



**National Council of
Women of New Zealand**

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20 June 2007

S07.32

**Submission to the Ministry for the Environment of the
Proposed National Policy Statement on Electricity Transmission Evaluation
under Section 32 of the Resource Management Act 1991**

The National Council of Women of New Zealand (NCWNZ) is an umbrella organisation representing 42 nationally organised societies. It has 31 Branches throughout the country attended by representatives of those societies and some 150 other groups as well as individual members. The Council's function is to serve women, the family and community through research, study, discussion and action.

This submission is compiled from responses from 20 Branches of NCWNZ, with between 10 and 30 members.

A universal response to the document was that it is very badly written, and so badly punctuated that often the meaning was unclear. As an example, conclusions were presented but there was no suggestions of expected outcomes if the policy was put in place. Policies that are suggested are too simplistic and need greater analysis and structure. NCWNZ considers that the Statement should be re-written with clear and brief proposals to combine the present diversity of electricity arrangements under one national policy. It is understandable that working with 73 councils and 12 regional authorities, all with their own rules and regulations, is both costly and time consuming.

In particular:

Policy 3 (p.21) Corridors and sites should be located and other activities associated with the electricity transmission network should be undertaken in a way that avoids, remedies, or mitigates any adverse effects on matters of national importance.

- This is ambiguous since there is no definition as to what constitutes national importance.

Policy 4 (p.22) Any new development that is sensitive to the effects of the electricity transmission network should be managed in a way that does not compromise the efficient operation the electricity network.

- Ambiguity can be reduced by re-writing to clarify whether "development" refers to residential or industrial or both.

Policy 6 (p.24) Provisions dealing with electric and magnetic fields (EMF) associated with the electricity transmission network should be based on ICNIRP guidelines.

- The precautionary principle should always apply in issues of public safety.





Membership put forward several comments regarding items that could be included in a revised statement.

- Electricity should be generated close to the users of the energy. If it is the expense of the resource consent process that makes this option less viable then the Statement could enlarge on this with suggestions for change.
- Solar power should be used more frequently, and businesses encouraged to incorporate this for water heating as a minimum, and room heating where possible.
- Generating machinery in current hydro schemes should be upgraded regularly to maintain efficiency.
- All new dwellings should be built with insulation and solar water heating.
- Provide regular publicity in media on power usage to encourage energy conservation.

Christine Low
National President

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Convenor, Environment Standing Committee

