
BEFORE THE BOARD OF INQUIRY

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 and operate a Windfarm at Turitea

**MEMORANDUM OF COUNSEL FOR PALMERSTON NORTH CITY COUNCIL
ON MR KALAFATELIS' TURITEA SUB-SAMPLE**

Dated: 1st September 2009

COOPER RAPLEY
LAWYERS

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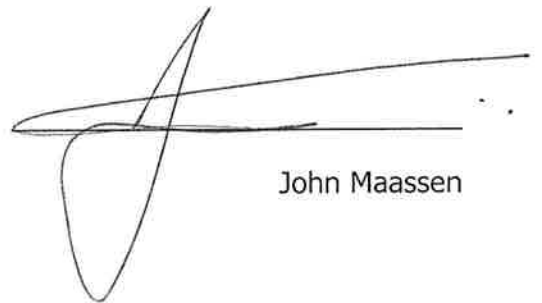
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1. Commissioner Hudson's request for additional information arose in the context of a discussion about (i) concern about visual effects, (ii) levels of support/opposition from people in the "Turitea catchment" (Commissioner Hudson's words), and (iii) visibility and distance of respondents. (Refer to pp.449-450 of the transcript).
2. It was expected Mr Kalafatelis would provide some data on distances which are specific to his Turitea sub-area; that is to say distance and visibility-related data specific to the 56 responses from this sub-area of his survey sample¹.
3. Table 1 provided by Mr Kalafatelis is based on 464 responses and plainly does not answer the question of Commissioner Hudson. It appears to measure responses from respondents outside the Turitea catchment based on distance from existing windfarms.
4. PNCC requests the following from Mr Kalafatelis:
 - (a) The number of responses from within each of the 3 Turitea foothill communities' described and spatially defined in Map 2 of the PNCC Map Booklet (being further sub-catchments of the Turitea sub-sample) and the nature of their response based on knowledge of the TWF and support/opposition matrices used by Mr Kalafatelis²;
 - (b) The total proportion of responses from within each foothill community expressed as a percentage of the total number of residences in the foothill communities;
 - (c) The distance of each of the 56 respondents from the nearest turbine in the proposed wind farm and their response based on the support/opposition matrix used by Mr Kalafatelis;

¹ Mr Kalafatelis acknowledged that 1 of the 57 responses from the Turitea catchment came from the eastern side of the Turitea catchment as he defined it leaving 56 responses within Palmerston North City

² Mr Kalafatelis in his SOE identified the respondents level of knowledge and also provided several categories of response including strongly opposed, somewhat opposed, strongly support and somewhat support

- (d) An order that the raw data on which (a) – (c) is based including precise locations of respondents be provided to James Baines, Jeff Baker and John Maassen alone on a confidential basis and on the basis the anonymity of respondents shall be maintained.

A handwritten signature in black ink, consisting of a large, stylized loop on the left and a long horizontal stroke extending to the right.

John Maassen