

IN THE ENVIRONMENT COURT OF NEW ZEALAND
WELLINGTON REGISTRY

I MUA I TE KŌTI TAIAO O AOTEAROA
TE WHANGANUI-Ā-TARA ROHE

ENV-2024-WLG-000001

Under the	RESOURCE MANAGEMENT ACT 1991
In the matter of	the direct referral of applications for resource consents under section 87G of the Act for the Mt Munro Wind Farm
By	MERIDIAN ENERGY LIMITED Applicant

JOINT STATEMENT OF THE AIR QUALITY EXPERTS

31 July 2024

INTRODUCTION

1. This joint expert witness statement relates to the direct referral application lodged by Meridian Energy Limited for resource consents to construct, operate and maintain a windfarm on Mt Munro, Eketāhuna.
2. The air quality experts attending the conference were:
 - (a) Andrew Curtis (**AC**) for the Consent Authorities (Manawatū-Whanganui Regional Council, Wellington Regional Council, Tararua District Council, and Masterton District Council)
 - (b) Robert Van de Munckhof (**RVM**) for Meridian Energy Limited (**MEL**).
3. The conference took place in person on 31 July 2024.

CODE OF CONDUCT

4. This joint witness statement is prepared in accordance with section 9 of the Environment Court Practice Note 2023.
5. We confirm that we have read the Environment Court Practice Note 2023 and agree to abide by it.

PURPOSE AND SCOPE OF CONFERENCING

6. The purpose of this expert conferencing was to identify, discuss, and highlight points of agreement and disagreement on air quality issues.
7. Issues have been identified following the reporting of the Consent Authorities in the s 87F reports, and through evidence filed by MEL and the s 274 parties. At mediation in June 2024, the parties also agreed that some issues would be discussed at expert conferencing.

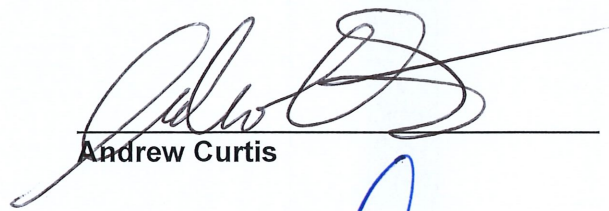
AGREED ISSUES

8. Refer to Annexure A.

DISAGREEMENT AND REASONS

9. Refer to Annexure A.

Date: 31 July 2024



Andrew Curtis



Robert Van de Munckhof

ANNEXURE A

In the matter of the Mt Munro windfarm application

Expert conferencing – Air Quality – AC and RVM

Issue	Agreed position with reasons	Disagreements with reasons
Topic: Methodology		
<ol style="list-style-type: none"> Appropriate of methodology and analysis of likely effects <ul style="list-style-type: none"> Construction Operational Consistency of proposed dust management methodologies with MfE guidelines 	<p>The experts agree that the qualitative FIDOL assessment that has been used to assess the potential effects from the construction activities is appropriate, and consistent with MfE guidelines and best practice in New Zealand.</p> <p>The experts note that the assessments have focussed on construction effects as there are no air quality issues associated with operation that they are aware of.</p>	
Topic: Specific Issues - Effects		
<ol style="list-style-type: none"> What is the likelihood and extent of effects of dust nuisance on adjoining properties (for example from earthworks during construction)? 	<p>The experts agree that with effective implementation of the CAQMP the potential for effects for the construction activities within the main site are low to negligible on off-site receptors.</p> <p>For the reconstruction of Old Coach Road, the experts consider that without mitigation the risk of effects is high. The experts also note that the risk and nature of effect would be the same for any major road maintenance that was undertaken at any similar location.</p>	

Issue	Agreed position with reasons	Disagreements with reasons
	<p>The experts consider that with the management and mitigation measures that are proposed the risk of effects is reduced to low. However given the location there need to be contingency measures available in the event that management measures are not sufficiently effective.</p> <p>The experts agree that the methods set out in paragraph 52 of Mr RVM EIC are appropriate, but are not an exhaustive list of potential potential contingency measures. Specific measures would depend on the situation and location.</p> <p>In terms of vehicle movements on Old Coach Road, the experts agree that sealing the road provides the best method for avoiding potential dust effects on sensitive receptors.</p> <p>The experts agree that while other management methods could be used on Old Coach Road, they will be more difficult to implement over a longer period.</p>	
<p>4. Consideration of activities on the ridgeline as part of construction dust assessment.</p>	<p>The experts agree that the separation distances are sufficient to minimise the potential for off-site effects.</p> <p>However the experts note that this does not negate the need for dust control at this location, given the exposed nature of the site.</p>	
<p>5. Potential (if any) for effects where construction of onsite access road is close to a property's site boundary. Do effects at this location need to be further considered? If so, how?</p>	<p>The experts consider, that there is potential for dust to travel beyond the northern site boundary, during the construction of the site access road, and this activity requires effective management to minimise dust.</p> <p>The experts agree that there are no highly sensitive receptors (e.g. dwellings) that might be affected by this dust.</p> <p>The experts consider, based on their experience, that with the effective implementation of the management methods the risk of dust effects on stock or pastures would be low.</p>	

Issue	Agreed position with reasons	Disagreements with reasons
6. Potential Effects of Fill Sites	<p>The experts consider that the dust management methods required in the CAQMP, and those proposed in the EIC of Graeme Ridley in relation to erosion and sediment control ,are appropriate to manage the potential effects for dust from the operation of these sites, and in particular that there will be progressive and rapid stabilisation with all unworked surfaces to be stabilised within 14 days.</p>	
7. Implications (if any) of dust on farm activities.	<p>The experts consider based on their experience that with the effective implementation of the management methods, the risk of dust effects on farm activities, stock or pastures would be low.</p>	
8. Potential for effects on drinking water and fruit and vegetables. Note the s 274 party Mir Olliver raises this as a concern.	<p>The experts consider that apart from the properties on Old Coach Road, discussed above, the potential for effects on drinking water and fruit and vegetables is negligible.</p>	
Topic: Construction Air Quality Management Plan (CAQMP)		
9. Scope of CAQMP	<p>In terms of the questions posed by the planners to the air quality experts we agree the following.</p> <p>The experts agree that reference to a SQEP is not necessary, however it needs to be prepared by someone with experience in dust management.</p> <p>The expert agree that there should be a separate bullet point which deals with the identification for the need of and implementation of contingency measures.</p>	

Issue	Agreed position with reasons	Disagreements with reasons
	<p>The experts consider that point c (iv) should be focused on monitoring that demonstrates the effectiveness of the dust management methods and providing feedback loop for controlling the methods identified in c (iii).</p> <p>The experts agree that the CAQMP should also identify the persons responsible for management and implementation of the plan.</p> <p>In respect to the question raised about “other airborne contaminants” the experts consider that based on the location of the site and any potential sources e.g. generators, there is no need for specific control measures.</p>	
10. Effectiveness of mitigation measures	The experts consider that the management measures are well understood and have been proven to be effective for dust management form construction activities.	
11. Length of construction period and appropriateness of management measures	The experts note that the duration of the construction works have been considered as part of the FIDOL assessment, and they are confident that the management measures proposed are appropriate for that duration	
Topic: Conditions		
12. Discussion of conditions to address effects	<p>The experts agree subject to our response to Question 9, that the proposed conditions should be effective to address the dust effects at this site.</p> <p>Notwithstanding this, we consider that clause (i) could be expanded to include specific reference to rock crushing and the operation of the concrete batching plant.</p>	
13. Address questions from planning experts (see attached)	See response of Question 9.	

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