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Submission on Mighty River Power Ltd application for resource consent, from Bruce Ronald Sinclair (contact details above). I do not wish to speak on this submission but am happy to answer any questions the board may have.

My submission relates to 104553, RC0068 and 1448.

I have insufficient information and knowledge to comment on 104554 and the discharge permits (104555-104560).

Background

That low carbon emissions electricity generation must form a major part of our future electricity supply is obvious to all. No more oil is manufacturing itself, what oil and coal there are are more expensive, and human induced climate change is a serious problem everywhere (whether we recognise it or not). That said, it is not clear to me that large scale wind farms concentrated in one or more areas is the right way to go for our long term future. I should define what I mean by 'long term' here (at least 20-50 years and more) as I have often seen 5 years considered long term - it isn't. In my opinion, 5 years is short term only.

NZ has one of the best wind profiles in the world, and the Manawatu one of the best in NZ, but I note that there are many windfarms overseas, obviously profitable that use "lesser" resources. I note also that there are times when even the windfarms in Manawatu stand idle from lack of wind.

I am generally in favour of wind power (to the extent of putting money into it - I am a small shareholder in NZ windfarms who operate the Te Rere Hau windfarm and Windflow technologies).

I list here some possible alternatives for our long term future.

I) I believe that micro generation (eg solar panels and small windmills), coupled with solar water heating are in fact a much better solution for NZ generally. Couple that with insulation (including double glazing) and NZ actually has enough generation capacity for many years.

The advantages should be obvious -

- 1) If anything breaks down it affects a small number of users.
- 2) The spread of small units ensures that some power will be generated somewhere all the time.
- 3) The capital cost is relatively small and the distribution problems (compared to having generation in one place) reduced.
- 4) Insulation is cheap compared to new generation of any sort.
- 5) Everyone can do it.

II) Small scattered groupings of turbines are common overseas, rather than our current model of hundreds in one area. These can be in remote areas away from houses and so minimise any impact they may have. Of course, with the creation of 'competition' in the power industry, opportunities for long term planning of any sort are now remote - a sad loss.

I note with amazement that NZ has no guidelines on the siting of turbines, (eg distances from existing houses, noise levels, monitoring regimes of any sort or anything at all !). I suspect that this is the only industry currently in this priveledged position, and suggest they may e taking advantage of this while it still exists.

With that background in mind, I refer to some specific points below.

Reserves

The company wants to site many of the turbines on reserve land. That they can even ask for that is, to me, incredible. A dictionary defines 'reserve' as (among other things) "to put aside or keep back for a later occasion or special use" and goes on to say ... "especially as a habitat". Recently published figures say that the area of native bush remaining in the Manawatu is less than 1%. To contemplate building large industrial structures of the size proposed in this reserve beggars belief. How then, is this a reserve? Given the proposal itself is applying for consent to clear vegetation in rare or threatened habitats, that habitat (let alone rare or endangered habitat) in the Manawatu is less than 1% now, and that there is, to my knowledge, very little information as to the ecology of that area, simply seeking permission to despoil one of the few remaining areas of native bush in the province is incredibly arrogant at best (see private good vs public bad below). We have no real data as to what species may be there, let alone if there are any new ones. Only a few years ago, a new species of tree was identified (in Northland I think). I believe we would be foolish in the extreme to assume there were no species of note in the area and no new species waiting to be found (assuming, of course they can survive in part of the 1% left to them).

The PNCC seems to support turbines in the reserve, having changed their plan to allow this (see below) despite the fact that the city's water is drawn from this area. Their support is obviously based on what they think they can make, should consent be granted and this proposal proceed, and it should be discounted for that reason.

I note that this reserve now lists turbines as a permitted activity. To anyone involved in the "consultation" during this plan change, it was obvious that

- a) The PNCC was always going to make this change and nothing anyone said would have any effect
- b) The reason for this was quite clearly money alone.
- c) Money is a really bad reason to do anything if used alone (as it was here).
- d) Proposed uses for the money raised (leisure areas) would simply have saved the council from finding that money elsewhere, giving them more money to use for other projects.
- e) The planning change to allow wind turbines in a reserve should never have been made.

Operationally, there is very little data on the effects of turbines on ecologies of any sort, and even less where turbines are sited directly within the area concerned. Why would we take any risk with a system we know so little about? This must argue for caution, rather than haste.

It is obvious that consent should be declined for any and all turbine sites within the reserve area.

Visual pollution

Before the first wind farm was built, I, along with many, thought turbines would be ugly and spoil the landscape. My opinion now is that they don't, and I enjoy seeing them as a sign of home when returning. I believe that 'visual pollution' as it is often called (ie "they look ugly and spoil the landscape") should be given no weight in this review. I suggest that "we" already destroyed the character of these ranges when the bush was cut down. All we have now is farmland of dubious quality, and I believe that there is no reason to decline consent for this reason. I should add for completeness that any turbines built will not be visible from our house?.

The review board should, however, consider the wilderness area bans on helicopters (west coast of the south island I think among other areas?), and on similar grounds, consider declining consent for any turbines largely visible from the reserve, remembering there is so little of the Manawatu bush left.

Current users of the area and the roads

Kahuterawa road, Greens road, the sledge track and nearby reserve areas are heavily used by walkers, runners, and mountain bikers among others and the PNCC is actively encouraging these activities in this area.

Kahuterawa road (to Greens road) is of reasonable quality (sealed and 2 lane), but is not wide enough to

allow 2 trucks to pass side by side with any comfort. Indeed, a truck and a car side by side have to be very cautious. There are 3 or 4 rather nasty corners and one or two narrow bridges on the approximately 4.5 km before Greens road. Greens road is unsealed and narrower. Data I have seen suggests 50 truck trips per day on Kahuterawa/Greens roads during construction (3 years ?). In my experience of this road (now more than 10 years), trucks rarely use *just* their side, and this obviously poses serious risks, not only to residents (eg our driveway, among others, is hidden from traffic coming from town; meeting trucks on blind corners) and other road users, but especially to bikes, runners and walkers. There is no shoulder, and no road marking on the sides, and I know of people having to take evasive action (into a ditch) to avoid oncoming traffic. More trucks would obviously make this more dangerous.

For these reasons, I suggest a strictly enforced speed limit on trucks and other construction vehicles of 50 km/h. This would be very tedious for residents (who likes being stuck behind a truck ?) but seems to be the only logical response that might reduce the danger acceptably and adds very little time to the trip for the trucks.

Private good vs public bad - the economics

This proposal seems to be another classic example where private companies want to make private profits from public good. Obviously, they want to make money. Fair enough ... but they seem unwilling to pay the full cost for this, seeking to put their wind farm largely on public land and paying a 'rental'. This way, they stand to gain without taking the full risk. Neither do they pay the full cost of the ecological damage, if any, that being taken by the landowner (largely the PNCC in this case and hence, the ratepayers). Other examples of this sort of thinking are factories that seek to make money for their owners, while polluting soil, air and water (effectively "owned" by everyone) and for which they pay nothing. They are happy to take the public good but want nothing to do with any possible public bad. The inherrent unfairness of this should be obvious.

I believe the correct model for wind farms would have them bearing the full cost of their activities, and taking the full risk. To me, the obvious way to do this would be to buy the land they want to build on, and any other properties affected by their proposed operation. Once built, they could then sell the land again. This way, any risks would be taken by the company concerned or the land buyer with full knowledge and disclosure. I understand that this is what NZ windfarms did, and that together with discussions with affected parties, they had few problems with consents. I note that, using this model, the company would not have been able to buy the reserve land, showing how deeply flawed the proposal is in this area.

Our outlook is almost always short term, and we usually prefer to 'develop' something now rather than not. This assumes that current development has a nett benefit over future development (ie keeping our options open and not building everywhere we can as quickly as we can). There is no evidence to support this assumption in my view and if this is implied (as I suspect it is) then these assumptions need to be questioned carefully.

NZ Guidelines

I was very surprised to discover that, unlike other countries, NZ has no guidelines for building wind turbines or wind farms. Nothing on construction, siting, noise, visual impact, monitoring or anything else that I could find. It seems to me that the board then has an incredibly difficult job to do ... to make recommendations without any rules or guidelines of any sort. The board ought to be very uncomfortable with this. How can you make reasonable recommendations when nothing exists as a framework for those decisions ? Without standards of any sort, how can reasonable conditions be imposed ... and if conditions are imposed, how might they be monitored ? Even if imposed, how might their reasonableness be measured ?

How close to existing houses is too close ? What noise levels at what frequencies measured against what standard(s) should there be ? What visual standards ... frequency of reflections or strobe effects ? What geographical or other features might modify any of these requirements ?

There seem to be many problems with setting conditions without guidelines, and I recommend the board request that guidelines are developed urgently.

Decisions

I believe the board of enquiry should reach the following decisions for the reasons outlined above:

- 1) Decline consent for all proposed turbine sites in a reserve.
- 2) Think seriously about declining those that are only *visible* from the reserve.
- 3) Think very carefully about the remainder of the turbines (is this a good idea now ... are there better alternatives available ?) before approving consent for those turbines not in a reserve.
- 4) Set strict conditions on trucks (particularly) and other construction vehicles using Kahuterawa and Greens road for the period of construction, should the turbines be allowed.
- 5) Urgently recommend investigation of micro generation (small wind, solar) and solar water heating to the government.
- 6) Urgently recommend that NZ guidelines are established for future wind turbine development.
- 7) Urgently recommend that NZ begins to plan its overall long term energy strategy.

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