

**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 OF ANNETTE TYREE MCGOVERN IN REBUTTAL  
FOR TRANSPOWER NEW ZEALAND LIMITED  
(Planning: Notices of Requirement for the Pakuranga Substation and Pakuranga  
to Brownhill underground cable route, and resource consents)**

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## Introduction

1. **MY** name is Annette Tyree McGovern. I wish to present rebuttal evidence to the statements of evidence of:
  - (a) Ms Jade Wikaira, on behalf of Manukau City Council (**MCC**);
  - (b) Mr D J Scott, on behalf of MCC; and
  - (c) Mr Timothy Chatteron; on behalf of Vector Limited (**Vector**).
  
2. I address the evidence of each of these submitters below.

### **Ms Jade Wikaira (MCC) (Submission number 0861)**

#### *Pakuranga Substation*

3. **AT** paragraph 40 of her revised evidence, Ms Wikaira states that she considers: "*the use of a GIS is a better option than the proposed air insulation switch gear at the Pakuranga substation*", which she "*believes adversely impacts on the visual amenity of the surrounding area*".
  
4. **THE** evidence in chief of Mr Deller (at paragraphs 35 and 36) discusses why the AIS substation is the preferred option for the site as opposed to a GIS substation. Mr Deller states that an AIS substation is lower in capital costs by approximately \$15million and the Electricity Commission's decision for the Upgrade Project required Transpower build the Pakuranga Substation as an AIS, rather than GIS.
  
5. **IN** addition, the evidence of Mr Lister addresses the visual effects of the proposed AIS substation in paragraphs 92 - 96 of his evidence in chief and paragraphs 29 - 34 of his rebuttal evidence. Mr Lister considers that an AIS substation is appropriate, proposed mitigation will lead to an improvement to existing amenity, and there will not be high adverse effects compared with the existing substation.

6. **TAKING** into account that mixed urban development has occurred around the substation since it was constructed, along with the evidence of Mr Deller and Mr Lister, and the proposed mitigation planting plan, I consider that Ms Wikaira's request for a GIS substation is unnecessary.
7. **AT** paragraph 43 of her revised evidence, Ms Wikaira states that "*much of Transpower's evidence seems to be predicated on the basis that the new station will be similar in character to the current one even though it is of a greater scale and impact.*"
8. **AT** paragraph 44 of her revised evidence, Ms Wikaira goes on to state that "*[t]his implies that the site has some form of existing use rights which can be incrementally added to by the current proposal, or that some kind of existing environment baseline should exist for a new designation such as this*".
9. **IT** is my opinion that it is appropriate to consider the existing landuse environment of the substation site when considering the effects of the upgrade to the substation. The Pakuranga Substation has been built and been in operation since 1971. I am not aware of any information (and no evidence has been put before the Board by any submitters), to suggest that any use and development of land around the Pakuranga Substation has been precluded by the substation presence.
10. **AT** paragraph 45 of her revised evidence, Ms Wikaira states that she would "*consider it more appropriate that the proposal be assessed largely as a new development against the provisions of the District Plan*".
11. **TRANSPOWER'S** proposal for Pakuranga Substation is, in my opinion, clearly an upgrade to well established and operational infrastructure, and is not a new development. I therefore consider that it is appropriate to compare the potential effects of the proposed upgrade against the existing situation and to provide mitigation measures as outlined in the Notices of Requirement (**NOR**) documentation. I therefore do not agree with Ms Wikaira's opinion.
12. **AT** paragraphs 46 – 47 of her evidence, Ms Wikaira discusses the zoning of Public Open Space 2 zoned land "*at the western aspect and across the Pakuranga Creek*", which I have taken to assume means the western side of

the substation site. She also discusses how the zoning will protect public space for passive outdoor recreation.

13. **MS** Wikaira then refers to paragraph 17 of my evidence in chief, and states that my evidence stated *"this part of the site will be bundled and planted for screening purposes"*. Ms Wikaira goes on to say that she considers *"that the visual amenity issues will not be adequately addressed and that an enclosed substation (which would be completely out of view) is a more optimal solution"*.
14. **FIRSTLY**, in response, I consider that it is important to note that while the western boundary of the Substation is on the eastern side of the Pakuranga Creek, no part of the substation site is zoned as Open Space as stated by Ms Wikaira. Secondly, my evidence in paragraph 17 actually stated that *"[t]he site is surrounded predominately by road, or open space and business zone land on its immediate north western and south western / south eastern boundaries. Where it abuts residential housing, it is bundled and planted for screening purposes"*.
15. **THE** purpose of paragraph 17 of my evidence in chief was to describe the existing situation at the substation site, not future mitigation planting. Details of such mitigation planting is addressed by the evidence of Mr Lister. Mr Lister concludes that with the mitigation measures proposed, the visual effects of the development of the substation will be appropriately addressed.
16. **AT** paragraph 49 of her evidence, Ms Wikaira requested that a condition be imposed requiring Transpower to prepare a Reserve Restoration Plan, to Council's satisfaction, and also a Construction Management Plan to address construction effects.
17. I note that Transpower has offered mitigation planting as outlined in paragraph 96 of Mr Lister's evidence in chief. Transpower has also already proposed preparation of a Construction Management Plan prior to any works commencing on site, in the NOR for the Pakuranga Substation and in the proposed conditions put before the Board. Construction Management Plans are outlined in the evidence of Mr Rasul, Mr Joyce and Mr Prince. I consider that the relief sought by Ms Wikaira, to the extent that it seeks planning for landscape enhancement, design, timing and initial management of the "restoration works" will be adequately addressed by Transpower through the

proposed Construction Management Plan, and the visual mitigation and ecological planting plan.

*Underground cable route: Whitford Park Road*

18. **MR** Joyce in his evidence addresses the various points raised by Ms Wikaira in relation to the Pakuranga to Brownhill underground cable route. I will address the matters relating to road widening and upgrade proposals on Whitford Park Road.
19. **AT** paragraphs 18 – 21 of her revised evidence, Ms Wikaira states that there is a current Council notice of requirement to designate future road widening along Whitford Park Road. She states "*it is important that the cable route be designed to ensure that future planned work on the road is not compromised*".
20. I am aware that MCC notified seven NORs as part of Plan Change 8 on 8 July 2005<sup>1</sup>. It is my understanding from recent conversations with MCC (Ms Leonie Osborne) that the NORs of relevance to the Whitford Park Road and Sandstone Road intersections (referred to as requirement 1 and requirement 2 within Plan Change 8) are still subject to appeal and therefore have not been confirmed.
21. **IN** paragraph 35 of her revised evidence, Ms Wikaira seeks a condition to ensure that the cables "be based at a depth that reflects planned ultimate road levels and road drainage requirements and that any level changes to accommodate this be undertaken in conjunction with the cable construction (if not already undertaken by Council)".
22. **IT** is my understanding that MCC has provided revised details of its road widening and upgrade plans to Mr Joyce at Transpower.<sup>2</sup> Mr Joyce confirms in his rebuttal evidence (at paragraph 4) that the road widening will not conflict with the installation or operation of the underground cables.
23. I consider that this measure means that the cables can be installed in such a way as to ensure that neither the underground cable designation nor the

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<sup>1</sup> <http://www.manukau.govt.nz/tec/district/plan-change-register.pdf>

<sup>2</sup> Pers Comms, Richard Joyce 06 March 2008.

