

Before the Hearings Commissioners
at Palmerston North

in the matter of: in the matter of Notices of Requirement by the New Zealand Transport Agency under section 168 of the RMA for the construction, operation, maintenance and improvement of approximately 11.5km of new State Highway between Ashhurst and Woodville to replace the closed section of State Highway 3 through the Manawatu Gorge and associated works, known as the Te Ahu a Turanga Manawatu Tararua Highway Project ('the Project')

to: **Palmerston North City Council**

Manawatu District Council

Tararua District Council

applicant: **New Zealand Transport Agency**

submitter: **Meridian Energy Limited**

Summary of Evidence by **Christopher Simon Jones** on behalf of
Meridian Energy Limited

Date: 28 March 2019

Summary

1. This summary should be heard in conjunction with that of Paul Botha, Tony Keyte and Lindsay Daysh and is in support of Meridian Energy's submission.
2. My experience and expertise is outlined in paragraphs 1- 5 of my Statement of Evidence dated 15 March 2015.
3. My evidence covered the construction sequencing and project management considerations required because of the NOR.
4. To manage unique risks associated with Project construction activity and Wind Farm infrastructure and operations a dedicated Wind Farm Management Plan should be developed, implemented and maintained.
5. My specific recommendations include that Meridian:
 - have an ability to peer review all Enabling Works designs as it relates to the Te Apiti wind farm. That Enabling Works should be fully scheduled and complete before Meridian current assets are taken out of service. 24/7 access is required to all Turbines and cable networks;
 - attend NZTA's project management meetings during the execution of the Enabling Works phase, and is copied into all associated Project reporting;
 - attend regular dedicated coordination meetings with NZTA during the overall Highway construction phase;
 - review all Safety Audits undertaken by NZTA as they relate to over dimensional accesses and if needed seek peer review of any Audit findings that it considers necessary;
 - undertakes all design work associated with cable design and NZTA uses only approved cable laying Contractors; and
 - undertakes any reconfiguration of any existing wind farm roads outside of the Designation.
6. That it is difficult to assess effects with the lack of detailed design of Highway, over dimensional and service road network and associated construction sequencing.
7. That in some instances the timing of the construction of the new cable routes and access roads may be dictated by the main Highway excavation or for earthwork stability reasons have to be constructed as part of the main Highway construction. Accordingly, amendments to Condition T1B and the definition of Enabling Works which refer to associated Wind Farm work being completed before construction begins should be modified to provide flexibility to allow NZTA and Meridian to agree alternative timeframes should this outcome not be possible.

8. Management Plans documenting Construction Traffic, Dust, Vibration, Security and Health and Safety, as they relate to the Enabling Works and the impacts on the Wind farm operation need to be developed, kept updated and ideally included within the Wind Farm Management Plan.
9. That construction activity for access roads, earthworks cuts and fills and spoil deposition are proposed close to turbines, over existing and possibly new cabling. Construction methodologies will need to be developed that protect the integrity of all Meridian's existing and new assets.
10. To ensure over dimensional access to all turbines is possible during Highway construction and to minimize reliance on Highway construction completion of the direct access points it is recommended that an upgrade of Cook Road is undertaken.

Dated: 28 March 2019

C S Jones