

BEFORE THE BOARD OF INQUIRY

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of a Board of Inquiry appointed under section 146 of the Resource Management Act 1991 to consider an application by Mighty River Power Limited for resource consents to construct, operate, and maintain a wind farm at Turitea.

**MEMORANDUM OF COUNSEL FOR MIGHTY RIVER POWER LIMITED REGARDING
REVISED PHOTOMONTAGES**

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MAY IT PLEASE THE BOARD:

Corrections to Viewpoint 6 circulated on 1 February 2010

1. Mighty River Power exchanged evidence on 1 February 2010 in respect of the Turitea Wind Farm redesign. That information included a revised set of photomontages, selected to demonstrate the effects of the redesign.
2. On 3 February 2010 Mighty River Power became aware that the photomontage prepared for Viewpoint 6 (Aokautere Drive) that had been circulated did not include relocated turbine zones 128, 129, 130, and 131. These turbine zones are represented in the numbered turbine frames, but not the main photomontage, nor the 'wireframe'.
3. As outlined in Mr Wyatt's evidence regarding the redesign, ERM Limited was again responsible for preparing the photomontages of the amended layout. ERM has advised that the error in Viewpoint 6 was simply an oversight, and reflective of the iterative process that Mighty River Power undertook (within tight timeframes) with respect to the project redesign.
4. As a result of the error, ERM was instructed to undertake a thorough audit of the remaining revised photomontages, to ensure that no other similar errors have occurred. Based on this audit, ERM has confirmed that all the other photomontages circulated on 1 February are correct and contain all relevant turbines.
5. Mr Brown has also confirmed that relocated turbine zones 128, 129, 130 and 131 were appropriately included in earlier versions of the revised photomontages provided to him by ERM (as outlined in Mr Wyatt's evidence regarding the redesign). As noted above, they are also included on the numbered turbine frames. He has accordingly considered the effects of all turbines in his assessment of the amended layout.
6. Accordingly, please find **attached** a copy of the corrected Viewpoint 6, to replace that circulated on 1 February 2010.

Comparative photomontages

7. Mighty River Power has also instructed ERM to prepare a set of comparative photomontages, which demonstrate the changes made through the redesign. These simply show the original and revised photomontages for each relevant viewpoint on one page, to allow for easy comparison (so only include information that has already

been circulated in accordance with the Board's directions but presented in a different format).

8. A0 versions of the comparative photomontages will be made available for the Board and all parties when the hearing resumes. However, by way of assistance, electronic copies of each are also provided on the **enclosed** disk.



K R Price

Counsel for Mighty River Power Limited
17 February 2010