

**Wellington Registry  
Te Whanganui-a-Tara Rohe**

**ENV-WLG-2024-001**

**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**

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**Statement of Rebuttal Evidence of Maurice Mills on behalf of Meridian Energy Limited**

**6 September 2024**

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### **Appendix A:** Mt Munro Windfarm: Recently Identified Active Faults – Consent Condition Considerations

## INTRODUCTION

1. My full name is Maurice Mills. My statement of evidence in chief dated 24 May 2024 addresses civil design, geotechnical, and stormwater matters 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 in preparing and presenting this rebuttal evidence.
2. The purpose of this rebuttal evidence is to respond to the remaining outstanding issues raised in the evidence of Mr Neil Crampton, Ms Susan Ira and Mr Andrés Roa Concha, and any relevant matters raised by the section 274 parties.
3. I participated in expert conferencing in relation to geotechnical matters with Mr Crampton, and on stormwater and hydrology matters with Mr Roa and Ms Ira. We had a high level of alignment on all matters, as is reflected in the Joint Statement of Geotechnical Experts (the **JWS - Geotechnical**), and the Joint Statement of Stormwater and Hydrology Experts (the **JWS – Stormwater & Hydrology**). I attach the memorandum prepared by Mr Crampton which is referred to in the JWS – Geotechnical as **Appendix A** to this evidence, noting that it was intended to be attached to that statement.
4. The condition set attached to the evidence of Mr McGahan (the **August Proposed Conditions**) incorporates the changes we agreed should be made, except as noted in relation to some minor operational stormwater matters discussed in the evidence of Mr Roa and Ms Ira. This is discussed further below.
5. I confirm that I consider the August Proposed Conditions are appropriate and will allow effects to be appropriately managed throughout the construction and operation of the Project.

## RESPONSE TO S 274 EVIDENCE

6. I have reviewed the s 274 evidence.
7. The evidence of Mr Crampton responds to the concerns raised by Mr Robin Olliver in his evidence around the recently identified active faults

described in the GNS 2021 Report.<sup>1</sup> I agree with Mr Crampton that the concern raised is appropriately addressed by new condition EW3.

8. The evidence of Mr Roa notes the concern raised in s 274 evidence around the rainfall figures used in the application, and identifies that the JWS – Stormwater & Hydrology sets out the experts' agreement that HIRDS Version 4 RCP8.5 (2081-2100) is the appropriate rainfall data set to use for design. I agree, but also acknowledge Mr Ridley's evidence in chief and rebuttal evidence, where he explains that the Masterton data used in the application was to illustrate the annual rainfall pattern, rather than purporting to reflect exact site conditions. Mr Ridley notes that the specific design of erosion and sediment controls will be based on local data,<sup>2</sup> which I agree is appropriate and is in line with the agreement of the stormwater and hydrology experts.

## **RESPONSE TO COUNCIL GEOTECHNICAL, AND STORMWATER AND HYDROLOGY EVIDENCE**

9. There are no remaining outstanding issues in relation to geotechnical issues. I agree with Mr Crampton that the Project is feasible from a geotechnical perspective, and confirm that I agree with the August Proposed Conditions that are relevant to my area of expertise.
10. There are several outstanding issues in relation to the appropriate conditions for operational stormwater and hydrology:
  - a) The planners have reached a different view on the stormwater conditions, to those agreed at the stormwater and hydrology conferencing.
11. Tonkin + Taylor stormwater engineers<sup>3</sup> have confirmed that detailed design will result in the relevant permitted activity rules for stormwater discharge being met, for operational discharges. Demonstration of compliance with the permitted activity rules will be undertaken through

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<sup>1</sup> Statement of evidence of Neil Andrew Crampton at [15] and [16]

<sup>2</sup> Evidence of Graeme Ridley, at [116]

<sup>3</sup> Tonkin + Taylor memo "*Mt Munro Wind Farm Stormwater S92 Responses*", dated 07 September 2023, attached as Appendix 13 of the AEE.

the detailed design process required by the August Proposed Consent conditions.

12. In their JWS, the planners agreed that proposed condition CM1(b) (4) can be amended to be more explicit regarding permitted activity standards.

- a) The planners are of the opinion that because the stormwater design will meet the relevant permitted activity rules, a Stormwater Operation and Maintenance Plan is not required. This matter is covered in the evidence of Ms Lauren Edwards and Ms Alisha Vivian for the regional councils.

## **CONCLUSIONS**

13. I confirm that stormwater design will ensure the operational project will meet the permitted activity rules for stormwater discharges, and this will be demonstrated through the detailed design process, in accordance with proposed condition CM1(b)(4).
14. While I supported the recommendation in the Stormwater and Hydrology JWS requiring the development of a stormwater operation and management plan, I understand and accept the planners' agreed position that this is not required as part of compliance with the relevant permitted activity rules.

**Maurice Mills**

6 September 2024

**Appendix A: Mt Munro Windfarm: Recently Identified Active Faults –  
Consent Condition Considerations**