Fast-track

Te Kāwanatanga o Aotearoa
New Zealand Government

Joint Witness Statement
Geotechnical Seismicity / Active Faulting

Ashbourne [FTAA-2507-1087]
11 December 2025]

Facilitated by: N/A
Recorded by: Tony Cowbourne/David Sullivan

Attendance

The list of participants for this expert conferencing is included in the schedule at the end of this Statement.

Basis of Attendance and Environment Court Practice Note 2023

All participants agree to the following:

(a) The Environment Court Practice Note 2023 provides relevant guidance and protocols for the expert conferencing session;
(b) They will comply with the relevant provisions of the Environment Court Practice Note 2023.

Matters Considered at Conferencing – Agenda and Outcomes

Further Information to be provided

Geotechnical seismicity

17. In relation to Memorandum 2 from T Cowbourne, it is stated that the site has not been shown to be freed of active faults. The memo included a description of an expected scope of works that a SQEP such as GNS to carry out, noting that this would take months to complete. It does not appear that this has been provided. Please outline how it can be understood that the site is free from risks from active fault lines.

Response:

Active faulting issues were discussed on 9th December 2025 by the geotechnical experts David Sullivan (DS), Greg Snook (GS) and Tony Cowbourne (TC).

It was agreed that active faulting within this type of geological setting is difficult to assess and that it is almost certain there will be a residual uncertainty contained within any assessment. Therefore rather than considering the Ashbourne site as being '*...free of active faults ...*' it would be more appropriate to be framed as ' *... not requiring any further assessment for active faulting ...*'.

Additional features and possible assessment methodologies were tabled by DS towards demonstrating that there were no active fault traces present, such as an absence of spring lines, age of burial, etc. TC pointed out that the criteria were ambiguous and did not add to the weight of evidence. One example of this was the NNW-SSE trending topographic lineaments and whether or not they were innocuous fluvial terrace risers. TC pointed out that GNS had flagged this type of feature as being ambiguous in their 2024 study for the area near Morrinsville (Attachment G4c).

There were discussions as to possible investigation techniques that could be utilized however this did not identify anything that could be undertaken as an extension to the faulting assessment given in the geotechnical reports by CMW.

It was agreed that a screening process should be adopted, with an initial desktop study being undertaken by GNS/Earth Sciences NZ.

CMW have contacted GNS to commission a desktop fault study, and plan to meet on 12 December 2025 to discuss scope requirements.

Our joint recommendation is that the consent conditions should include:

- A SQEP from GNS Science / Earth Science NZ to be engaged to assess the potential for active faulting within the Ashbourne site via an initial desktop assessment, and specifically advise as to the need for further assessment.

- The desktop assessment should be undertaken at the forefront of the detailed design stage for the Ashbourne project.

<u>Confirmed in person: 11 December 2025</u>

Expert's name and expertise	Party	Expert's confirmation
David Sullivan (DS)	Matamata Development Ltd	[redacted]
Greg Snook (GS)	Matamata Development Ltd	
Tony Cowbourne (TC)	Matamata-Piako District Council	