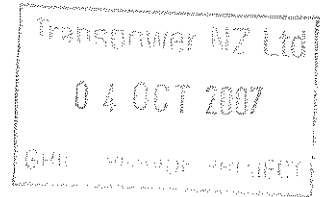


Amanda Papps

TP10811

From: David Kirkpatrick [david.kirkpatrick@parkchambers.co.nz]
 Sent: Thursday, 4 October 2007 14:22
 To: Submissions
 Cc: 'Cathie'; cathyanntuck@gmail.com; 'Denis Nugent'
 Subject: Transpower North Island Grid Upgrade Project
 Attachments: UIM-submission-form.DOC; UIM-submission-additional.doc



I act for Underground in Manukau, a group of people who wish to submit in opposition to the Grid Upgrade Project.

I attach their submission together with an attachment setting out the reasons for it and the decision they wish the Board of Inquiry to make.

Please acknowledge receipt of this message and the attachments.

RECEIVED ON

David Kirkpatrick
Barrister

29 OCT 2007
1244 NS

Park Chambers
23 Victoria Street East
PO Box 5844 Wellesley Street
DX CP 24075
Auckland

P: 09 379 9780
F: 09 377 0361
M: 021 598 224
e: david.kirkpatrick@parkchambers.co.nz

PLEASE NOTE: This message is for the named person's use only. It may contain confidential, proprietary or legally privileged information. No confidentiality or privilege is waived or lost by any mistransmission. If you receive this message in error, please immediately delete it and all copies of it from your system, destroy any hard copies of it and notify the sender. You must not, directly or indirectly, use, disclose, distribute, print, or copy any part of this message if you are not the intended recipient.

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

Section 145 of the Resource Management Act 1991

To: Minister for the Environment
 Freepost 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: _____

My/Our Full Name(s): Underground In Manukau

Postal Address: c/- David Kirkpatrick, Barrister, PO Box 5844, Wellesley Street, AUCKLAND

Home Ph: 09 379 9780 Hm Ph: Cell: 021 598 224

Wk Fax: 09 377 0361 Hm Fax: Email: david.kirkpatrick@parkchambers.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:
 As set out on the attached material.

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):
 As set out on the attached material.

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): "D A Kirkpatrick"

Date: 4 October 2007

as Counsel for Underground In Manukau

(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.)

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.

OR

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

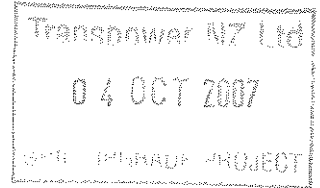
	Support	Oppose	Neutral
Manukau City Council			
Pakuranga Substation Notice of Requirement. Reference No. 27619		✓	
Otahuhu Substation Notice of Requirement. Reference No. 27619		✓	
Brownhill Substation Notice of Requirement. Reference No. 27619		✓	
Underground Cable – Pakuranga to Brownhill Notice of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

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

North Island Grid Upgrade Project, Transpower Freeport 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.

Underground In Manukau
Attached Material



A. Reasons for Submission

Underground in Manukau is primarily concerned with the location of additional overhead transmission lines in Manukau City. However, it considers the entire project proposed by Transpower from Whakamaru to Auckland is flawed in concept and is contrary to the promotion of sustainable management of natural and physical resources. Transpower has fixed on a solution and then followed a programme to promote that solution rather than considering the best means of dealing with the problem, taking environmental concerns fully into account.

Reasons for Undergrounding line in Manukau City

Undergrounding the line within Manukau City would promote sustainable management of the natural and physical resources of the Whitford, Brookby and Clevedon areas, including the transmission line, whereas the development of overhead lines for 400kv transmission would be contrary to the purpose of the Act. In particular:

- (a) Overhead lines require a greater easement than the 65m proposed to contain any potential for line toppling, and to maintain an adequate distance between the EMF of the lines and other land use activities;
- (b) The electromagnetic field will be reduced if the line is placed underground, minimising the potential disruption to other land uses;
- (c) The proposed route and size of the towers will have an adverse effect of impact on the use of Ardmore Aerodrome, which is regionally significant infrastructure, and the mitigation methods proposed will have significant adverse visual effects on surrounding areas;
- (d) The route and the scale of the towers along with the lines will have adverse visual effects in a rural area noted for high amenity values;
- (e) Erecting overhead lines of this scale through Whitford, Brookby and Clevedon areas and the associated easements and separation distances will foreclose future options for the use of this area for urban purposes during the life of the line;
- (f) There is insufficient information and detail contained within the notice of requirement documentation to satisfy Transpower's request that the requirement for outline plans under section 176A of the Act be waived.

- (g) Providing an underground line through the South Auckland area will improve the diversity of route and supply options for electricity transmission into Auckland;
- (h) An underground line would better meet the objectives and policies of the Regional Policy Statement and the District Plan than an overhead line;
- (i) The purpose of the proposal appears to be driven by matters of cost without any real consideration of the benefits that may flow from alternative methods of providing security of supply for the northern part of the North Island, or of the social and environmental costs that will be caused by the 400kv option;
- (j) A line of this size will have increased effects in terms of reverse sensitivity, inhibiting or preventing otherwise appropriate activities in its path into the future.

Reasons relating to Brownhill Substation

The location of this site is highly visible to residential dwellings. Improved landscaping is required to minimise the visual impact of this substation. An alternative site is available in the immediate vicinity that is not so visually obtrusive and moving the substation to that location would better meet the purposes of the Act.

Transpower have publicly stated that it will only be implementing the gas insulated substation option at this substation. That should be confirmed by a condition on the requirement.

Reasons Relating to the Underground Route from Pakuranga to Brownhill

Transpower have publicly stated that it will only be implementing the Sandstone, Whitford Park, Brownhill Roads route. That should be confirmed by a condition on the requirement.

Rehabilitation of Brownhill Road post undergrounding should include landscape enhancement to better accord with the purpose of the Act.

B. Decision Sought

1. Overhead Line Notice of Requirement in Manukau City (Reference No. 27619):

Decline the Notice of Requirement or alternatively modify it and impose conditions to require that the entire route of the line in Manukau City be placed underground.

2. Brownhill Substation Notice of Requirement (Reference No. 27619)

Decline the Notice of Requirement or alternatively impose conditions:

- (a) limiting the implementation of the Notice to the fully enclosed gas insulated substation option only;
- (b) mitigating the visual impacts of the substation by improved landscaping, including planting the remainder of the site, or alternatively moving to an alternate less visually obtrusive site.

3. Underground Cable – Pakuranga to Brownhill Notice of Requirement (Reference No. 27619):

Decline the Notice of Requirement or alternatively Impose conditions:

- (a) limiting the implementation of the Notice to the Sandstone, Whitford Park and Brownhill Roads route;
- (b) requiring beautification of Brownhill Road.

4. Such other relief that satisfies the concerns of Underground in Manukau.