

# SUBMISSION ON MIGHTY RIVER POWER LTD APPLICATIONS FOR RESOURCE CONSENT

Section 145 of the Resource Management Act 1991

<b>To:</b> Freepost Call In Ministry for the Environment PO Box 10362 The Terrace Wellington 6143	<b>RECEIVED</b> 23 FEB 2009	<b>Email:</b> turiteacallin@mfe.govt.nz <b>Fax:</b> 04 439 7705 [Note: If you are emailing or faxing your submission, please mark in the subject line: 'Turitea Call In']
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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):** RICHARD K. HARKER (DR.)

**Postal Address:** 303 KAHUTERAWA RD., R.D.4., PALMERSTON NORTH, 4474

**Work Ph:** \_\_\_\_\_ **Home Ph:** (6) 3571425 **Cell:** \_\_\_\_\_

**Work Fax:** \_\_\_\_\_ **Home Fax:** \_\_\_\_\_ **Email:** R.Harker@openblue.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 DOCUMENTS:

1. REASONS FOR SUBMISSION;
2. MAP SHOWING RESIDENCE LOCATION.

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):

To have the number of turbines substantially reduced, and none to be within 35km. of residential areas.

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:** \_\_\_\_\_

(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**

Attachment to submission from:

Emeritus Prof. Richard Harker  
Kahuterawa Road  
R.D. 4  
Palmerston North

Having lived in this quiet rural area for over 30 years, it is rather alarming to find that we are going to be adjacent to a major industrial site. Our house is just 2 km from the nearest turbine site, a distance which many overseas jurisdictions regard as unacceptable. My concerns are:

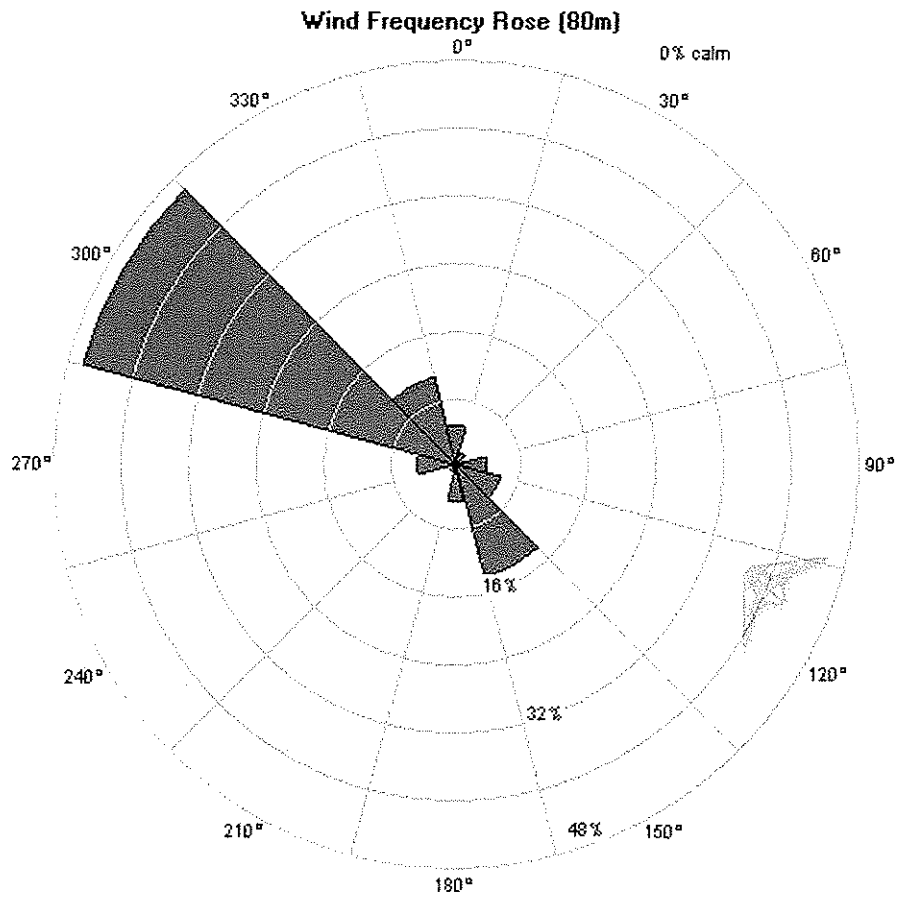
- that the level of noise, during construction, and in the operation of the turbines will be unacceptably loud;
- that Kahuterawa Road, narrow and winding as it is, is not suitable for heavy vehicles;
- there are now many houses in this area which are likely to be affected by the heavy traffic.

My major concern is the first of these. MRP set out their thoughts on the issues of noise on pp. 109-110 of the document, and they consider that the noise pollution will be of a minor nature. Maybe individual turbines will not make much noise, but there is no indication of the cumulative effect of over 120 turbines. Not just the operational noise from the blades and gear trains, but the low frequency noise (ground waves) that is likely to be generated from the huge blocks of concrete that each is sitting in, as the turbines flex or vibrate in the strong winds regularly experienced in this area.

It seems from my explorations on the internet, that there is growing concern about these issues in other countries, some of which now set limits (usually between 5 and 10 kms) to the distances that such turbines must be from residential areas.

MRP recognise that noise is going to be a factor and try to ameliorate this by stating that the residents will not be much affected since they will be “predominantly” up-wind of the turbines.

I refer specifically to the “windrose” graphic on page 25 of the application (see reproduced below). The unanalysed visual impact of this graphic is that the wind hardly ever blows from any other direction than the North-West. This is achieved by having the outer circumference of the rose set at 48%, thus allowing the 45% of winds that come from that direction to look hugely dominant. Objective reporting should show the rose with the outer circumference set at 100%, which is the proper base for such an exercise. Even if one includes the 4 adjacent sectors (2 to either side of the predominant sector), this still leaves over 30% of the time with the wind blowing from the South and East, which, if the turbines prove at all noisy (which many studies show them to be), will directly impinge on the residential areas of the Kahuterawa and Turitea valleys, Ngaere Park and Aokautere, which will all be “downwind”. This amounts to about one third of the time (4 months of the year), which is a substantial proportion. The text of the application talks of the “predominance” of the North-West winds, and leaves the distorting graphic unanalysed. It is disappointing to see these Advertising Agency “tricks” being used by a State Owned Enterprise to further their interests, against those of the community.



I would submit that the number of turbines should be considerably reduced by eliminating all those within 3.5 km of residential areas. This would also assist with the visual impact by removing many that are to be situated on the forefront (skyline) of the hills.

