

**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 NEIL THOMAS

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

GROUNDWATER

Dated: 23 August 2024



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STATEMENT OF EVIDENCE OF NEIL THOMAS

A. INTRODUCTION

- [1] My name is Neil Thomas. I am a Technical Director – Water Resources at Pattle Delamore Partners Limited, specialising in groundwater.
- [2] I prepared a report on the application required by s 87F of the Resource Management Act 1991 (**RMA**) on behalf of Manawatū-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**) in relation to groundwater. 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 5 to 8 of my s 87F Report.

B. CODE OF CONDUCT

- [5] 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

- [6] 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;
- (b) A response to section 274 party evidence; and
- (c) Conditions.

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

- (a) Joint Witness Statement for Planning, dated 9 August 2024 (**Planning JWS**);
- (b) Statements of Evidence of:
 - (i) Graeme Ridley - Erosion and Sediment Control dated 24 May 2024, on behalf of Meridian;
 - (ii) Dr Vaughan Keesing - Freshwater and Wetland Ecology dated 24 May 2024, on behalf of Meridian; and
 - (iii) Thomas Anderson - Planning dated 24 May 2024 on behalf of Meridian.
- (c) The proposed changes to conditions filed with Mr Anderson's evidence (the **Meridian conditions**);
- (d) Evidence of Janet McLraith (s 274 party) dated 10 July 2024;
- (e) Evidence of Robin Olliver (s 274 party) dated 10 July 2024;
- (f) Evidence of Hastwell/Mt Munro Protection Society Inc. (s 274 party) dated 10 July 2024; and
- (g) Evidence (Social Impact Report) of John Maxwell (s 274 party) dated 10 July 2024.

D. OUTSTANDING ISSUES

- [8] There are no outstanding issues arising from my s 87F Report. These have been resolved through the Planning JWS and conditions attached to the evidence of Mr Damien McGahan (the **August Proposed Conditions**).
- [9] The outstanding issue from the s 87F Report was in relation to the potential location of the concrete batching plant. If the concrete batching plant was to be located in the valley along Old Coach Road, there was a risk that discharges of stormwater runoff and washwater, together with associated contaminants could enter groundwater and travel to nearby receptors, including nearby bores and the Mākāhahi River.¹
- [10] As identified in Planning JWS, the concrete batching plant will be located outside of the Mākāhahi Valley.² The Planning JWS goes on to record that conditions could be imposed to ensure that the concrete batching plant was not located in the valley (and the construction laydown area). I have since reviewed the Proposed August Conditions, and agree that the approach proposed in Condition CB1 will ensure that the Mākāhahi Valley will be avoided. I therefore consider this issue to now be resolved.

E. RESPONSE TO SECTION 274 PARTY EVIDENCE

- [11] I have reviewed the section 274 party evidence and note that impacts on groundwater are not identified in any of the statements. Therefore, I have not commented further on the section 274 party evidence.

F. CONDITIONS

- [12] I have reviewed the August Proposed Conditions. I am comfortable with the conditions as they relate to minimising the potential effects on groundwater.

¹ Section 87F Report – Neil Thomas (Groundwater), 15 March 2024 at [27]-[29].

² Planning JWS at pages 12-13, and Attachment A.

G. CONCLUSION

[13] In my opinion, the effects of the Project and ancillary activities on groundwater will be very small, provided Meridian complies with the proposed conditions.

23 August 2024

Neil Malcolm Thomas