

Before Independent Hearings Commissioners  
appointed by the Northland Regional Council

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*under:* the Resource Management Act 1991

*in the matter of:* an application by Meridian Energy Limited for resource consents for earthworks, associated stormwater diversion and discharges, vegetation clearance, and wetland removal for the construction of a solar farm at Ruakākā, Northland (APP.045356.01.01)

*between:* **Meridian Energy Limited**  
*Applicant*

*and:* **Northland Regional Council**  
*Consent Authority*

Summary statement – Brett Hood (Planning)

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Dated: 5 August 2024

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## **SUMMARY STATEMENT OF BRETT HOOD**

### **INTRODUCTION**

- 1 My full name is Brett Lewis Hood.
- 2 My qualifications, experience and confirmation I will comply with the Code of Conduct are set out at paragraphs 2-7 of my statement of evidence.

### **SUMMARY OF EVIDENCE**

- 3 My planning evidence considers the evidence of other experts, including in relation to effects on the environment, and provides a detailed assessment of the Proposal against the relevant statutory planning framework.

### **Relevant statutory plans**

- 4 My evidence identifies the relevant statutory planning documents, being the National Policy Statement for Renewable Energy Generation (*NPS-REG*), National Policy Statement for Freshwater Management (*NPSFM*), National Environmental Standards for Freshwater Regulations (*NESFM*), Regional Policy Statement for Northland (*RPS*) and the Proposed Regional Plan (*PRP*).
- 5 To assist the Commissioners, I have collated a package of the relevant *NPS-REG*, *NPSFM*, *RPS* and *PRP* provisions. This is attached as **Exhibit 1** to my summary statement.

### **Key matters addressed in statutory planning documents**

- 6 While the consents sought from the Northland Regional Council (*NRC*) relate to a range of matters associated with site preparation, my evidence is primarily focussed on the proposed removal of natural inland wetlands from Site 1, this being the key matter in contention.
- 7 My evidence identifies and addresses the enabling provisions in the *NPS-REG*, *RPS*, and *PRP*, including those that support renewable energy generation, security of energy supply, Regionally Significant Infrastructure, and economic wellbeing. I also identify and address the provisions relating to indigenous biodiversity and natural wetlands in the *RPS* and *PRP*.
- 8 My evidence also identifies and addresses the requisite requirements under the *NESFM*, and the overarching provisions in the *NPSFM*.

## Key conclusions

9 My evidence concludes that resource consent can be granted under both the PRP and NESFM for the following reasons:

9.1 The Proposal is consistent with the enabling provisions of the overarching NPS-REG, neatly encapsulated in the sole Objective:

To recognise the national significance of renewable electricity generation activities by providing for the development, operation, maintenance and upgrading of new and existing renewable electricity generation activities, such that the proportion of New Zealand's electricity generated from renewable energy sources increases to a level that meets or exceeds the New Zealand Government's national target for renewable electricity generation.

also noting the relevant practical constraints facing renewable electricity generation identified in Policy C1, and consistency with the anticipated effects management response in Policy C2.

9.2 My evidence concludes that the Proposal aligns with the objectives and policies of the RPS and PRP when read overall, including the enabling provisions for Regionally Significant Infrastructure, economic development, and renewable energy generation, and the provisions for managing adverse effects on natural wetlands and indigenous biodiversity.

9.3 My evidence concludes that the Proposal aligns with the relevant objectives and policies of the NPSFM and the requirements of Regulation 45 of the NESFM, including application of the effects management hierarchy. My conclusions in this respect are, in part, based on my awareness of and involvement in the complex, multi-faceted and multi-disciplinary process that MEL followed to avoid, minimise, and remedy wetland loss on Site 1 to the greatest extent practicable as required under (a)-(c) of the definition of "effects management hierarchy" in the NPSFW.

9.4 Regarding wetland delineation, my evidence considers both the evidence of the Boffa Miskell Limited (*Boffa Miskell*) expert ecologists and the Council ecologist. I consider that the approach taken by *Boffa Miskell* in determining the natural inland wetland extents on Site 1 aligns with best practice based on the best information available. I also conclude that the robust nature of the *Boffa Miskell* investigation, including in excess of 100 plots and multiple rapid tests, further fieldwork ground truthing, and detailed consideration of weather-related factors (including aerial photograph analysis across a number of years) far exceeds the analysis carried out by the Council ecologist.

- 9.5 My evidence includes proposed conditions of consent and concludes that these encapsulate the effects management proposed by the various MEL experts, and that adherence to the conditions will result in the outcomes contemplated under the various planning documents.
- 9.6 To the extent that it is relevant, my evidence concludes that the Proposal is consistent with Part 2 of the RMA.

5 August 2024

**Brett Lewis Hood**