

Lauren Edwards

From: Lauren Edwards
Sent: Wednesday, 20 September 2023 10:53 AM
To: Tom Anderson
Subject: Mt Munro s92 Response

Mōrena Tom

Hope you are having a good week.

In regards to the s92 response provided by Meridian, there are a few critical points in terms of the scope of the application and/or potential consenting requirements that we would like to resolve prior to notification. There are other less critical issues that we believe can be worked through later in parallel to the notification process. The below gives an initial indication of what has arisen, I will follow up later this week with something more detailed.

1. The provision of the Fill Disposal Areas Plan (Drawing 1016884.1000-016) has raised a number of questions from a few of our technical assessors. The calculation of the volume of excess fill requiring disposal may not include all contributions, which may have flow of effects including:
 - a. Additional excess fill volume would increase one or more of the number/area/volume of excess fill disposal sites within the provided Indicative Fill Disposal Areas plan. This has potential implications for the landscape and visual assessment, to ensure excess fill volume does not result in a series of highly visible, engineered/geometric fill edges/faces, or is significantly higher than anticipated (noting that the s92 response suggests that a significant quantity of fill (approximately 1.2M m3) may be disposed of in relatively visible locations and at up to depths of around 5m). This is critical given the envelope approach being proposed.
 - b. Adequate representation of the most likely fill disposal areas across the site is also required to inform potential submitters.
 - c. Changes to the fill disposal site would require an updated review of the geotechnical effects as well as assessment by other technical disciplines to adequately assess the effects of the works (and may result in other consent requirements being triggered).
2. Further information is required to confirm the above.
3. Given the Fill Disposal Areas take up a large area of the envelope, please confirm how erosion and sediment control measures will be incorporated into the envelope. For example, is there room for SRP's to be used?
4. In regards to the methodology to be used for the construction of the proposed culverts, you have proposed to wait for detailed design and SEMP for specific methodology. In our view, this is the highest risk earthworks on site and we need to see a more detailed methodology or example SEMP for these works to assess practicality.
5. You have mentioned in the s92 response (Question 90 Response) that in addition to the culverts identified in the lodged application, a further nine culverts are identified as necessary. Please advise whether these will meet the Permitted Activity standards in the NESF and the Regional Council Plan's or whether additional consents are required for these culverts. If they require resource consents, we will need this confirmed and further information provided in relation to these (location, design etc).
6. We also note that you have set out that the three proposed culverts will meet all of the Permitted Activity standards in the NESF, with much of the details being left to detailed design, please confirm that consent for the culverts is not required under the NESF.

7. In regards to stormwater, we note that the assessment undertaken in Section 4.3.2 and 4.4.3 relate to short term construction run off and management measures to mitigate these short term effects. No assessment of long term run off of stormwater discharges from the access road and substation areas has been undertaken. With the current level of detail, we cannot confirm whether or not the diversion and discharge of stormwater will meet the Permitted Activity standards in the One Plan and the GWRC Natural Resources Plan.
8. Please confirm whether you consider the following resource consent requirements are triggered:
- a. **Tararua District Plan Standard 4.1.6.1** - An activity specifically listed in Part 5 (such as a renewable electricity generation facility) of the Plan as a “discretionary activity” also requires consent as a “discretionary activity” under rule 4.1.6.1 in the rural management area;
 - b. **Tararua District Plan Standard 5.4.1.2** - For activities that cannot meet the permitted activity standard (and do not meet the definition of a temporary activity) for noise in a rural management area
 - c. **Wairarapa Combined District Plan (WCDP) Rule 4.5.6.(a)** - For any activity listed in Schedule of primary Industry (specifically for stone and mineral crushing and concrete batching) not captured by temporary activity standard of Rule 21.1.16(a)
 - d. **WCDP Rule 21.2.2** - For hazardous facilities that includes hazardous substances with a quantity falling within controlled activity standards in Appendix 2 (specifically for the diesel fuel tank, likely HSNO subclass 3.1D)
 - e. **WCDP Rule 21.6(n)** - For hazardous facilities that includes hazardous substances with a quantity falling within discretionary activity standards in Appendix 2 (specifically for the transformer fuel) please confirm likely quantities and HSNO subclass)
 - f. **WCDP Rule 4.5.2(a)(f)** - Rural zone noise limits for activity/activities not captured by temporary activity standard of Rule 21.1.16(a). Consent required if not met.
 - g. **National Environmental Standards for Assessing and Managing Contaminants in Soil to Protect Human Health 2011 Regulation 11** - on the basis that there will disturbance of soil on a relevant piece of land, for a duration longer than allowed for within the Regulation 8 Permitted Activity standard, and without a DSI provided (to meet Regulation 9 or 10) – noting that earthworks will occur in locations identified as HAIL sites (e.g., by the ‘super bin’ that contained fertiliser) in the submitted PSI. The PSI says no earthworks will occur, but the submitted Fill Disposal Area Plan & other proposal documents suggest otherwise.
9. We also note that you may wish to comment on the draft NPS Natural Hazards (noting this was released this week and may come into force prior to the decision).

We will discuss further in our meeting this morning – we are conscious some of these points may have an impact on the notification process and are keen to resolve the points above.

Ngā mihi,

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Please note I am out of office on Mondays.

