

**SUBMISSION ON A NOTIFIED APPLICATION
FOR A RESOURCE CONSENT**

(Section 96 Resource Management Act 1991 and Amendments)

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Submitter: The Onehunga Enhancement Society
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Submission Details

1.0 This is a submission (**in opposition**) to an application from Transpower New Zealand Limited for a resource consent to increase the rating and operating capacity of the Henderson- Otahuhu A 220kV transmission line, during forced outage (as described in the application and summary of the proposal, as attached in the public notification documents). Auckland City Council 23 May 2007

The application is for a land use consent for a restricted discretionary activity in terms of Rule 4A.4.6E of the Auckland City Council's Operative District Plan (Isthmus Section).

2.0 The particular parts of the application that my submission relates to, is **all of application.**

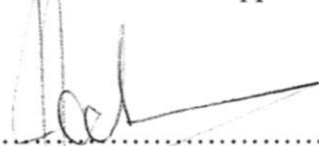
3.0 The reasons for my submission are as follows:

- (i) The proposed activity will increase the adverse effects on the environment, to the extent that public safety and convenience will be affected.
- (ii) The proposed activity will affect public health.
- (iii) The proposed activity will create potential hazards to habitable buildings and occupiers of buildings.
- (iv) The electric and magnetic fields created by the proposed activity will have an adverse effect on the electrical, communication and electronic equipment of my business and operation.
- (v) That Transpower New Zealand Limited has identified the proposed work is not a matter of national importance and as a consequence Section 6 of the Resource Management Act, is not applicable, in terms of assessing and determining the application.
- (vi) That in terms of the provisions of the Resource Management Act, any assessment of the application under Proposed Plan Change 90 of the Auckland City Council's Operative District Plan (Isthmus Section) is limited and little to no consideration should be given to Proposed Plan Change 90. Therefore the application should be assessed in terms of the operative provisions of the District Plan (Isthmus Section).
- (vii) That Transpower New Zealand Limited, (in terms of the provisions of the Resource Management Act) cannot avoid, remedy and mitigate any potential adverse effect (including any cumulative effect) on the environment that arise from the proposed activity and associated work.
- (viii) That the application (including the Assessment of Effects Report and supporting reports) is misleading, in terms of what Transpower New Zealand Limited is actually applying for. Transpower New Zealand Limited application (is in effect) seeking a wider use of the 220kV transmission line to deal with a general increase in demand which is outside of any forced outage.
- (ix) That the application is requesting approval to exceed the level of usage beyond that which it is permitted in terms of the provisions of Section 139 of the Resource Management Act.
- (x) The application is misleading in terms of the effects created by increasing the current (to 1085MVA) during an outage and there is no information provided in terms of temperature increases associated with the proposed uprating and or any associated effects that such an increase will create.

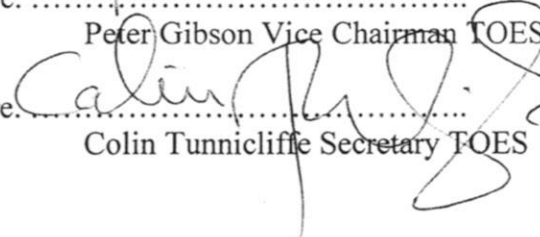
- (xi) That it is impossible for Transpower to state that outage will be limited to a maximum period of 15 minutes for any single event (as illustrated by reference to Appendix C of the application). Furthermore it is noted that Appendix C only includes outage history up until June 2006. There is no information for the period June 2006 to May 2007, yet the reason given for this “fresh” application is made on the bases that there is up-dated information on the frequency and duration of forced outage.
- (xii) In terms of the causes of forced outage, this application contains no information or reference to the major outage failure that occurred in 2006 at the Otahuhu substation, even though the table in Appendix C, appears to indicate that a similar event occurred on the Otahuhu/Henderson transmission line in May 1996.
- (xiii) That the application is not in accordance with the Auckland Regional Council’s Proposed Air, Land and Water Plan (A.L.W. Plan) dated June 2005, in that the proposed activity is deemed to be a moderate risk, for the purpose of the A.L.W. Plan.
- (xiv) That the proposed activity is not in accordance with Auckland Regional Council’s Regional Policy Statement, (in particular but not restricted to the matter) that the proposed activity does not make appropriate provision for the avoidance of adverse effects (including cumulative adverse effects) and the application does not consider alternative locations for utility services which give rise to significant adverse effects and does not provide any environmental enhancement and /or remediation opportunities.
- (xv) The application is ambiguous in terms of “further information” that is available or provided with the application or that there is an explanation as to the differences between the current application and the previous application. Furthermore it does not appear as if the previous application has been formally withdrawn.
- (xvi) The application is inconsistent with the objectives and policies of the Operative District Plan (Isthmus Section).
- (xvii) The application is inconsistent with the principles and directions outlined under part 4 “ new transmission lines underground’ and part 5 “ existing overhead lines underground” stated by Auckland City Council, in their letter dated the 4 August 2006, to Transpower New Zealand Limited.
- (xviii) That the proposed activity and application is inconsistent with Section 5 of the Resource Management Act

4.0 The decision I seek, is that Auckland City Council, decline the application by Transpower New Zealand Limited.

5.0 We wish to be heard in support of my submission.

Signature.  Date: 21-06-07
Jim Jackson Chairman TOES

Signature. Date:.....
Peter Gibson Vice Chairman TOES

Signature.  Date: 21.06.07
Colin Tunnicliffe Secretary TOES

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