

**In the Environment Court
Christchurch Registry**

ENV-2011-CHC-090

Under the Resource Management Act 1991

and in the matter of direct referral of an application for resource consents by Meridian Energy Limited in respect of the Project Hurunui wind farm proposal under section 87G of the Resource Management Act 1991

Between

Meridian Energy Limited,

and

Hurunui District Council,

and

Canterbury Regional Council,

and

Others

**Supplementary Statement of Evidence of KEN GIMBLETT
on behalf of Meridian Energy Limited**

15 August 2012

Introduction

1. My full name is Kenneth (Ken) George Gimblett. I am a Director and Senior Resource Management Planner with the environmental consulting firm Boffa Miskell Limited, Christchurch.
2. My qualifications and experience are as set out in paragraphs 17 to 21 of my evidence in chief (EIC). I reiterate that I have read the 'Code of Conduct for Expert Witnesses' contained in the Environment Court Consolidated Practice Note 2011 and agree to comply with this Code of Conduct.

Canterbury Regional Policy Statement

3. The decisions on the Proposed Canterbury Regional Policy Statement were publicly notified on Saturday 21st July 2012. The decisions on submissions on the RPS apply from that date; however, in accordance with section 66 of the Environment Canterbury (Temporary Commissioners and Improved Water Management) Act 2010, appeals could be made to the High Court on points of law up until 10 August 2012. Four appeals have been lodged with the High Court. Given those appeals, change to the RPS provisions is still possible, however it is now further advanced procedurally than when I prepared my EIC and accordingly, in my opinion, it should be afforded greater weight.
4. I discuss the operative and proposed RPS beginning at paragraph 158 of my EIC, and at paragraph 175 I introduce my evaluation of the applications against the proposed RPS. I note that a number of the objectives and policies of the new RPS still broadly seek the same outcomes as the corresponding provisions of the former RPS, particularly in relation to the relationship Ngai Tahu has with resources, the management of hazardous substances, air, soils, land use and infrastructure, historic heritage, and transport matters (albeit now embodied within the land-use and infrastructure and development chapter of the new document).
5. In the new RPS there are more specific provisions concerning natural character values in the case of waterways, and the management of freshwater resources in general. Similarly, there is greater direction given towards identifying and protecting significant natural areas, providing for

ecological enhancement and restoration, and carefully managing the use of biodiversity offsets.¹ The evidence from Dr Keesing, Dr Barea and Mr Hoosen in particular points to the proposal not being inconsistent with these objectives and policies.

6. There are specific provisions seeking identification and protection of outstanding natural features and landscapes, and a call for consistency across the region in that identification.² There are also new provisions relating to the identification and management of other important landscapes that are not outstanding natural landscapes, particularly in regard to natural character, amenity, and historic and cultural heritage.³ The evidence of Mr Rough is that the project site does not merit consideration as an outstanding natural landscape or feature, nor is the subject landscape a candidate for being regarded as an "important landscape" in the sense of a Queenstown Lakes District Council (QLDC) 'Visual Amenity Landscape' (VAL).
7. In his supplementary evidence, Mr Rough has considered the project site against objective 12.2.2 and policy 12.3.3 and concludes that "*there is no justification for the Project Hurunui Wind site to be regarded as an important landscape in the sense that it warrants protection and management for natural character, amenity, historic cultural, historic heritage or other purposes, in accordance with Policy 12.3.3 of the CRPS*". On this basis, I consider that the proposal remains consistent with the objectives and policies seeking the identification and protection / management of landscapes.
8. Lastly, the chapter devoted to energy places particular significance on promoting a diverse and secure supply of energy⁴, recognition of and provision for the benefits of renewable energy generation facilities⁵ consistent with the policy statement at a national level, and recognition and provision for efficient, reliable and resilient electricity generation

¹ Appendix A, RPS objectives 9.2.1, 9.2.2, & 9.2.3, and related policies.

² Appendix B, RPS objectives 12.2.1 & 12.2.3, and related policies.

³ Appendix B, RPS objective 12.2.2, and related policies.

⁴ Appendix C, RPS objective 16.2.2, and related policies.

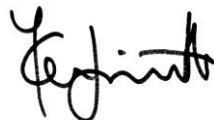
⁵ Appendix C, RPS policy 16.3.3.

within Canterbury⁶. The proposal is for a new Canterbury based electricity generation project based on renewable energy sources. The evidence of Mr Muldoon and Mr Truesdale outlines the anticipated benefits of the proposal and again I consider this aligns closely with the intent of these objectives and policies.

9. Mr Timms at paragraphs 62 to 77 of his EIC analyses the various chapters of the PRPS and concludes that "*Overall, provided that the EMP and SEMP's can demonstrate that the environmental effects will be minor, it is my opinion that the proposed activity is generally consistent with the provisions of the proposed RPS*". I agree with his conclusion, although noting that this analysis is from the perspective of considering the necessary regional consents and in relation to the proposed RPS prior to the release of decisions.
10. In terms of the district consents, I consider that the proposal is also generally consistent with the RPS, particularly in relation to natural resources, visual amenity, noise, transport, and use of renewable energy.

Proposed Canterbury Land & Water Regional Plan

11. The Proposed Canterbury Land & Water Regional Plan (PLWRP) was publicly notified on Saturday 11th August 2012. Given the timeframes, in preparing this supplementary evidence I have not had sufficient opportunity to fully analyse the provisions of the PLWRP against the Hurunui Wind proposal or take technical advice on what, if any, consents may be required under this document.



Ken Gimblett

15 August 2012

⁶ Appendix C, RPS policy 16.3.5.