

To the Chairperson  
Board of Inquiry

This is a submission on the proposed national policy statement for renewable electricity generation that was publicly notified on 6 September 2008.

The support, changes and additions I seek, with reasons, are set out below.

### **Avoid concentrating wind generation in one area**

1. I am in full agreement with the words in Policy 1, which state:

*Maintaining or increasing security of electricity supply at local, regional and national levels by diversifying the type and/ or location of electricity generation.*

An excellent example to illustrate the importance of diversifying the type and location of renewable generation are the Manawatu wind generation facilities.

- The Wind generation Investigation Project raised the issues of the management of large, sudden changes in wind generation output, which have already been observed in the Manawatu region, as well as the effect of wind generation output uncertainty on pre-dispatch processes. Such a situation does not increase security of supply.
- Kevin Devine (Transpower system operations manager) is quoted in the Taranaki Daily News: *The country's three major wind farms clustered around the Manawatu Gorge, supplied less than one percent of their capacity during peak load periods during the past three winters, 2005-07. We have real concerns about the large amount of wind generation planned in the lower North Island, because the preliminary information is that they will all have very similar characteristics to the Manawatu farms and that won't help with winter peaks. We'd prefer they were spread around so that when one's up others will be down and it would balance itself out.*
- Presently there is approx. 300MW of installed capacity in the Manawatu wind generation facilities. Mighty River Power's proposal is 360MW and will greatly exacerbate the problems described above.
- The tipping point for cumulative effects in the Manawatu has now been reached and the rush by Mighty River Power to grab the last remaining site that forms the backdrop to Palmerston North is no longer sensible development for the reasons above.

### **Target driven development does not achieve the best result**

2. A renewable energy policy that is target driven, i.e. 90% renewables by 2025, is not based on sound analysis and planning. The renewable energy target is being interpreted by SOE's, such as Mighty River Power, as carte blanche to erect as many turbines as they possibly can irrespective of the impact on local landscape and communities, all in the name of the national good. The national good requires that security of supply and reliability is enhanced by a geographical spread of wind generation facilities outside of the Manawatu. The NPS must ensure that projects are not solely target driven in the quest for carbon credits, i.e. all projects make a sensible and worthwhile contribution to security and reliability of supply. 'Carpet bomb' and speculative applications such as Turitea are designed to intimidate and demoralise local communities.

### **Moratorium necessary on industrial scale wind generation facilities**

3. The Minister of Energy in a speech to NZWEA Conference, 8 April 2008 stated that NZ needs around 175 MW of new renewable generation each year. The Minister also stated that:
  - Two wind projects of 188MW are under construction in Manawatu and Wellington.
  - Five wind projects totalling 312 MW have been consented.
  - Applications are being processed for nine wind projects totalling 1700 MW. (Since the 8<sup>th</sup> of April, Waitahora at 177MW, Central Wind, Turitea at 360MW and Mt Cass at 69MW have been announced).
  - Mighty River Power's geothermal station of 125MW ( has now been commissioned). Another geothermal plant of 130 MW has been consented and Te Mihi is currently seeking consent (has now been called in).
  - Five resource consents for up to 415 MW have been applied for South Island hydro.

It is obvious that the target of 175 MW of renewable energy per year will be exceeded for many years. On this basis a moratorium should be placed on industrial scale wind generation facilities until national guidelines for reasonable off set distances are developed. Unfortunately, the rush for industrial scale wind generation facilities appears to be a result of the Governments gross miscalculation of our Kyoto obligations due 2012, resulting in a scramble for carbon credits that does not treat the environment responsibly.

An article in the Manawtu Standard, 29 August 2008, titled "Turbine certainty called for", states that Horizons has fielded 29 inquiries in the past two years from parties interested in building wind generation facilities.

Horizon's CEO recommends that the rules about what could go where had to be clarified, to put an end to the current case-by-case situation. The CEO claims applications are dealt with in an ad-hoc method.

#### **Small scale community generation projects are a priority**

4. Easing the way for large scale industrial wind generation, such as Turitea, does not facilitate, or encourage small community-scale development of renewable electricity generation, which is a more pragmatic solution in the long term. Refer to the report titled "Wind, Power and People" prepared by the Parliamentary Commissioner for the Environment, which highlights the role of small scale distributed generation and community projects (Refer to recommendations 1&2 on p.114). Small-scale projects also avoid the cumulative effects, which is an issue in the Manawatu (see p. 90 of the report) Small-scale community generation projects avoid sacrificing communities for the perceived national good and the associated pressure for grid up-grades. Small-scale community projects also increase awareness that energy conservation and load spreading are a more economical and environmentally friendly way forward.  
The focus for the National Policy Statement on Renewable Energy should be primarily on small-scale community projects.

#### **Reasonable off-set distances need to be established to balance national benefit against loss of local amenity**

5. Section 5 of the RMA theoretically enables people and communities to provide for their social, economic, and cultural wellbeing and for their health and safety. This is interpreted in the Proposed National Policy Statement for Renewable Generation as a security of supply issue regarding economic, social and cultural benefits to the country, i.e. the national good comes first, where the perceived benefits are deemed to outweigh the costs. Communities that are adjacent to proposed industrial scale wind generation facilities will become more vulnerable to losing their social, economic and cultural wellbeing as well as their health and safety because:
  - Wind generation facilities create divisions in the community between those who receive royalties for wind turbines and those who don't and are often more adversely affected in terms of loss of amenity, i.e. social wellbeing and neighbourly relationships are destroyed. The report titled 'Wind, Power and People' states that tensions with

communities have been noted with recent proposals partly because only the landowner benefits financially (p.57).

- Reduced property values and the inability to sell property that is close to large industrial scale wind generation facilities is now becoming a serious issue with the monstrous turbines that are now being proposed too close to so many residences. For example, Mighty River Power's Turitea project has proposed a 125m high turbine 50m from my cottage, plus two more at 100m and three at 250m. I have been trying to sell two titles of my property for over a year but no one wants to live in the shadow of monstrous wind turbines. Thus, the economic wellbeing of the community is destroyed with excessive property devaluation beyond normal market trends, or if people are unable to sell their properties as their life circumstances change.
- Noise monitoring is on the basis of modelled sound pressure levels and does not relate to audibility. The dripping tap effect of audible wind turbine noise can affect many nearby residents. (Refer to Bob Thorne's evidence in the Motorimu appeal) There is growing evidence that such noise can adversely affect health, i.e. health and safety issues arise (Refer to Daniel Shepherds evidence in the Motorimu appeal, and Richard James's evidence in the Mill Creek RMA hearing).

Thus, local communities are adversely affected for the perceived national good. The 'Telegraph', 26 July 2008, reported on a landmark case where Jane Davis will get a discount on her council tax because her home had been rendered worthless by a wind turbine 1000 yards away. In a similar case in the Lakes District Judge Michael Buckley awarded £15000 damages to a couple who had bought a house in 2004 without being told by the sellers that a wind generation facility was going to be built nearby. Judge Buckley said that the noise, visual intrusion and flickering of light through the blades of wind turbines reduced the value of the house they bought by a fifth.

The only way for the National Policy to facilitate industrial scale wind generation development that does not sacrifice local residents is to establish **reasonable offset distances** of wind turbines from dwellings, e.g. 2 to 3km. If an industrial scale wind generation facility developer wishes to place turbines within the offset distance, in order to maximise their project, it should be **mandatory that they offer to purchase any such affected property**, at an evaluation that takes into account values prior to the wind generation proposal being announced.

Why are developers reluctant to consider this option? Developers always claim that their noise modelling is the reality and that property values are not adversely affected, thus they have nothing to lose by exercising such an option because if what they claim is correct they can easily on-sell the property.

The report prepared by the Parliamentary Commissioner for the Environment titled, "Wind, Power and People", claims that a separation distance of 2.0-2.5km appears to be the threshold below which acceptance is more likely to be replaced by negative sentiments for neighbours who experience no direct benefits (p.56).

The Motorimu Environment Court decision released on 1 October 2008 declined 34 of 38 appealed turbines on the grounds of:

- Adverse effects on landscape and amenity.
- Imposing unreasonable burden on neighbours
- Proximity of turbines to neighbours
- Elevation of turbines above the nearby properties

The Motorimu Environment Court decision provides valid justification for the **establishment of offset distances between turbines and dwellings** to protect local communities from the rampant grab for turbine sites that totally disregards local amenity values.

### **Trying to sustain the unsustainable**

6. The energy debate is hollow because it is attempting to help us keep on living the way we do in a carbon neutral way. In the long term this is not sustainable, i.e. we have to make radical changes to everything we do. For example we cannot continue to fill our homes with electronic toys such as flat screen TVs that continually increase demand over and beyond population increase. Jim Kunstler ([www.kunstler.com](http://www.kunstler.com)) describes this as the, 'suburban sprawl building economy', meaning an economy dedicated to building a living arrangement with no future. Kunstler claims the climax of the sprawl building economy occurred in lockstep with the climax of peak oil.

### **Facts must drive policy**

7. The emotionally compelling climate change debate has been useful to raise public awareness that we must live in a more sustainable way and reduce our dependency on fossil fuels. However, policy must be driven by facts! IPCC's role has been to gather evidence that anthropogenic greenhouse gas emissions are the cause of climate change. Other natural phenomena such as solar irradiance have been overlooked, speculative possibilities have been overstated and the uncertainty of climate change modelling has been understated. Climate change based solely on anthropogenic greenhouse gas emissions is not proven science and is an on-going debate. Policy based solely on such hypotheses without conclusive proof is equivalent to the era of where witches were burned at the stake and Galileo was imprisoned for stating that the earth orbited the sun. It is also dishonest for industrial scale wind generation facility developers to justify their grab for turbine sites on this basis.

**Industrial scale wind generation facility developers must held accountable for lies/ mis-information**

8. Experts hired to create evidence on behalf of industrial scale wind generation facility developers are paid well. Most animals do not bite the hand that feeds them. If experts desire future work they are under pressure to create a favourable case for whoever hires them. If the modelling/ predictions made by experts are not borne out in reality, the experts or whoever hired the experts are not held accountable. Furthermore, many developers down play and minimise effects such as photomontages. For example, in Mighty River Power's (MRP) Turitea proposal they state that they have carefully considered the proposal and adverse effects are only minor. There is no way noise levels will comply at my cottage where there are approximately 24 turbines within 1.5km. My safety will be at risk and I could possibly be killed if a the 125 metre high turbine proposed less than 50 metres away from my cottage folds over and falls on it, or a bade falls off one of the turbines situated 100 metres away. Such events do occur as can be seen on [www.palmerston-north.info](http://www.palmerston-north.info).

MRP state that their project will supply 150 000 houses but fail to clarify that this will only occur when the wind blows at optimal speeds. MRP state that their project is 10km SE of the city. The closest suburb is 2km distance and the Fitzherbert Bridge is 5-6km distance from the nearest wind turbine. The CEO for MRP stated in a radio interview that the Turitea proposal is the same size as Te Apiti when it is four times the size. If MRP are mis-informing the public on these obvious matters what trust can be placed in any other evidence they present?

**The National Policy statement must add in a clause that all evidence/ information put forward by developers must be factual and correct to avoid mis-informing the public and the commissioners who are involved in assessing proposals.**

There are already signs that large SOE's and other wind generation developers will turn the RMA and consent conditions into the "Wild West" on the back of Government policy that is target driven and hungry for relief from Kyoto obligations. **Consent conditions must be given teeth in the National Policy Statement to enforce social responsibility by predatory SOE's.**

I wish to be heard in support of my submission.  
If others make a similar submission, I will consider presenting a joint case  
with them at a hearing.

A handwritten signature in black ink, appearing to read "John Adams". The signature is written in a cursive style with a large initial "J".

John Adams

3 October 2008

**Please omit my personal details from the public document**

