

**IN THE MATTER OF:**

the Resource Management Act 1991

**AND**

**IN THE MATTER OF:**

Applications by Mighty River Power Limited to  
Palmerston North City Council, Horizons Regional  
Council and Tararua District Council for Resource  
Consents for the Turitea Wind Farm Proposal

---

**REBUTTAL EVIDENCE OF DEBORAH MARY BURNS**

---

	2
<b>INTRODUCTION</b>	<b>3</b>
<b>BACKGROUND</b>	<b>3</b>
<b>INVOLVEMENT IN PROJECT</b>	<b>4</b>
<b>THE CITIZENS EXERCISE</b>	<b>4</b>
<b>EX-POST AND OTHER COMMUNITY EXERCISES</b>	<b>5</b>
<b>THE RNZ SURVEY</b>	<b>6</b>
<b>CONCLUSION</b>	<b>7</b>

## **INTRODUCTION**

1. My name is Deborah Mary Burns. Since 1988 I have directed and operated a consultancy company based on market research and public consultation. The company currently operates as Deborah Burns Research Consultant Limited. Prior to this, I was the Wellington Manager and a New Zealand director of AGB Mc Nair, a market research company and was also previously responsible for Town Planning Research for the Wellington City Council, a role I held for 10 years.
2. I have 40 years' experience as a professional researcher working with a wide range of clients. Until their recent merger, this included seven years as Transit New Zealand's Consultant Research Manager, responsible for road user and stakeholder research and public opinion surveys.
3. I am a recently retired member, and former President, of the Wellington Branch, of the Market Research Society, and have in the past been a member of other relevant organisations such as The Population Association, formerly known as the Demographic Society.
4. I am a specialist in carrying out high specification projects requiring measurement of public opinion on complex technical subjects. I have a particular focus on the clear communication of research findings, and between 2001 and 2004 I fulfilled a half-time role for the newly formed Office of Ethnic Affairs, establishing consultation systems and other communications strategies to facilitate government agencies working with diverse ethnic communities.
5. I hold a Bachelors Degree from Victoria University with a major in psychology, and extended study of English Grammar with a Post Graduate qualification in Teaching English as a Second Language.
6. I confirm that I have prepared this rebuttal evidence in accordance with the Environment Court Code of Conduct for Expert Witnesses (July 2006).

## **BACKGROUND**

7. I am providing this rebuttal evidence to comment on, and respond to, some of the primary evidence presented in respect of these applications that relate to the potential social impact of the Turitea Wind Farm. In particular, I will comment on the social impact assessment undertaken by James Baines on

behalf of Palmerston North City Council (*PNCC*), as discussed in his statement of evidence.

8. I note that my statement of evidence should be read in conjunction with that of Mr Baines' for PNCC, and Mr Kalafatelis and Dr Philips for Mighty River Power.

### **INVOLVEMENT IN PROJECT**

9. Prior to Research New Zealand's (*RNZ*) Public Perceptions Survey being finalised, I peer reviewed the sampling, methodology and questionnaire design. I made several suggestions, including the wording of the questions on support/opposition and strength of support/opposition.
10. I have prepared this rebuttal evidence to respond to James Baines' evidence, contrasting it, where necessary with the public perception survey undertaken by RNZ, as explained further in the evidence of Mr Kalafatelis.

### **THE CITIZENS EXERCISE**

11. In my opinion, the project Mr Baines refers to as the 'Citizens Survey', documents a largely positive climate of local public opinion for the project, at least among panel participants on this occasion.
12. In Mr Baines' evidence, this is conveyed by the first four tables in paragraphs 2.5.9 - 12. However, those results are complicated by the inclusion in his report of a number of subsequent tables. I am concerned that these subsequent tables, which are cross analyses of data, do not clearly communicate the extent of positive versus negative opinions, and skew the overall impression of the results of the exercise.
13. It is important to note the actual numbers of people represented in the cells in the cross analyses matrixes. Where groups who appear to be doubly negative have been identified, these are minority numbers of respondents. I refer in particular to the five cross analyses tables, being tables 5, 17,18,20,23 in paragraphs 2.5.14, and 5.2.3, 5.3.3, 5.4.5, and 6.2.5 respectively.
14. For example, in paragraph 2.5.15 of his evidence, Mr Baines uses table 5 to conclude that public opinion is 'enough is enough', and in paragraph, 2.5.16, uses the words "*in a cumulative sense the balance of public attitudes is clearly at tipping point*".

15. To illustrate my concern at these statements, I draw attention to the two left cells in the bottom row of table 5. These two cells contain 40% and 24%, or the total of 64% referred to by Mr Baines in paragraph 2.5.15, preceding his statement 'enough is enough'.
16. However, looking back to table four in paragraph 2.5.12, we can see that the bottom row of table 5 is based on only 16% of a sample of 218, i.e. the respondents who chose "*there is already too much wind farm development on these ranges*". I calculate this number to be no more than 35 people.
17. The 64% of this subgroup of 35 people, who appear in the two left cells as also having disagreed with the statement "I like having the wind farms here as they add interest to the city's landscape" thus represents 22 people, being 64% of a base size of 35 people. Therefore, these two cells showing a total of 64% actually represents only 22 people out of a total of 218, or 10% of those interviewed. It thus represents a small minority.
18. In the interests of brevity and simplicity of communication, I will not address each of the subsequent cross tabulations in detail. It is sufficient to say that I have the same concern for each, namely, the percentages in the cells appear to convey a picture of significant cumulative effects, whereas only a minority of those sampled were negative about aspects of the proposed wind farm.
19. While I agree with Mr Baines' statement in paragraph 5.3.3 that "*the results display a clear alignment of values*" this is simply a general survey effect. It is expected that where a respondent is negative on a particular aspect of a proposal, they tend to be more likely to be negative on the proposal's other aspects as well. It is not a symptom of a growing or cumulative effect amongst the general population. For this reason it is important to show base numbers or raw data, so that the reader is reminded of the small actual numbers.
20. I am concerned at the apparent use of cross analyses of responses to rating scale statements, to imply something akin to a building crescendo of negative impacts, when in my experience, what is being observed is a small number of people who are negative on a range of aspects.

#### **EX-POST AND OTHER COMMUNITY EXERCISES**

21. I note that a further survey was carried out by PNCC, referred to by Mr Baines as an 'ex-post survey' of residents of the affected area. I also note that

consultation and focus groups were also carried out, and contributed to Mr Baines' evidence.

22. I have reviewed the material supplied by Mr Baines in respect of the post survey and focus groups, but note that this does not include the explanatory or introductory material that was used by the researchers prior to eliciting opinions from the respondents. Without this crucial information I am unable to comment on the findings. Responses to any opinion gathering exercise are highly dependent on how the purpose of the survey has been explained to respondents.
23. Consultation and Community involvement exercises identify the range of concerns on potential effects held in the community. Random sample surveys measure the incidence of such concerns.
24. I am concerned that in Mr Baines' evidence there is confusion between the roles of the two types of information gathering and their applicability. In carrying out an evaluation of effects, a robust survey, if available, should be used in preference to less scientific methods of canvassing local opinion.

#### **THE RNZ SURVEY**

25. Over at least a five year period, I have experienced 'support/opposition' wording, as used in the RNZ survey, being successfully used for public opinion surveys carried out in a context of prior consultation, in which the public are given the opportunity to identify their support or opposition for a proposal, and document their concerns regarding potential development effects.
26. In paragraph 8.6 of his evidence, Mr Baines notes that "*this kind of question structure tends to split people into two groups with definite views and a large group in the middle who are not so sure of their opinion*". However, in my experience, this is not the case, and I am unclear why Mr Baines has made this statement. This is especially so given the results demonstrated in the RNZ survey. Of those surveyed, 381 people were supporters, 113 opposers, and a minority of 107 had no opinion. This is clearly inconsistent with Mr Baines' statement.
27. I have quoted the actual numbers of respondents involved, to make clear the level of support documented in the RNZ survey. I have also used this raw data because of my concern that throughout Mr Baines' evidence, the use of

percentages, and often percentages of percentages, that is, small subgroups, has obscured the overall pattern of positivity to the Wind Farm proposal, both in the RNZ survey and in the Community Involvement Exercises which Mr Baines has reported on.

28. As input to a social impact assessment, I have found questions which more directly document people's behaviour or living patterns provide a more reliable tool than rating scale opinion statements.
29. In this respect, when peer reviewing the RNZ survey, I was reassured that in addition to the 'support/opposition' type of question, the survey also sought to obtain responses through the use of direct questioning. These 'open response' questions did not prompt respondents in any way, but allowed them to state their reasons for support or opposition. Furthermore, respondents were not told the topic of the survey when their participation was being sought, nor was the client for the survey identified.
30. These features of the RNZ survey are important, as they remove any skewing of the sample toward respondents who are interested in the topic, and remove any tendency of people to align themselves with the known views of the client for example, in the case of the citizens' survey, with the PNCC.
31. Moreover, the RNZ survey was randomly sampled, and thus results can be applied to the general population. In contrast, the citizens' exercise was more akin to a self-selection of interested residents, and reflected their views as a sub-group of the population, rather than those of the general population.

## **CONCLUSION**

32. In conclusion, I consider that there are significant flaws in the way in which the data in Mr Baines' evidence has been presented. Further, in terms of measuring community effects as input to a social impact assessment, in my opinion, the RNZ Survey provides more robust sampling, methodology and questionnaire design, and hence the more reliable data.

**D M Burns**

**5 June 2009**