

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of a Board of Inquiry appointed under section 146 of the Resource Management Act 1991 to consider an application by Mighty River Power Limited for resource consents to construct, operate, and maintain a wind farm at Turitea.

ORAL SUBMISSION OF RICHARD MILDON

1. My name is Richard Mildon and I am an independent submitter as well as a member of TAG. I live at Kairanga which is west of Palmerston North but outside its territorial boundary. I live about 6 km in a straight line from the Square and about 16km mean distance from the proposed wind farm.
2. I am a fourth generation resident of Kairanga having moved my place of abode only 300 metres from the day I was born. My association with the Manawatu and its landscape and landforms has been continuous for 63 years. In that time from childhood to increasing age I have seen the Ranges in all its moods and through all the seasons.
3. I have travelled around the world yet never fail to be impressed with what I see in my own back yard.
4. I have given my reasons in my written submission for my objection to this application, but again, in brief, I state I am very concerned by the degradation of the natural viewscape of our highly regarded, elevated country when viewed from some distance. It is this more distant view that gives us a sense of identity of our locality and which contributes to our overall appreciation of our whole natural landscape and its landforms.
5. I am sorry that a private land owner should see someone such as me as a 'laptop ecologist', as such a thing is far from the truth and I am offended by this implication of disingenuousness. But we also should keep in mind that critics are not necessarily affected parties but often significant beneficiaries. They had a choice. We did not.
6. I am also sorry that we have to also argue against the wish of private land owners to diversify the earning potential of their properties. Some of them are close acquaintances with whom I maintain a friendly relationship, and I hope it will remain that way. I know that many of them are fine custodians and trustees of

their own land. The conundrum is that because of its prominence and high visibility their land is also in the public domain of a shared and iconic Manawatu landscape.

7. I have a great regard for the totality of our local landscape, so I am not just considering my own narrow residential view, where I am not placed to take advantage of the distant landscape because of my own intervening and very necessary shelter planting. However, such shelter does not mean one has to remain isolated from the greater local landscape, because I, like others, do not remain cloistered forever on my own spot. We are all are very mobile so our viewpoints are always changing from near to far.
8. Little attention has been given by MRP to the fact that this is actually a significant cross boundary issue. From a landscape aspect the information produced by MRP has been largely drawn up considering the proposal only from the point of view of those within the urban and rural areas within the Palmerston North territorial boundary with some emphasis on individual residential locations to the rural eastern side of the Manawatu River in closer proximity to the proposed windfarm.
9. After stating in para. 7.32, p. 31: *'The Ranges are an obvious and often dramatic feature when viewed from the flat alluvial plain'*, Mr Wyatt's evidence for MRP then proceeds to negate the possibility of potential visual effect from the flat alluvial plain by placing the effect from any viewing point within and beyond the 8.5 to 18 km limit into the category of 'visually insignificant'.
10. The proposed turbines will extend the existing 13 km of turbines by a further 12 km, affecting the whole Manawatu landscape for a total stretch of 25 km along the Ranges and into an area of the Tararua Range that could be considered the Dress Circle to the stage of Palmerston North and the Manawatu Plains to the north west. They will actually be very clearly visible from as far out as Mt

Stewart at the N.W. limit of the plains about 28 km away. It is this broader view which I am concerned about.

11. My assessment and appreciation of the Manawatu landscape differs utterly from that of MRP and Mr Wyatt. With his mechanistic and formulaic, and passionless approach he lacks the necessary emotional responses that are engendered over a lifetime of experience in a particular landscape.
12. Mr Wyatt has only spent a very limited time in the Manawatu. He could not say that he has seen the Ranges from a distance of at least 15-20 km in all weather conditions, and at all times of the day between early morning and late evening when the changing conditions and light and degrees of visibility show extreme variability in the character of the Ranges?
13. He cannot say that he has seen the Manawatu and the Ranges over the spread of the seasons for even one full year? With such a relatively fleeting experience he makes many assumptions, and would still rate his opinion and understanding of the Manawatu landscape more highly than one who has lived here continuously for 20, 40 or 60 years and who has at least equal powers of observation?
14. The foundation of MRP's assertions upon which they rely so heavily with their photo-montages is a construction based on the 'Technical Approach', paras 6.4-6.14, pp. 16-21 of Mr Wyatt's evidence-in-chief, where such a judgement is based on a purely formulaic or arithmetical approach. He writes, and I quote: *The parameters of human vision provide a basis for assessing and interpreting the impact of a development by comparing the extent to which development features will intrude into the central field of vision (both horizontally and vertically)*'. He then describes the range of human vision as if the head is held vice-like in a rigid, forwards looking position and produces photo-montages on the same principle.

15. The eye and the brain are much more complex than this at forming a mental picture, including emotional response, which cannot be replicated in any way by a picture taken by a camera, which may only represent a flat reproduction of our fixed head, central field of vision.
16. Combined with the ability of the head and eyes to move left and right and up and down over a wide arc, and where the eye and brain can also take in the effects of motion in the viewscape, and when the brain processes visual and emotional information into an overall broader picture on a totally different scale from a 2 dimensional, static image of very limited field of view, the photographic montages such as those produced cannot give a truly accurate representation of the real effect of these turbines on our landscape.
17. To one standing out on the Manawatu plains, let's say on Kairanga-Bunnythorpe Road which is about 16 km mean distance from the proposed turbines, the most prominent, natural local features that one can see are Mt Stewart to the NW, and opposite, spanning an arc of nearly 180 degrees NE to SW are the Ruahine and Tararua Ranges rising in sharp contrast to the plains.
18. Mr Wyatt's farthest described publicly accessible viewpoint for the proposed wind farm is the Kingsgate Hotel, VP12, in the approximate middle of Palmerston North which is about 10 km from the centre of the site. Because of preconceived notions of visibility based on some formula, he did not choose any viewpoints along roads such as Kairanga-Bunnythorpe Road, Flyers Line, Rangitikei Line or even further out, all at distances of greater than 10 km where the whole span of the existing windfarms can be taken in within a single glance, and the addition of the Turitea wind farm will be easily accommodated within that scope.
19. The assumption in Mr Wyatt's evidence is also made that if not viewing the Ranges from ones residential address then the only remaining viewpoints are from the roads. This totally ignores the fact that there is a large rural population out on

the plains. There are thousands of people out there who work rurally and who spend all their daylight hours working outside. They do so because they have a love for the land. Their views of the Ranges are not confined. The appreciation of a rural person for the landscape and its landforms is a part of their being. It is not only viewed in a recreational capacity. The Ranges are viewed as a natural extension of their horizon.

20. Mr Wyatt describes a turbine as a feature that would be 'visually insignificant' and also as being 'often hard to discern' when viewed at a distance of from 8.5 km and up to 18 km. And at those distances he asserts that *'In all but exceptionally clear lighting conditions they are imperceptible'*.
21. These conclusions are wrong and have been noticeably erroneous to those of us at the hearing where turbines from Te Rere Hau at 11 km, the nearest T3 turbines at 12 km, and Te Apiti at 16.5 km have been in clear and plain view from Arena 4 in a wide range of weather conditions. The present experience of their inescapable presence at these distances and in many conditions of lighting, cloudiness, sky colour and sun position, and not just exceptionally clear lighting conditions gives the lie to his assessment.
22. Mr Wyatt also does not believe that if the additional larger turbines are added to the existing hundreds of turbines arrayed within the same single viewscape, they will contribute significantly to simultaneous cumulative effect because he tells us that there are only a limited number of viewing points. The negative effects of simultaneous and sequential effects are brushed aside with words and phrases like 'acceptably minor', '...will therefore be minor, at worst', and 'will...be de minimis' Once again the present experience at these distances gives the lie to his assessment.
23. It might have surprised him to know, and the evidence is plainly visible to any person with average visual acuity, that in a wide range of viewing conditions the

extent of the Ranges and the turbines presently erected on them are all very clearly visible along kilometres of road length and from thousands of hectares of rural workplace at distances of 10-20 km, and are quite visible when standing on Mt Stewart at a distance of about 28 km, and that it is impossible to view those sections of the Ranges where they are presently erected without the eye being distracted by them.

24. If I am in a crowd of people sitting in an outdoors environment and I want to attract the attention of somebody at a distance I might stand and wave my arms. I might ask myself why do I do this? The answer is to increase my noticeability. So in addition to the relatively greater noticeability of an unnatural object such as a turbine standing very tall above its surroundings, in relation to the phenomenon of attracting ones attention, the difference between the effect of motion such as the rotor of the turbine compared to the same rotor if it is stationary is to increase its noticeability and hence its dominance.
25. This phenomenon is not demonstrated in the series of Viewing Point photo montages produced by Mr Wyatt. It is not only difficult but impossible visually to isolate and remove from ones perception the sense of motion of unnatural objects such as turbine rotors from the surroundings such as a natural landscape if it is in the range of ones vision?
26. As it is an effect that is quite inescapable, can a moving turbine now still be 'visually insignificant' or 'no more than minor' when contemplating with thoughtfulness an elevated natural landform such as the Tararua Range? How can the cumulative visual effect of motion, now combined with the physical presence of 121 turbines of gigantic proportions extending a further 12 kilometres over a natural landscape be said to 'not dominate the landscape'?
27. This is supported and summed up by Ms Julia Williams who expresses it rather nicely in her assessment, and whose experience I was delighted to read, mirrors

my own independently formed opinion. She also indicates that there is some professional disquiet about the reality of photo montages:

3.81 Photomontages

Overview

Photomontages illustrate a two dimensional view of a proposed activity from a particular viewpoint as depicted in a photograph – not as it would appear as a three dimensional image as seen in the field with the human eye.

There is some discussion within the profession that visual simulations in the form of photomontages are inadequate in their ability to show the full effects of wind turbines in terms of turbine movement and the three dimensional arrangement of turbines in the landscape. They can never fully replicate the range of light and atmospheric conditions that occur throughout the day or over a year which in turn influence the clarity and perception of objects within a landscape. Nor can they reflect the changing viewpoint of a viewer turning their head, turning their body, moving around a site or moving through the landscape.

28. The Ranges are a natural icon of the Manawatu region's landscapes. For that reason, the MWRC Regional Policy Statement (RPS) and also the MWRC Proposed One Plan (POP) identifies natural features and landscapes that are outstanding and regionally significant. A particularly important feature of the Ranges singled out by the RPS and reinforced in the POP is the skyline.
29. The POP is still a developing document and no part is yet set in concrete. It has moved on significantly in terms of landscape and landform identification from its formative period when it was first notified, and skyline now has, or is very likely to have, a far wider meaning than implied by the text of the RPS.
30. Mr Wyatt reads the RPS definition of skyline and understands that it is only the highest ridges and peaks of the main ridge that are the skyline that are considered to be of particular significance. For the present purposes this is sufficient.

31. Many of the turbines are to be placed along a stretch of these actual summit ridges and peaks of the Tararua Range, with every single one of the 120 turbines intersecting this land/sky boundary. Yet MRP believe that their turbines will be visually insignificant when considering the great importance attached to this outstanding regional feature which is the land form backdrop and its skyline.
32. I know from personal experience it is easy to be seduced by their effect and grandiosity, and even majesty, in their slow, considered rotation if one gets close among them. But that seductive effect reduces as ones distance increases from them. Ultimately, from out on the plains their grand mass is diminished and the sheer number of their spindly accumulated numbers silhouetted against the skyline now creates a visual mess as the skyline bristles with these vertical intrusions above the natural form of the Ranges.
33. It is not so much that I can see them but that I cannot *not* see them. I cannot lift my eyes up to the hills without lifting my eyes to the turbines.
34. And surely this is the whole point of the Regional Policy Statement: ... *the skyline of the Tararua Ranges is to be protected for the scenic qualities provided by its prominence throughout much of the region and its backdrop vista in contrast to the Region's plains.* The policy statement is not much concerned by an examination of internal, more intimate landscape units within the Range, often hidden from view from the plains, which on a micro level may include areas that are both outstanding and not outstanding. It is the total, broad effect of the Range viewed from out on the plains that is of the highest value because it creates the iconic Manawatu image.
35. It is outstanding when all the individual characteristics of its make-up are merged into a whole. In various conditions the Range might be seen as somewhat detailed in the differentiations of its natural character: forestry, pasture, natural cover. Often a vivid 'electric green', but also very often simply just as a purplish-

greenish-blue profile of exquisite beauty in certain light, or where low cloud and haze of varying density highlights the multilayered valley structure from front to back. These are the backdrop features that characterise the Ranges in the Manawatu, its familiar profile giving us a unique identity.

36. I don't believe that any kind of internal redesign to accommodate this proposal in this location will go any distance to mitigate any of the presently identified difficulties, and particularly to fit this particular outlined requirement of the RPS. All the objectionable features will remain, and we will simply just have to start this process all over again.

37. Mr Wyatt's paragraph 8.20 pp.36-37 and ultimately his final justification is breathtaking in its assumptions and leap of wild imagination, and now nothing is sacred:

*8.2 In addition, I note that in accordance with Policy 8-3(p) from the Regional Policy Statement, the skyline of the Tararua Ranges is to be protected for the scenic qualities provided by its prominence throughout much of the region and its backdrop vista in contrast to the Region's plains. Turbines within the Turitea Wind Farm will not obscure views of the Ranges, nor are the turbines (either individually or collectively) of such a scale that they will completely dominate or overwhelm them. In addition, of itself and in combination with the existing wind farm developments, **the wind farm will in fact serve to showcase the Ranges and their regional and national importance. In my opinion, the proposal will therefore in many respects enhance, rather than degrade, the prominence of and backdrop vista contrast provided by the Ranges.***

38. I am afraid Mighty River's crowning glory in the Ranges is to be its Crown of Thorns.