

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of a Board of Inquiry appointed under s146 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

SUPPLEMENTARY EVIDENCE OF PETER PHILLIPS

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1. INTRODUCTION

- 1.1 My name is Peter Phillips. My qualifications and relevant experience are set out in my rebuttal evidence. I confirm that I have prepared this supplementary evidence in accordance with the Environment Court Code of Conduct for Expert Witnesses (July 2006).
- 1.2 I am providing this supplementary evidence to comment on and respond to matters that relate to social survey and social impact assessment contained in the Section 42A report on “Landscape, Visual and Cumulative Effects” prepared by Ms Julia Anne Williams.
- 1.3 Specifically, I shall address the following matters:
 - (a) Inappropriate generalisation of focus group and survey results; and
 - (b) Inappropriate reporting on/ interpretation of the submissions.

2. INAPPROPRIATE GENERALISATION OF FOCUS GROUP ANDS SURVEY RESULTS

- 2.1 Issues arise from the uncritical acceptance by Ms Williams of the results of the Citizens Panel survey and focus groups undertaken by James Baines. This is significant in that Ms Williams gives added weight to this work over the wider body of literature and uses it to arbitrate between the evidence of Palmerston North City Council (PNCC) and Mighty River Power (MRP) witnesses.
- 2.2 The specific sections of concern are discussed below by page number.

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- 2.3 Ms Williams states that: *“Mr Anstey has had the advantage of not only having access to Mr James Baines, Palmerston North City’s expert on social impact assessment, but also assisting him with focus group meetings within local communities. He identifies three local communities of interest, the Pahiatua-Aokautere Road area group, the Turitea Valley / Ngahere Park group and the Kahuterawa Valley group. He notes that much of what local individuals and their communities had to say verified the significance of the amenity values of the foothills, the Turitea Reserve and the Tararua Ranges. He also states that these foothills communities are particularly concerned about the potential effects of turbines located in this landscape.”*

- 2.4 The core issue here is that Mr Anstey's evidence is unreliable because of the manner in which the focus groups were recruited and the limited number of participants. In social science and marketing research, focus groups are used to explore the views of selected individuals or groups about a topic. They yield qualitative results specific to the participants. There is no basis for asserting that the material presented by Mr Anstey is representative of the views of all the people living in these localities. All generalisations reported by Ms Williams, such as *"he also states that these foothills communities are particularly concerned about the potential effects of turbines located in this landscape"*, are therefore without merit, in my opinion, as the source material relates only to the people taking part in the focus groups, not a random sample of these communities.
- 2.5 Ms Williams also states that: *"Mr Baines' evidence discusses the results of a wider survey targeted a households living within 5km of an existing windfarm notes in the context of landscape and visual effects. It appears that consideration of landscape values is an important factor influencing residents' attitudes to further wind farm development."* (sic) This is a reference to the "Ex-post survey". This survey was not undertaken using random sampling procedures, or any other process that would ensure that the survey results were representative of all the people in the area concerned. In my opinion, it is therefore not valid to draw conclusions from that survey about the views of residents, other than with respect to the actual persons surveyed.
- 2.6 Ms Williams further notes: *"His (Baines') overall conclusion, based on the input of over 500 residents of Palmerston North is that "residents of Palmerston North are not rejecting windfarms, but they are beginning to reject the idea of more windfarms nearby.""* This statement is based on the Citizens Panel survey which like Mr Baines' other work is not based on true random sampling and suffers from other deficiencies (including the high non-response rate) set out in my rebuttal evidence. These preclude drawing any valid generalisations from those surveys regarding the views of the residents of Palmerston North.

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- 2.7 Ms Williams places significant reliance on the survey work of Mr Baines (assisted in the focus groups by Anstey) in arriving at a summary on "Perception Studies and Focus groups". Ms Williams states: *"Reviewing the evidence, it is clear that a wide range of studies/tools/ methodologies have been employed to assess perceptions on landscape*

and amenity values and attitudes to windfarm development. While I accept that there is an established body of work testing public attitudes and preferences, it is my opinion that a study based on a specific proposal in a specific location, with reference to the specific community and those residents most likely to be affected must carry the most weight. For this reason I prefer the evidence of Mr Anstey and Mr Baines over that of Mr Wyatt and Mr Brown.”

- 2.8 This preference is undermined by the uncritical acceptance of Mr Baines’ research which is unrepresentative of Palmerston North citizens, the communities in the foothills of the Tararua Ranges and those in the vicinity of the existing windfarms near Ashhurst. While in principle the preference for location specific information is understandable, in practice it is not appropriate in this case as the studies are not representative. Hence, in my opinion, the perceptions and attitudes of the people living in these areas have not been accurately determined by the research.

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- 2.9 Ms Williams states that: *Mr Anstey, in his review of Mr Wyatt’s assessment notes that:*

- *Most residents in the local rural residential properties assessed by Mr Wyatt choose to live there, at least in part, for the views.*
- *Residents are unlikely to willingly mitigate adverse effects with planting when the views to the hills and onto the skyline are so special (and their primary views).*

- 2.10 While Ms Williams quotes these opinions, in practice Mr Anstey does not present any robust evidence to support these generalisations either in relation to the location decisions of “*most residents*” as a systematic survey of all residents was not undertaken, or the specifics of residents’ assessments of the “*primary views*” from individual properties. In my opinion, Ms Williams therefore again places undue reliance on unsubstantiated assertions.

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- 2.11 In her Summary on “Visual Effects”, Ms Williams discusses the disagreements between various expert witnesses and states the “*The differences in interpretation arise not from a philosophical basis but from a greater knowledge of the wider landscape, of the community and its values and the movements of people through the landscape*”. In relation to community values Ms Williams goes on to state:

“Community values: perception studies of a generic community are useful but current, site specific data gathered from informed communities must by definition carry more weight.”

- 2.12 As noted earlier with reference to similar conclusions on page 21, while this may be correct in principle, in practice the survey information presented in the evidence of Mr Baines and Mr Anstey is flawed by the sampling design of the surveys and by inappropriate extrapolation of the results from the focus groups. In my opinion, it is not appropriate to generalise the results from the specific participants in the studies to wider populations. In my view, no weight whatsoever should be assigned to the focus groups and the Citizens Panel survey in terms of their reflecting the values of the wider communities of the foothills of the Tararua Ranges or of Palmerston North.

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- 2.13 Ms Williams states *“Social impact analysis, based on the input of over 500 people indicates that residents of Palmerston North are beginning to reject the idea of more windfarms nearby.”* Ms Williams again relies on what I consider to be the flawed survey results presented by Mr Baines. The survey method used a non-random sample and it is simply not possible to generalise the results to the wider population of the *“residents of Palmerston North”*. In addition, the conclusion that residents *“are beginning to reject”* turbines is based, in my opinion, on a flawed interpretation of an ambiguous question as discussed in my rebuttal evidence in relation to the alleged *“tipping point”*.

3. INAPPROPRIATE REPORTING ON/INTERPRETATION OF THE SUBMISSIONS

- 3.1 Ms Williams states on pages 38-39, *“Submissions received for this application indicate a level of concern within the community that there are already too many windfarms on the Manawatu skyline”*. This statement is technically correct but the “level of concern” warrants qualification. This is noted by Ms Williams herself in her summary on page 40, where she states *“A conservative review highlighting words and phrases that focused on cumulative effects such as ‘cumulative’, ‘enough is enough’, ‘saturated’ and ‘already too many’ shows 122 submissions or in the order of 25% of the submissions received on amenity were concerned about cumulative effects.”* Given the population of Palmerston North of 75,543 in 2006, the number of people motivated to express this concern was low.

- 3.2 Ms Williams quotes the analysis of submissions¹ as stating: *“Loss of lifestyle and enjoyment for residents and visitors was another common theme. Many submitters highlighted that they had specifically moved to the area for its tranquil and rural nature. People often noted that they had worked hard to be able to have their current dream home and that the enjoyment of it would be taken away from them. This was noted to be a stressful and worrying experience. Transmission lines, turbines and large-scale construction were not considered to be consistent with a rural lifestyle by many submitters.”*
- 3.3 Ms Williams reports this quotation without comment. It is worth noting, however, that the views expressed about *“Transmission lines, turbines and large-scale construction”* are not consistent with established practice. There are, for instance, 12,341 km of high voltage lines in the National Grid, nearly all of which is in rural areas. The new 220/400 kV line to be built from Whakamaru to South Auckland includes 186 km of towers ranging up to 70 metres high, entirely through rural areas. The substantial air insulated substation at the Whakamaru end of the line will add to the extensive structures in this rural setting.
- 3.4 In discussing submissions on recreation, Ms Williams also includes notes: *“It was highlighted that recreation will be adversely affected by the increase in heavy traffic on the roads, making it unsafe for recreational road users.”* In my opinion, it would have been appropriate to qualify this by explaining that the heavy traffic would only occur in the construction period and any related effects would be temporary.

4. CONCLUSIONS

- 4.1 In my rebuttal evidence I have previously stated that *“In my opinion, the failure to obtain a proper random sample renders invalid all statements which assert that the results from the Citizens Panel are representative of the wider population of Palmerston North.”* I set out a range of statements in Mr Baines’ evidence which were thereby disqualified. I also noted that *“Similarly, any other evidence which relies in whole or in part on interpretations made from the results of the Citizens Panel should be similarly discounted.”* All the statements made by Ms Williams which relate to the wider population of Palmerston North fall into this category.

¹ Hill D, R Scannell, E Toh, (2009), *Turitea Wind Farm – Summary of Submissions*, Hill Young Cooper Ltd, 133pp

- 4.2 In my rebuttal evidence I also noted that *“The respective roles in social research of focus groups and surveys are critical in Mr Anstey’s endeavour “to gain at least some appreciation of how individuals and their communities relate to the foothills landscape and what they think is important.” Mr Anstey may have gained some insights into the views of the 34 individuals, from an undefined number of households, attending the focus groups. But it is entirely inappropriate to assert this as the basis of understanding the views of “their communities” because there is no way of ensuring that they were representative. Similarly, a social scientist would qualify the statement of Mr Anstey in paragraph 37 of his evidence when he states “The responses of the residents” and restate it as “The responses of the residents attending these focus groups”, because that is all that they are.”* Ms Williams unfortunately uses Mr Anstey’s evidence uncritically as if it were representative of the communities along the Tararua Ranges. In my opinion, the statements made by Ms Williams that rely on generalising from these focus groups are not supported by the evidence.
- 4.3 Ms Williams states at page 21 that *“I prefer the evidence of Mr Anstey and Mr Baines over that of Mr Wyatt and Mr Brown”* because it is local to the proposal. Unfortunately, being local does not offset the limitations of method which, in my opinion, mean that the results are not representative of either the communities in the foothills of the Tararua Ranges or the wider population of Palmerston North. In my view, this preference is therefore unsoundly based.

Dr Peter Phillips

23 July 2009