

**In the Environment Court
I Mua I Te Kōti Taiao O Aotearoa**

Under the Resource Management Act 1991 (**RMA**)

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

Meridian Energy Limited
Applicant

and

**Tararua District Council, Masterton District Council, Manawatū-
Whanganui Regional Council and Greater Wellington Regional Council
(Councils)**
Consent Authorities

and

s 274 Parties

**Statement of Evidence of Emily Ann Howitt on behalf of Meridian Energy
Limited**

24 May 2024

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INTRODUCTION

1. My full name is Emily Ann Howitt.
2. I am a consultant archaeologist and have run my own consultancy (Emily Howitt Archaeology) for the last three years. I have also worked as a Senior Archaeologist with the consultancy WSP for seven years in the Christchurch and Wellington offices.
3. I hold a Bachelor of Arts and Master of Arts in Archaeology from University of Otago, and I am a member and current Councillor for the New Zealand Archaeology Association (**NZAA**).
4. I have undertaken archaeological assessments in relation to a range of proposed developments throughout New Zealand. Current and recent projects include the Peka Peka to Ōtaki Expressway, Harakeke Heights Subdivision in Waikanae, and the Wellington International Airport East Side Area Designation.
5. In 2022 I was engaged by Meridian Energy Limited (**Meridian**) to assess any archaeological effects from a proposed wind farm at Mt Munro in the Northern Wairarapa (the **Project**). I completed this assessment in November 2022, and confirm that I hold the same views and conclusions as expressed in the technical report. This report was included as Appendix M of the Assessment of Environmental Effects (**AEE**) which supports the resource consent application for the Project.
6. As part of this work, I conducted a site visit in October 2022, and I also relied on an archaeological survey undertaken by Cathy Barr in 2010/2011 when the Mt Munro project was first considered.

CODE OF CONDUCT

7. I confirm that I have read the 'Code of Conduct for Expert Witnesses' contained in the Environment Court Consolidated Practice Note 2023. I agree to comply with this Code of Conduct. In particular, unless I state otherwise, this evidence is within my sphere of expertise and I have not omitted to consider material facts known to me that might alter or detract from the opinions I express.

SCOPE OF EVIDENCE

8. I have been asked to provide evidence on the archaeological values and effects of the Application.
9. In this evidence, I also:
 - () Respond to issues raised in submissions;
 - (a) Respond to the s87F report; and
 - (b) Comment on conditions.

SUMMARY OF ARCHAEOLOGICAL ASSESSMENT REPORT

10. The key issues considered in my assessment are:
 - (a) Whether there are archaeological sites and features within the area of proposed work; and
 - (b) How the proposed work might adversely affect these sites and features; and
 - (c) Whether avoidance or mitigation of adverse effects is possible.
11. To investigate these issues, I prepared the technical report titled "Mt Munro Wind Farm: Archaeological Assessment of Effects" included as Appendix M of the AEE for the resource consent application for the project. I conducted a desk-based review of previous archaeological work undertaken in the area, and historical information sources. I also undertook a walkover of the proposed site entrance/laydown area off Old Coach Road.
12. In summary, the findings expressed in my technical report are as follows:
 - () Much of the proposed Mt Munro Wind Farm area is farmland that was cleared of bush in the late nineteenth century. No archaeological sites or heritage items have been identified within the Turbine Envelope Zone, the Turbine Exclusion Zone (east of Old Coach Road) or the Transmission Corridor. The areas where

the turbines will be sited are on an exposed ridge generally considered to be undesirable for human occupation.

- (a) There is one probable archaeological site (recorded as **T25/7** in the NZAA's archaeological site recording scheme ArchSite¹). This site is situated within the proposed laydown/site entrance area on Old Coach Road. This area was formerly the site of a farmhouse which was likely built prior to 1900 by the first European landowner Henry Stewart. The house has been demolished and no structures remain on the site. However, there is potential for subsurface features, such as foundations, post holes, and rubbish pits to remain intact below the ground surface.
- (b) Because the farmhouse was likely to have been constructed prior to 1900, it may be an archaeological site as defined in the Heritage New Zealand Pouhere Taonga Act 2014 (the **HNZPT Act**). An Archaeological Authority should therefore be sought from Heritage New Zealand Pouhere Taonga before the site entrance/laydown area is established, as per of Part 3 of the HNZPT Act.
- (c) All work areas in the site entrance/laydown area which will take place outside the archaeological site T25/7 can be undertaken following an archaeological discovery protocol, as the probability of finding unrecorded sites is low.

13. The recommendations in my report are:

- () Implementation of an exclusion zone within the site entrance/laydown area around recorded site T25/7 where excavations should be avoided: or if this is not avoidable,
- (a) archaeological monitoring of groundworks within the area of the farmhouse to identify and record any archaeological features if they are exposed.

¹ <https://nzaa-archsite.hub.arcgis.com/>

14. I understand that Meridian intends to seek a general Archaeological Authority from Heritage New Zealand Pouhere Taonga for the site entrance/laydown area, which will address the above concerns. I therefore consider that any effects of the Project on archaeological sites and values can be appropriately managed through a general Archaeological Authority as the Applicant intends, or through an accidental discovery protocol if outside an area covered by an Authority.

RESPONSE TO ISSUES IN SUBMISSIONS

15. Reviewing the submissions on the applications, I note that submissions 13 (Hastwell/Mt Munro Protection Society Incorporated), 24 and 37 (Olliver), 47, 48 and 49 (Braddick and Stanton Farm Limited), 68 (Gully) and 73 (Groombridge) make reference to archaeological or heritage matters. I wish to address the following matters raised in these submissions:

- () Submitters 13, 24, and 37 raise concerns about the impacts on an old 'bush cottage' on Old Coach Road which they say was built in 1881. This building (assumed to be 103 Old Coach Road) is situated approximately 700 m north of the proposed project area, but along the main access road to the Site. No physical works which would affect this cottage are being proposed, and therefore the cottage was not included in my report. While this house may date to 1881 and hold archaeological values, these values will not be impacted by the proposed project. I note that any works undertaken nearby, such as vegetation removal, will be within the existing road reserve.
- (a) Submitters 13, 24, and 68 raise concerns around effects on local heritage sites including Scandinavian and Hastwell settlements, Pūkaha / Mount Bruce National Wildlife Centre, and the ANZAC Memorial Bridge on State Highway 2. While some of these sites may also hold archaeological values, there are no recorded archaeological sites associated with any of these heritage areas within the proposed project area. Archaeological values associated with these heritage sites will not be impacted by the

proposed works as they are a significant distance from the proposed project area.

- (b) Submitters 37 and 47 refer to Forty Mile and Seventy Mile Bush. The proposed project area was part of the historical tract of bush known as Seventy Mile Bush or Forty Mile Bush (referring to the southern part of the forest). The area was logged in the late nineteenth century. There is unlikely to be any archaeological evidence associated with the removal of the trees within the proposed project area. Discovery of any unrecorded archaeological sites will be managed by an Accidental Discovery Protocol (unless the find is within an area covered by an Archaeological Authority).
- (c) Submitters 13, 37, 73 refer to the heritage and archaeological values of Old Coach Road as the original main travel route. Part of this road, at the northern end, is still in use as a formed access road. This provides access to several properties in the area for approximately 1.7km south from the junction with State Highway 2. The remaining legal section of the road is partly used as farm track, but is mainly represented as a benched grass track across farm paddocks between the end of the maintained Old Coach Road and Opaki-Kaiparoro Road. I understand that part of Old Coach Road will be upgraded as part of the project to provide access to the site. However, this is along the length of road that is currently used as access for properties in this area. The entire length of Old Coach Road remains a legal road but only the northern section has been maintained. As such, within this maintained section there are unlikely to be any features or deposits that meet the legal definition of an archaeological site.

SECTION 87F REPORT

- 16. I have read the section 87F report prepared for this matter. I note the reporting officer generally agrees with my conclusions and

recommendations. The reporting officer supports my specific recommendation that an Accidental Discovery Protocol should be implemented for all areas of the Project that are not subject to an Archaeological Authority granted under section 48 of the Heritage New Zealand Pouhere Taonga Act 2014. They also support the intent to seek a general Archaeological Authority from HNZPT to cover the construction laydown area, rather than the creation of an exclusion zone around recorded archaeological site T25/7 to allow for construction flexibility.

17. I agree with the reporting officer's recommendation to expand the proffered Accidental Discovery Protocol condition to include sites of significance to iwi, although it is my opinion that archaeological sites can also be sites of significance to iwi.

CONDITIONS

18. One of the recommendations in my report is that an Accidental Discovery Protocol is followed for all areas not covered by an Archaeological Authority from HNZPT, and I note that this has been included in the proffered condition set.
19. I have suggested some minor wording changes (see Appendix A of this evidence and Appendix A to Mr Anderson's evidence) including using the term 'Accidental Discovery Protocol' for areas not covered by an Archaeological Authority, and defining 'immediate vicinity' to be a 10-metre radius exclusion zone around any unexpected archaeological discoveries.

CONCLUSIONS

20. In summary, there is one probable archaeological site within the proposed site entrance/laydown area. The Applicant intends to apply for a general Archaeological Authority from HNZPT to cover this area of the proposed Project, and archaeological monitoring targeted to excavations in close proximity to the recorded site is likely to be a condition of any Authority. The details of this monitoring would need to be outlined in an Archaeological Site Management Plan submitted as part of an Authority application. I recommend that all other areas of the

proposed project are managed by an Accidental Discovery Protocol as set out in the proffered conditions.

21. These measures will ensure that the effects of the Project on archaeological sites and values are appropriately managed.

Emily Howitt

24 May 2024

Appendix A: Suggested changes to the Councils' proposed archaeology conditions

AH1 Accidental Discovery Protocol

a) In the event that the activities authorised by these resource consents discover or disturb an archaeological site, kōiwi tāngata, wāhi tapu or wāhi taonga, the Consent Holder must immediately cease further work within 10 metres of the discovery or disturbance and inform:

- i. Heritage New Zealand Pouhere Taonga;
- ii. each of the Iwi/Hapū Authorities;
- iii. the Councils (subject to the relevant territorial jurisdictions); and
- iv. New Zealand Police (only in the event of kōiwi being discovered).

b) Further work within 10 metres of the discovery or disturbance must be suspended until:

- i. Procedures for the recording and removal of the archaeological material are completed; and
- ii. Heritage New Zealand Pouhere Taonga, relevant iwi/hapū authorities, the Councils (subject to the relevant territorial jurisdictions) have advised that the work can recommence.

c) Clauses (a) and (b) do not apply where the works are subject to an archaeological authority granted under section 48 of the Heritage New Zealand Pouhere Taonga Act 2014.