

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
1076

Submit to BOTH:

Minister for the Environment
Freepost Grid Upgrade Submissions
PO Box 4405
Hamilton East
HAMILTON 3247
Email: tpcallin@mfe.govt.nz
Fax: 04 439 7700

And Transpower
Freepost 182915
PO Box 1021
WELLINGTON
Email: submissions@transpower.co.nz
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): Robert McQueen

Postal Address: 320 Te Miro Road, RD4, Cambridge

Wk Ph: Hm Ph: 07 823 7372 Cell:

Wk Fax: Hm Fax: Email:

The reasons for my submission are:

I am 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.

The environmental impacts of this line (construction impacts; visual amenity impacts, health impacts) are much larger than the proposed benefits.

There is no "national significance" to this proposed line that should reduce consideration of environmental effects or more environmentally friendly alternatives to the proposal.

The supposed justification of this line by the demand growth of Auckland has not been linked to new, base load generation (that will be of use in meeting Auckland peak demand periods) that has been proposed and approved that will come on stream south of Whakamaru. It is a line to nowhere, a white elephant of obsolete third world technology.

This line will reduce, rather than increase, the security of electricity supply to Auckland.

The capacity of the transmission capability, size of the pylons proposed and the 400 kV capability will not be required in the next 40 years if reasonable assumptions on demand growth (2007 SOO) and reasonable estimates of likely new Auckland area generation are used.

There are better, equal or better 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 use of new conventional small scale 220kV transmission lines.

I 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.

The proven health risks of EMF and corona charged particulate matter have not been reasonably considered by Transpower. Transpower relies on an outdated and irrelevant ICNIRP standard intended to protect electrical workers from tissue heating effects caused by extremely high EMF fields (over 100 microteslas), rather than the cellular change mechanisms that have been proven by



Ministry for the
Environment
Kaitiaki Take Kōwhiri

many epidemiological studies to cause various diseases, including childhood leukaemia, which happen at levels of 0.1 microteslas, 1000 times lower than what Transpower intends to impose on those who will have to live and work under and near to these lines.

Transpower have taken the position of a generic policy of "prudent avoidance" with regard to health issues linked to transmission lines. This policy says that if you can mitigate negative impacts at little or no cost, then do it. Transpower should be adopting the "precautionary principle" approach to health effects, which says that if there are potential effects that might become more firmly proven in future, then present day designs should anticipate those effects and undertake whatever is needed, whatever the cost, to avoid future liability. In the specific case of this proposal, a precautionary principle policy would obligate Transpower to obtain easements for much wider corridors for this line, such as 600 metres wide for overhead pylon lines, rather than the 65 metre wide easements they are proposing. At the hearings, we will provide persuasive evidence and expert testimony on all of these issues.

I 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.

I oppose these applications because the first step process of approval by the Electricity Commission on economic and security of supply grounds has been manipulated to grant approval when the decision, if the law had been followed, should have been to turn down the Transpower application. I object to the use of the Electricity Commission decision to cut off debate on the economic merits of this proposal, and I oppose the Board of Inquiry relying on the decisions of the Electricity Commission. I welcome the use of the raw data and the staff and consultants' analysis accrued by the Electricity Commission to be considered as relevant evidence by the Board of Inquiry. I will object to the use of the unlawful Electricity Commission decision itself to be used as evidence that the proposed line is needed and economically preferable to other alternatives.

I oppose these applications because Transpower has falsely 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 true cost of environmental impacts and mitigation in their justifications, have not included the true cost of easement purchase, and are providing misleading and inaccurate costings of the real alternative options to this line that should be considered.

I oppose this application because Transpower have not followed required consultation processes, and the so-called "consultation" they have undertaken has not been done with a true intention of proposing a "least environmental impact" solution. The consultation processes they have used are unlawful and have not been undertaken in the spirit that the RMA intended.

I oppose this line because Transpower has not dealt fairly with landowners impacted by the line in negotiating either equitable and fair purchase or purchase of easements, and Transpower has refused to consider compensation based on both one time and rental components.

I oppose this proposal because Transpower wishes to restrict land use (quarrying, forestry, fertiliser application, fires) beyond the limits of the easements which they say they intend to purchase. I oppose these proposals because the environmental impacts of this line will extend far beyond the boundaries of the easements Transpower intends to purchase, and no compensation or mitigation for those parties outside the planned easements has ever been considered and discussed by Transpower.

This more detailed submission replaces the preliminary submission made by me through the notowers website on approximately September 16, 2007.

I/we seek the following decision from the Board of Inquiry (provide precise details including the nature of any conditions sought):

That the application for Notices of Requirement and Resource Consents should be turned down completely, and Transpower directed to investigate generation, conservation and transmission alternatives that will avoid this line being built under any circumstances.

I explicitly **do not** want the Board of Inquiry to approve the applications subject to conditions – I want the applications turned down in whole.

I/we wish to be heard in support of my/our submission at the public hearing, and expect I will need at least between two and three days, possibly more, to present my evidence and expert witnesses. 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 (Cambridge or Hamilton).

✓

I/we make my/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.

✓

I/we have served a copy of my/our submission on the applicant by copy to Transpower as above.

✓

Names(s):

Robert McQueen

Date: October 5, 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.)



Ministry for the
Environment
Manatū Mo Te Taiao