

**FORM 13**  
**SUBMISSION**  
**ON RESOURCE CONSENT APPLICATION**



**Taranaki Regional Council**  
Telephone: 06-765 7127  
Facsimile: 06-765 5097  
Email: [consents@trc.govt.nz](mailto:consents@trc.govt.nz)  
Website: [www.trc.govt.nz](http://www.trc.govt.nz)

**Important Note:**

Please ensure that all sections of this form are completed and that the Taranaki Regional Council receives this submission before midnight on the closing date specified on the notification.

**For Council Use Only**

Post **The Chief Executive**  
To: Taranaki Regional Council  
Private Bag 713  
Stratford 4332

Or: Email to: [consents@trc.govt.nz](mailto:consents@trc.govt.nz)  
Fax to: 06 765 5097

**1. Submitter's details**

Full Name: Simon Venn Young

**Address for Service:**

Email: simon.young@thekarogroup.net

Postal: 7 Tole Street

Ponsonby, Auckland Post Code: 1011

Telephone: \_\_\_\_\_ Mobile: 027 222 5801

Contact person: (if different to name above): \_\_\_\_\_

Street Address of property affected (if different to address above) \_\_\_\_\_

**Serving of documents**

The Council will serve all formal documents electronically via the email address provided above.

**2. Application to which submission relates**

Name of Applicant: Opunake Power Ltd

Proposal (activity type and location): Hydro Electric Power Scheme

TRC Consent Number(s): 1795,1796,1797,4563,4744,5581,5692 and 10826

**3. Attendance and wish to be heard at consent hearing**

I/we **do not** wish to be heard in support of my/our submission  
*(This means that you will not be advised of the date of any consent hearing and cannot speak at any hearing. However, you will still retain your right to appeal any decision made by the Council.)*

I/we **do** wish to be heard in support of my/our submission  
*(This means that you will have the option to speak in support of your submission at any consent hearing.)*

If others make a similar submission, I/we will consider presenting a joint case with them at the hearing  
**[Please tick if you will consider presenting a joint case otherwise leave blank]ssssss**

**4. The specific parts of the application this submission relates to are:**

The whole application (*tick box*), or parts of the application described below:

(Attach additional sheet if necessary)

**5. My submission is (*give details*):**

See separate sheet below

(Attach additional sheet if necessary)

**6. I seek the following decision from the Council**

To grant consent

To refuse consent

If Consent is granted, the conditions I seek are:

**Note:** ~~You do not have to suggest conditions, particularly if you seek that consent be refused.~~

(Attach additional sheet if necessary)

**7. Request for independent commissioner(s)**

Pursuant to section 100A of the Resource Management Act 1991, I request that the Taranaki Regional Council delegates its functions, powers, and duties required to hear and decide the application to one or more hearing commissioners who are not Taranaki Regional Councillors.

**[Please tick if you do wish to make a request otherwise leave blank]**

**Note:** Such a request may be made [in writing] up to 5 working days after close of submissions. If you do make a request under section 100A of the Resource Management Act 1991, **you will be liable to meet or contribute to the costs** of the hearings commissioner or commissioners.

**8. Signature**

I/we have served a copy of this submission on the applicant (*This is required by section 96(6) of the Resource Management Act 1991*)

Signature:\* \_\_\_\_\_  
(Person making submission, or person authorised to sign on behalf of person making submission.)



Date: 22/4/20

## 5. My submission is *(give details)*:

- a. My standing in wishing to make a submission in support of the Opunake Hydro scheme applications is twofold:
  - a. My own experience as a previous direct and indirect owner of the Opunake Hydroelectric Power Scheme, with intimate knowledge of the operation of the scheme. It is also provided from my background as Director of significant companies that own and manage small hydro schemes, e.g. Trustpower and The Lines Company. Further, it is with a connection to the area; my grandfather was a founding member of the Opunake Power Board, nearly a century ago, serving for a further 30 years.
  - b. As a person with an understanding of the qualities of the current owner of the scheme. I worked alongside Steve in several companies related to electricity generation and retail, and highly appreciate his knowledge of the technical requirements to run a scheme like the Opunake scheme and his commercial judgement in performing that.
- b. The Opunake Hydro scheme is not typical
  - a. It is an integral part of the community
    - i. It creates a lake for water activities and lakeside play
    - ii. It provides a nice place for people to walk around
    - iii. It gives easy access for white-baiters to the outlet
  - b. It is complex and has all the characteristics of far larger schemes, without the monetary yield. For example it has the following;
    - i. Weir and intake gates
    - ii. Canal
    - iii. Sluice canal
    - iv. Stop gate
    - v. Storage lake
    - vi. Algorithms managing storage for peak supply
    - vii. Public access
    - viii. Screen cleaner
    - ix. Surge tank
    - x. Penstocks
    - xi. Underground powerhouse
    - xii. Underground tailrace
    - xiii. Publicly accessible outlet
  - c. Most other hydro schemes only share a portion of these things
- c. Management is made more difficult by sand egress originating from a natural event on Taranaki in 1998
  - a. It is very difficult to prevent sand getting into the canal or lake
  - b. I note that a new consent allows sand to move into the lake. While that may enable operation of the scheme I believe the best long term solution is to flush the lake sand back into the Waiau River during high flood events. This would not alter the fish habitat downstream of the weir. This conclusion was made after I did significant investigation of this issue, including consulting fluid material experts at Massey University
- d. The scheme has marginal economics and onerous Resource Consent conditions can be the difference
  - a. The costs of monitoring were nearly 10% of revenue when I owned it
- e. The current owner has the ideal attributes to run the scheme because he:
  - a. is local and can physically as well as electronically monitor the scheme
  - b. is an instrumentation and electrical expert
  - c. understand electrical power technology

- f. Alternatives to having the scheme are not as attractive as finding a way for the scheme to operate on a commercial basis
  - a. If it is left idle:
    - i. the lake water will not be recycled and will become dirty with duck manure and farm runoff will cause weeds to grow, especially in summer as water temperatures increase (as it did in 2011). It will become a fetid mess. There would also likely be disputes over use of equipment to flush the lake;
    - ii. the owner could exercise an option to purchase the land under their DOC lease, drain the lake, remediate the land (it would not take much), and offer it for sale. The community could lose a lake, and a valuable asset for the people of Taranaki
- g. In summary, my submission is to encourage the Taranaki Regional Council to see the value that the Resource Consents provide to far more people than the applicant and that placing onerous conditions on them is only likely to drive the scheme away from viability, possibly leading to unwanted consequences.