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In

Submission from
Ian Wishart

7 pages following

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	OR	Email: turfteacallin@mfe.govt.nz Fax: 04 439 7705
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[Note: If you are emailing or faxing your submission, please mark in the subject line: Turfitea Callin.]

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): IAN DOUGLAS WISHART

Postal Address: Box 327 PALMERSTON NORTH

Work Ph: 06 3585986 Home Ph: 06 3568335 Cell:

Work Fax: 06 3584102 Home Fax: Email: iandouglas@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

See attached 5 page notes

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):

Approval of consents applications to PNCC and Horizons, and Tararua Council.

Conditions of precise monitoring of flora and fauna to be imposed

Please use more pages if you need to.

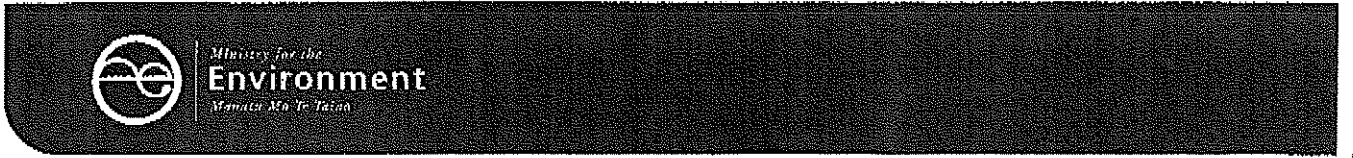
Use a clear tick in the appropriate box below (✓)

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): [Signature] Date: 23 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.)



1-KOM

L N W I S T K T

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
Manawatu-Wairarapa Regional Council - Land Use Consents			
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.	✓		
Manawatu-Wairarapa Regional Council - Discharge Permits			
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.	✓		
Palmerston North City Council - Land Use Consents			
RC0068: <ul style="list-style-type: none"> to establish and operate a wind farm in the areas within the Palmerston North city jurisdiction as generally shown on the included map 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 for the western side of Pahiatua Aokautere Road not meeting access requirements at the location shown on the included map 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 for the construction of a 220 kV electricity transmission line and substations as shown on the included map. 	✓ ✓ ✓ ✓ ✓		
Taranaki District Council - Land Use Consents			
1448: <ul style="list-style-type: none"> for a wind farm (which is not listed as a permitted or controlled activity) in the areas within the Taranaki District as generally shown on the included map for land disturbance of more than 200 m³ of soil and cleanfill material associated with tracking and roading, turbine construction, spoil disposal and other associated works in the areas within the Taranaki District as generally shown on the included map for upgrades to South Range Road and the construction of new site access at the location shown on the included map for turbine and wind monitoring mast structures not meeting height requirements within the Taranaki District for the modification of a Significant Natural Feature in Schedule 3.3 (ie, Taranaki Ranges Ridgeline) for not meeting noise requirements for clearance of indigenous vegetation in the areas within the Taranaki District as generally shown on the included map. 	✓ ✓ ✓ ✓ ✓ ✓		✓

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

Freeport - MRP
 Mighty River Power Ltd
 PO Box 445
 Hamilton 3240
 Attention: Stephanie Froggatt

Or email 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
 Mana Rau Mo Te Taiao

New Zealand Government

**SUBMISSION TO BOARD OF INQUIRY ON THE
TURITEA WINDFARM APPLICATION**

By Mighty River Power

From

Ian Wishart, Box 327, Palmerston North

OVERALL POSITION

I wish to support the application in its entirety. Reasons are outlined below.

INFORMATION ON THE SUBMITTER

I have lived in Palmerston North for 19 years. Previous to that I lived in Otago. My property in Riversdale looks right at the proposed windfarm site.

I have over the last 30 years been involved in numerous projects concerning electricity production, most notably the Clyde High dam and the Upper Clutha dams at Luggate and Queensbury. In both cases, as part of a larger Dunedin team whose views were that the dams were unnecessary, we won the cases against the Ministry of Energy whose estimates of energy requirements were wildly wrong. Alas, things have changed dramatically for New Zealand now as far as energy requirements go and I shall discuss this later.

I am also currently involved in efforts to safeguard landscape values stemming from Tenure Review outcomes in the South Island High Country.

I shall discuss the reasons for supporting the Mighty River application under 5 headings

1. Meeting the requirements of the Resource Management Act [RMA]
2. Meeting the requirements of the Palmerston North City Council [PNCC] District Plan
3. Meeting the requirements of the Horizons One Plan
4. Meeting the requirements of wider Government Policy and national energy strategy.
5. Suggested action by the Board of Inquiry

I will discuss the issues by regarding all consent applications to PNCC and Horizons as a block. I make no reference to the applications to the Taranaki District Council as I am not familiar with their Plan.

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A MEETING THE REQUIREMENTS OF THE RMA

- [i] Section 5a The windfarm IS a sustainable use of a natural resource
- [ii] Section 5c Adverse environmental effects ARE effectively mitigated
- [iii] Section 7b The windfarm IS an efficient use of a natural resource
- [iv] Section 7j The windfarm utilises the benefits of renewable energy
- [v] Section 88[4b] and 4th Schedule: The application AEE includes adequate assessments and describes mitigating actions concerning actual and potential environmental effects. I recommend however that the Board impose conditions on consents [a] that PNCC get a detailed public document from relevant experts regarding good management plans for the Eco Park and that these plans become unassailable, [b] that DOC or a suitable body monitor baseline and ongoing status of biodiversity issues such as concerning native snails, birds, and bats
- [vi] Section 6a There are no outstanding natural landscapes yet identified in the windfarm area and so this requirement is not contravened.
- [vii] Section 6c I believe that flora and fauna will be adequately protected if described mitigating action is carried out and the conditions of consent noted above are adhered to.
- [viii] Section 7c The issue of amenity values is a highly subjective one and I accept that my views are not shared by all. Amenity values includes elements of "comfort" and "expected appearance". There is at present no facilities for walking or tramping in the area and so claims of recreation being ruined are spurious. Granted, the view of turbines from Fitzherbert avenue will not be to everyones liking, but I personally find turbines rather pleasant things to see [given especially their usefulness]. There may be some support for that position quoted in a report for PNCC concerning Trustpower's Windfarm which states that 60% of New Zealanders surveyed say they would approve of having turbines visible in their locality. Matter ended, except to say that issues of the need for renewable energy may override lesser issues on occasions and this may be one of them.

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B MEETING THE REQUIREMENTS OF THE PNCC PLAN

Meeting the requirements of the PNCC Plan is generally met by meeting the requirements of the RMA. There are several other considerations however:

[i] Section 9, Rule 9.9.2 of this Plan [on unrestricted discretionary activities] regarding landscape and amenity values in the rural zone can be met with appropriate conditions being set by the Council for the consents sought.

[ii] Objective 3 concerning enhancing the natural character of the rural zone is clearly challenged by windfarm proposals. This will need to be seen as being overridden by other factors.

[iii] Objective 2 about encouraging the efficient use and development of natural and physical resources will be met by the windfarm.

The Plan has no other provision for landscape classification prioritising. One would thus need to resort to Regional Plan and RMA landscape criteria .

C MEETING THE REQUIREMENTS OF THE HORIZONS ONE PLAN

Policy 3-4 and Policy 3-5 on renewable energy and energy efficiency indicate that Horizons will need to promote the placement of windfarms as long as other conditions are being met.

One of these conditions will be that issues discussed in Section 5 concerning erosion will need to be considered.

As a lay person I am unable to comment further on these specialist issues and will assume that Horizons will take appropriate precautions and apply appropriate conditions on consents granted.

There are no issues regarding outstanding landscapes as the proposed windfarm locality is outside the Tararua skyline outstanding landscape zone described in Schedule F. of the One-Plan.

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D MEETING THE REQUIREMENTS OF GOVERNMENT POLICY AND NATIONAL ENERGY POLICY

The following comments are made in the context of Section 104[1i] which requires the consent authority to have regard to any other matters deemed necessary to make an appropriate decision about the application.

The proposed windfarm meets the objectives aimed at in the following areas.

[i] The Government's commitment to Kyoto and other international efforts to curb **climate change**. The proposed windfarm production of 1200 GWH will save the equivalent of 1 million tonnes of CO2 compared to coal based generation of 1200 GWH.

Unfortunately the new National Government has thrown responsibility to the wind [excuse the pun] by allowing future new thermal generation. This is nothing short of economic madness and international irresponsibility, even though it is being done with the objective of reliability of supply.

[ii] National Energy Strategies have the objective of **renewable energy** being 90% of total electricity production by 2020. There are numerous Govt. publications available depicting the overall aim of moving to sustainable renewable energy production systems henceforth and these are amply summarised in the New Zealand Energy Efficiency and Conservation Strategy document *Making it Happen*, October, 2007.

[iii] **Reliability of electricity supply** is a major concern currently with unreliable hydro and the ensuing closure of various fossil fuel based generators. An added concern is that the much discussed Project Hayes windfarm in Otago is very much in doubt now because of recently realised problems with transmission infrastructure [reference Energy and Environment Business Week, Vol 5, No 40] This will mean that 600MW of planned for electricity may not be available until a long way off. Indeed, this report suggests that the project is unlikely to proceed because of other factors such as serious threats to local flora.

Again, much mooted hydro generation planned for the West Coast is unlikely to ever get off the ground because of proximity of all studied sites to the Alpine Fault earthquake zone.

Compounding all this is the fact that there is **currently** insufficient generation in the South Island for its own needs, and this will become acute in the immediate future for the above reasons.

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All of this leaves New Zealand with a very uncertain future of electricity supply, and where we have places for windfarms with little threats from ecological, geological, infrastructure, and landscape-based issues, I believe we should take any investigation to the next stage.

The New Zealand Energy Strategy notes an objective of increasing supply from renewables to 30 Petajoules annually from 2012. As well, it is estimated that an extra 830 MW is required by 2016. These amounts will be impossible to attain without fast and major additions to the grid. The Mighty River proposed Turitea windfarm output of 336 MW will go a long way to alleviating this problem.

The above comments are made in the context of further comments in the final section.

E SUGGESTED ACTION BY THE BOARD OF INQUIRY

1. That the Board approve the consents requested by Mighty River Power pending point no. 2
2. Request added information from the applicant about their true commitment to the much vaunted Eco-Park under Section 92 RMA.
3. Ensure resource consent conditions are imposed on monitoring flora and fauna status in the windfarm area.
4. Make submissions to Government on the Statutory deficiencies in making sensible decisions about major electricity projects. We need
 - An integrated approach to projected supply needs by the MfE, DOC, EECA, Electricity Commission, Ministry of Economic Development, and all the SOE's involved in electricity generation. For instance, there is evidence from the USA that Western countries can save 30% of electricity by using it more efficiently [Energy & Environment Business Week Vol5, No40] but our own EECA does nothing about it.
 - Ditto for generation methods. The current ad hoc non-integrated approach to windfarm locations is pathetic and the public is sick of it.
 - The RMA is quite insufficient for making good decisions about big projects because of its effects-based focus. This is even allowing for Section 104[1i] allowance for the Authority to consider wider factors. The wider factors allowable as *relevant* are only effects-based factors and not factors relating to whether the project should be built in the first place for other logistic reasons.
 - If we are going to stick with the market mode of electricity supply, then let us do it properly and build in the true carbon cost of production to the supply from fossil-fuel based versus renewable based energy, and let the customer know at any given moment where his electricity is coming from.

Thank you for considering the above points.

