

Report 11.125  
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Committee Greater Wellington Parks Network Plan Subcommittee  
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## Parks Network Plan, wind farm access through Battle Hill - Report on submissions

### 1. Purpose

To provide the Greater Wellington Parks Network Plan Subcommittee (the Subcommittee) with a summary of the submissions received on this issue and provide officer comment where appropriate.

### 2. Significance of the decision

The matters for decision in this report **do not** trigger the significance policy of the Council or otherwise trigger section 76(3)(b) of the Local Government Act 2002.

### 3. Background

The Greater Wellington Parks Network Plan (Parks Network Plan) is a management plan for parks and forests owned or managed by Greater Wellington, some of which is held under the Reserves Act 1977.

In December 2010 Council considered the Regional Sustainability Committee's recommendation to adopt the Parks Network Plan (Report 10.658). The Council determined to adopt the Parks Network Plan but retain in draft the provisions of the Plan that provide for a potential wind farm access road in Battle Hill Farm Forest Park (Battle Hill). Further, the Council agreed to undertake a further public consultation process on the proposed provisions for a potential wind farm access road and ancillary underground services in Battle Hill.

The indicative route of the potential wind farm access road (potential road) is shown in the Parks Network Plan map of *Battle Hill – Projected future changes*. The proposed route is sometimes described as lying 'within the 350 metre contour', as it largely follows the top of the ridgeline. It enters the park from private property on the southern boundary and follows the existing forestry access road, which has already been developed for logging purposes. The mid section of the potential road is within the Puketiro/Akatarawa Forest.

The northern section of the potential road would follow the line of an existing track and future forestry access road but would extend a further 100 metres to the northern boundary and then continue on through private property. This route is considered to be the only feasible route for an access road to the proposed wind farm site.

The characteristics of the road required for a wind farm is outlined in Submission 22 (by RES New Zealand Limited).

It is important to note that the provisions of the Parks Network Plan under the scrutiny of the Subcommittee are strategic in nature, and relate to projected future development in the park. As such there is no detailed assessment of effects prepared and the alignment of the proposed road is indicative only. If the potential road (and the related wind farm) is developed at some point in the future, this will be the subject of a separate resource consent process under the Resource Management Act.

### **3.1 Role of the Subcommittee**

As set out in the terms of reference attached to **Report 11.123** the Subcommittee has the power to hear oral submissions on the proposed provisions of the Greater Wellington Parks Network Plan that provide for a potential wind farm access road, including servicing cables buried beneath the access road, in Battle Hill Farm Forest Park (proposed provisions).

The Subcommittee is to consider both the written and oral submissions on the proposed provisions. They will summarise the outcomes of the consultation process and prepare a report to Council with recommendations regarding whether the proposed provisions, or any variation to them, should be included in the Greater Wellington Parks Network Plan.

The Subcommittee is to hear and consider the submissions unfettered by any previous Council decisions and disregarding any previous contractual arrangements. Council officers are available to provide clarification on any technical matters.

## **4. Overview of submissions received**

Twenty two submissions were received on the issue of provisions for wind farm access and ancillary underground services through Battle Hill. All but one of the submissions opposed the potential access road and its inclusion in the plan.

The remaining submitter was from the developer of the Puketiro wind farm. This submission outlines the type of roading that would be required and the likely access needed throughout the construction, operation and decommissioning of the development.

The Subcommittee members have already received copies of the full submissions, including past submissions made on this issue to the Regional Sustainability Committee in 2010. A tabulated summary of the submissions received is found in **Attachment 1**.

## 5. Issues raised relating to the access road and ancillary underground services

### 5.1 Access

Eight submitters outlined concerns that recreational access to the park will be severely affected by the development of the potential road, not only through the construction phase but also throughout the operational life of the wind farm. Many refer to the West Wind development at Makara. The submitters expressed in their submissions disappointment that access at the Makara site was promised but to date this has not been made available as originally agreed.

Submitters believe the vehicle movements will conflict with the recreational needs of horse riders and mountain bikers and will mean restricted public access. They are concerned that the public's right to use and enjoy the park will be overridden by commercial interests.

#### *Officers' comment*

*Battle Hill Farm Forest Park gets a significant number of visitors (around 30,000 in 09/10), however the majority of these do not access the steeper northern sections of the Park.*

*The route of the potential road intersects with the Puketiro Loop track both within the Battle Hill Park and the Akatarawa Forest. This track is maintained as an unsealed road (like a 4WD track) and is used by walkers, mountain bikers and horse riders all year round. Many of these people are locals who use the park regularly. The track is the longest in the park and provides access to the open tops and 360 degree views.*

*Access through this area is provided for many events including the summer events run by Greater Wellington (Battle Hill History Walk had 38 participants in 10/11), part of the Porirua Grand Traverse multisport event (300 participants in 09/10), the Akatarawa Attack mountain bike challenge, an annual Equestrian Trail ride competition and other events granted through a concession such as trail bike and 4WD club events which traverse through the Akatarawa Forest.*

*The link along the forestry road to the south is often used by local horse riders and the link to the east beyond the summit to Puketiro Road/Bulls Run Road is often used by mountain bikers.*

*Recreational activities do already co-exist with forestry harvesting operations as only a small section of the road is closed at any one time. Forestry activities are modified to cater for major events (e.g. Karapoti Classic).*

*If the potential road was constructed it is expected that it could be managed to ensure that activities do not unreasonably interfere with recreational access. However, there is likely to be some short-term disruption during the construction period where some restrictions on access would be required for health and safety reasons. It is considered that mitigation measures to ensure*

*continued recreational access could be adequately dealt with as part of resource consent process.*

## **5.2 Environmental impact**

The majority of submitters state that the environmental effects of constructing a road would be significant, and would require clearance of vegetation and earthworks, causing erosion and sedimentation of waterways (and in particular Pauatahanui Inlet).

Submitters assert that this road has a much more significant impact than a forestry road, which already exists along many parts of the route. Widening and straightening to the required specifications for a wind farm access road would in their view create a road of a scale and size that cannot be contained within the landscape and therefore should not be in a regional park. One submitter notes that contours are steep and ridges would need to be removed to accommodate such a road.

### *Officers' comment*

*The route of the potential access road is through plantation forestry and open grassy ridge tops. There are some small native shrubs on the edges of the existing forestry road to the south, where these have regenerated in recent years.*

*The southern section of the route has already been developed for forestry access purposes. This road is metalled to a width of 4.5-5.5 metres when being actively used for logging purposes. Between harvest periods, secondary growth is allowed to form and this is trimmed before the next logging cycle. The maximum gradient of a road for loaded logging trucks is 12.5% (1 in 8).*

*The route of the mid section of road (contained within Puketiro/Akatarawa Forest) is not fixed at this point, and it is uncertain whether it will or will not follow the current forestry access road. If it does not, this will require more extensive works. However it is noted that this section of the route is outside of the Battle Hill Farm Forest Park boundaries.*

*The northern section of the route follows the route of an existing 4-wheel drive track, which is intended to be upgraded to a forestry access road in the future as the area around it is actively logged as part of the usual cycle. Most of this is currently clay track with minimal amounts of roading metal in place. The standard of this forestry access road will be similar to the existing southern section. The forestry access road would terminate approximately 100 metres from the adjoining property on the northern side of the Battle Hill land as this is all that is required for harvesting purposes. If developed for wind farm purposes, this last 100 metres would need to be formed.*

*The submission from RES includes a preliminary roading assessment that identifies an additional width of 0.5 to 1.5 metres of metalled road for wind farm access purposes compared to a forestry road but requiring similar gradients. Widening of some corners will also be necessary to transport the larger components.*

*At this stage, there is also provision in the Greater Wellington Parks Network Plan for a new roadway to be constructed from Paekakariki Hill to the ridgeline at Battle Hill. This road will be built to design standards for forestry access purposes only.*

*Overall it is considered that at a strategic level the effects can be adequately mitigated and the details around this can be considered as part of any subsequent resource consent process.*

### **5.3 Landscape and amenity impacts**

Most submitters state that the road will have a large visual impact affecting the rural amenity or landscape values, including the Eastern Hills identified as important landscape features in the Parks Network Plan.

One submitter also refers to the noise and heavy traffic impact on the Park.

#### *Officers' comment*

*No formal assessment has been undertaken of landscape or amenity impacts. Both sections of the potential road would wind through plantation forestry. The northern section is likely to be visible only from the lower sections of the park when the forest is harvested (until cover is achieved after replanting).*

*Officers note that Battle Hill is an already modified landscape due to farming and forestry operations. At its purchase, the area included pinus radiata trees on 87.5 hectares and this area continues to be part of Greater Wellington's forestry business.*

*During harvesting operations there is heavy vehicle traffic and machinery onsite with associated noise impacts. Visually, the harvesting operation may be considered unsightly and while trees are planted within a year of harvesting, it takes about four years before a good tree cover is achieved.*

*Overall it is considered that heavy vehicle traffic and noise impacts are likely to be no more significant than those of forestry operations, and once construction has finished the use of the access road for wind farm purposes will be limited. The effects of the proposed Transmission Gully motorway through the Park is likely to have much more significant effects in terms of noise, landscape and amenity.*

### **5.4 Inconsistency with the Parks Network Plan**

Almost all submitters state that the road is inconsistent with the Parks Network Plan citing the vision, guiding principles, general management outcomes and policies, as well as the key characteristics of Battle Hill Farm Forest Park.

#### *Officers' comment*

*Battle Hill Farm Forest Park is a working farm that includes active forestry and farming operations.*

*The relevant outcome and policies of the plan are:*

- *Outcome 4: The integrity of important landscapes and geological features are protected from inappropriate development and use.*
- *Policy 23: To consider the impact of any new proposals or activities on important landscapes and geological features including the view of these from within the park.*
- *Policy 26: To manage land use, developments or other activities to ensure that park values are not compromised. This includes:*
  - a. Managing the scale of development so it is appropriate to its setting*
  - b. Ensuring any tracks or access ways are constructed to minimise visual effects on landforms*
  - c. Minimising the intrusion of any built structures on the landscape.*
- *Policy 84: To maintain discretion over other activities (including new activities and utilities) to avoid or limit impacts on the environment and key park characteristics, as well as ensure the safety of park users.*

*The potential road and the underground ancillary services extend across the Eastern Hills of the Park. While this is identified as a key landscape feature of the Park (refer to 6.2.2), it should be noted that this is an already modified landscape and will continue to be used for rotational forestry in the future. Forestry access roads will continue to be required to provide access to this area for logging purposes. These roads are highly visible at the time of harvest but less obvious after replanting.*

*The potential wind farm access road will not alter the management focus for the park (refer to Management Focus 6.2.3), and will not significantly affect the key characteristics of the park. The key landscape feature of the park (that is 'the forested steeplands of the eastern hills') will continue to be a feature of the park regardless of whether the road is developed for wind farm or forestry purposes.*

## **5.5 Ancillary underground services**

Where submitters opposing the provisions refer to ancillary underground services, they state that they do not support these being included within the park boundary and that they are inconsistent with the Parks Network Plan. One submitter believes that to include the road and ancillary services is effectively disposal of part of the park.

*Officers' comment*

*The issue of whether allowing road access and ancillary services constituted disposal (with reference to Section 138 of the Local Government Act 2002) was raised at hearings on the draft Parks Network Plan. A legal opinion obtained*

*by Council (dated 25 August 2010) provided clarification that a right of way easement and easement for buried cables did not meet the definition of disposal under Section 138. Any effects of the ancillary underground services are expected to be minor.*

## **6. Outcome sought by submitters**

Most submitters seek that the policies from the Battle Hill Farm Forest Park Management Plan approved in 2009 be reinstated in the current plan. Their understanding of this is that reinstating the 2009 provisions removes all reference to wind farm development within the park, whether access or turbines or blade flyover.

### *Officers' comment*

*In the Battle Hill Farm Forest Park Management Plan (BHFFMP) approved by Council it was agreed that the wind farm access road (which at that stage would wind through the Park from the Paekakariki Hill Road to the rear of the park) be removed and further that there was no blade flyover or wind turbines allowed in the park. The BHFFMP was subsequently replaced by the Greater Wellington Parks Network Plan.*

*The Parks Network Plan currently does not provide for blade flyover or wind turbines. The only outstanding matter is the potential wind farm access road.*

## **7. Recommendations**

*That the Sub Committee:*

- 1. **Receives** the report*
- 2. **Notes** the content of the report*
- 3. **Agrees** to recommend to the Council whether the proposed provisions, or any variation of them, should be retained in the Greater Wellington Parks Network Plan.*

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Attachment 1: Tabulated summary of submissions