

IN THE ENVIRONMENT COURT OF NEW ZEALAND
WELLINGTON REGISTRY

I MUA I TE KŌTI TAIAO O AOTEAROA
TE WHANGANUI-Ā-TARA ROHE

ENV-2024-WLG-000001

Under the	RESOURCE MANAGEMENT ACT 1991
In the matter of	the direct referral of applications for resource consents under section 87G of the Act for the Mt Munro Wind Farm
By	MERIDIAN ENERGY LIMITED Applicant

JOINT STATEMENT OF THE GEOTECHNICAL EXPERTS

2 August 2024

INTRODUCTION

1. This joint expert witness statement relates to the direct referral application lodged by Meridian Energy Limited for resource consents to construct, operate and maintain a windfarm on Mt Munro, Eketāhuna.
2. The geotechnical experts attending the conference were:
 - (a) Neil Crampton (**NC**) for the Consent Authorities (Manawatū-Whanganui Regional Council, Wellington Regional Council, Tararua District Council, and Masterton District Council)
 - (b) Maurice Mills (**MM**) for Meridian Energy Limited (**MEL**).
3. The conference took place remotely via Microsoft Teams on 2 August 2024.

AGREED AGENDA

4. The agenda for discussion is set out below in Annexure A.

CODE OF CONDUCT

5. This joint witness statement is prepared in accordance with section 9 of the Environment Court Practice Note 2023.
6. We confirm that we have read the Environment Court Practice Note 2023 and agree to abide by it.

PURPOSE AND SCOPE OF CONFERENCING

7. The purpose of this expert conferencing was to identify, discuss, and highlight points of agreement and disagreement on acoustic issues.
8. Issues have been identified following the reporting of the Consent Authorities in the s 87F reports, and through evidence filed by MEL and the s 274 parties. At mediation in June 2024, the parties also agreed that some issues would be discussed at expert conferencing.

AGREED ISSUES

9. Refer to Annexure A.

DISAGREEMENT AND REASONS

10. Refer to Annexure A.

Date: 2 August 2024



Neil Crampton



Maurice Mills

ANNEXURE A

In the matter of the Mt Munro windfarm application

Expert conferencing – Geotechnical – NC and MM

Issue	Agreed position with reasons	Disagreements with reasons
Topic: Methodology		
1. Appropriateness of methodology and assessment of likely effects.	We both agree that the methodology and assessment of likely effects relating to geotechnical matters are appropriate. Reasons for this include the overall constraints on earthwork extents imposed by the envelope zones and the proposed design criteria for batter slopes and identified fill disposal areas. In addition, follow up detail design investigations, construction monitoring and available mitigation measures are conditioned to ensure the cuts and fills remain in the envelopes.	
Topic: Cut and Fills		
2. Location and stability of cuts and fills sites.	The location of the cuts and fill sites is agreed as per the plan referred to in condition EW2a. The further detail regarding the location and stability of the fill sites as outlined in EW2f, EW2g and EW3a is also agreed. These conditions apply to the location and stability measures that can be implemented during detailed design and during and after construction.	
Topic: GNS Report – Inferred Faults		
3. Response to the findings of the GNS Report, and the three additional inferred active faults, when considering the	<p>We both agree that a condition requiring:</p> <ol style="list-style-type: none"> 1. Consideration of the surface fault rupture hazard should be a specific assessment matter; and 	

Issue	Agreed position with reasons	Disagreements with reasons
<p>location of the proposed terminal substation.</p> <p>Note: see attached memorandum of Neil Crampton to inform discussions.</p>	<p>2. Site specific investigation, including detailed fault mapping at 1:35,000 or better and appropriate mitigation measure determined for the accurately mapped fault (e.g. set back or engineering measures).</p> <p>This applies to the three active faults at the windfarm site identified the following report: <i>Langridge RM, Morgenstern R, Coffey GL. 2021 Active fault mapping for planning purposes across the western part of the Tararua District Lower Hutt (NZ): GNS Science 85p. Consultancy Report 2021/03.</i></p>	
<p>4. Whether other project activities are potentially affected by the inferred faults and how they should be addressed through conditions (noting any conclusions under 3 above).</p>	<p>Covered by agreed position above in point 3.</p>	
<p>Topic: Other matters</p>		
<p>5. The only geotechnical matter raised in the section 274 submissions was from Robin Olliver relating to the identified active faults in the GNS report referred to in point 3.</p>	<p>We both agree that this matter is addressed by the proposed condition in point 3 above.</p>	