence of Leyland and Read.

***Section 6 (b) The protection of outstanding natural features and landscapes from inappropriate use and development.***

18. We submit that the Turitea site with its defined skyline is an outstanding natural feature and landscape that should be protected for present and future generations.

**We find the Mighty River Power application to be excessive, rapacious and abusive of the RMA process. We seek the following decision from the Court:**

19. **Decline the application in full.**

If this is not possible, then

20. We seek a reduced number of turbines to achieve the more stringent noise conditions and the mitigation remedies recommended by Dr Thorne.
21. We seek a reduced number of turbines to limit the reduction in visual amenity described as effects significantly more than minor.
22. We seek a reduced number of turbines to limit the adverse effects, increased risks and insufficient mitigation of the ecology of the Turitea Reserve, as recommended by Ms Gabites.