

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

**STATEMENT OF EVIDENCE OF RICHARD EDWARD JOYCE IN REBUTTAL
ON BEHALF OF TRANSPOWER NEW ZEALAND LIMITED
(Construction processes and management: cables)**

SIMPSON GRIERSON
D J S LAING / J G A WINCHESTER
TELEPHONE: +64-4-499 4599
FACSIMILE: +64-4-472 6986
DX SX11174: PO BOX 2402
SOLICITORS
WELLINGTON

J S KÓŠ QC
STOUT STREET CHAMBERS
TELEPHONE: +64-4-472 9026
FACSIMILE: +64-4-472 9027
PO BOX 117
WELLINGTON

Introduction

1. **MY** name is Richard Edward Joyce. 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 each submitter below.

Ms Jade Wikaira (MCC) (Submission number 0861)

3. **AT** paragraph 11 of her revised evidence, Ms Wikaira notes that MCC have a number of existing designations for proposed roads or roading improvements traversing the cable routes. I understand that these proposed roads and roading improvements are planned for three particular locations. At paragraph 12 of her revised evidence, Ms Wikaira states that she considers the cable route should not preclude or add to the costs of MCC to undertake works in accordance with its designations for proposed roads or roading improvements. I discuss each location in turn below.

Road widening at Whitford Park Road

4. **AT** paragraph 19 of her revised statement, Ms Wikaira states that in addition to widening Whitford Park Road, MCC has plans to alter the vertical alignment of the road, and considers it important that the cable be placed at a depth that reflects the ultimate proposed vertical alignment. I have received a number of drawings from MCC that outline the preliminary design for the new road alignment. The Pakuranga cable circuits overlay the new alignment for approximately 500m. Having viewed these plans, I consider that the cables can be satisfactorily buried at a depth that would not compromise MCC plans for this new alignment. It is likely that such a depth would be 1.5 m to the top of the uppermost cable.
5. **THERE** is only one area that I consider warrants any comment at this stage, that being the culvert shown approximately at chainage 780 (Opus Drawing

1/027/368 Code 3124 Sheet 203 R0). The Pakuranga to Brownhill underground cable route has the cables crossing this culvert. The plans show that the final level at this point will be changed by only 1cm, which is not a significant alteration and would not compromise the cover over the cable circuits. Provided Transpower is kept updated about MCC's plans for this realignment, it can be considered by Transpower in relation to the cable depth at this location. In this regard, I can also confirm that copies of the MCC drawings were incorporated in the package of information provided to the prospective Design and Build tender participants for their inclusion when formulating their bids.

6. **AT** paragraph 20 of her revised evidence, Ms Wikaira states that achieving the five year storm water flows "*could mean that the planned works may need to occur in conjunction with the cable works*", and at paragraph 21 of her revised evidence that she does "*not believe it is necessarily a simple case of burying cable beneath the current road*". She does not elaborate on any reasons for her views. I consider that the approach of carrying out the cable and road works at the same time appears to be sensible and worthy of further exploration to ascertain if respective project timetables could accommodate this. However, I note that Transpower would not be carrying out any road realignments that were not otherwise authorised by the Upgrade Project. Accordingly, MCC would have to complete the road alignment, and there would be no need for it to contribute financially to Transpower, as suggested at paragraph 21 of Ms Wikaira's revised statement.

7. I would also like to take this opportunity to correct Ms Wikaira's comment at paragraph 21 of her revised evidence. I am aware that Whitford Park Road is sealed and acknowledged this in paragraph 183 of my first statement of evidence.

Intersection of Caldwells/Sandstone Road & Alternative Route Along Caldwells Road

8. **AT** paragraph 25 of her revised evidence, Ms Wikaira refers to the part of the Pakuranga to Brownhill cable route that travels along a paper road. She states her view that the current Caldwells paper road is not in the best position to serve development of the immediate area. She then goes on to state that MCC has held discussions with the land owner at this point, and that an

alternative route/access point has been identified from Sandstone Road to the rest of Caldwell's Road.

9. I remain of the view that the cable route set out in the NOR is appropriate, and there are no engineering or other constraints that would prevent the cable being installed in this location. However, in a spirit of cooperation, Transpower has examined alternative options with MCC and the landowner's representative.
10. **AT** paragraph 27 of her revised evidence, Ms Wikaira states her understanding that Transpower has investigated the route proposed by MCC and advises that it is feasible, but would involve additional civil engineering costs. The route Transpower has investigated was proposed by the landowner, not MCC. This route was subsequently refined by Maunsell. As noted earlier, we have done this despite our view that the alignment on the paper road is entirely appropriate. Maunsell were commissioned to investigate a new position for the junction of Sandstone Road and Caldwell's Road, as well as an altered road alignment that was developed in conjunction with Camperdown's engineering consultants.
11. **THE** engineering work required for the alignment proposed by Camperdown and the intersection works proposed by MCC have been estimated at \$9,089,600, including a 30% contingency. This cost is prohibitively expensive, and the option of considering an alternative alignment through the Camperdown land is not being considered further by Transpower.
12. **TO** achieve the required sight lines and satisfy all other applicable design requirements, the junction at the revised position requires considerable earthworks and the cost for this work is estimated to be in the order of \$1.3M (excluding contingency). I note that the \$1.3M is part of the approximately \$9M figure referred to earlier in my evidence. Discussions continue with Camperdown's agents as to the apportionment of costs. However, I note that as at the date of finalising this evidence, I have had no confirmation (or indication) that Camperdown is prepared to treat any initial engineering costs incurred by Transpower as betterment and would provide reimbursement, as suggested by Ms Wikaira at paragraph 27 of her revised evidence.

