

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

Section 145 of the Resource Management Act 1991

RECEIVED ON

- 5 OCT 2007

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To: Minister for the Environment
Freeport Grid Upgrade Submissions
PO Box 4405
Hamilton East
HAMILTON 3247

OR Email: tpcallin@mfe.govt.nz
Fax: 04 439 7700

[If you are emailing or faxing your submission, please make it for the attention of "Grid Upgrade Submissions"]

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 on the next page.

CLOSING DATE FOR SUBMISSIONS: 5 OCTOBER 2007

Title: Mr

My/Our Full Name(s): Alan McCulloch

Postal Address: 29 Crosby St Dunedin

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Wk Fax:

Hm Fax:

Email: alan.mcculloch@agresearch.co.nz

Please tick the relevant boxes on the next page to identify whether you are making a submission on all notices of requirement and applications for resource consents 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 notice(s) of requirement and applications for resource consents. If you are making a submission only on parts of a notice of requirement or application for resource consents, please note this when specifying the reasons for your submission.

The reasons for my/our submission are:

To oppose the notices of requirement and resource consent as per reasons given in attachment "additional page". Although currently resident in Dunedin for work reasons, my mother runs a small farm in Piako county at Tahuroa Rd. Our family has suffered considerable stress and worry as a result of these proposals, which as I argue in the attachment are in any case not even in Auckland or NZ's long term interest. Please see attachment for additional pages,

If you are attaching further information tick (✓) for yes

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):

Resource consent for vegetation clearance rejected in its current form as too vague and could permit arbitrary clearance of high amenity and value trees, with no compensation. It is essential landowners have an opportunity to define and contest "vegetation clearance", and to establish compensation for loss of economic and amenity value (and carbon credits)

Recommend provision of free legal aid to affected landowners

See other decisions sought in additional attachment

Please use more pages if you need to.

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

I/we wish to be heard in support 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): Alan McCulloch

Date: 4/10/2007

(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.)



Ministry for the
Environment
Manatū Mo Te Taiao

Use the tick boxes below to indicate the called-in notices of requirement and applications for resource consents that your submission concerns. Use a clear tick in the appropriate box or boxes (✓).

I/we make my/our submission concerning all notices of requirements and applications for resource consents below.

y

OR

My/our submission only concerns the notices of requirement and applications for resource consents that I/we have ticked below.

	Support	Oppose	Neutral
Manukau City Council			
Pakuranga Substation Notice of Requirement. Reference No. 27619		y	
Otahuhu Substation Notice of Requirement. Reference No. 27619		y	
Brownhill Substation Notice of Requirement. Reference No. 27619		y	
Underground Cable – Pakuranga to Brownhill Notice of Requirement. Reference No. 27619		y	
Underground Cable – Otahuhu to Brownhill Notice of Requirement. Reference No. 27619		y	
Overhead Line Notice of Requirement. Reference No. 27619		y	
Franklin District Council			
Overhead Line Notice of Requirement. Reference No. L07089		y	
Waikato District Council			
Overhead Line Notice of Requirement. Reference No. DES0011/07		y	
Matamata-Piako District Council			
Overhead Line Notice of Requirement. Reference No. RMR200621		y	
Waipa District Council			
Overhead Line Notice of Requirement. Reference No. DN/0006/07		y	
South Waikato District Council			
Overhead Line Notice of Requirement. Reference No. 240/021		y	
Taupo District Council			
Overhead Line Notice of Requirement. Reference No. RM070209		y	
Whakamaru and Whakamaru North Substation Notice of Requirement. Reference No. RM070209		y	
Auckland Regional Council – Resource Consents			
<i>Pakuranga to Brownhill Underground Cable Resource Consents</i>		y	
Application 34102: Land Use Consent for earthworks		y	
Application 34370: Discharge of Contaminants to land from ancillary activities that produce wastewater or washwater		y	
Application 34372: Works in the Bed of a Watercourse		y	
Application 34373: Diversion of Surface Water		y	
<i>Overhead Line and Brownhill Substation Resource Consents</i>		y	
Application 34711: Land Use Consent for earthworks		y	
Application 34712: Discharge of Contaminants to land		y	
Environment Waikato – Resource Consents			
<i>Overhead Line and Whakamaru North Substation Resource Consents</i>		y	
Application 116902: Land Use Consent for vegetation clearance and earthworks		y	
Application 116903: Discharge Permit for the composting of vegetation		y	
Application 116904: Land Use Consent for the drilling of tower foundation below the water table		y	
Application 116905: Discharge Permit for the discharge of site water and drilling fluids from drilling activities into surface water.		y	

NOTE: A copy of this submission form must be sent as soon as possible at:

North Island Grid Upgrade Project, Transpower Freepost 182915, PO Box 1021, Wellington
or email submissions@transpower.co.nz or fax 04 819 7624.

I/we make my/our submission concerning all notices of requirements and applications for resource consents below.

Additional Page for “Reasons for Submission”

These proposals are intended to guarantee security of supply for greater Auckland yet will not achieve this - the fundamental problem of Auckland's distance from supply remains, and a significant risk of disruption to supply through natural or manmade disasters to, or overloading of, the long, very exposed and non-redundant supply lines will remain – particularly as these proposals will actually reduce the ability of New Zealand to add to generating capacity, by competing for scarce capital, and hence increase the likelihood of peak overload for Auckland and the network. Furthermore, transmission of energy over such distances is inefficient due to losses associated with transmission, as compared with siting generation close to consumers. In addition, the very large cost of this infrastructure is an economic dead-weight – it does not contribute to growth as would investment in generation capacity, and competes for capital that could be much better utilised than in relatively inefficient rearrangement of the limited electricity supply deck-chairs, on a sinking ship in which total demand for electricity is soon to outstrip supply. Diverting capital funds into this expensive transmission option, away from more productive options such as adding to generation capacity, will actually further increase the risks to supply to Auckland, since it will not mitigate the risk of peak demand exceeding supply.

Yet on the other hand these lines will result in substantial environmental degradation throughout a very large productive and scenic part of the Waikato. This degradation represents a huge cost to the regions, communities and individuals through which these activities and resulting lines will pass - a loss in both productivity and quality of life which we strongly believe will not be recouped by satisfactory security of supply for Auckland. We believe the planning has been conducted with undue haste, without adequate consideration of long term risks, costs and benefits and needs to be redone – the very large transmission line that is proposed will simply not achieve the goal of security of supply for Auckland, and will not achieve it at a huge economic, environmental and social cost.

A sound long term plan, would involve

- A moderate upgrade to current lines to address the short term problems
- Potentially, a second, smaller and less intrusive line over a different route to add both redundancy and transmission capacity to the network. The current very high capacity transmission line represents a dangerous single-point-of-failure.
- Initiation of planning for generating capacity to be sited close to Auckland to improve security of supply and avoid the economic dead-weight cost of the current transmission proposals – in other words, the enormous funds being invested in transmission lines do not add anything at all to economic output – these would be better spent towards new generation capacity close to Auckland, that would both directly add to economic output, and provide far greater security of supply in the long term. While nuclear generation is currently not on the agenda, this is changing and will in all probability change increasingly rapidly in response to concerns over global warming and the need to closely manage global carbon cycles. In all probability, this transmission line will be a white elephant within 10 years, as the need and ability to add

generating capacity closer to greater Auckland becomes apparent – with the technical ability very likely to emerge via either the nuclear option, renewables (solar and wind), or other emerging technologies.

Additional Page for “Decisions Sought”

We seek the following decisions from the board :

1. Resource consent for vegetation clearance rejected in its current form as too vague and could permit arbitrary clearance of high amenity and value tree blocks, with no compensation. It is essential landowners have an opportunity to contest and more clearly define "vegetation clearance", and that there is a mechanism to establish compensation for loss of economic and amenity value (and carbon credits), consequent on clearance.
2. Board to recommend provision of free legal aid to affected landowners
3. Board to recommend strong censure of Transpower management and board for inappropriate process. Specifically – reckless disregard for the welfare of vulnerable individuals – and thereby, indirectly, for the reputation and stability of the corporation they lead, and hence the interests of its shareholder. Personally, we have been utterly appalled by the arrogant treatment meted out to a solitary 70 year old grandmother farming at Tahuroa Rd, by a state corporation that appears to be completely unaccountable. We feel that this treatment has recklessly put at risk the health and livelihood of a family member, in a thoroughly inhumane way, and more reminiscent of eastern Europe in the soviet era than New Zealand in the 21st century.
4. Recommend alteration of planning for pylons in certain hill-country areas, where the current planning results in totally unacceptable burden on some individual properties – in our case no less than 4 huge pylons on a very small farm in the hills to the north of Tahuroa road. This level of alteration will have a completely unacceptable affect on both short and long term farming operations and amenity values – we believe this is a very significant flaw in the technical planning that has been overlooked and urgently needs to be addressed.