

**Submission on Transpower's Notices of Requirement and Applications for  
Resource Consents**

**From: Warwick Chandler**

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**The reasons for my submission are:**

I acknowledge that there is a need to improve NZ's transmission infrastructure and, in particular, that upgrades to this section of the national grid are reasonably necessary for its efficient operation. However, I am completely opposed to Transpower's intention to build this un-needed line, as the demand growth projections of the Electricity Commissions (2007 SOO) do not justify its construction. The proposal also comprehensively fails the Grid Investment Test.

The reasons for my opposition are:

1. Transpower has failed to give adequate consideration to alternative sites, routes or methods of undertaking the work and of implementing its reasonable objectives.
2. The Proposal in its current form gives rise to unacceptable and unnecessary adverse effects on the environment, in particular adverse visual and amenity impacts.
3. The scale of the proposed lattice towers (having regard to the various dimensions of the towers including a maximum height of 70m) is significantly greater than that of existing pylons and lines. That scale, in conjunction with the decision to implement a design with capacity for 400kV lines, will generate significantly greater adverse visual and health effects over a significantly larger area than would otherwise be the case.
4. A 400 kV design will not be needed within the context of NZ's transmission infrastructure over the lifetime of the Proposal and the problem is that it locks us into old technology rather than embracing new and improved technologies.
5. Transpower's investigation of alternative sites, routes, or methods of undertaking the work was insufficient and inadequate. For example:
  - Under-grounding the line further south along the transmission route especially through sensitive areas including in particular the line along that part of the route between its northern terminus and State Highway 2 to the south.
  - Replacing the lattice towers (in whole or in part) with less intrusive monopole and/or compact design structures.
  - Adopting a maximum design capacity based upon 220 kV lines rather than 400 kV lines.
6. That Transpower has continually refused to reconductor existing lines thereby fully utilising existing infrastructure which would save \$40 million per year in deferred expenditure, giving a much needed 10 year delay, (ie, it would pay for itself within 5 years).
7. Transpower have called for two significant exemptions in their NoR:
  - [i] Waiver on requirement under section 176(a) of the RMA to provide outline plans.
  - [ii] Extension from 5 years to 35 years for certain designations to remain active in District Plans. (This is proof they do not need 400 kV for 35 years).

The submitter wishes to be heard in support of this submission.