

**BEFORE THE BOARD OF INQUIRY**

**IN THE MATTER** of the Resource  
Management Act 1991

**AND**

**IN THE MATTER** of applications for  
resource consent and  
notices of requirement  
by Transpower New  
Zealand Limited for the  
North Island Grid  
Upgrade Project

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**STATEMENT OF EVIDENCE (1) OF SYLVIA JEAN ALLAN IN REBUTTAL  
FOR TRANSPOWER NEW ZEALAND LIMITED  
(Route and site selection: General, Overhead Transmission Line, Brownhill  
Substation and Whakamaru and Whakamaru North Substation, and consenting  
strategy)**

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## Introduction

1. **MY** name is Sylvia Jean Allan. I wish to present rebuttal evidence to the statements of evidence of:
  - (a) Christopher James Freke for Manukau City Council (**MCC**);
  - (b) Randal McKenzie and Mark Spring;
  - (c) Peter Bernard Hassell for Waipa District Council;
  - (d) John Blair Olliver for Waipa District Council;
  - (e) Mary Caroline Buckland for Waipa District Council;
  - (f) Aaron Mark Collier for South Waikato District Council (**SWDC**);
  - (g) Diane Jean Lucas for SWDC;
  - (h) Geoff Copstick and Kate Brennan; and
  - (i) Martin David Gledhill for the Ministry of Health (**MOH**).
  
2. **THIS** rebuttal applies to matters that generally relate to my first statement of evidence. I will provide separate rebuttal evidence in relation to my second statement of evidence.
  
3. **THE** fact that I have not dealt in my rebuttal evidence with specific issues or opinions raised in evidence of others, should not be taken to mean I am in agreement with the evidence of others in respect of those issues or opinions.

## Evidence of Christopher Freke (MCC) (Submission number 0861)

4. **IN** paragraph 131 of his revised evidence, Mr Freke refers to a plan attached to his evidence which was provided to Manukau City Council during consultation/discussions on substation/transition station sites and cable/overhead line options. In paragraph 132 of his revised evidence, Mr Freke says that *“Transpower did not progress or to Council’s knowledge investigate these options any further”, for “largely cost-based reasons”*.
  
5. **THIS** is incorrect. The site is very similar to site 14 included in the *“Interim Report on Northern End Modifications”*<sup>1</sup>. It was one of four site options identified for further evaluation (out of an original list of 13) involving two options – part overhead and part underground 220kV line/cable, and full underground 220kV

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<sup>1</sup> North Island Grid Upgrade Project Amended Proposal Environmental Investigations Interim Report on Northern End Modifications, MWH NZ Ltd, October 2006. (**Common Exhibits**).

cable - for connecting to the Pakuranga and Otahuhu Substations (Options T and R). In the multi-criteria analysis as reported, cost was included as one of the lower-weighted aspects in the evaluation. As the report states (page 42), *“it was considered that, while relevant, costs should not be allowed to overly influence the preference, so it was given a moderate weighting of 5”<sup>2</sup>*. An additional analysis was performed with the cost aspect entirely removed. This did not change the preferred option. Details are included in the same report (page 43).

6. I acknowledge that the option favoured by Mr Freke of a transition station at this location with a 400kV underground cable connecting to a substation at Brownhill Road was not one of the options evaluated. However, it is my expectation that the option favoured by Mr Freke, which includes both a substation (including conversion of one 400kV cable to 2 x 220kV cables) at Brownhill Road and a overhead/underground 400kV transition station in the vicinity of Twilight Road, would have scored more highly (negatively) in a similar analysis than Option R, which involved a single transition station/substation at Twilight Road.
7. **THE** analysis was undertaken for both GIS and AIS substation technologies and included an assessment with and without costs (see Table 2.8 of the *Interim Report on Northern End Modifications*). The chosen option remained the same under both these analyses, indicating that cost was not the main determinant.

#### **Evidence of Randal McKenzie and Mark Spring (Submission numbers 1008 and 0739)**

8. **IN** paragraphs 14 to 16 Messrs McKenzie and Spring refer to two potential alternative locations for the substation proposed to be located at Brownhill Road.
9. **IN** respect of the East Tamaki Road site, they state that it *“was discounted by Transpower because it was too small to accommodate an AIS substation”*. This was the case for a nearby site identified early by Transpower, and, I understand, also for the site referred to by Messrs McKenzie and Spring. A review was undertaken when a site in the location was again identified during the consultation process – this time by both Manukau City and the Brownhill Road residents. That

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<sup>2</sup> All Weightings were out of 10

review is included in the “*Final Report on Northern End Modifications*”<sup>3</sup> and includes a range of reasons why the site was not proceeded with.

10. **IN** respect of the Dodd site, a separate report was prepared – “*Brownhill Substation, Dodd Property Option*”<sup>4</sup>. A number of reasons not to proceed with this site are set out in this report.
11. I do not accept the comment in the evidence that “*Transpower’s ownership of the land at 149 Brownhill Road has limited their review of other alternatives (including Hampton Park and the Dodd Proposal)*”. The documentation provided as Common Exhibits demonstrates a robust process was used in the assessment of the wide range of alternatives around four possible substation sites reported in the “*Interim Report on Northern End Modifications*”. The Hampton Park Site at East Tamaki Road was also considered carefully, as was the Dodd site, and reported as noted above. In none of the analyses was Transpower’s ownership of the Brownhill site a reason to reject an alternative.

**Evidence of Peter Hassell (Waipa District Council) (Submission numbers 0919 and 0984)**

12. **MR** Hassell has drawn on his background in the application of pre-determined criteria to decisions on funding of strategic infrastructure in Auckland to comment on the process which led to the identification of the route option for the North Island Grid Upgrade Project. He provides interesting background relating to the use and development of multi-criteria analysis in New Zealand from 1998.
13. I would generally agree with him that there has been relatively rapid development of acceptance of such processes in the 21<sup>st</sup> Century. However, similar processes have been used in numerous planning decisions since the late 1980s and early 1990s, and even earlier. Transit New Zealand’s Project Evaluation Manual, for example, was in use at least in the mid 1980s.
14. **IN** the early 1990s, I researched international literature to assist the Wellington Regional Council choosing between complex transport system combinations. In

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<sup>3</sup> North Island Grid Upgrade Project Amended Proposal Environmental Investigations Final Report on Northern End Modifications, MWH NZ Ltd, February 2007 (**Common Exhibits**).

<sup>4</sup> North Island Grid Upgrade Project Amended Proposal Environmental Investigations Brownhill Substation, Dodd Property Option, MWH NZ Ltd, July 2007 (**Common Exhibits**).

1991, I applied multi-criteria analysis in assisting Napier City Council to prioritise future development areas.

15. **IN** his paragraph 15, Mr Hassell makes it clear that he has confined his evidence to a review of the *Report on Interim Route Decision*.<sup>5</sup> He has not commented on the methodology applied at Area, Corridor or Route<sup>i</sup> stages, nor on the contents of the *Final Route Decision Report*.<sup>6</sup>
16. **IN** his paragraphs 17 to 19, Mr Hassell explains that, had he been tasked with the responsibility of choosing a route option, he would have made sure that Transpower was meeting all its statutory obligations under relevant legislation. I agree with Mr Hassell that relevant legislation is a very important contextual matter for any decision.
17. **IN** designing the process Transpower's advisers (including myself) were specifically responding to the many matters which must be taken into account in the RMA, including the environmental, social and cultural considerations as well as the practical and economic requirements of a project. The RMA does not however provide a simple checklist of relevant considerations, at any of the stages of Area, Corridor or Route decisions.
18. **AT** Route stage, the aspects that are relevant to an RMA evaluation were identified and assessed at the relevant level of detail. At the Route interim decision stage, the relevant aspects were grouped and evaluated on the "quadruple bottom line" basis which features in decision-making under the Local Government Act 2002.<sup>7</sup> However, a range of other analyses was also undertaken, as reported in the Report on Interim Route Decision and the Final Route Decision Report<sup>8</sup>.
19. **I** do not consider that any relevant aspects of any legislation were overlooked, including the State Owned Enterprises Act or the Electricity Act. I acknowledge that Mr Hassell does not suggest that we did.

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<sup>5</sup> North Island 400kV Backbone Investigation Project Environmental Phase 2 Report on Interim Route Decision Part 1: Report, MWH NZ Ltd, May 2005 (**Common Exhibits**).

<sup>6</sup> North Island 400kV Backbone Investigation Project Environmental Phase 2 Final Route Decision Report Part 1, Reports MWH NZ Ltd, July 2005 (**Common Exhibits**).

<sup>7</sup> Social, economic, cultural and environmental well being section 3 Local Government Act 2002.

<sup>8</sup> Common Exhibits

20. **IN** his paragraph 24, Mr Hassell suggests that for two aspects – Engineering Degree of Difficulty and Property Compensation Costs – it would have been more transparent to provide actual engineering and compensation costs for each of the options for each section of the route. This was considered, but for a number of reasons dollar values were not given.
21. **AS** Mr Hassell notes, rough-order costs were available relating to both factors. For the Engineering Degree of Difficulty, considerations encompassed more than just dollar cost as explained in the Interim Route Report.
22. **IN** terms of dollar cost, from my recollection, the difference between the two route options for the overhead line was within 10%. Thus dollar costs would not have been a significant distinguishing factor between the two route options. The different lengths of the different sections<sup>9</sup> would also have led to a level of additional complexity in terms of actual figures. The use of a proxy for dollar value in terms of “utility value” was considered, but it was regarded as problematic in terms of transparency, and there would be difficulty in combining that measure with the less tangible components included in the same aspect.
23. **FOR** the property compensation costs, again rough-order information was available. The relative lengths again would have added complexity in terms of comparative dollar values. Transpower made a specific determination that the information on assumptions of dollar values for property compensation should not be released, as explained in the Interim Route Report.
24. **IN** my opinion, it was not necessary to provide dollar information as part of the public information for consultation, and nothing would have been gained by doing so. On the contrary, it could have unduly influenced both the consultation processes, and the subsequent negotiation processes.
25. **IN** his paragraphs 31 and 32, Mr Hassell comments on scoring systems and outcomes. In particular, he comments on five of the aspects evaluated. It appears that, in making his comments, Mr Hassell would like to simplify and clarify scores awarded to make them more logical to those trying to understand the basis for the decision. If it was possible to reduce the scoring to something

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<sup>9</sup> And also the potential numbers and placement of towers per section

more simplistic, it would have been desirable. However, for all the aspects considered we were dealing with high levels of complexity in the “real world”.

- 26. AS** Mr Hassell notes earlier in his hypothetical examples in his paragraphs 28(i) and (ii), any type of scoring system is likely to have difficulties in application. To address the scoring on as “fair” a basis as possible, the decision-conferencing technique was used. This enables complexities to be identified, discussed and resolved within the process. The downside is that the process involves conversations amongst the numerous workshop participants similar to those that (for example) a jury may have, which are not readily recorded and are therefore not particularly transparent.
- 27. THE** scoring of all the examples that Mr Hassell discusses are of that type. Factual information was provided as a basis for the scoring decision but the workshop participants brought additional information to the consensus view<sup>10</sup>. A simple example is that of the two schools of different sizes in Mr Hassell’s paragraph 32 (ii) which scored apparently illogically. The workshop participants clearly took into account the extent to which the school grounds and buildings were within the route – in the case of Paparimu, the complete school establishment, and in the case of Horahora, part of the playground but no buildings<sup>11</sup>. If it were a simple matter of collecting information and applying scores on either of the bases in his paragraph 28, the decision conferencing technique<sup>12</sup> would not have been needed.
- 28. IN** his paragraphs 34 and 35, Mr Hassell is critical of the lack of explanation as to why the scores were what they were, and says that they are thus open to challenge. He provides a particular example in his paragraph 35. Commenting generally, as noted above, the detailed recording of why a decision to score an aspect a particular way would be an extremely difficult task and it is, in my experience, never done in detail. The background information should, however, be open to scrutiny, as the ACRE process provided for<sup>13</sup>.

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<sup>10</sup> Typically a workshop session spent an equivalent amount of time on presentation and question/answer per aspect, to that spent on further discussion and scoring (generally a workshop comprised a full day). The information included visual information (if relevant), GIS information, etc, comprising many layers of information, which would have been impossible to record in a traceable manner.

<sup>11</sup> This can be ascertained from reviewing the maps in Volume 3 (Series 2) of the Route Report (Common Exhibit)

<sup>12</sup> Decision conferencing is an internationally recognised method of MCA – eg O’Hagen, A; Buck, CE; Daneshkhan, A; Eiser, JR; Gaithwaite, PH; Jenkinson, DJ; Oakley, JE; and Rakow, I, 2006 “Uncertain Judgements – Eliciting Expert’s Probabilities” (Published by J Wiley and Sons).

<sup>13</sup> The Interim Route Decision Report was accompanied by seven appendices and eleven draft working papers, and was available for public scrutiny.

29. **IN** my opinion, the “*open to challenge*” comment in Mr Hassell’s evidence was addressed by the consultation, submission and hearing processes (firstly on the Area, Corridor and Route Reports, and then on the Interim Route Decision), and the review prior to the final route decision. As a result of additional information received during the consultation process, all scores were reviewed and a small number of scores were changed. In my opinion, that additional process added robustness.
30. **IN** respect of the example in Mr Hassell’s paragraph 35, he has chosen to quote and criticise the scoring on Visual Impact/Landscape Values by referring to a single sentence in the section entitled “Summary Description of Route Options”, while greater clarity can be gained from Table 3 – Summary of Key Aspects (see reference to 12-E and 12-W in the Table) or indeed the comprehensive Draft Working Paper 7 or its update Report 7 (Visual/Landscape Assessment Report) included in Part 2 of the “*Final Route Decision Report*”<sup>14</sup>.
31. **IN** his final paragraph 38, Mr Hassell sets out three scores and says they are “*clearly anomalous*”. I do not agree. As a check, I have looked at:
- (a) Number of Dwellings in the final Route Report for Section IIW, 13 dwellings, score 2<sup>15</sup>. Other route sections with a similar number of dwellings are Section IE, score 5 (the section is much shorter<sup>16</sup>); Section 2E+W, score 5 (the section is similar to Section IE in length); Section 12E, score 3 (15 dwellings, short section), Section 13E, score 2 (15 dwellings, long section); Section 14E, score 3 (11 dwellings, long section but a concentrated area of dwellings).
  - (b) Visual Impact/Landscape Values – discussed in my paragraph 30 above; not anomalous.
  - (c) Sensitive Landuses – discussed in my paragraph 27 above; not anomalous.
32. **THE** Interim and Final Route Reports included a range of weightings applied to the scores to test the robustness of the analysis. These are fully explained in the

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<sup>14</sup> Common Exhibit, although I note that the scores from the Workshop do not always fully reflect the background information that was provided for the workshop session, as described in paragraphs 26 and 27.

<sup>15</sup> Section IIE, 5 dwellings, score 1.

<sup>16</sup> I have noted section lengths as a variable but other aspects were also taken into account.

reports. As a further check, an analysis was performed to identify the extent to which the scores would need to change to result in a different preference across the range of analyses. This is Table 7 in the Final Route Decision Report and is not mentioned in Mr Hassell's evidence. It is clear that a relatively significant anomaly (or several anomalies in a single section) would need to be found to alter the preference.

**EVIDENCE OF JOHN BLAIR OLLIVER (WAIPA DISTRICT COUNCIL) (Submission numbers 0919 and 0984)**

33. **MR** Olliver's evidence includes general planning commentary as well as commentary on the basis for the decision to choose the western route in sections 11 to 14, but concentrating on sections 11 to 13. I address these latter comments here, but the bulk of my rebuttal in relation to this witness is included in my statement of rebuttal evidence (2).
34. **IN** paragraphs 121 to 123, Mr Olliver raises the section 171(1)(b) matter of alternative sites, routes or methods. He appears to acknowledge the complexity of considerations, but states in paragraph 123 that *"the final stages of the route selection were flawed"*. This is followed by his comment in paragraph 126, which states *"when I apply a planning evaluation in accordance with the RMA tests it is the western route that conflicts with S6(a) because it crosses the Waikato River twice. The eastern option does not cross it at all"*.
35. **IN** paragraph 127, he goes on to state *"it is only the western option that crosses areas of outstanding natural features and landscapes, creating a conflict with S6(b)...For similar reasons, the western route also has significantly greater conflicts with sections 7(c), 7(f) and 7(g)"*.
36. **IN** making these comments, it appears that Mr Olliver is relying very heavily on the contents of the Waipa District Plan (as compared to those of the Matamata-Piako District Plan and the South Waikato District Plan). There are, in my opinion, a number of reasons why a District Plan should be considered a guide rather than an absolute when connected networks are being considered. Amongst these are:

- (a) Lack of consistency between plans, including for example, different techniques and methods applied, resulting in different emphasis on different aspects.
- (b) The need to undertake analyses “within” the framework of the RMA and the Plan, ie, even if an area is significant in terms of Section 6(a), (b) and (f), protection is afforded only in relation to “*inappropriate subdivision, use and development*”. Not all subdivision, use and development, is necessarily inappropriate. Amenity and quality considerations also involve a range of localised considerations, at the route stage largely around visual impact in the local landscape context.
- (c) Potential for “double counting”, if included as a separate item in an analysis such as that undertaken in the ACRE process.

**37. THE** ACRE documentation expressly notes that the Waipa District Plan includes provisions relating to identified significant landscape areas from Corridor stage onwards. The methodology relating to landscape and natural character was however applied equivalently across all relevant areas at the different stages of analysis. I do not accept that there is any justification to do it any other way.

**38. WHILE** I acknowledge that Mr Olliver is relying on the Waipa Plan for his comments in relation to sections 6(a) and (b), I am not clear as to the basis on which he has decided that considerations under sections 7(c), (f) and (g) would clearly favour the eastern route option in route sections 11 to 13. It also appears that he may not have noted Mr Druskovich’s comments (paragraph 17 of his first statement of evidence) in relation to the eastern option in route section 13E which raise section 6(f), and thus 7(g) matters, and also potentially 6(e) matters.

**39. IN** paragraph 129, Mr Olliver states that he is “*not able to identify from the NOR documentation why for sections 11, 12 and 13 the western route was chose when in my opinion the balance tips clearly to the eastern option*”. I am not sure if Mr Olliver has reviewed the Report on Interim Route Decision and the Final Route Decision Report. It would have been helpful had he identified which of the “*multitude of criteria analysed*”, do not relate to the aspects chosen later for the multi-criteria analysis on pages 27 to 31 of the Report on Interim Route Decision (and repeated in the Final Route Decision Report).

**40.** HE does however set out some of his concerns (referring to items touched on in my evidence in chief (1), paragraph 56, and noted on page 74 of Part VIII of the NOR). I note that the items that Mr Olliver is referring to relate to the identification of routes from the Corridor stage, and not the actual aspects used in the decision between the two routes. I however comment as follows, referring to the explanation for:

- (a) Avoidance of Crown Land. Both Crown and Maori land were included in the “property degree of difficulty” aspect, along with quite a number of other considerations. This was relevant, as generally Crown land (along with local government owned land) is held for specific purposes “*and poses difficulties in terms of acquisition or easements*” (see Corridor Study Report, page 7). Largely, Crown land had been avoided in the identification of the routes, and was not a major consideration by the time a decision was made between route options.
- (b) Number of dwellings. This was an aspect evaluated in the route decision, and was described as “the key social impact indicator” in the Interim Route Decision Report, page 27. Effects on people and communities are an RMA matter.
- (c) The presence of the ARI-PAK A line. This was taken into account in the visual/landscape, recreational, and to some extent the airstrips evaluation. It was not an aspect in its own right in terms of the multi-criteria analysis of options.
- (d) Property compensation costs. This is a relevant consideration in terms of the project and was one of the aspects included in the multi-criteria analysis.

**41.** I am not sure if Mr Olliver has endeavoured to follow the multi-criteria analysis application as explained in the Report on Interim Route Decision and the Final Route Decision Report. It is clear that a number of different weighting systems were applied. In terms of the particular interests which Mr Olliver has, a “Section 6 Emphasis”, and “Section 5 and 6 Balance” analysis were both undertaken, applying the weightings explained on page 41 (and enumerated in Table 4) of the Report on Interim Route Decision.

42. **TABLE 6** indicates that for Route section 12, the eastern route was slightly preferred when the Section 6 Emphasis weightings were applied (excluding any consideration of sensitive landuses, farming effects, effects on other rural landuses, property and engineering degree of difficulty and compensation costs). The other seven analyses also showed some slight variation depending on the aspects used and the weightings applied. I am confident that the approach adopted involved appropriate systematic analysis and determined the most appropriate route alternative.
43. **MR Olliver** then turns to the Route Study Report<sup>17</sup> and its “*helpful tabulation*” of pluses and minuses for each route section. It is quite clear from the Report that the evaluation was very preliminary and was part of the information provided as “*the basis for consultation, and will be refined through consultation and further environmental, engineering and property investigations in the second part of the Route Stage (Route<sup>ii</sup> in Figure 1), prior to choosing a preferred route<sup>18</sup>*”.
44. **THE** methodology and purpose is set out in 2.6. It is preliminary; it was intended to aid and stimulate public discussion and consultation responses; in particular it rolls together under a single heading of “other” a range of special characteristics or issues; and it does not claim to be a comprehensive multi-criteria analysis. Indeed, it is explained that the use of pluses and minuses was specifically intended to “*discourage simple addition and comparison of aspects within route sections*”.
45. **THE** technique was also applied to a range of route options which were not recommended to be proceeded with. The Interim Route Decision followed significant further investigation and analysis and consultation. As noted above, when evaluated on a range of bases, and with scores combined over the section 11 to 14 length, the western route option was preferred.
46. **MR Olliver** includes a quote from the Report on Interim Route Decision in his paragraph 133. This correctly states that the landscape values within the areas identified in Waipa District Plan would be “*taken into account in the visual and recreational aspect evaluations*”. That was done during the evaluation process.

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<sup>17</sup> North Island 400kV Backbone Investigation Project Environmental Phase 1, Volume 3 of 3, Route Study, Part 1 of 2, Report, MWH NZ Ltd, October 2004, at page 4. (**Common Exhibits**)

<sup>18</sup> Page 4, Route Study Report.

47. **MR** Olliver concludes his comments on the methodology applied by stating in his paragraph 135 *“section 171(b) is not satisfied because inadequate consideration has been given to a route (the eastern route) that would effectively avoid significant conflicts with Part 2 matters. Inadequate in this context means that the planning assessment was flawed, meaning that the outcome was flawed”*.
48. **WITH** respect, as I have noted in my earlier paragraph 17 in relation to Mr Hassell’s evidence, the RMA does not provide a simple checklist of relevant matters, and when applied in the real world there is a great deal of complexity and many “shades of grey”. In my opinion, the identification and consideration of route alternatives has been careful and thorough, and is thus robust. In the context of section 171(1)(b) I consider sufficient information has been provided for a decision-maker to determine the adequacy of consideration.

**EVIDENCE OF MARY BUCKLAND (WAIPA DISTRICT COUNCIL) (Submission numbers 0919 and 0984)**

49. **MS** Buckland has undertaken a review of the eastern route option for the part of the line that is equivalent to sections 12 and 13 within Waipa district. This assessment relies on visual aspects only, but takes into account proximity to the rural towns of Tirau and Putaruru. In her summary in paragraph 10.11, Ms Buckland acknowledges that the landscape on the eastern route option is *“bumpy”* and that *“overall the spatial quality of the landscape is open”*. I understand Ms Buckland to be indicating that the landscape would not readily absorb the line. The *“bumpy”* landscape near Tirau noted by Ms Buckland is described by Mr Druskovich in his evidence in chief, paragraph 17, as a *“significant archaeological landscape”*, and *“an area (that) has the highest density of Pa in the country”*.
50. **THIS** area could in the future become recognised as a heritage landscape in the relevant District Plans, but this was not acknowledged in Ms Buckland’s evidence. I am also not sure on what basis, given the higher visual exposure noted by Ms Buckland, she is able to conclude in her paragraph 12.4 *“the eastern route is much better”*, and that *“this route should be implemented”*. In her paragraphs 11.5 to 11.7, Ms Buckland quotes from Mr Lister’s report, which was Specialist Report 7, attached to the Final Route Decision Report. Mr Lister’s quotes aside, Table 2 of the Final Route Decision Report, reflecting the consensus view of the decision conferencing workshop was that, under the heading “visual impact/landscape

values”, the western route was slightly preferred for route sections 11, 12 and 13<sup>19</sup>. Taking other aspects relevant to the route choice into account, the western route was preferred overall.

51. **IN** her conclusion, paragraph 12.3, Ms Buckland states that *“Mr Lister makes (sic) quite clear that if both the east and west routes had been “greenfields” sites, the eastern route would have been chosen”*. With respect, the choice of the route relied on an analysis of many aspects of the environment, not just visual or landscape effects. As with Mr Olliver, in my opinion, Ms Buckland seeks to elevate visual/landscape/natural character aspects disproportionately in her assessment of the basis of the route choice.

#### **EVIDENCE OF AARON COLLIER (SWDC) (Submission number 0799)**

52. **IN** paragraphs 6.26 to 6.29 of his revised evidence (13<sup>th</sup> March 2008), Mr Collier expresses his view that District Plan provisions should have been taken into account in the *“examination of alternative routes”* and *“this was not done”*. With respect, District Plan provisions were identified and acknowledged at all stages of the evaluation. The reasons why they did not form a specific criterion are explained in the documentation, including the words quoted in Mr Collier’s paragraph 6.27, and have been further expanded in my response to Mr Olliver’s similar comments above (paragraph 36 of this evidence).
53. I should note that, as recorded in Appendix 7 of the Interim and Final Route Decision Reports, I presented information on the provisions of the District and Regional Plans to the workshops undertaking decision conferencing. These were subject to workshop consideration and formed part of the background knowledge then available to participants. Mr Collier’s paragraphs 6.28 and 6.29 are in my view incorrect.

#### **EVIDENCE OF DI LUCAS (SWDC) Submission number 0799)**

54. **IN** paragraph 21, Ms Lucas states, on the basis of my paragraphs 18 and 19 in my first statement of evidence, that the ACRE model *“required adaption to adequately recognise different factors encountered”*. That is not what my evidence says and is not a correct reflection of the process. My evidence rather

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<sup>19</sup> By one point (out of 5) in each case.

describes a logical process of refinement, moving from the broader Area analysis to the Corridor and Route stages. I have noted that the model was adaptable to the different stages.

55. **MS** Lucas sets out in her paragraph 22, components of the Area part of the model. She appears to be critical of the Desk-top analysis method. In my experience, it is valid to use Desk-top methods in the first broad stage of information collection and analysis, as was done for most aspects. However, as also confirmed by Mr Lister in his rebuttal evidence, extensive field work was undertaken in relation to the landscape, visual and natural character aspects at all the stages of the ACRE process. In her paragraph 23, Ms Lucas says there are “*fundamental gaps in the process taken to first assess the Area*”. She does not state what the gaps are.
56. **MS** Lucas does not state that she referred to or examined the documentation of the actual process: rather in her paragraphs 22 to 25 she has critiqued the methodology as it was set out in the initial brief, but she has not examined how the brief was put into practice.
57. **IN** her paragraph 27, Ms Lucas states that “*there seems to have been a fundamental methodological problem in criteria or attribute selection and application*”, but she does not say what it was. Ms Lucas does however not appear to qualify herself as an expert, or experienced in the field of multi-criteria decision-making.

#### **EVIDENCE OF GEOFF COPSTICK AND KATE BRENNAN (Submission numbers 0405 and 0406)**

58. **MR** Copstick and Ms Brennan offer comments on what they see as “*an insincere and dismissive approach to genuine environmental concerns*” in paragraph 115 of their revised evidence. They then quote extensively from my first statement of evidence. I comment on one matter here, although it does not fall entirely within the matters in that evidence.
59. I do not agree with the assertion of Mr Copstick and Ms Brennan in their paragraph 118 that there was a lack of engagement with anyone other than landowners in the easement corridor. There was an extensive consultation process on the route options, as documented in the evidence of Dr Phillips and in

the NOR documentation. I consider that Transpower and its advisors have a good understanding of the impact of the line on the wider communities around the proposed line and have taken this into account at all stages of the ACRE process.

60. **AS** expressed in my second statement of evidence (paragraphs 249 and 250), section 5 of the RMA requires balance in terms of enabling people and communities to meet their needs. It is widely recognised that not all environmental effects can be avoided, remedied or mitigated on all people and communities at all levels. I confirm my opinion that Transpower has endeavoured to address Part 2 responsibilities through the processes it has applied.

#### **EVIDENCE OF MARTIN GLEDHILL (MOH) (Submission number 0823)**

61. **MR** Gledhill notes in his paragraph 3.13 that the route identification process included consideration of the number of dwellings within the route, and later that the position of dwellings was taken into account in the alignment decisions. Mr Gledhill is unsure whether this was intended to further reduce exposures to electric and magnetic fields beyond the “worst case” baseline design of meeting the ICNIRP guidelines for public exposure.
62. **PROXIMITY** to dwellings was applied as an indicator of likely social impacts of the line at the route stage, and it was acknowledged that impacts on dwellings would range from ongoing visual impact to shorter term construction effects. No specific consideration was given to the potential additional low/no cost benefits of further reductions in exposure to electric and magnetic fields (beyond the low levels at the edge of the easement). However, I do acknowledge that a minor additional benefit could be perceived.
63. **AS** Mr Gledhill notes, dwellings, but also other buildings such as milking sheds where people may spend long periods, are proposed to be excluded from the easement. This means that such areas will experience significantly less than ICNIRP guideline levels of electric and magnetic fields.

**Sylvia Jean Allan**

**25 March 2008**