

# 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  
23 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): John Francis Adams

Postal Address: 24 Greens Rd RD4 Palmerston North

Work Ph: 06 354 5176 Ext. 764 Home Ph: 06 354 6200 Cell:

Work Fax: — Home Fax: — Email: herman.adams@xtra.co.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: *If you are attaching further information tick for yes*   
See attached sheet  
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):  
See attached sheet  
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): *John Francis Adams* Date: 10 Feb 2009

(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.)

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

	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

## **Details of John Adams's Submission**

### **Mighty River Power Ltd Applications for Resource Consent:**

#### **Turitea industrial scale wind generation facility**

#### **The reasons for my submission are:**

1. The miniscule gains in contribution to reliability and security of electricity supply do not offset the severe impact of the application in terms of: landscape; noise; loss of amenity; risk to the integrity of Turitea water supply including contamination and a devastating fire; traffic impact on residents and recreational users in Kahuterawa Valley and the Turitea- Greens Road loop; health and well-being of residents; economic, social and cultural sustainability of communities; prior rights to subdivide part of our property have been expropriated; slow vegetative re-growth of disturbed areas and possible ecological impacts on native falcons, and insects such as bumble bees and odonata species, including the fallacy of an eco-park surrounded by wind turbines.
2. The benefits claimed for the application, including the national benefit, are overstated. The net benefit to the community including injection of capital and jobs created is minimal and does not balance the severe impacts. The drivers for the application are possibly other than what is claimed by Mighty River Power. The management of climate change and the tonnes of carbon dioxide mitigated require revision. The claims of a world-class wind resource come with a harsh wind regime and the high maintenance requirement of turbines has not been factored in. The claims of consistent generation, high levels of forecasting and high capacity factor are not met in reality. A detailed analysis of issues related to backup generation, grid upgrades and the need for a geographical spread has been overlooked. The economic inefficiency of this application will be masked by price rises passed onto consumers.
3. Mighty River Power has not exhibited social responsibility by proposing several wind turbines and a substation/ concrete batching plant within 400 metres of my cottage, which is on a separate title with access from Greens Road. There is a failure of compliance on the grounds of: health and safety, dust and contamination of rain water collected from the roof, noise, total loss of visual amenity, flicker and nightlight pollution. Mighty River Power did not reciprocate attempts at good faith negotiation prior to lodging its totally unreasonable proposal.

4. There is no urgency for this application because there are enough renewable generation projects and proposals in the pipeline to meet growing demand for many years. Also the present economic situation will create an over-estimation of growing demand. For example, at present Tiwai aluminium smelter is reducing demand. A moratorium should be applied until the select Committee ETS Review and the review of the National Policy Statement for Renewable Energy are complete. A moratorium should also be applied until national offset distances are established to prevent speculative and carpet bomb type proposals such as the Turitea application.
5. Palmerston North City Council and Horizons Regional Council have failed in their duty of care. Misinformation has been promulgated by PNCC and MRP. In my opinion a true and realistic representation of the visual impact has not been presented to the public.
6. Shifting city growth and development from class 1 and flood prone land to the poorer soils beyond the Massey side of Palmerston North will be stifled by the close proximity of wind turbines. Property values on the Massey side of Palmerston North will reduce beyond normal market trends. Divisions have already emerged in the community as a result of this application.
7. According to my calculations the Noise Assessment under estimates the noise. Best practice and standard procedures were not followed during noise monitoring.
8. The perception studies quoted in the Landscape Assessment lack standard referencing. The studies quoted appear to have been commissioned by vested interests and details of research methodology are lacking.
9. Possible impact of earthworks and fill areas on the origins of the many small streams throughout the southern end of the proposal.
10. The Army regularly uses the Greens Rd-Turitea Rd loop and Kahuterawa Rd for training runs. Is the Army aware that construction traffic will remove the opportunity for training runs in the area as well as other adverse impacts? Have other recreational user groups been fully informed of the impacts?
11. There is no cultural impact assessment in MRP's proposal.
12. The same rules that apply for other construction activities should also apply to wind turbines, e.g. geotechnical assessment criteria.

## **I seek the following decision from the Board of Inquiry**

1. **Philosophically and spiritually I oppose the application in its entirety.**  
Pragmatically I am seeking removal of the following turbines: 37, 45, 46, 47, 48, 52, 54, 55, 56, 110, 111, 112, 113, 114, 115, 116, 117, 118, 119, 120, 121, 122, 123, 124, 125, 127, 128, 129, 130, 131, 132, 133, 134, 135 and 136 due to the severe impact the application has: at my cottage and property, the surrounding area and communities, and the recreational area which includes the Turitea-Greens Rd loop, the Kahuterawa recreational hub and Harding's Park.
2. I am seeking at least a 2.0 km offset between my cottage and the Brown's Flat sub-station and site of the concrete batching plant. The present site within 400 metres of my cottage displays callous disregard of my amenity values, the right to be able to sleep, relax and retain my good health. It also destroys my family and extended family's enjoyment of the cottage as a place of retreat and recollection. They enjoy the challenge of walking there and the opportunity for a solitary experience in a rugged landscape with the vista of the plains below.
3. I request the Board specifically state that a noise management plan must be implemented. Our acoustics expert will be presenting a complying noise management plan that I request the Board impose as a condition.
4. I am seeking the tar sealing of Greens Rd from the junction of Kahuterawa Rd to 68 Greens Rd, and a 20km per hour speed restriction on this section of road due to blind corners and narrowness of the road, and a speed restriction of 60 Km/hr on Kahuterawa Road. In addition a speed restriction of 20 Km/hr to be applied to Farm Drive which is in an elevated position above our property. The elevated position above our property will not only create a severe noise nuisance by trucks clanging and banging up and down but is also a safety issue for us if a truck goes over the side of the road, i.e. it will end up in our property.
5. I request that the Board of Inquiry takes the pre-cautionary approach and declines turbines rather than specify consent conditions that are notoriously difficult to enforce.
6. I request that the Board of Inquiry reduce the lapse period from 10 years to 3 years because 10 years is an unreasonably long period for residents to be in

limbo. A three-year lapse period rather than the standard 5 years is requested because urgency is associated with a call-in. If the project is urgent enough for a call-in then it should be erected with the same urgency. A 60-year lease period is ridiculous and should be no longer than the life of turbines, which is claimed to be 20 years but presently remains unproven. The life is likely to be less than 20 years.

7. I strongly urge the Board to seek the following independent reports to aid their decision making in balancing all the factors associated with the large footprint of the application, which brings too many turbines that are too large too close to too many people:

- Socio-economic impact assessment of local communities and residents.
- A cultural impact assessment.
- A perception and adverse effects assessment of the residents within 5km of Te Apiti and Tararua 3, which does not include those who benefit financially.
- A comprehensive noise assessment including the 1 Hz amplitude modulation that is not absorbed by house walls and creates secondary effects and vibrations.
- An energy contribution and economic assessment in terms of delivering electrical energy economically to consumers without passing on additional un-factored costs such as grid upgrades onto consumers.
- A town planning assessment to determine the merits or otherwise in discouraging housing development and further subdivision on the poorer soils present on the Massey side of Palmerston North. This area is also above the flood plain.
- An assessment made on the claims of managing global warming and the extent at which carbon dioxide is mitigated by someone who is a hands on expert rather than the reviewers of reviews and pseudo experts who operate outside their area of expertise.
- An assessment of flicker that will occur at my cottage.
- An ecological assessment that determines the impact on insects such as odonata species and bumblebees, as well as the effect of noise on birds in terms of whether they continue to habituate or move away. The difficulty of re-establishing trees without natural succession via nurse plants must also be assessed in more detail.

- A comprehensive traffic impact assessment is completed for Kahuterawa Road and Greens Road. Similarly, a safety assessment is made concerning the extensive truck traffic on Farm Drive, which is directly above our property. The possibility of trucks going over the side is high if speed restrictions are not imposed.
- A comprehensive assessment of the expected life of turbines at the present wind generation facilities and the maintenance costs.
- A geological/ hydrological assessment of soakage areas and origins of streams that feed the Kahuterawa River.
- An assessment by an independent medical researcher to review the growing literature and evidence emerging on the health impacts of industrial scale wind generation facilities.

John Adams  
10 February 2009

I wish to present evidence and documentation (including expert evidence) to support my submission.

I wish to speak to my submission as well as using experts to present evidence.