

Tweed Billabong



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TWEED SHIRE COUNCIL	
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cc. Ms Colleen Forbes - Tweed Shire Council
cc. Mr Geoff Provest MP
cc. Mr Chris Duncan – Lindisfarne Primary School

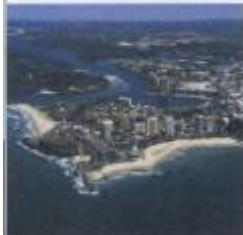


Thursday, 2 August 2007

Lot 2 DP615053
39 SUNSHINE AVE
TWEED HEADS SOUTH.

Subject: South Tweed Substation

Thank you for your letter dated 28th of June 2007 which included the report into Electric and Magnetic Fields by Connell Wagner P/L and the Site Investigation Report by Clarence Consultants P/L (attachment B).



As we pointed out to you and Tweed Shire Council (TSC) previously, the Sunshine Avenue Field Service Centre was inflicted upon our neighbourhood some twenty years ago at which time none of the existing neighbourhood was given the opportunity to object because it was a state government utility. Since then, we, our staff, the residents who live in our park, the children of Lindisfarne Primary and the residents who surround the centre have had to endure the noise, dust and visual pollution that come with it. In emergencies, it operates all hours of the night. Now Country Energy wish to exacerbate the problems by bringing electric and magnetic field radiation into the equation by building a substation in the centre, with all it's accompanying perils.



We pointed out that if a substation is necessary a more suitable site would be within an industrial area where people are not exposed to it twenty-four hours a day. As you know, Country Energy in response commissioned Clarence Consultants to compare various sites. The report's blatant bias towards Country Energy's existing proposal demonstrates the consultant's mercenary mode of operation and they should be ashamed to put their name to it.



Using much of the same criteria Clarence Consultants used in their report, it can be demonstrated that site B - Enterprise Avenue (an industrial area) is a far more viable location. Site B is a more responsible alternative from a social and planning point of view, and meets the 'Prudent Avoidance' recommendation accepted throughout the world and in Country Energy's own Assessment of Electric and Magnetic Fields study.



Below we have commented on the issues raised in the report prepared by Clarence Consultants in respect to;

- Negatives to Site F Proposal - Sunshine Avenue
- Positives to Site B - Enterprise Avenue
- Alternative Site H – New Location

Negatives to Site F Proposal - Sunshine Avenue

Zoning

- The report implies that site F is suitable due to its zoning of 5(a) Special Uses. TSC had no option but to zone the site Special Uses when the Field Centre was forced upon the Community around 20 years ago. Industrial land is a far more appropriate location for a substation from a visual, acoustic, social and health viewpoint. Location F exposes the substation to a large number of residents and children 24 hours a day.

Distance to 66kV line

- The 66kV line runs North – South along Minjungbal Drive. A more accurate distance to site F is 1250m rather than 1100m as quoted in the report.

Corridor to the West

- On page 22, the report states that “The Tweed Local Environment Plan 2000 also provides a corridor...west of the site, effectively providing a route for future 66kV interconnections to the west”. This corridor tracks over part of the Tweed Billabong Holiday Park. Having just heard of this we vehemently oppose it for the same health and visual reasons we oppose the substation location. Locating the substation on sites B or H would allow future high powered lines free access to the west across undeveloped land.

Environment

- The report claims that the site is “a highly disturbed weed infested woodland”. The site is certainly not weed infested. Although recently largely cleared (apparently state government utilities don't need approval to clear) the site is characterised by large trees including Bloodwood and Swamp above mown grass. Please see photo of the site below.



Site F – location of CE proposed substation, looking South East.

Land Exchange with TSC

- The report goes on to say that “A small area of land adjacent to the site (unformed road reserve) would also need to be incorporated into the site to achieve sufficient area for a zone substation. This could be negotiated with Council as a land swap for an unused strip of land in the western portion of the site”. The area Country Energy wish to take from council is dense melaleuca woodland (see area to the rear of the above photo). The area Country Energy wish to give to council is a long narrow strip of land between the Service Centre and our Holiday Park. This land will only ever be a liability to the ratepayers of the Tweed Shire as it can only ever be used as an open stormwater drain that will need to be maintained. We have received advice that TSC has limited powers to stop the approval of the substation. We ask that TSC therefore at least reject this land swap proposal in the interests of it’s constituents and to further the objective of relocating the substation to an industrial area.

Health

- The report produced by Connell Wagner P/L and commissioned by Country Energy confirms our concerns of having the substation located on site F – between a primary school, residential area and 160 caravan park residents. The recent cases of rampant breast cancer in female workers at the ABC studios in Brisbane causing the ABC to relocate, only heightens our concerns of unknowns associated with locating the substation in an area surrounded 24/7 by children and the elderly.
- Our repeated requests from Country Energy for some kind of guarantee that our residents and staff will not suffer any negative health effects from the substation have gone unheeded. The silence in this area is deafening. At best Country Energy have provided reports indicating that evidence of negative health effects from the substation are inconclusive and that the electric and magnetic fields will be within guidelines.
- Connell Wagner’s report discusses the concept of ‘Prudent Avoidance’. We quote from page 13, “Given the inconclusive nature of the science and the ongoing possibility of adverse health effects, it is considered that a prudent avoidance

approach continues to be the most appropriate response in the circumstances. Under this approach, subject to modest cost and reasonable convenience, power utilities should configure their facilities to reduce the intensity of the fields they generate and locate them to minimise the fields that people, especially children, experience over prolonged periods". We argue that the positives attributes of locating the substation at site B or H meet this intent.

Positives to Sites B – Enterprise Avenue

- Locating what is essentially an industrial development in an industrial area (such as site B) exposes the public to the negative aspects of the substation for only eight hours a day.

Distance to 66kV line

- The report discusses the difficulty of running the line to site B due to the road pavement. Country Energy's proposal is to run the line along Kirkwood Road which is also paved.
- If the 66kV line was to be taken along the Enterprise Ave/Greenway Drive route as analysed in the report, the distance would be close to 1500m, only 250m longer than the proposed route. Alternatively, the line could be taken along Kirkwood Road to the North West corner of the Crematorium, then South and under the Pacific Highway to site B. This adds 310m to the length of the cable. However, it uses the majority of the route Country Energy has proposed and there is an existing box culvert under the Highway at this point which would allow easy access to this industrial area.

Feeders to the North and South

- On page 14 of the report, the consultant claims that "It may be possible to take feeders in a northerly direction under the Pacific Highway, however, based on previous Country Energy experience it is highly unlikely that the RTA would agree to the proposal". It is absurd to suggest that the RTA would accept Country Energy run feeders to the South (as proposed) but not to the North along the same route. The RTA have indicated to us that they are unlikely to object to a transverse crossing of the highway. Additionally, site B is closer to the large industrial users of power than site F.

Future Line to the West

- The report claims that site B "is effectively land locked by residential development for a future line route to the west". This statement typifies the consultant's carelessness in researching the area. The land to the west of site B is completely undeveloped. An easy route is available through to Fraser Drive in the West.

Community Resistance

- Page 15 of the report states that a constraint with site B is that "Significant local government, local and broader community resistance is anticipated". For the consultants to suggest that locating the substation at site B with only industrial development on one side would have less community resistance than locating it at

site F - between a primary school, a residential section of a caravan park (160 permanent residents) and residential housing 24/7 is completely ludicrous. We can only guess that the consultants have not visited site B at all. Obviously those who lease the buildings opposite the substation in the industrial area of site B would only be exposed to the substation for 8 hours, 5 days a week.

- By comparison, the proposal at site F has received significant objection. Our residents have held 6 public and private meetings to discuss and plan objection to the site. We have appeared on television and newspapers objecting to site F. We and our residents have written and met with Geoff Provest MP asking for assistance in this matter. Additionally the Principal of Lindisfarne Primary School (Chris Duncan) has appeared on NBN News objecting to the site. We know of a significant number of written objections which have been sent to TSC and our local State Member of Parliament.
- Residents and Management of our Holiday Park have established a 'fighting fund' which we intend utilising to pursue our objection to the substation in the Land and Environment Court if it is approved on site F.

Distance to the North

- The report further argues against site B saying the site has "Very limited opportunities to feed north of the Tweed River". Assuming the consultant means Terranora Inlet, we point out that the extra distance from site F to site B is approximately 350m to the south and that the same consultant's map finds it a convenient feeder from site F to the area of site B. Surely power will run just as easily North as South along the same route?

Alternative Site H – New Location

- We also ask Country Energy consider an alternative site H. This is about 250m from site F on the Western side of the Pacific Highway (see Attachment A map) and on non-developed land under the aircraft flight path. It is ideally suited as no permanent residents will ever live nearby. It also meets the criteria pursued in the Clarence Consultant's report including;
 - (a) Easy access for 66kV lines from Minjungbal Drive, across Terranora Inlet north and future lines through undeveloped land to the west.
 - (b) Within immediate proximity for running feeder lines to the high energy usage of the local commercial/industrial area.

Summary

Realistically, the constraints of sites B and F are similar except that site F is right in the middle of where a large number of children and elderly people live and learn. Below we have recreated Clarence Consultant's report with more realistic ratings.

Substation Option	Description	Enviro/Ecology/ Access	Landholder/ Stakeholder acceptance	Proximity to 66kV network	11kV network issues	Total	Rank
B	Enterprise Avenue	4	4	4	4	16	1
F	Sunshine Avenue	2	1	4	4	11	3
H	Site West of H/Way under flight path	2	4	3	4	13	2

- 1 = Significant Constraints
- 2 = Medium Constraints
- 3 = Low Constraints
- 4 = Negligible Constraints

It would seem that Country Energy has the view that Caravan Park residents are second class citizens and can be treated as such. The effect on the Tweed Billabong Holiday Park (one of Australia's leading parks) will be significant. The health effects on the children studying at Lindisfarne Primary School is a concerning unknown. We once again ask the TSC and Country Energy to exercise 'Prudent Avoidance' by locating the substation in an industrial site (B) or away from everyone (H). Both sites will have minimal negative visual, noise, electric / magnetic field radiation and stormwater effects inherent with the Sunshine Avenue proposal. These sites are both practical and logical, which should have been exposed in the reports commissioned had they been designed to be anything more than a justification for what Country Energy sees as a forgone conclusion.

Yours faithfully,



Andrew Tribe
 General Manager
 BIG4 Tweed Billabong Holiday Park

Attachment A

