

M&P Makara Family Trust
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**Oral submission by M&P Makara Family Trust to HEARING STREAM 9
Wellington City Council Proposed District Plan**

12.06.2024

1. M&P Makara Family Trust (M&P Trust) owns approx. 80 Ha of land in Makara adjoining in part Makara Road, Terawhiti Station and Meridian Energy Ltd. The rural area has a tiny population with specific interests in comparison to wider city matters, and as active farmers and carbon-farmers the Trust represents relevant aspects of the public interest in the rural area. M&P Trust also has an interest in the REG chapter of the Proposed Plan that is greater than the interest the general public has due to its Trustees, Ruth Paul and Chris Moore being original parties to the Environment Court hearing on the West Wind resource consent, and with Ruth Paul being a committee member of NZS6808 – Wind Turbine Noise, representing the Makara Community as (then) chairperson of the Makara Ohariu Community Board.

2. Ruth Paul, on behalf of M&P Trust, is present at the Hearing Stream 9 to offer a voice for the resident community in the GRZ which has largely been inactive in the DP process. As a resident who has at different times chaired the School Board and Community Board, and is present Chairperson of the Makara Community Centre Association, and a member of the Meridian Power Up Community Fund, I welcome the opportunity to participate in any discussions, public or otherwise, relating to this submission or the REG Chapter in general. At all-time the aim in the GRZ facilitated by the REG Chapter should be for good relations between neighbouring generation facilities and the local resident community.

3. M&P Trust structures this oral submission on the WCC Officers s42A Report of 13 May 2024.

4. At para 344 the Report outlines in the s32AA evaluation the officers recommended amendments to the REG Chapter.

At 344(a) the recommendation is to move all large scale generation from Non-Complying to Discretionary Activity status.

M&P Trust would like to know what happens to the notification status of large-scale REG in the GRZ and proposes that it should be compulsory notification.

5. Along with the re-wording of P9 and proposed PX, M&P Trust disagrees with the Officers reasoning (p188) that avoidance of effects that are more than minor is not a necessary requirement anywhere in the GRZ, instead using the word 'minimise'.

If moving the Activity from Non-Complying to Discretionary, M&P Trust argues that it is even more important to keep the obligation to avoid effects that are more than minor.

Activities such as windfarms and solar farms can avoid certain negative effects by thoughtful placement of individual turbines and ancillary structures and the onus should remain for this to be the desired outcome.

M&P Trust submits that REG-P9 be modified to reflect PX by changing the wording to:

REG-P9(5):

*“They ~~minimise~~ **avoid, remedy or mitigate** any adverse effects, including adverse effects on ...”*

6. M&P Trust submits that in REG-P9:

“while having regard to any adaptive management, offsetting measures or environmental compensation which may benefit the local environment or community affected.”

be deleted.

The M&P Makara Family Trust’s concern is that when it comes to an adverse effect from a Generator’s specific activity being off-set by some other environmental good, i.e. the adverse effect(s) from a turbine in a new location overlooking a neighbouring property could be off-set by native bush planted kilometres away or a donation to the local pony club - which in no way ameliorates or mitigates the adverse effect on the affected party.

All large-scale electricity generators are required by law to do carbon off-setting. This can be considered an “*offsetting measure*” and is to the benefit of the country at large but is of no particular benefit to local community if their amenity values are severely diminished by an activity of the same Generator. Any claim that investing in local carbon projects off-sets the negative impact of a new turbines on another property is a win-win for generators, as it both fulfils their legal obligations concerning carbon off-setting and over-rides the expectation from the local community that adverse effects will be avoided, remedied or mitigated. Likewise, community funds and sponsorship – such funds are of huge benefits to groups with in the community but do not address the adverse effect where or with whom it needs to be addressed.

P9 already ‘provides’ for REG, and this wording further softens a Generators obligations to any affected parties.

7. At para 344(b) the Report outlines the change in approach to upgrading of turbines, so that all new generation and upgraded generation is considered under the new REG-PX.

M&P Trust does not oppose this approach, and specifically supports the restriction in S11 that defines what an upgrade is, with its restriction to an upgrade being no more than 5% higher than an existing structure. It is our understanding that this is the only definition of the term ‘upgrade’ in the REG section of the PDP but please inform us if this is not the case.

8. Other matters:

The wording of REG-02 and REG-03 combined create a new, negative impact on rural landowners adjoining generation facilities.

While we support the retention of the word 'communities' in this objective, REG-02 is strongly worded in favour of the Generator by only requiring 'management' of adverse effects and recognising functional and operational needs and the potential national benefit.

REG-03 makes 'reverse sensitivity effects' a new consideration and therefore a new burden on neighbouring landowners.

This new reverse sensitivity consideration stretches out unfairly across the rural landscape. This unreasonably hinders residents of the Rural Area in their pursuit of activities that are otherwise acceptable in terms of the underlying GRZ provisions.

M&P Trust submits that in REG-03

~~"...including reverse sensitivity effects."~~

be deleted.

9. M&P Trust supports the Reports recommendation that S9 and S10 be retained. NZS6808 is a Standard that needs to be purchased to be read by any individual, and any rule included in the District Plan should fundamentally be available to all ratepayers free of charge.

Clarification of the required noise standards in the District Plan is therefore not an option but a basic necessity.

10. M&P Trust thanks the committee and WCC for the opportunity to be heard.