

**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 Robert Alan Van de Munckhof on behalf of Meridian Energy Limited

6 September 2024

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INTRODUCTION

1. My full name is Robert Alan Van de Munckhof. My statement of evidence in chief dated 24 May 2024 addresses air quality effects 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 air quality that have been raised in the evidence of the section 274 parties, and in the evidence of Mr Andrew Curtis on behalf of the Councils.

RESPONSE TO COUNCIL EVIDENCE

3. Mr Curtis and I participated in expert conferencing in relation to air quality and reached agreement on all matters, as is reflected in the Joint Statement of Air Quality Experts (the **JWS**), and as noted in Mr Curtis's evidence.
4. I consider that there is agreement between Mr Curtis and myself that the effects of dust can be appropriately managed through the August Proposed Conditions, in particular conditions DM1, DM2 and CTM2.
 - a) Condition DM1 which sets out the limit of effects for the project; and
 - b) Condition DM2 which requires the preparation of a Dust Management Plan (DMP) which set out the methods and measures to manage dust at the site;
 - c) Condition CTM2 which requires sealing of Old Coach Road from SH2 to the site entrance.
5. Condition DM2 includes recommendations from expert conferencing by the air quality experts as outlined in the JWS dated 31 July 2024 including:

- a) Identification of persons responsible for the management and implementation of the DMP;
- b) specific reference to mobile aggregate crushing and the concrete batching plant as suggested by experts during expert conferencing; and
- c) Methods and measures to avoid, where practicable, and otherwise to minimise dust emissions including provision for contingency measures.

RESPONSE TO S 274 EVIDENCE

- 6. I have reviewed the s 274 evidence, and agree with Mr Curtis's response in his evidence to the concerns raised in relation to dust and air quality.

CONDITIONS

- 7. I have reviewed the August Proposed Conditions attached to the evidence of Mr Damien McGahan. The conditions are consistent with my evidence and recommendations. I do note that during expert conferencing the experts agreed that reference to a SQEP was not required. Based on the current definition of a SQEP, I am comfortable with the reference as currently proposed.

CONCLUSIONS

- 8. My opinion remains that with the effective implementation of the consent conditions, including the requirement to seal Old Coach Road and to develop and implement a DMP, the effects of dust can be managed to be no more than minor.

Robert van de Munckhof

6 September 2024