

# SUBMISSION ON TRANSPOWER'S NOTICES OF REQUIREMENT AND APPLICATIONS FOR RESOURCE CONSENTS

Section 145 of the Resource Management Act 1991

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**Submit to BOTH:**

Minister for the Environment  
Freepost Grid Upgrade Submissions  
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And Transpower  
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WELLINGTON  
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Fax: 04 819 7624

Please note: you must forward a copy of this submission to BOTH Ministry for the Environment AND Transpower, by any means you wish (post, fax, email)

This submission relates to the notices of requirement and/or applications for resource consent, lodged by Transpower New Zealand Ltd for the North Island Grid Upgrade Project, and identified below.

**CLOSING DATE FOR SUBMISSIONS: 5 OCTOBER 2007**

My/Our Full Name(s): Lorraine Joan Bilby and Ross Charles Stewart

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The reasons for my submission are:

We are completely opposed to Transpower's intention to build this un-needed line, as the demand growth projections of the Electricity Commission (2007 SOO) do not justify its construction. The scale and capacity of this proposed 400kV capable line is completely out of alignment with the expected requirements for transmission capacity into Auckland to meet demand growth in the next 40 years. The potential new generation capacity likely to be constructed in the Auckland region in the next 40 years has been grossly underestimated in an attempt to justify this line as one of national significance and urgency.

Better equal benefit alternatives to this proposed line are available that have a much reduced environmental impact, such as more generation in the Auckland region, duplexing and reconductoring of the Whakamaru A, B and C lines, use of HVDC transmission technology which will be less obtrusive and easier to underground, more extensive use of undergrounding of HVAC lines, and consideration of new conventional small scale 220kV transmission lines.

We oppose this line being built on a 65 metre wide easement, when a 600 metre wide easement, free of houses and workplaces, should be required as a precautionary principle to reduce future health risks and environmental impacts.

We oppose large scale HVAC transmission lines being built on narrow 65 metre wide easements because of the EMF emissions and ionized particle emissions that will come from this line, which have been proven to cause numerous diseases, including childhood leukaemia.

We oppose these applications because Transpower has falsely (and perhaps criminally) tried to justify the need for this line being built by using out of date and inaccurately high demand growth forecasts (2005 SOO), have not included the cost of environmental impacts in their justifications, and are providing misleading and inaccurate costings of the real alternative options to this line that should be considered.

Transmission in New Zealand has developed in a haphazard manner, giving rise to the extreme ugliness impacting on the residence of this country and our overseas visitors as they travel around the country. Three outstanding examples of this incompetence is on the South Bound motorway from Auckland, the residential area of Ruakura in Hamilton and the beautiful rural area of Hunua. There are many other examples of environmental and social impacts up and down the length of NZ. While it is accepted that generation has to the greater extent been to the south of Auckland and therefore the necessity of transmission lines this does not give rise to justifying the building of a new line of 400KV capable capacity which is unlikely to ever be energised above 220Kv by the EC staffs own working papers. It does not offer the security of supply, which has been the calling card of Transpower, to scaremonger the residence of Auckland. What it will do is appear as an unacceptable and unnecessary increase in cost, adding a further burden on the consumer, especially middle class NZ'ers as the Government brings in subsidies for lower income families.

By allowing the construction of this line it discourages new technology, which, if the Government are truly committed to the Kyoto Agreement they have entered into, will become a priority. This is likely to include wave or tidal generation, an ideal solution to Auckland's energy problem. While the fine-tuning of this technology may be some time away it is definitely feasible well inside the forty years growth specified if the 2007 SOO Report was used. The sensible option to satisfy the immediate futures need is the upgrading of the infrastructure currently being used. The upgrading of the Whakamaru A, B & C lines is inexpensive when compared to the much maligned 400kva proposal.

In the early 1980's Lorraine was a tour director conducting American and Canadians throughout our beautiful country. She spent many hours selling the virtues of the clean green environment and the beauty of its unspoiled countryside. Americans in particular commented on the "discreet" manner in which we dealt with our utilities and many were abhorred by the way their own country had developed. Since that time we in NZ have followed many of their mistakes and not corrected others we have had the opportunity to do so as those opportunities have arisen. We should have learned not to make these mistakes from observing their example, instead we are heading headlong in to another gross error unless the Board of Inquiry will stop this from happening.

It is not reasonable for our future generation to have to pay the consequences of bad decisions made in our generation. They must not be subjected to the health hazards, which we have the knowledge of robust peer reviewed science to support. Countries such as Sweden and Italy have been responsible to their citizens in reducing their own standards significantly below that which the World Health Organisation allows for. They are striving to reduce these effects even further while in NZ the likes of Transpower hide behind the National Radiation Laboratory's recommendations. We should be one of these leaders not lagging behind.

On the land we have an ageing population. Many of the people affected by this proposal have had their lives "put on hold" for three years due to this proposal. By the time this line is commissioned (should it be allowed to go ahead) many will be in their seventies and will not have had the chance to retire due to the fact that their lives have changed so significantly. Many properties are unable to be sold at this given time. Transpower has played out a power game with many of these people making their lives miserable. Many have suffered health problems as a result of the bullying tactics displayed by Transpower and the unreasonable expectation that should the property owner err and cause disruption to the conveyance of electricity they will be personally liable for that outage which could conceivably cost them their life savings. Many of the properties will be unmanageable at age seventy without this incumbent and with it will make it impossible for these people. This is an unrealistic situation that is not socially or economically acceptable.

Property that has been sold to Transpower has come with a clause which stops the previous landowner from freedom of speech, they are not permitted to make any adverse comment about Transpower or disclose details of the purchase of the property, yet we are led to believe from Transpower that fair payment for land and easements are made consistent with market prices. If these transactions are secret then a fair market situation does not prevail.

At the Electricity Commission's Hamilton meeting where oral submissions were made the Waipa District Council made a significant submission around the effects the proposal would have on Maungatautari Ecological Island Trust. There have been many submissions to the EC on this matter. One of the Commissioners had no idea where or what Maungatautari was and had to be informed by one of the other commissioners. While we accept it was outside their mandate to consider environmental effects as part of the grid investment test ones confidence was shattered that this commissioner had indeed read or been informed of any of the considerable body of submissions many which dealt in depth on the technological aspects and costings showing that the alternatives to this proposal were far superior from all aspects. It was also his view that, as the land had been cleared of its natural bush and that farming had taken its place with its associated infrastructure that pylons of this magnitude would have little effect on the landscape. One may consider that a Constable painting which portrays the rolling English countryside would not be adversely affected by a 70 metre pylon or perhaps a McIntyre would be more realistic to this situation! It was also suggested by the same commissioner that we use microwave ovens and cellphones in our everyday life. This is a choice, living in close proximity to this line is not.

As part of our submission we have included an interview with Marion Hobbs (when she was Minister to the Environment) and Sue Kedgley. We ask the Board of Inquiry to listen to these interviews. While they relate in this instance to the Trolley Buses in Wellington the message that both of them send can equally be applied to the 200kv (400kv) proposal. The message is clear that all costs must be taken in to account when considering such a proposal, noise pollution, environmental pollution and all other detrimental effects on the lives of those who have to endure them. These lines are a major inconvenience to those who have to spend their lives with them not minor as considered in the draft National Policy Statement.

The town of Morrinsville would be severely affected by this proposal. It traverses the town on the Western side just outside the borough as we currently know it. In Transpower's report by MWH "Transpower's North Island 400kV Backbone Investigation Project Environmental Phase 1 Volume 3 Route Study October 2004" there is reference made to the present 110kV line through the Western end of the town that there was some residential development away from the line, a disused commercial building and that there were possibly no houses due to the fact that the 110kv line was constructed there. This reference is made on page 37. It also refers to the Eastern end of the town as having quality houses. This we believe is strong evidence that transmission lines severely affect the growth and development of towns. When the existing line was erected the land to the west was raw undeveloped peat. It is now consolidated peat and many transmission lines east of Hamilton are built on such land. No line should be built in such close proximity to urban development and even more especially one of this magnitude.

The landowner in signing an easement agreement no longer has any control over any other utility which Transpower may wish to lease that easement to and derive further income. They could be severely affected by this arrangement and bring further loss of value to the property. There are many examples of this in other countries. In an environment where the possible sale of State Owned assets is not out of the question, they could find that effectively part of the rights of their property have been sold off to a third party, even overseas interests.

It is considered that all those who reside within 2.5 km of the line received information packs from Environment Waikato. Unfortunately due to a decision made by the nine councils only those with in 500 metres of the line in urban areas received them. In our view this meant that, despite the council advertising the submission process, it did not encourage the submission process on an informed basis.

As each landowner has not been fully informed of the total effect this line will have eg., one land owner has just been told that over 100 trees will be removed on their property alone, it is very difficult to argue the facts fully as that information is simply not available. There is a huge element of uncertainty surrounding this proposal.

New Zealand is a small country with a small population. There are many alternatives demonstrated that are far more acceptable. We ask the Board of Inquiry to please **not allow the 200KV (400KV) proposal or any amendments to that proposal to be approved in any way or form.**

**While this submission has been sent electronically, it has also been posted to allow for the inclusion of the cassette recording.**

Lorraine **wishes to be heard** in support of our submission at the public hearing, and expect I will need between one and two hours to present my evidence. I would like the location of the portion of the hearing which will receive my evidence to be held in a local venue near to where I live.

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We make our submission concerning **all** notices of requirements and applications for resource consents relating Transpower's applications that will be heard by this Board of Inquiry. The references are NORs 27619, L07089, DES0011/07, RMR200621, DN/0006/07, 240/021, RM070209, and resource consents 34102, 34370, 34372, 34373, 34711, 34712, 116902, 116903, 116904, 116905, and any other NORs or resource consent applications that may subsequently be filed or altered. We oppose all of these NORs and applications for resource consent.

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We have served a copy of our submission on the applicant by copy to Transpower as above.

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<b>Names(s):</b>	Lorraine Bilby	<b>Date:</b>	2 October 2007
	Ross Stewart		2 October 2007

(Signature is not required for electronic (email) submissions.  
If this is a joint submission by two or more individuals, each individual's name is required.)