

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

**MEMORANDUM OF COUNSEL ON BEHALF OF TRANSPOWER NEW ZEALAND
LIMITED IN RELATION TO SUPPLEMENTARY FIGURES FROM MR GAVIN LISTER
AND MR GRAHAM WARREN**

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MAY IT PLEASE THE BOARD

1. **THIS** memorandum of counsel on behalf of Transpower New Zealand Limited (**Transpower**) relates to additional images and a map that were provided to the Board of Inquiry near the close of Transpower's case. The relevant images and map are:
 - (a) Photographs of monopoles, located in Toowoomba, Australia. These visuals are **Exhibit "AB"**.
 - (b) A replacement map of the proposed Whakamaru and Whakamaru North Substations, with an overlay of the Whakamaru Electricity Generation Core Site and the Noise Control boundaries. This map is **Exhibit "AC"**.
2. **WE** address each of these exhibits below.

Monopole photographs

3. **MR LISTER'S** evidence refers to monopoles in a number of places. During the course of presenting his evidence, reference was made to existing monopoles that were located in Toowoomba, Australia. During questioning from the Board, a request was made for Mr Lister to produce the photographs of the Toowoomba monopoles, together with details of their location (Board of Inquiry, Day 35, 6 June 2008).

Whakamaru Noise Boundary

4. **APPENDIX "A"** to Mr Warren's rebuttal evidence is a map which shows the location of the proposed Whakamaru and Whakamaru North Substations site and the Whakamaru Electricity Generation Core Site and Noise Control boundaries. During the presentation of Mr Warren's evidence (Board of Inquiry, Day 23, 13 May 2008), questions were raised by the Board in relation to the boundary of the Whakamaru Electricity Generation Core Site and also the Noise Control boundary. Accordingly, an enlarged colour A3 replacement map was prepared, based on Taupo District Plan Map B3, to clarify these boundaries for the Board.

Recall of witnesses

5. **AS** indicated by Counsel on 6 June 2008, should any party should wish to cross-examine, or otherwise question Mr Lister or Mr Warren in relation to these additional images, we will recall these witnesses to enable such questioning to occur.

DATED at Wellington this 1st day of July 2008



J S Kós, QC/D J S Laing/J G A Winchester
Counsel for Transpower New Zealand Limited