

# SUBMISSION ON MIGHTY RIVER POWER LTD APPLICATIONS FOR RESOURCE CONSENT

Section 145 of the Resource Management Act 1991

To: Freepost Call In  
Ministry for the Environment  
PO Box 10362  
The Terrace  
Wellington 6143

RECEIVED  
20 FEB 2009

Email: turiteacallin@mfe.govt.nz  
Fax: 04 439 7705  
[Note: If you are emailing or faxing your submission, please mark in the subject line: 'Turitea Call In']

This submission relates to the applications for resource consent lodged by Mighty River Power Ltd for the Turitea Wind Farm proposal as identified on the next page.

## CLOSING DATE AND TIME FOR SUBMISSIONS: 5.00 PM MONDAY 23 FEBRUARY 2009

Title: \_\_\_\_\_ Mr \_\_\_\_\_ Mrs \_\_\_\_\_ Miss \_\_\_\_\_ Ms \_\_\_\_\_ (Please circle the appropriate title(s) or print clearly below)

My/Our Full Name(s): PROFESSOR TIMOTHY S PARKINSON, MISS JENNIFER M PARKINSON

Postal Address: 33 THE BUSH TRACK, RD1, ARLINGTON NORTH

Work Ph: 06 356 9099

Home Ph: \_\_\_\_\_

Cell: \_\_\_\_\_

Work Fax: \_\_\_\_\_

Home Fax: \_\_\_\_\_

Email: T.S.Parkinson@massey.ac.nz

Please tick the relevant boxes on the next page to identify whether you are making a submission on all applications for resource consent or just some of them (please identify).

Please also indicate on the back of this form (✓) whether you support, oppose, or are neutral in relation to the applications. If you are making a submission only on parts of an application for resource consent, please note this when specifying the reasons for your submission.

The reasons for my/our submission are:

Please see attached

If you are attaching further information tick for yes

Please use more pages if you need to.

I/we seek the following decision from the Board of Inquiry (provide precise details including the nature of any conditions sought):

Please see attached

Please use more pages if you need to.

Use a clear tick in the appropriate box below (✓)

I/we wish to be heard in respect of my/our submission (to speak at the public hearing).

I/we DO NOT wish to be heard and hereby make my/our submission in writing only.

Signature(s): \_\_\_\_\_

Date: \_\_\_\_\_

19/2/09

(Signature of submitter, or person authorised to sign on their behalf is required. Note signature is not required for electronic (email) submissions. If this is a joint submission by two or more individuals, each individual's signature is required.)



Ministry for the Environment  
Manatu Mo Te Taiao

Use the tick boxes below to indicate the called-in applications for resource consent that your submission concerns.  
Use a clear tick in the appropriate box or boxes (✓).

I/we make my/our submission concerning all applications for resource consent below

OR

My/our submission only concerns the applications for resource consent that I/we have ticked below:

	Support	Oppose	Neutral
<b>Manawatu-Wanganui (Horizons) Regional Council – Land-use Consents</b>			
104553: for vegetation clearance and land disturbance in rare or threatened habitats, near streams and on highly erodible land throughout the general wind farm site.		✓	
104554: for the construction of a double culvert in an un-named tributary of the Kahuterawa Stream as shown on the included map.		✓	
<b>Manawatu-Wanganui (Horizons) Regional Council – Discharge Permits</b>			
104555: for the discharge of dust to air from the concrete batching plants to be located as generally shown on the included map.		✓	
104556: for the discharge of dust to air from the mobile crushing plant throughout the general wind farm site.		✓	
104557: for the discharge of wastewater from two operations and maintenance facilities to land to be located as generally shown on the included map.		✓	
104558: for the discharge of stormwater from substations to land to be located as generally shown on the included map.		✓	
104559: for the discharge of cleanfill to land in the form of spoil disposal sites throughout the general wind farm site.		✓	
104560: for the discharge of stormwater from roads, turbine platforms and other areas to land.		✓	
<b>Palmerston North City Council – Land-use Consents</b>			
RC0068: <ul style="list-style-type: none"> <li>to establish and operate a wind farm in the areas within the Palmerston North city jurisdiction as generally shown on the included map</li> <li>to undertake earthworks associated with tracking and roading, turbine construction and associated buildings in the areas within the Palmerston North city jurisdiction as generally shown on the included map</li> <li>for the western side of Pahiatua Aokautere Road not meeting access requirements at the location shown on the included map</li> <li>for the storage of diesel (10,000 L) in bunded areas outside the Turitea water supply catchment, generally located at the two substation laydown areas shown on the included map, that exceeds the 0.2 effects ratio maximum in the rural zone</li> <li>for the construction of a 220 kV electricity transmission line and substations as shown on the included map.</li> </ul>		✓	
<b>Tararua District Council – Land-use Consents</b>			
1448: <ul style="list-style-type: none"> <li>for a wind farm (which is not listed as a permitted or controlled activity) in the areas within the Tararua District as generally shown on the included map</li> <li>for land disturbance of more than 200 m<sup>3</sup> of soil and cleanfill material associated with tracking and roading, turbine construction, spoil disposal and other associated works in the areas within the Tararua District as generally shown on the included map</li> <li>for upgrades to South Range Road and the construction of new site access at the location shown on the included map</li> <li>for turbine and wind monitoring mast structures not meeting height requirements within the Tararua District</li> <li>for the modification of a Significant Natural Feature in Schedule 3.3 (ie, Tararua Ranges Ridgeline)</li> <li>for not meeting noise requirements</li> <li>for clearance of indigenous vegetation in the areas within the Tararua District as generally shown on the included map.</li> </ul>		✓	

**NOTE: A copy of this submission form MUST also be sent to Mighty River Power Ltd at:**

Freepost – MRP  
Mighty River Power Ltd  
PO Box 445  
Hamilton 3240  
Attention: Stephanie Froggatt

Or email [turitea@mightyriver.co.nz](mailto:turitea@mightyriver.co.nz) or fax (07) 857 0192

I/we have sent a copy of my/our submission to Mighty River Power Ltd as per Section 96(4) of the RMA.



Ministry for the  
**Environment**  
*Manatū Mo Te Taiao*

**New Zealand Government**

**Reasons for this submission are:**

- 1) The environmental impact of the proposed windfarm has been grossly underestimated/understated at a number of levels.

Firstly, their environmental cost has to be understood in terms of the energy costs of building the turbines themselves plus the concrete and roads that are needed to install them. Simplistic statements in terms of 'potential savings' of fossil fuel during the generation process are inaccurate and misleading in terms of their total energy cost.

Secondly, wind turbines are unsightly, intrusive (they can be seen for many kilometres) and cause an unwarranted industrialisation of the landscape. The beauty of the ranges should not be so lightly set aside for short-term profits of a power company.

Thirdly, the noise pollution that arises from turbines has been consistently misrepresented and understated. Areas within the noise zone of the turbines resemble the take-off path of an airport. When we came to New Zealand from the UK 12 years ago, the North Ridge Road was a wonderful place, full of silence and bird song. Last weekend, we walked there:- it is now only full of the thumping noise of turbines, a place from which peace and beauty have been irretrievably banished. Similarly with the Manawatu Gorge track: when we came here, it was the edge of the wild: now it is just a path around an industrial park. There is no bird song, no wildness, just industrial noise pollution. I cannot believe that this environmental desecration would be acceptable to the Minister for the Environment.

This emphasises an even more important point; namely, that native bird life is noticeably diminished in areas within the noise pollution zone of the turbines. The Manawatu Gorge walking track is a notable example of this: as mentioned above, there is no bird song anywhere near the turbines. As many native birds are already endangered, anything that causes further risk to their survival is irresponsible.

The Turitea Reserve has been set aside as a secure remnant of an outstanding native and national ecosystem. It is one of relatively few pristine areas of bush in the vicinity, which has been set aside a reserve so that it should be preserved un sullied for posterity. Not only would the building of a windfarm in this reserve

destroy its environmental integrity, but also, doing so would set a precedent for the industrialisation and commercialisation of any other reserve in the country, regardless of their environmental/ecological importance. This is completely unacceptable in a country that purports to be 'clean and green'.

- 2) The Turitea Reserve has been specifically used as a catchment area to safeguard the water supply for Palmerston North, to ensure the cleanness and quality of the city's water.

Building a windfarm in the reserve would result in very substantial disturbance to that catchment area (e.g. during road-building and erection of concrete plinths). This would, without doubt, seriously jeopardise the integrity of the city's water supply.

Moreover, the catchment area within the Reserve is currently regarded as being so fragile, that the public is barred from regular access to it. This, being well-established by precedent, makes it unfathomable how anyone could suggest that the earthworks etc., necessary to establish a windfarm would not have a massively detrimental effect upon the integrity of the water catchment area.

- 3) The hazards associated with wind turbines have been totally ignored. A cursory perusal of the international literature regarding windfarms shows them to be at high risk of fire and collapse (e.g. in earthquake or storms). Should a fire occur in one of the proposed turbines (or, rather, when such a fire occurs), it would jeopardise the whole bush reserve and risk causing irreversible pollution to the water-supply catchment area.
- 4) Turbines are an inefficient means of generating electricity, particularly in relation to their negative impact upon the environment.

In this context, there is a widely-held view that windfarms are too inefficient to repay the cost of their construction (and later dismantling) solely from the electricity that they generate; and consequently, the only way that they are profitable is through the marketing of 'carbon credits' that they generate.

Consequently, there needs to be an evaluation, at a national level, through democratic processes, to determine whether wind turbines have any role in power generation in New Zealand, and whether the amount of electricity they produce is commensurate with the environmental destruction that they cause. We submit that,

if the profit from windfarms comes primarily from the marketing of carbon credits (i.e. not from the power that they produce), this is strongly indicative that it is inappropriate for them to be part of a national electricity-generation strategy.

- 5) It is also inappropriate to deal with Resource Consents for windfarms on the current piecemeal basis. Rather, there needs to be a national consideration (again, through democratic process), to determine what, if any, specific areas in the country are suitable for wind generation, so that piecemeal development of windfarms cannot take place outside these designated areas.
- 6) The provision of alternative sources of power that have a lower environmental impact should be actively pursued. For example, there is considerable overseas experience that suggests that 'community' or 'household' level power generation is a far more effective way of adding to the national power-generating capacity than are monoliths such as the proposed windfarm. Developing community ownership of power generation, rather than inducing community resentment of inappropriate exploitation of a fragile environment, seems to be a far more sustainable way to progress.

**The following decisions are sought from the Board of Inquiry:**

- 1) To refuse resource consent to Might River Power for the entire windfarm project
- 2) To recommend that the Minister places a moratorium on all windfarm developments, pending exhaustive enquiry regarding (a) whether they are truly a sufficiently sustainable source of electricity generation to be suitable for use in New Zealand and (b) the identification, via democratic process, of any sites in New Zealand that are appropriate for the development for windfarms.