

558

# 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): Alan Finley & Pamela Joyce MASON

Postal Address: 333 Ngahere Park Rd, RD4, Turitea, Palmerston Nth

Work Ph: — Home Ph: 06 356 7849 Cell: 027 618 1999

Work Fax: — Home Fax: — Email: mason@inspire.net.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

Please refer to attached sheets 1 to 4

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 refer to attached sheets 1 to 4

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): A. J. Mason Date: 19 Feb 09  
P. J. Mason 19 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

Manawatu-Wanganui Regional Council

Land-use Consent 104553

Further information with respect to the reasons for the submission of AF and PJ Mason.

The Turitea Reserve was created by the Palmerston North City Council for the purpose of safeguarding the supply of potable water to the City. Whilst water is also provided from several bores within the City, these bores only supplement the Turitea supply and by themselves can only provide a restricted supply to the City. The loss of the supply from Turitea whether as a result of damage to pipelines and treatment facilities, loss of reservoir storage, or contamination of the flow to the treatment facility, would result in widespread disruption of City life.

The protection of the catchment has been paramount in the shaping of Policies, and management procedures, with respect to the Reserve.

Accordingly, remnant native bush has been allowed to regenerate, and considerable areas of previously farmed land has been purchased and planted in native bush species. This initiative has resulted in the stabilisation of highly erodible land and the maintenance and establishment of rare or threatened habitats.

A further Council initiative has been the creation of Green Corridors. The objective is to provide a continuity of treescape between significant stands of bush, and the City. This has seen the establishment of the Turitea Stream valley corridor to provide linkage between the Turitea Reserve and the Esplanade. It is being established as a result of lengthy consultation with land owners who have retired land from their farming activity to allow native planting to be carried out along the stream banks. Any loss of habitat within the Turitea Reserve will have an impact on the viability of this programme.

Access to the Reserve is only available to the public at present subject to medical certification that the applicant has no condition that might compromise the security of the water supply. This policy safeguards the catchment, and at the same time, allows hunters and trampers to enjoy this unique amenity. All City Council staff and contracted workers operating and maintaining the treatment plant, and involved with the management of the reservoirs and catchment, are similarly required to undertake medical checks on a regular basis.

These policies may appear to be conservative; however they are consistent with those of other authorities providing water supplies for public consumption from surface catchment areas. Furthermore, these policies have assured the residents of Palmerston North, a safe and reliable supply of water over many years.

It is incomprehensible that consent be given to remove the carefully nurtured vegetation and then carry out the earthwork necessary to form the roading network required to construct and service the generators. The road formation is to be 10 m wide, plus the additional width required to accommodate a filling slope of 2 m in width for 1 m of height. In addition, all control by the Palmerston North City Council over the medical fitness to be within a water catchment area of the builders and maintainers of the facility, will be lost.

continued over

**Land-use Consent 104553 continued**

We seek that the Board of Inquiry prohibit the installation of turbines and all ancillary works within the Turitea Reserve.

If consent is granted to works within the Reserve, full engineering plans of the roading, surplus spoil disposal, and turbine site works be made available for assessment of environmental impact. These plans will already have been produced for the purpose of construction.

Manawatu-Wanganui Regional Council

**Discharge Permit 104559**

Further information with respect to the reasons for the submission of AF and PJ Mason

The location of sites for the purpose of the placement of surplus excavated material is not specified in the application of Mighty River Power Ltd. Such dumping within the Turitea Reserve (which has not been excluded from the application) will necessarily cover further areas of the regenerating native bush. The results of this activity will be similar to those associated with road construction as detailed in Land-use Consent 104553, except that the extent and manner have no controls specified.

We seek that the Board of Inquiry prohibit the discharge of surplus excavated material, clean or otherwise from the Turitea Reserve.

**Discharge Permit 104560**

Further information with respect to the reasons for the submission of AF and PJ Mason

Stormwater discharging from roads is highly contaminated with waste products associated with motor vehicles. These wastes are highly toxic and include those from fuels and lubricants, braking systems, tyres, and engine cooling systems. Concentrations of these products are presently being intercepted for separate treatment or disposal off-site by Roading authorities within this Country. In these cases, treatment or removal is for the protection of recreational users of the receiving waters. Such discharges untreated, would be very harmful to a potable water supply. Some of the wastes include heavy metals which are very difficult to remove from raw water by the means available at a conventional water treatment plant.

We seek that the Board of Inquiry prohibit the discharge of stormwater from roads and turbine platforms, within the Turitea Reserve.

Palmerston North City Council

Land-use Consents RC0068

In the absence of clear direction in the PNCC District Plan, the installation of turbines which at first were comparatively small in number and in size, and having only a modest environmental impact, now is escalating. Developers are not only seeking to position turbines at every possible location, but presumably in accordance with a rule linking economy with scale, the size of the machines dominate the surroundings.

The outlook to the South-East from the City is now mired by the numbers of turbines, but from properties in the vicinity of the wind farms, the outlook is overbearing.

The District Plan has specifically provided areas including the Aokautere rural lifestyle zone, for residential development. It has given those seeking to live in the area an expectation that they may enjoy their properties and community without the intrusion of heavy industrial development taking place on their respective doorsteps.

A further realistic expectation is that when, for whatever reason, owners wishing to sell their property can recover the costs of building and development, and accrue such profit that the market place provides at the time of sale. The public perception of the impact of the wind farms is compromising this expectation.

The issue of a Consent to undertake earthworks, turbine and associated construction works will have the same effects upon the Turitea Reserve as detailed in the submission above on the Manawatu-Wanganui Regional Council's Consents and Permits.

We seek that the Board of Inquiry decline the application for Land-use Consents.

Manawatu-Wanganui Regional Council

Land-use Consent 104553

Further information with respect to the reasons for the submission of AF and PJ Mason.

The Turitea Reserve was created by the Palmerston North City Council for the purpose of safeguarding the supply of potable water to the City. Whilst water is also provided from several bores within the City, these bores only supplement the Turitea supply and by themselves can only provide a restricted supply to the City. The loss of the supply from Turitea whether as a result of damage to pipelines and treatment facilities, loss of reservoir storage, or contamination of the flow to the treatment facility, would result in widespread disruption of City life.

The protection of the catchment has been paramount in the shaping of Policies, and management procedures, with respect to the Reserve.

Accordingly, remnant native bush has been allowed to regenerate, and considerable areas of previously farmed land has been purchased and planted in native bush species. This initiative has resulted in the stabilisation of highly erodible land and the maintenance and establishment of rare or threatened habitats.

A further Council initiative has been the creation of Green Corridors. The objective is to provide a continuity of treescape between significant stands of bush, and the City. This has seen the establishment of the Turitea Stream valley corridor to provide linkage between the Turitea Reserve and the Esplanade. It is being established as a result of lengthy consultation with land owners who have retired land from their farming activity to allow native planting to be carried out along the stream banks. Any loss of habitat within the Turitea Reserve will have an impact on the viability of this programme.

Access to the Reserve is only available to the public at present subject to medical certification that the applicant has no condition that might compromise the security of the water supply. This policy safeguards the catchment, and at the same time, allows hunters and trampers to enjoy this unique amenity. All City Council staff and contracted workers operating and maintaining the treatment plant, and involved with the management of the reservoirs and catchment, are similarly required to undertake medical checks on a regular basis.

These policies may appear to be conservative; however they are consistent with those of other authorities providing water supplies for public consumption from surface catchment areas. Furthermore, these policies have assured the residents of Palmerston North, a safe and reliable supply of water over many years.

It is incomprehensible that consent be given to remove the carefully nurtured vegetation and then carry out the earthwork necessary to form the roading network required to construct and service the generators. The road formation is to be 10 m wide, plus the additional width required to accommodate a filling slope of 2 m in width for 1 m of height. In addition, all control by the Palmerston North City Council over the medical fitness to be within a water catchment area of the builders and maintainers of the facility, will be lost.

continued over