

IN THE MATTER OF The Resource Management Act 1991
AND
IN THE MATTER OF appeals under clause 14 of the First
Schedule to the Resource Management Act
1991 concerning proposed One Plan
(Combined Regional Policy Statement and
Regional Plan) for the Manawatu-Wanganui
Region.

BETWEEN **TRUSTPOWER LIMITED**
ENV-2010-WLG-000145

AND **OTHER PARTIES**
Appellants

AND **MANAWATU-WANGANUI (HORIZONS)
REGIONAL COUNCIL**
Respondent

**STATEMENT OF SUPPLEMENTARY EVIDENCE OF ROBERT JOHN SCHOFIELD
ON BEHALF OF TRUSTPOWER LIMITED
RELATING TO THE PROPOSED ONE PLAN LANDSCAPE PROVISIONS**

14 March 2012

Introduction

- i. My full name is Robert John Schofield. I have previously prepared a statement of evidence in this proceeding, dated 17 February 2012. I confirm that the further opinion I provide in this supplementary evidence is within my area of expertise and experience.
- ii. I have read, and agree to comply with, the Code of Conduct for Expert Witnesses set out in Schedule 4 of the Environment Court Practice Note 2011.
- iii. I have prepared this supplementary evidence to address matters arising from the expert conferencing which has occurred since my evidence-in-chief was circulated, namely:
 - Planners' Conferencing, 28 February 2012; and
 - Landscape Architects' Conferencing, 1 March 2012.
- iv. My supplementary evidence is only focused on identifying a possible resolution to the concerns I outlined in my evidence-in-chief, in response to the agreement of the landscape architects that –

"All parties agree that the upgrading or repowering of wind farms are a special case and need to be recognised somehow and consider this would be best addressed under Policy 3-4 rather than Policy 7-7."

- 1.1 My supplementary evidence takes into account the Record of Planners' Conferencing on Policies 3-3, 3-4 and 7-7 and Schedule F, dated 28 February 2012, and the Record of Technical Conferencing on Policy 7-7 and Schedule F dated 1 March 2012.

2 Significant Adverse Cumulative Effects on Outstanding Natural Features and Landscapes

- 2.1 In respect of the issue of significant adverse cumulative effects in outstanding natural features and landscapes under Policy 7-7(aa), I accept that the policy is generically expressed and could potentially be applied to any number of potential future situations in which a proposed development could occur within an identified ONFL. However, as the evidence-in-chief

of Mr Anstey highlights, the policy is clearly derived from and is intended to address the existing situation of wind farms within the Ruahine/Tararua Skyline ONFL, and I find it difficult to envisage many other scenarios in which this could apply.

- 2.2 Furthermore, the cumulative effects raised in Policy 7-7 relate to the effects of development on the characteristics and values of these landscapes, rather than to all forms of cumulative effects that an Assessment of Effects on the Environment would have to address. Thus, the appropriate place for policy guidance on addressing the potential cumulative effects of development (or redevelopment) on an ONFL would be within Policy 7-7.
- 2.3 More importantly, having specific guidance in Policy 7-7 would remove or reduce the uncertainty created by decision-makers having to weigh up the absolute nature of the 'avoid' requirement with the generic 'recognition' policies in Chapter 3.
- 2.4 In my opinion, because of the significant investment required to repower an existing wind farm and the benefits to be obtained from such a repowering, some guidance criteria in Policy 7-7 on how the landscape characteristics and values could be protected if not enhanced through repowering would be an appropriate policy response, for the reasons set out in my evidence-in-chief.
- 2.5 There is uncertainty among the landscape architects about whether a repowering of an existing wind farm would trigger significant adverse cumulative effects, as the degree of effects would be dependent upon a specific proposal, and a whole range of factors would need to be taken into consideration in making such a determination. However, there also appears to be some agreement among the parties that a proposal which brought about a more consistent and coherent pattern of turbines within the wider landscape could improve the overall visual effects, given the current visual "hotchpotch" that the current pattern of wind farms present on the landscape.
- 2.6 It is the expression of this outcome that would form the type of guidance that TrustPower is seeking to have included within Policy 7-7, as this would provide clarity that, while a repowering may create a significant visual

change when the wind farm is considered by itself, the effects will not be considered to create significant adverse cumulative effects within the ONFL if the overall outcome is a more coherent pattern of turbines. Without this policy clarity, there is likely to be ongoing confusion and debate about whether the scale of visual effects that repowering would undoubtedly generate breaches the threshold of acceptable effects on the characteristics and values of the Ruahine/Tararua Skyline ONFL.

- 2.7 I would reiterate that such guidance would not exempt a repowering proposal either from the resource consent process or from the need to assess the effects of a specific proposal on the characteristics and values of the Ruahine/Tararua Skyline ONFL. However, such guidance would create an appropriate focus for the assessment, and thereby reducing the uncertainty and scope of debate.

3 Conclusion and Proposed Relief

- 3.1 In conclusion, my opinion remains unchanged that the most appropriate means to provide some clarity over how the future repowering of wind farms could be achieved without being considered as a significant adverse cumulative effect is to provide some policy guidance or criteria in Policy 7-7.
- 3.2 However, notwithstanding my position on Policy 7-7, I have taken into account the outcome of the recent conferencing and given some thought as to how sufficient specificity could be introduced into Policy 3-4 to address the positive effects that a repowering of an existing wind farm could have on the overall cumulative effects of multiple wind farms.
- 3.3 In response, I recommend a number of interrelated amendments that could be made to the One Plan to address these concerns:
- (a) To amend Policy 3-4 (iv) to specifically refer to the repowering of wind farms as an example of how the benefits of increased generation capacity and efficiency of existing renewable electricity generation facilities can be realised (given the profile and importance of wind energy to the Region);

- (b) To amend Policy 3-4 to require local authorities to have particular regard to the environmental benefits that repowering wind farms could have in landscape and visual effects;
- (c) To add further explanatory text in regard to the three new clauses to Policy 3-4, with a specific illustration of the positive visual effects that repowering could providing for the upgrading of existing infrastructure; and
- (d) To introduce a definition of repowering to support these amendments.

3.4 These amendments are outlined in **Appendix 1** attached to my evidence.



Robert Schofield
Director, Boffa Miskell Limited | Environmental Planner
14 March 2012

Appendix 1: Recommended Amendments to the Proposed One Plan

The following outlines the suggested amendments to the Proposed One Plan discussed in my evidence (based on the decisions version of the One Plan):

- Proposed changes agreed to at the Planners' conferencing are highlighted in yellow
- Suggested wording to give effect to the Expert Landscape Architects' conferencing statement are highlighted in blue.

Policy 3-4: Renewable energy[^]

(a) *The Regional Council and Territorial Authorities[^] must have particular regard to:*

- (i) *the benefits of the use and development of renewable energy[^] resources including:*
 - (A) *contributing to reduction in greenhouse gases,*
 - (B) *reduced dependency on imported energy sources,*
 - (C) *reduced exposure to fossil fuel price volatility, and*
 - (D) *security of supply for current and future generations,*
- (ii) *the Region's potential for the use and development of renewable energy[^] resources, and*
- (iii) *the need for renewable energy[^] activities to locate where the renewable energy[^] resource is located.*
- (iv) *the benefits of enabling the increased generation capacity and efficiency of existing renewable electricity generation facilities, including the repowering of wind farms.*
- (v) *the logistical or technical practicalities associated with developing, upgrading, repowering, operating or maintaining an established renewable electricity generation activity.*
- (vi) *the environmental benefits that can be gained from the repowering of wind farms, particularly where the changes would have positive landscape and visual effects in regard to cumulative effects.*

3.7 Explanations and Principal Reasons

3.7.1 Infrastructure and energy

Objectives 3-1 to 3-1C and Policies 3-1 to 3-5 have been adopted to recognise the benefits of infrastructure and having it well integrated with other land uses, and to recognise and provide for renewable energy and energy efficiency measures. The policies on infrastructure* aim to give guidance to decision-makers about how to weigh up the local adverse effects of infrastructure* against the*

positive regional and national benefits. They also aim to provide guidance on how to avoid adverse effects on important infrastructure through the inappropriate use of land near or adjoining important infrastructure*, and the importance of integrating urban growth with infrastructure provision and the retention of versatile soils for use as production land.* // [paragraph break]

The policies regarding energy efficiency and renewable energy seek to recognise the benefits to be derived from the use and development of renewable energy, and the efficient use of energy and resources (both of which are matters to be had in particular regard in Part II of the RMA Resource Management Act 1994). The policies also seek to recognise the practical constraints facing the development, repowering, operation, maintenance and upgrading of renewable electricity generation, as well as the benefits to be derived from improving the efficiency and capacity of existing facilities (for example, in reference to Policy 7-7, the environmental benefits that the repowering of an existing wind farm could have in improving the overall coherence of turbines within a landscape).

Parts of Policies 3-1, 3-2, 3-3A and 3-5 are included to give effect to parts of the Regional Land Transport Strategy, which seeks to protect the strategic transport network and create opportunity for the uptake of public transport options in the future.

Glossary:

Amend the Glossary by adding the following definition:

Repowering, in respect of wind farms, means the replacement of turbines that have reached the end of their economic life with updated turbine technology to continue to make use of the available energy resource by maximising the efficiency and capacity of a given renewable electricity generation facility within the existing consented site.