

**BEFORE THE MANAWATŪ-WHANGANUI REGIONAL COUNCIL  
INDEPENDENT HEARING PANEL**

**IN THE MATTER** of the Resource Management Act 1991 ("RMA" or "the Act")

**AND**

**IN THE MATTER** of resource consent applications to **MANAWATŪ-WHANGANUI REGIONAL COUNCIL** by **WINSTONE PULP INTERNATIONAL LIMITED** to discharge up to 750m<sup>3</sup>/day of condensate wastewater, and land disturbance together with any ancillary diversion of water and discharge of sediment for the associated construction of a wetland (ATH-2010011593.03 and ATH-202609463.00).

**STATEMENT OF EVIDENCE OF SUNIL PRASAD  
DATED 29 SEPTEMBER 2026**

**1. SUMMARY OF EVIDENCE**

- 1.1 I was engaged by WPI to prepare the preliminary design and drawings for the proposed wetland earthworks, along with the required erosion and sediment controls necessary for the Site.
- 1.2 The Site earthworks and erosion and sediment controls for the proposed wetland have been designed to minimise earthworks and ensure no discharge of contaminated or sediment laden runoff from the Site.
- 1.3 The proposed earthworks consist of excavating a series of wetland ponds, with a total cut to fill volume of approximately 10,000m<sup>3</sup>. A perimeter earth bund is proposed to prevent clean water from entering the Site and to keep dirty water from leaving the Site during the earthwork activities.
- 1.4 Pond 1 is proposed to be excavated first and to be used as an initial sediment retention pond. Subsequent wetland ponds will then be constructed, providing additional sediment retention as each pond is excavated.

Excavated material is proposed be used to fill the existing Pond 6. Given the existing large pond and the excavation of subsequent ponds, there is extensive capacity within the Site to store more than the full 100-year event rainfall within the Site. Consequently, there will not be any discharge of runoff from the Site, keeping any contamination or sediment contained.

- 1.5 Following the preparation of the preliminary drawings and Erosion and Sediment Control Plan, the proposed concept wetland design and configuration has been revised. The proposed revision reduces the earthworks in both quantity (volume) as well as extent on Site. The existing pond (Pond 6) is now proposed to be filled. Following completion of the proposed works, this area will be capped and grassed and will not be part of the wetland system. The remaining area will be used for a series of connected shallow, narrower channels to assist in cooling the condensate water entering the wetland while providing extensive planting between channels for treatment.
- 1.6 The proposed revision to the wetland concept will not affect the general methodology proposed for the earthworks and the erosion and sediment controls. The volume of earthworks will likely be reduced with the cut from the proposed wetland channels being used to fill the existing pond. The exact volumes are not available as the concept design has not been finalised and therefore the revised earthwork design has not yet been completed. The methodology for Erosion and Sediment control is unchanged with substantial initial retention volume in the existing pond and additional volume becoming available as the wetland channels are excavated. A topsoil perimeter bund will be utilised to ensure containment during construction works.
- 1.7 The s 42A Report from Council representative, Mr Kerry Pearce, supports the proposed earthworks and sediment and erosion control activities provided specific conditions of consent are imposed. I agree with these proposed conditions, which will ensure certain clarifications and elaborations of the proposed design are included in the final detailed design and Erosion and Sediment Control Plan.

## 2. **INTRODUCTION**

- 2.1 My name is Sunil Prasad. I am an Engineering Manager at Cheal Consultants Limited.
- 2.2 This evidence has been prepared in respect of the resource consent applications by Winstone Pulp International Limited ("**WPI**" or "**the Applicant**") to consent the discharge of up to 750 m<sup>3</sup>/day of condensate

wastewater associated with the proposed wood processing operations, in addition to consent for land disturbance together with any ancillary diversion of water and discharge of sediment associated with construction of the wetland ("**the Proposal**") at 1002 State Highway 49, Tangiwai ("**the Site**") under the Horizons Regional Council One Plan ("**One Plan**").

### **Qualifications and experience**

- 2.3 I have a Bachelor of Engineering (Hons) (Civil Engineering) from University of Auckland (2015). I also have an Advanced Diploma in Civil Engineering, a Diploma in Civil Engineering, and am a Chartered Professional Engineer (CPEng).
- 2.4 I have 18 years' experience in Civil Engineering. I specialise in design, construction and contract management of civil infrastructure engineering including land development projects, earthworks and roading.
- 2.5 Examples of my experience relevant to this project are:
  - (a) Neil Group – Bulk Earthworks Design and Construction;
  - (b) Neil Group – Stage 1 and 2 Civil works Design and Construction;
  - (c) Neil Group – Stage 3 and 4 Civil works Design and Construction;
  - (d) Contact Energy Limited – Te Mihi Power Station Earthworks Design; and
  - (e) Contact Energy Limited – Te Huka Unit 3 Power Station Earthworks Design.

### **Involvement in project**

- 2.6 I was engaged by WPI in March of 2026 to prepare the preliminary design and drawings for the proposed wetland earthworks, along with the required erosion and sediment controls necessary.
- 2.7 I have reviewed and approved the following design drawings:
  - (a) Cheal Finished Contour Plan 260156-200, Rev. A, 1 April 2026;
  - (b) Cheal Cut and Fill and Erosion and Sediment Control Plan 260156-201, Rev. B, 8 June 2026; and
  - (c) Cheal Wetland Cross Sections 260156-202, Rev. A, 1 April 2026.

- 2.8 I have overseen and reviewed the following report:
- (a) Wetland Construction – Erosion and Sediment Control Plan, Rev. 2, 10 June 2026.
- 2.9 This evidence should be read alongside that documentation.
- 2.10 I have read the following documentation:
- (a) The resource consent application prepared by Suhki Singh of Babbage Consultants Limited dated 30 April 2026 and associated technical memorandums;<sup>1</sup>
  - (b) Council's section 92 request dated 18 May 2026, and Babbage Consultants Limited's response dated 11 June 2026 and associated attachments;<sup>2</sup>
  - (c) The submissions filed on the application;
  - (d) The Applicant's memorandum dated 8 September 2026; and
  - (e) Council's s 42A reports ("**s 42A Report**") prepared by Ms Fiona Morton and Mr Kerry Pearce dated 22 September 2026 and attachments.
- 2.11 I have not yet undertaken a site visit, given the scope of work for which Cheal was engaged. I can confirm that I will visit the Site prior to the hearing.

**Purpose and scope of evidence**

- 2.12 The purpose of my evidence is to assess the proposed earthworks and the Erosion and Sediment Control (ESC) report associated with the construction of the wetland.
- 2.13 Specifically, my evidence will:
- (a) Briefly describe the Proposal, receiving environment, and Site context (Section 3);
  - (b) Describe the proposed earthworks (Section 4);

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1 Being the Technical Memorandums 1-8.  
2 Being Attachments 1-7.

- (c) Provide an overview of the proposed erosion and sediment control measures (Section 5);
- (d) Comment on issues raised by submitters relevant to my area of expertise (Section 6); and
- (e) Comment on the Council Officer's s 42A Report (Section 7).

**Expert Witness Code of Conduct**

- 2.14 I have read the Code of Conduct for Expert Witnesses, contained in the Environment Court's Practice Note (2023) and I agree to comply with it. I can confirm that the issues addressed in this statement are within my area of expertise and that in preparing my evidence I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed.

**3. THE PROPOSAL, RECEIVING ENVIRONMENT, AND SITE CONTEXT**

- 3.1 The description of the Proposal, the receiving environment, and Site context is outlined in the planning evidence of Sukhi Singh and Council's s 42A Report. Further to this, I note the following specific matters that are relevant to my evidence:

- (a) The site is within a predominantly rural environment with an existing pond situated within the proposed footprint of the wetland works. This pond is historic and has not been used for many years, with no existing flows into or exiting the pond.
- (b) The existing footprint is predominantly grassed, with no significant vegetation requiring removal during the proposed earthworks.
- (c) The site is mostly flat with some gentle undulations. There are no overland flow paths crossing the proposed earthworks footprint, reducing the likelihood of clean water entering the Site or any erosion from concentrated surface flows.

**4. PROPOSED EARTHWORKS**

- 4.1 The proposed earthworks for the originally proposed four separate wetland basins was to affect an area of approximately 17,146m<sup>2</sup>, with a total cut volume of approximately 10,447m<sup>3</sup> and a total fill volume of approximately 9,994m<sup>3</sup> resulting in an excess of approximately 453m<sup>3</sup> of material. A

perimeter bund around the earthwork's extent is proposed using topsoil from the construction site footprint.

- 4.2 The revised overall footprint will be similar, though slightly reduced, and the existing pond area will be filled and grassed upon completion, rather than being repurposed as a wetland.
- 4.3 The perimeter bund will protect the Site from any clean water entering the Site and any dirty water leaving the work area. However, it should be noted that given the contours of the Site there is essentially no overland flow path across the proposed work area.
- 4.4 The existing pond located within the footprint of the wetland will be filled using material excavated during the construction of the wetland basins.

## 5. **SEDIMENT AND EROSION CONTROL MEASURES**

- 5.1 The sediment and erosion controls will be constructed prior to any earthworks commencing.
- 5.2 Earthworks will be undertaken during a favourable weather window in the summer months, where practicable, to minimise erosion, sediment generation, and the potential for runoff during rainfall events.
- 5.3 Existing topsoil within the works area will be stripped and subsequently reused to form a temporary perimeter bund around the earthworks area. This bund will provide containment of disturbed areas and assist in preventing sediment-laden water from leaving the site. The perimeter bund may be progressively removed in stages as the pond excavation and infilling works are completed and stabilised, and once there is no longer a risk of sediment-laden water discharging beyond the works area.
- 5.4 Should there be any contaminated material, this will need to be excavated and disposed of. I refer to Mr Hiram Garcia's brief of evidence which addresses contaminated land and remediation.
- 5.5 The formation of the wetland (Pond 1) in the northwest corner of the site shall be completed first as this wetland requires the least amount of earthworks resulting in cut. This pond can then be used for storing and soaking runoff from other earthworked areas during construction. This runoff can be pumped to the storage wetland/pond so that earthwork operations can continue for the remainder of the site. As each additional wetland is constructed, additional capacity will be created for storing runoff while the storage within the existing pond will correspondingly reduce as it is filled.

- 5.6 At the start of earthworks, the existing pond has a capacity of approximately 6300m<sup>3</sup>. A 100-year event will produce approximately 900m<sup>3</sup> of runoff for the entire site. Consequently, there is more than sufficient capacity to capture all runoff from large rainfall events.
- 5.7 Upon completion of the first wetland pond (Pond 1), this newly formed pond will provide 900m<sup>3</sup> of storage capacity, which is sufficient for the full 100-year rainfall event.
- 5.8 Should dewatering be necessary, provisions of Section G1.0 of the Greater Wellington Erosion and Sediment Control Guide for Land Disturbing Activities, Feb 2021 shall be followed, subject to requirements for contaminated soils.
- 5.9 Following completion of earthworks, the remainder of the site will be topsoiled, seeded and where necessary straw mulch shall be placed to provide immediate stabilisation of all exposed surfaces and batters. All controls shall remain in place until stabilisation occurs.
- 5.10 I note that the wetland concept has been revised since Erosion and Sediment Control Plan was prepared. The proposed revision reduces the earthworks in both quantity (volume) as well as extent on Site. The existing pond (Pond 6) is now proposed to be filled, capped and grassed and will not be part of the wetland system. The remaining area will be used for a series of connected shallow, narrower channels to assist in cooling the condensate water entering the wetland while providing extensive planting between channels for treatment.
- 5.11 The proposed revision to the wetland concept will not affect the general methodology proposed for the erosion and sediment controls. The methodology for Erosion and Sediment control is unchanged with substantial initial retention volume in the existing pond and additional volume becoming available as the wetland channels are excavated. A topsoil perimeter bund will still be utilised to ensure containment.

## **6. COMMENTS ON ISSUES RAISED BY SUBMITTERS**

- 6.1 Ngāti Rangi raised a concern regarding using potentially contaminated soil for the perimeter earth bund.
- 6.2 To respond to this concern, the final Erosion and Sediment Control plan will be updated to state that the earth bund shall specifically be constructed from known uncontaminated soils onsite.

**7. COMMENT ON ISSUES RAISED IN THE COUNCIL OFFICER'S REPORT**

7.1 A few minor concerns have been raised in the s 42A Report prepared by Mr Kerry Pearce. These concerns are regarding:

- (a) Clarification of areas to be vegetated versus lined with HDPE;
- (b) Dewatering details, should it be necessary; and
- (c) Greater detail regarding monitoring of site controls.

7.2 However, despite the concerns raised, Mr Pearce considers that these concerns can be addressed through appropriate conditions of consent and covered off during detailed design and preparation of a final Erosion and Sediment Control Plan.

7.3 Mr Pearce has also collaborated with Ms Morton and reviewed the proposed conditions. Mr Pearce is satisfied that those conditions appropriately address the matters raised in his report.

7.4 My response is that:

- (a) I agree that these concerns can and will be addressed through a further detailed design and subsequent updated final Erosion and Sediment Control Plan (with proposed Condition 2 updated to reflect the latest version). This will incorporate the recent proposed revisions to the wetland design as well. I can confirm that these changes do not materially affect my conclusion that the proposed methodology and sediment and erosion controls remain appropriate for the Site.
- (b) Regarding clarification of vegetated areas versus HDPE lined areas, this will be shown on a plan once final layout and planting plans have been completed.
- (c) Dewatering is not likely to be required due to the very large storage capacity available on Site before and during construction works. This capacity is seven times greater than the calculated runoff generated from the site in a 100-year rainfall event.
- (d) Monitoring of site controls will be detailed in the final Erosion and Sediment Control plan and will ordinarily include specification of which controls need ongoing monitoring, how frequently or when the controls need to be inspected, and what specific maintenance or

remediation may be required. This includes regular inspection of the perimeter bund to ensure it has not been damaged or compromised, or it may include monitoring of water depths within pond areas to ensure there is no discharge of runoff from the site.

**Sunil Prasad**  
**29 September 2026**