

**In the Environment Court  
Christchurch Registry**

**ENV-2011-CHC-090**

Under the Resource Management Act 1991

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

Between

**Meridian Energy Limited,**

and

**Hurunui District Council,**

and

**Canterbury Regional Council,**

and

**Others**

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**Statement of Evidence of Samuel Crichton Chaffey on  
behalf of Meridian Energy Limited**

**15 August 2012**

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1. **Introduction**

- 1.1 My name is Samuel Crichton Chaffey. I hold a Bachelor of Commerce degree from the University of Canterbury at Lincoln College. I am the founder and Executive Chairman for the firm Truescape Limited (*Truescape*).
- 1.2 I am a computer simulation specialist and founded Truescape in 1995. I developed the methodology behind the accurate simulation technology used to produce the simulations presented in this evidence.
- 1.3 I have over 18 years experience working in the 3D Photo and Video Simulations industry, and have completed a wide range of different visualisation projects from photo-simulations for simple projects to full computer generated 3D video simulations for complex projects.
- 1.4 I have been involved with many simulations that have been commissioned to support consent applications in New Zealand, Australia, Canada and the USA. In New Zealand Simulations that I have produced have been used as evidence in numerous council hearings and the Environment and High Courts. Members of Truescape's staff, including myself, have presented evidence as expert witnesses in these Courts, where our work has been subjected to cross-examination and accepted by the Court on many occasions.
- 1.5 I confirm I have reviewed the Evidence in Chief and Rebuttal evidence of Russell John Maunder. Mr Maunder is unfortunately unable to attend the hearing because of serious health issues and accordingly I am providing evidence in his place.
- 1.6 I confirm that the simulations prepared for this project comply with the guidelines outlined in the New Zealand Institute of Landscape Architects Best Practice Guidelines and fit within the Truescape standard process for producing simulations. I otherwise agree with the statements made by Mr Maunder in his statements of evidence, and I adopt them as my own evidence.
- 1.7 I confirm that I have read and agree to comply with the Environment Court Code of Conduct for Expert Witnesses (Consolidated Practice Note 2011). This evidence is within my area of expertise, except where I state otherwise. I have not omitted to consider material facts known to me that alter or detract from the opinions that I express.



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Samuel Crichton Chaffey

15 August 2012