

**In the Environment Court
I Mua I Te Kōti Taiao O Aotearoa**

Under the Resource Management Act 1991

and in the matter of the direct referral of an application for resource consents by Meridian Energy Limited in respect of the proposed Mt Munro wind farm under section 87G of the Resource Management Act 1991 (**RMA**).

Meridian Energy Limited
Applicant

and

Tararua District Council, Masterton District Council, Manawatū-Whanganui Regional Council and Greater Wellington Regional Council (Councils)
Consent Authorities

and

s 274 Parties

Statement of Rebuttal Evidence of Dr Leigh Sandra Bull on behalf of Meridian Energy Limited

6 September 2024

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INTRODUCTION

1. My full name is Dr Leigh Sandra Bull. My statement of evidence in chief dated 24 May 2024 addresses effects on terrestrial ecology in relation to the proposed Mt Munro Wind Farm. My qualifications and experience are set out in that statement of evidence, and I reaffirm my commitment to comply with the code of conduct for expert witnesses.
2. The purpose of this rebuttal evidence is to respond to matters relevant to terrestrial ecology that have been raised in the evidence of the section 274 parties, and in the evidence of Mr James Lambie on behalf of the Councils.

RESPONSE TO COUNCIL EVIDENCE

3. Mr Lambie and I participated in expert conferencing in relation to terrestrial ecology and reached agreement on all matters, as is reflected in the Joint Statement of Terrestrial Ecology Experts (the **JWS**), and as noted in Mr Lambie's evidence. I consider that there is agreement between Mr Lambie and myself that effects on terrestrial ecology can be appropriately managed through the August Proposed Conditions attached to the evidence of Mr McGahan. I note that Mr Lambie has proposed some amendments to the bat monitoring conditions, which I leave to Mr Anderson to comment on from a planning perspective in his rebuttal evidence.

RESPONSE TO S 274 EVIDENCE

4. I have reviewed the evidence filed by Ms Janet McIlraith, Mr Robin Olliver, the Hastwell/Mt Munro Protection Society Inc. and Mr John Maxwell (the **section 274 evidence**) and have considered the concerns raised in relation to terrestrial ecology. I agree with Mr Lambie's response to the matters raised, and consider that there are no outstanding matters in the s 274 evidence to address in relation to terrestrial ecology effects.

CONDITIONS

5. The August Proposed Conditions attached to the evidence of D McGahan reflect those agreed in the Terrestrial Ecology JWS.
6. However, I note that EC.9 b) refers to a “BCMP”, this should be corrected to “BSMP”.

CONCLUSIONS

7. With regards to terrestrial ecology, there are no outstanding matters.

Dr Leigh Bull

6 September 2024