

**BEFORE AN INDEPENDENT HEARING COMMISSIONER FOR WAITOMO
DISTRICT COUNCIL**

IN THE MATTER of the Resource Management Act 1991 (“Act”)

AND

IN THE MATTER of an application to vary resource consent
RM050019 by Taumatotara Wind Farm
Limited under s127 of the Act

**SUMMARY STATEMENT OF SIMON CHAPMAN
ON BEHALF OF TAUMATOTARA WIND FARM LIMITED
[ECOLOGY]
13 NOVEMBER 2023**

Counsel: G K Chappell

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1. INTRODUCTION

- 1.1 My name is Simon Chapman. I am employed as a Principal Ecologist by Ecology New Zealand Limited (Ecology NZ).
- 1.2 My qualifications and experience are as set out in my EIC.
- 1.3 I have been engaged by Taumatotara Wind Farm Limited ("T4") to provide expert evidence in respect of ecology.

2. SUMMARY STATEMENT

- 2.1 In my evidence I provide my views on the notable outstanding ecological issues in relation to the application.

3. THE BASELINE

- 3.1 Minute 5 in relation to the application confirmed that the adverse effects of the variation application are to be considered against the effects of the wind farm project consented for the site (as varied in 2011).
- 3.2 As alluded to in minute 5, a key consideration is whether the nature of adverse effects arising from the variation application are materially different to those that would arise from the exercise of the existing consent.

4. LONG-TAILED BATS

- 4.1 Bird and bat activity was surveyed on the site. The change in adverse ecological effects on long-tailed bats potentially arising from the variation application requires specific consideration due to the species' conservation status of threatened nationally critical.
- 4.2 The key consideration in relation to bats is whether the proposal to reduce the number of turbines from 22 to eight, and to increase the size of the retained turbines, will materially increase the risk of significant adverse effects.
- 4.3 While I accept that there is a degree of uncertainty, my view is that there is a very low risk of the variation application increasing adverse effects on bats. Furthermore, as I conclude in my EIC, a reduction in adverse effects on bats would be the most likely outcome if the variation application is approved.

- 4.4 Removing 14 turbines from the consented wind farm design cannot possibly increase adverse effects on bats. Given that the variation application involves the removal of turbines near areas of indigenous forest, a positive effect is by far the most likely outcome, with a neutral outcome being the potential worst-case.
- 4.5 For the remaining eight turbines, the key issue in relation to bats is whether the proposed increase in turbine size would materially increase the risk of adverse effects on bats.
- 4.6 In my opinion there is a low risk that larger turbines would increase adverse effects on bats. I am not aware of any studies that provide useful evidence either way on this specific topic (influence of turbine size on bat mortality), therefore my view is based solely on expert judgement, and I acknowledge that there is some uncertainty.
- 4.7 As I point out in my EIC, the cumulative rotor swept area of the eight turbines proposed in the variation application is 14% smaller than the existing consented design. While I cannot be certain that reducing the cumulative rotor swept area would reduce adverse effects on bats, I consider it highly unlikely that reducing the cumulative surface area of spinning turbine blades would lead to a materially worse outcome in terms of effects on bats.

5. CONDITIONS

- 5.1 The applicant is willing to accept a suite of ecological monitoring and management conditions aimed at addressing many of the concerns raised about the potential ecological effects of variation application. The conditions proposed by Mr Shearer further reduce the risk of a materially worse ecological outcome arising from the design changes proposed in the variation application.

Simon Chapman