

Before Independent Hearings Commissioners
appointed by the Northland Regional Council

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 and vegetation clearance 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

Memorandum of counsel regarding late hydrogeology evidence

Dated: 22 July 2024

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MAY IT PLEASE THE COMMISSIONERS

- 1 This memorandum of counsel is filed for Meridian Energy Limited (*MEL*) in respect of the evidence filed in support of its application for resource consents associated with its proposed Ruakākā solar farm.
- 2 On Friday 19 July 2024, evidence was filed for MEL from:
 - 2.1 Grant Telfar and Micah Sherman – company;
 - 2.2 Dr Sarah Flynn, Tanya Cook, Dr Lee Shapiro and Stephen Fuller – ecology; and
 - 2.3 Brett Hood – planning.
- 3 Accompanying the above package of evidence is also hydrogeology evidence from Mandy McDavitt.
- 4 Unfortunately, Ms McDavitt’s evidence was unable to be finalised and filed on 19 July 2024 due to a combination of factors, including the incorporation of the results of additional fieldwork (installation and data collection from piezometers on Sites 1 and 3).
- 5 Counsel consider that there will not be any prejudice arising from the late filing of the hydrogeology evidence because:
 - 5.1 There are still five full working days before any submitter expert evidence is due, this evidence being due at 4pm on Monday 29 July 2024.
 - 5.2 There are almost two weeks before the hearing commences on 5 August 2024.
 - 5.3 While there are links between the hydrogeology evidence and some of the ecology evidence (the evidence is cross-referred to in Dr Flynn’s and Ms Cook’s evidence), MEL’s other five statements of evidence could be reviewed in the interim.
- 6 Counsel therefore respectfully request that MEL be granted a one day extension for the late filing of the hydrogeology evidence.

Dated 22 July 2024



J Appleyard / A Hawkins
Counsel for Meridian Energy Limited