

**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 PAULA MARGARET HUNTER IN REBUTTAL  
FOR TRANSPOWER NEW ZEALAND LIMITED  
(Planning: Notices of requirement for Otahuhu Substation and Otahuhu to  
Brownhill cable route)**

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## Introduction

1. **MY** name is Paula Margaret Hunter. I wish to present rebuttal evidence to the statements of evidence of:
  - (a) Ms Jade Wikaira, on behalf of Manukau City Council (**MCC**); and
  - (b) Mr Nathan Baker, on behalf of Housing New Zealand Corporation (**HNZC**).
2. I address the evidence of these submitters below.

### **Ms Jade Wikaira (MCC): Otahuhu to Brownhill cable route**

3. **AT** paragraph 36 of her revised evidence, Ms Wikaira states that in relation to the Otahuhu to Brownhill cable route, the Manukau City District Plan (**District Plan**) "*includes an indicative road extending Redoubt Road to connect with Ormiston Road*". She goes on to state that:

*"Policy 8.11.1 of the District Plan states 'that no development activity or subdivision shall be constructed, erected or implemented in a manner that would prevent proposed roads or road widening being formed'."*

4. **AT** paragraph 37 of her revised evidence, Ms Wikaira raises the "*primary issue for Council*" being that the proposed cable is constructed and operated in a manner that does not preclude the ability to construct in the future the extension to Redoubt Road.
5. **MS WIKAIRA** goes on to seek the imposition of an appropriate condition to ensure that the developer of the road is not unduly compromised in the ability to complete the construction of the planned Redoubt Road connection.
6. **IN** the first instance, it should be noted that the policy referred to by Ms Wikaira is in fact not a policy, but a rule, and Ms Wikaira has not quoted the rule in its entirety. It is Rule 8.11.1 in Section 8.11 – Development and Performance

Standards in Chapter 8 Transportation of the District Plan, and for completeness the rule is reproduced as follows:

**"Rule**

**8.11.1 Development and Subdivision to be in Accordance with Proposed Roads and Road Widening**

*No development activity or subdivision shall be constructed, erected or implemented in a manner that would prevent proposed roads and road widening being formed in general accordance with those contained within the planning maps and structure plan policies and maps contained within the Plan."*

7. **THE** proposed extension to Redoubt Road is shown on the Planning Maps 49 and 50 of the District Plan and is notated as "Proposed Road, Service Lane and Road Widening"<sup>1</sup>. The location of the proposed extension is indicative only. Under the District Plan (Rule 8.10.2.4) "*at such time as land is vested as road it shall automatically be rezoned Secondary Road Zone*". MCC has generally chosen to zone its roads in the District Plan rather than designate them.
8. **RULE 8.11.1** will not apply to works carried out under Transpower's designation. However, in any event, as set out in the evidence in rebuttal of Mr Joyce, Transpower will use its best endeavours to ensure that the neither the cable designation nor the installation of the cable will prevent the construction of the proposed Redoubt Road extension. Transpower is proposing a condition to this effect (Underground Cable Route Common Conditions – Condition 11 Future Roding).
9. **HOWEVER**, given that the installation of the cable will not commence until about 2019, it is anticipated that the Redoubt Road extension will be constructed in advance of the cable installation. Thus, whoever is ultimately responsible for constructing the road will need to obtain Transpower's written consent pursuant to section 176 of the Resource Management Act 1991 (**RMA**). As also set out in the evidence in rebuttal of Mr Joyce, there should be no reason for Transpower to withhold its written consent provided the

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<sup>1</sup> These plans have been provided to the Board as part of the underground cable conditions.

proposed works will not prevent or hinder the work (installation of the cable and its operation) to which the designation relates.

10. **IF** however, the cable was installed prior to the construction of the Redoubt Road extension, it is anticipated that the earthworks required for the cable installation will be suitable for the future road construction. The road formation could be designed at the time of the cable installation, with the pavement construction taking place once the road was required. This is expanded further in the evidence in rebuttal of Mr Joyce. Also, as set out above, Transpower's proposed Condition 11 is designed to ensure that the establishment of the cable along the alignment of the proposed road will not prevent the construction of that road in the future.

**Mr Nathan Baker (HNZC)**

11. **AT** paragraph 28 of his evidence, Mr Baker states that "*a Construction Management Plan should be prepared up front to give all, the Board and HNZC included, certainty that construction effects within the designated area will not create adverse effects.*"
12. I do not consider it appropriate or practical to prepare management plans, such as construction management plans (**CMPs**), at this stage, nor for a fully-developed CMP to form part of the designation conditions as proposed by Mr Baker. The reasons why I have formed this opinion are as follows.
13. **THE** installation of the Otahuhu to Brownhill cable is not anticipated to commence until around 2019, and Stage 2 of the Otahuhu Substation works are not scheduled until 2022 to 2024. It is inappropriate and impractical to require the preparation of management plans for works that will not take place for another 11 to 14 years.
14. **IN** those intervening years, there are likely to be changes in the detail of construction methodologies, timing and staging will be clarified and there will be changes in the surrounding environment all of which will influence how the works will be undertaken. If, as proposed by Mr Baker, the completed CMPs form part of the designation conditions, then it is likely that changes to the designation conditions would need to be sought prior to construction

commencing in order to accommodate any changes in construction details, and the surrounding environment etc.

15. **BY** way of example, the conditions proposed by Transpower require consultation with landowners along the route. It is through this consultation that issues facing any mobility impaired Housing New Zealand tenants (to take the example raised by Mr Baker) would be addressed. However, to address such issues, up to date information is required about where such tenants live, and their specific requirements need to be ascertained. A considered approach to such matters cannot be made so far in advance of works occurring. Accordingly, I consider that preparation of management plans at this stage is inappropriate and unnecessary.
  
16. I also note that it is common practice, especially for major infrastructure projects, for consent or designation conditions to be imposed that require the preparation of management plans, including CMPs prior to the establishment or construction of an activity. Such conditions usually set out the types of management plans required, the matters the plans will address, and when the plans must be submitted to the consent authority. The management plan approach proposed by Transpower is entirely consistent with this practice.
  
17. **THE** approach proposed by Transpower is consistent with the management plan process adopted in a number of major infrastructure projects I have been involved with, or have particular knowledge of, including:
  - (a) Tauranga City Council Wastewater Consents Project – retrofit (relining) of the existing ocean outfall pipeline under Papamoa Beach out into the Pacific Ocean.
  
  - (b) Watercare Services Ltd, Project Waikato – construction of an underground water pipeline through the north Waikato and South Auckland including Manukau City.
  
  - (c) Christchurch City Council Ocean Outfall Project – construction of a new ocean outfall pipeline from the Bexley Wastewater Treatment Plant through South Brighton and out into Pegasus Bay.

- 18.** **IN** my opinion, the preparation of management plans prior to undertaking any works, and submitting them prior to the commencement of any construction, is an appropriate approach that has been well tested through the consenting and designating of many other major infrastructure projects. I am also confident that the management plan approach, together with the other designation conditions proposed by Transpower will ensure that effects associated with the construction works can be appropriately avoided, remedied or mitigated.

**Paula Margaret Hunter**

**9 June 2008**