

**IN THE ENVIRONMENT COURT
WELLINGTON REGISTRY**

**I TE KŌTI TAIAO O AOTEAROA
TE WHANGANUI-A-TARA ROHE**

ENV-2024-WLG-001

UNDER the Resource Management Act 1991

IN THE MATTER the direct referral of applications for resource consents by
under section 87G of the Act for the Mt Munro Wind Farm

BY **MERIDIAN ENERGY LIMITED**
Applicant

STATEMENT OF EVIDENCE OF NEIL ANDREW CRAMPTON

**ON BEHALF OF MANAWATŪ-WHANGANUI REGIONAL COUNCIL, GREATER
WELLINGTON REGIONAL COUNCIL, TARARUA DISTRICT COUNCIL, AND
MASTERTON DISTRICT COUNCIL**

GEOTECHNCIAL

Dated: 23 August 2024



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STATEMENT OF EVIDENCE OF NEIL CRAMPTON

A. INTRODUCTION

- [1] My name is Neil Crampton. I am an engineering geologist and Technical Director at Pattle Delamore Partners Limited (PDP). I have held this position for 30 years.
- [2] I prepared a report on the application required by s 87F of the Resource Management Act 1991 (**RMA**) on behalf of Manawātū-Whanganui Regional Council (**Horizons**), Wellington Regional Council (**WRC**) Tararua District Council (**TDC**), and Masterton District Council (**MDC**) (the **Consent Authorities**) dated 15 March 2024 (**s 87F Report**).
- [3] In my s 87F Report, I reviewed the application from Meridian Energy Limited (the **Applicant** or **Meridian**) for resource consent applications lodged with the Consent Authorities for the Mt Munro Wind Farm (**Mt Munro Project** or **Project**) in relation to geotechnical matters. The s 87F Report provided recommendations to improve or further clarify aspects of the resource consent applications, including with regard to conditions, should the Court be minded to grant resource consents.
- [4] I confirm I have the qualifications and experience set out at paragraphs 5 – 9 of my s 87F Report.
- [5] On 2 August 2024, I participated in expert conferencing on geotechnical matters, resulting in a joint witness statement dated 2 August 2024 (the **Geotechnical JWS**). I confirm the contents of the Geotechnical JWS.

B. CODE OF CONDUCT

- [6] I repeat the confirmation provided in my s 87F Report that I have read and agree to comply with the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023. This evidence has been prepared in accordance with that Code. Statements expressed in this evidence are within my areas of expertise, except where I state I am relying on the opinion or evidence of other witnesses.

C. SCOPE OF EVIDENCE

[7] My statement will cover the following:

- (a) The extent to which issues identified in my s87F Report have been resolved through mediation, Meridian evidence, and expert conferencing;
- (b) A response to s 274 party evidence; and
- (c) Conditions.

[8] In addition to the material that was reviewed for my s 87F Report, I have reviewed the following:

- (a) Joint Statement of Planning Experts dated 9 August 2024 (**Planning JWS**);
- (b) Statement of Evidence of Mr Maurice Mills (Civil Engineering Design) dated 24 May 2024, on behalf of Meridian;
- (c) The **GNS 2021 Report** referred to in Mr Mills' evidence relating to recently identified active faults in the wind farm site;¹
- (d) The proposed changes to conditions filed with Mr Anderson's evidence (the **Meridian conditions**);
- (e) Evidence of Janet McIlraith (s 274 party) dated 10 July 2024;
- (f) Evidence of Robin Olliver (s 274 party) dated 10 July 2024;
- (g) Evidence of Hastwell/Mt Munro Protection Society Inc. (s 274 party) dated 10 July 2024;

¹ 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*.

Evidence (Social Impact Report) of John Maxwell (s 274 party) dated 10 July 2024; and

- (h) Proposed consent conditions attached to the evidence of Mr Damien McGahan on behalf of the Consent Authorities (the **August Proposed Conditions**)

D. OUTSTANDING ISSUES

- [9] My s 87F Report confirmed that the project is feasible from a geotechnical perspective based on the information provided on geology, natural hazards and geotechnical matters within the application. I provided an overview of the key conclusions of my review at paragraph 12 of the s 87F Report. I also recommended a number of conditions regarding detailed design of the Project, as well as proposed mitigation or management measures.
- [10] All outstanding issues arising from my s 87F Report have been resolved through the Geotechnical JWS, the Meridian evidence of Mr Mills, and the August Proposed Conditions.
- [11] My s 87F Report identified that further investigations will be required to confirm geotechnical conditions required for detailed design of a range of project components including road cut batter stability, treatment of existing slope instability, fill batter stability, turbine foundations and facilities located on potentially liquefiable ground.² Such investigations are part of normal practice to inform detailed project design, and Mr Mills has indicated that a range of investigations will be carried out.³ The August Proposed Conditions ensure these matters are addressed adequately.⁴
- [12] The evidence of Mr Mills also referenced the GNS 2021 Report on faulting in the Tararua District.⁵ This report was not included in the geotechnical documents supporting the application and therefore not considered in my s 87F Report. The GNS 2021 Report includes three newly identified active faults in the windfarm site including one such fault passing near/under the

² Section 87F Report - Neil Crampton (Geotechnical), 15 March 2024, at [20].

³ Statement of Evidence - Maurice Mills (Civil Engineering Design), 24 May 2024, at [39].

⁴ August Proposed Conditions at Condition EW2.

⁵ Statement of Evidence – Maurice Mills (Civil Engineering Design), 24 May 2024, at [45].

substation site.⁶ These features are Unnamed Active Fault traces that have been assigned Fault Awareness Areas (**FAA**).⁷ There are recommended TDC planning actions for proposed activities within an FAA.⁸ These include site specific investigations, consideration of the surface fault rupture hazard and appropriate building related mitigation measures being specific assessment matters if resource consent for a new important or critical structure is required.

- [13] The Geotechnical JWS includes agreement that potential issues, such as construction considerations, associated with Unnamed Active Fault traces needs to be covered by a consent condition that reflects the appropriate TDC planning actions for FAAs in the windfarm.⁹ The planning experts agreed that a new condition EW3 is introduced to reflect this recommendation.¹⁰ Such a condition has been included in the August Proposed Conditions.¹¹

E. RESPONSE TO SECTION 274 PARTY EVIDENCE

- [14] I have reviewed the section 274 party evidence.
- [15] The evidence of Mr Olliver overlaps with some of the geotechnical matters I have assessed for the Project. In particular, Mr Olliver refers to the recently identified active faults in the windfarm site described in the GNS 2021 Report and particularly the active fault passing near/under the substation site. I have outlined key information related to these faults above.
- [16] The Geotechnical JWS includes agreement that the faulting matter raised by Mr Olliver can be addressed by the consent condition referred to in paragraph 13 (new condition EW3).¹² As noted above, the condition requires faulting related site specific investigations, consideration of the surface fault rupture hazard and appropriate building related mitigation measures for the

⁶ GNS Report 2021, at Section A1.1.1 (Figure A1.4) and Section A1.6.

⁷ GNS Report 2021, at section 4.4.1.

⁸ GNS Report 2021, at Table 4.3.

⁹ Geotechnical JWS at pages 3-4, item 3.

¹⁰ Planning JWS at page 11, item 8.

¹¹ August Proposed Conditions, at Condition EW3.

¹² Geotechnical JWS at page 4, item 5.

identified active faults as per TDC planning actions. I consider this to be a sufficient response in the circumstances.

F. CONDITIONS

[17] I have reviewed and am in agreement with the August Proposed Conditions.

[18] In particular, I note that the conditions provide for the requirement for further investigations to confirm the geotechnical conditions required for the range of matters outlined above at paragraph 12 and in my s 87F Report. Further, the conditions now address the Unnamed Active Fault traces in accordance with the recommendations I have identified above.

G. CONCLUSION

[19] Having reviewed the evidence of Meridian and the section 274 parties, and having regard to the August Proposed Conditions and the Geotechnical JWS, I remain of the opinion that the Project is feasible from a geotechnical perspective based on information provided on geology, natural hazards and geotechnical matters.

23 August 2024

Neil Andrew Crampton