

Jo Daly

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Sent: Tuesday, 26 February 2008 11:04 a.m.
To: TPCallin
Subject: Board of Inquiry - Upper North Island Grid Upgrade Proposal

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Date - 26 February 2008

The following information is submitted for consideration by the Board at its forthcoming Hearings.

Submitter Ref: 1184

REASONS FOR SUBMISSION (dated 5.10.2007)

1. Demand and Supply of Power Forecasts are inadequate

It was clear from various presentations by Transpower representatives that insufficient data was built-in to its forecasts.

That capacities of various existing, planned, and possible, energy sources was neither fully nor adequately documented.

Similarly demand estimates, being critical to the proposal, appear to be the result of superficial, rather than vigorous, research.

2. Easement Widths are Inadequate

Transpower's proposal makes scant reference to the criteria and minimum requirements for maintenance of the supply corridor. The proposed width of 65 metres would appear to be based on a "least-cost" rather than "safety" scenario.

Safety aspects must take into account land users as well as Transpower contractors/staff. The proposal seems to focus on the latter, whose activities in the vicinity of the lines are transitory, compared with those of owner/occupiers, which are continuous.

3. EMF and Health Issues Need More Vigorous Evaluation

After hearing 5 experts discuss and comment on health issues at a public meeting arranged by Transpower, it is clear that Dr. Black's reports are not the only conclusions to be relied on regarding health outcomes.

Further research and information is necessary before any adverse effects can be evaluated.

The importance of health and safety issues cannot be under-estimated. Sections 3 and 12 Part X of Transpower's Executive Summaries refer to risk aspects which are more fully outlined in the reports.

One would reasonably expect the line route to be declared a "green" zone and incorporated in local district schemes. Such a zone would have varying widths depending on location and land use. For example, no dwellings within 400 metres of the lines, no swimming pools within 200 metres etc.

4. Brownhill Site Unsuitable

Brief reference has been made by Transpower to some parts of the Brownhill area being subject to slumping ground and prone to slips.

Long-time residents in the Turanga catchment are well-aware of past flooding of the Brownhill stream and of the existing fault-line adjacent to the proposed site.

It would be gross negligence if planners disregarded such risk factors, including undergrounding alongside an existing watercourse, and the Auckland power supply were to be jeopardised by any severe natural occurrence in this area.

5. Substation Should Be Located Nearer Manukau City / Franklin District Boundary

28/02/2008

Having regard to future "urban drift" of city suburbs and rural townships, and to the permanency / long life of the lines once completed, it would seem prudent to site the proposed substation in section 3 of the route.

6. Undergrounding Should Be Extended to New Substation

Concomitant with relocating the substation to within Section 3 would require extending the underground cabling to that site.

7. Arakotinga Not Crossed By Proposed Line

Contrary to what is stated in Transpower's proposal (Overhead Line Notice of Requirement (Ref.no.27619)), Arakotinga is NOT crossed by the proposed line.

This oversight may have arisen because pylon S1/11 is shown on land owned by an Arakotinga resident. The line from S1/11 crosses Brookby Road to pylon S1/10.

CONCLUSIONS AND RECOMMENDATIONS

Having read the relevant publicly available reports from Transpower it is clear that much work has gone into the project, many expert reports commissioned and, mainly where favourable, included in the published proposal. There is little evidence that adequate attention has been given to alternatives or factors not supportive of Transpower's latest proposal.

The company's attitude throughout has been one of subjectivity prevailing over objectivity. In such circumstances the pre-supposed urgency has involved the costly acquisition of properties along the route and even more costly use of resources in the project to date.

A proposal of this complexity, when "called in" under Notices of Requirement and Resource Consent Documentation, demands the inclusion of quality, relevant, and illuminating data. Transpower's inclusion of extraneous information in its voluminous response, only serves to obfuscate and confuse.

Accordingly it RECOMMENDED

THAT the Board of Inquiry -

1. Defers any decision re the Upper North Island Grid Upgrade
2. Requests Transpower New Zealand Ltd. initiate further INDEPENDENT expert investigations into:
 - a) future power demand and supply
 - b) health and safety issues arising from E.M.F. proximities
 - c) geotechnical aspects of site selection and undergrounding within the Brownhill catchment
 - d) evaluation of new substation site in section 3 of proposed route
 - e) easement widths according to zoning and specified exclusionsAND to revise / amend its proposal accordingly.
3. Awaits and duly considers the report of the Electricity Commission thereon.

J. E. SCOTT

25 February 2008