

**IN THE ENVIRONMENT COURT
WELLINGTON REGISTRY**

**I TE KŌTI TAIAO O AOTEAROA
TE WHANGANUI-A-TARA ROHE**

ENV-2024-WLG-001

UNDER the Resource Management Act 1991

IN THE MATTER the direct referral of applications for resource consents by
under section 87G of the Act for the Mt Munro Wind Farm

BY **MERIDIAN ENERGY LIMITED**
Applicant

STATEMENT OF EVIDENCE OF ANDRES ROA CONCHA

**ON BEHALF OF MANAWATŪ-WHANGANUI REGIONAL COUNCIL, GREATER
WELLINGTON REGIONAL COUNCIL, TARARUA DISTRICT COUNCIL, AND
MASTERTON DISTRICT COUNCIL**

OPERATIONAL WATER QUANTITY

Dated: 23 August 2024



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STATEMENT OF EVIDENCE OF ANDRES ROA CONCHA

A. INTRODUCTION

- [1] My name is Andrés Roa Concha. I am an Engineering Consultant, and Founding Director of AR & Associates Ltd (recently acquired by Wood and Partners Consultants Ltd), a civil engineering, and surveying consulting firm.
- [2] I prepared a report on the application required by s 87F of the Resource Management Act 1991 (**RMA**) on behalf of Manawātū-Whanganui Regional Council (**Horizons**) and Wellington Regional Council (**WRC**) Tararua District Council (**TDC**), and Masterton District Council (**MDC**) (the **Consent Authorities**) dated 15 March 2024 (**s 87F Report**).
- [3] In my s 87F Report, I reviewed the application from Meridian Energy Limited (the **Applicant** or **Meridian**) for resource consent applications lodged with the Consent Authorities for the Mt Munro Wind Farm (**Mt Munro Project** or **Project**) with regard to water quantity effects from the operational phase of the wind farm turbines and associated infrastructure. The s 87F Report provided recommendations to improve or further clarify aspects of the resource consent applications, including with regard to conditions, should the Court be minded to grant resource consents.
- [4] I confirm I have the qualifications and experience set out at paragraphs 7 to 11 of my s 87F Report.
- [5] On 1 and 5 August 2024, I participated in expert conferencing on operational stormwater management, resulting in a joint witness statement dated 5 August 2024 (the **Stormwater and Hydrology JWS**). I confirm the contents of the Stormwater and Hydrology JWS.

B. CODE OF CONDUCT

- [6] I repeat the confirmation provided in my s 87F Report that I have read and agree to comply with the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023. This evidence has been prepared in accordance with that Code. Statements expressed in this evidence are

within my areas of expertise, except where I state I am relying on the opinion or evidence of other witnesses.

C. SCOPE OF EVIDENCE

[7] My statement will cover the following:

- (a) The extent to which issues identified in my s 87F Report have been resolved through mediation, Meridian evidence, and expert conferencing; and
- (b) Conditions.

[8] In addition to the material that was reviewed for my s 87F Report, I have reviewed the following:

- (a) Statements of Evidence of Mr Maurice Mills (Civil Engineering Design) and Mr Tom Anderson (Planning), dated 24 May 2024, on behalf of Meridian;
- (b) The proposed changes to conditions filed with Mr Anderson's evidence (the **Meridian conditions**);
- (c) Evidence of Janet McIlraith (s 274 party) dated 10 July 2024;
- (d) Evidence of Robin Olliver (s 274 party) dated 10 July 2024;
- (e) Evidence of Hastwell/Mt Munro Protection Society Inc. (s 274 party) dated 10 July 2024;
- (f) Evidence (Social Impact Report) of John Maxwell (s 274 party) dated 10 July 2024;
- (g) Draft evidence of Ms Susan Ira (Operational Water Quality), on behalf of the Consent Authorities; and
- (h) The draft proposed conditions attached to the evidence of Mr Damien McGahan on behalf of the Consent Authorities (the **August Proposed Conditions**).

D. OUTSTANDING ISSUES

- [9] Following mediation, expert conferencing and review of the Meridian evidence, and the resulting Stormwater and Hydrology JWS there are no issues arising from my s 87F report that remain unresolved.
- [10] Ms Ira, Mr Mills and myself agreed on all issues raised in the s 87F Report and agreed that these could be resolved via appropriate conditions of consent.¹ Of particular relevance is the agreement to address stormwater quantity matters through consent conditions regarding detailed design, including the imposition of design requirements and standards.² The experts have also agreed that a stormwater operation and maintenance plan is required (reflecting my opinion in the s 87F report that this is critical for the effective functioning of the stormwater system), and that fill disposal sites will be located clear of any flood plains, flood prone areas or overland flow paths (addressing my concerns raised in the s 87F report as to location).³

E. RESPONSE TO SECTION 274 PARTY EVIDENCE

- [11] I have reviewed the section 274 party evidence and no additional matters relating to long term operational stormwater quantity have been raised that were not addressed in my s 87F Report.
- [12] I note that submitters have continued to highlight concerns relating to rainfall figures provided in the application.⁴ The experts agreed in the Operational Stormwater JWS that the rainfall referred to in the Meridian application documentation is not appropriate for the Project site. As noted in my s 87F report, I consider the rainfall data given in HIRDS Version 4 RCP8.5 (for the period 2081-2100) (**HIRDS V4**) to be more appropriate for the purposes of the design. The Stormwater and Hydrology JWS confirms the

¹ Stormwater and Hydrology JWS, 15 August 2024.

² Stormwater and Hydrology JWS, pages 3-5.

³ Stormwater and Hydrology JWS, pages 4-5.

⁴ Section 274 Parties – Janet McIlraith, Robin Olliver, John Maxwell, Hastwell Mount Munro Protection Society Inc.

experts' agreement that HIRDS V4 is appropriate for the design of the stormwater system.⁵

F. CONDITIONS

[13] The Stormwater and Hydrology JWS set out a number of recommendations for conditions. I have reviewed the evidence of Ms Ira, who addresses all of these matters, to my satisfaction.⁶

[14] As noted by Ms Ira, the August Proposed Conditions do not address all the matters recommended in the Stormwater and Hydrology JWS (and therefore my s 87F Report).⁷ However, I consider that as a minimum, the following matters should also be covered by the consent conditions:⁸

(a) A condition requiring the development of an operation and maintenance plan.⁹

(b) A requirement for fill disposal areas to be located clear of any flood plains, flood prone areas or overland flow paths.¹⁰

[15] These conditions will ensure that any adverse stormwater effects are adequately managed in the long term.

G. CONCLUSION

[16] Following mediation, expert conferencing and review of the Meridian evidence, and the resulting Stormwater and Hydrology JWS, I consider that the issues raised in my s 87F Report can be resolved via appropriate consent conditions. This was also agreed in the Stormwater and Hydrology JWS.

23 August 2024

Andrés Roa Concha

⁵ Stormwater and Hydrology JWS, Issue 4, page 4.

⁶ Statement of Evidence- Sue Ira (Operational Water Quality), 23 August 2024, at [15]-[17].

⁷ Statement of Evidence - Sue Ira (Operational Water Quality), 23 August 2024, at [15].

⁸ At [15](c) and [15](d).

⁹ Stormwater and Hydrology JWS, item 6, page 4.

¹⁰ Stormwater and Hydrology JWS, item 7, page 4.