Wellington Registry **ENV-WLG-2024-001**
Te Whanganui-a-Tara Rohe

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

Under the Resource Management Act 1991

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 (**RMA**).

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 Rebuttal Evidence of Thomas Anderson on behalf of Meridian Energy Limited

6 September 2024

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INTRODUCTION

1. My full name is Thomas William Anderson. My evidence in chief dated 24 May 2024 provides my assessment of planning matters in relation to the proposed Mt Munro Wind Farm. My qualifications and experience are set out in that statement of evidence, and I reaffirm my compliance with the code of conduct for expert witnesses.

2. The purpose of this rebuttal evidence is to respond to the remaining outstanding issues raised in the planning evidence (Mr Damien McGahan (District Planning), Ms Alisha Vivian (Regional Planning – Wellington) and Ms Lauren Edwards (Regional Planning – Manawatu-Whanganui)), and to identify and provide an explanation regarding the areas where there remains some minor disagreement on conditions with the Councils.

3. I have reviewed the section 274 party evidence and consider all matters raised that are relevant to my area of expertise have been addressed.

4. The issues which are identified as outstanding by the Council experts are limited, and do not amount to substantive issues. This in my view represents the successful mediation, joint witness conferencing and provision of further information processes.

5. I attended mediation on 18-19 June 2024 in Palmerston North. Following mediation, I participated in discussions and workshops with the expert planning witnesses regarding matters arising from mediation, and in particular the set of proposed conditions.

6. I participated in the expert conferencing on planning, which resulted in a joint witness statement dated 9 August 2024 (the **Planning JWS**). I confirm the contents of the Planning JWS are an accurate record of the outcome of this meeting.

7. I also participated in further expert conferencing on 14 August with Meridian's traffic expert (Mr Colin Shields), the District Councils' traffic expert (Ms Harriet Fraser) and Mr McGahan. The purpose of this conferencing was to address some planning and condition related

matters arising from the Transport Joint Witness Statement dated 7 August 2024. As a result, a further Joint Witness Statement dated 14 August (the **Traffic and Planning JWS**) was issued. I confirm the contents of this JWS are an accurate record of the outcome of this meeting.

8. Ms Vivian, Ms Edwards and I also attended a meeting on 14 August, between Meridian's freshwater ecology and wetland expert (Dr Vaughan Keesing), and the Regional Council's freshwater ecology expert (Dr Adam Forbes). At this meeting, my role, along with Ms Vivian and Ms Edwards, was to provide advice regarding condition drafting to the freshwater ecology experts.

9. I note that Meridian is comfortable with the vast majority of the conditions in the set attached to the evidence of Mr McGahan (the **August Proposed Conditions**). I include as Appendix A to my evidence my suggested changes to the August Proposed Conditions. These changes are discussed below. These are referred to as the **6 September Proposed Conditions** in the rebuttal evidence filed on behalf of Meridian.

10. I also comment on matters raised in the evidence of the Council planners.

RESPONSE TO PLANNING EVIDENCE

Application of Existing Environment

11. I agree with Mr McGahan's description of the existing environment at Paragraphs 15 to 21 of his evidence in chief.

12. In his evidence, Mr McGahan briefly discusses the limitations on subdivision under Proposed Wairarapa Combined District Plan. (PWCDP).

13. I agree with Mr McGahan that the PWCDP is relevant to the adjoining and surrounding properties at Hastwell, in the Masterton District. I have reviewed the PWCDP and make the following observations with regard to the existing environment:

14. As can be seen in Figure 1, below, the majority of properties are zoned General Rural Zone (green area in Figure 1), with some being Māori Purpose Zone (light grey area in Figure 1);

Figure 1: Excerpt from PWCDP detailing the Zoning and Overlays Applicable in the Hastwell Area

15. The properties that adjoin Opaki Kaiparoro Road, Hall Road, Smiths Line and Bowen Road are all identified as Highly Productive Land in the PWCDP (dark grey overlay area in Figure 1).

16. The PWCDP sets the following activity status for use and development in the Hastwell area;

- One dwelling, and one minor dwelling[1] are permitted on rural zoned sites that are identified as Highly Productive Land. Any further dwellings require resource consent as a Discretionary Activity. This rule (GRUZ-R8) is identified as having immediate legal effect;

- Subdivision of rural zoned sites is a Controlled Activity where a minimum lot size of 40ha is met. As noted in Mr McGahan's evidence (at Paragraph 18), there are a large number of existing allotments which are less than 40ha in size. Any subdivision of land which is identified as Highly Productive

[1] A 'minor dwelling' is defined in the PWCDP as "*a self-contained residential unit that is ancillary to the principal residential unit and is held in common ownership with the principal residential unit on the same site*."

Land, and which results in allotments smaller than 40ha is a Discretionary Activity if Clauses 3.8 and 3.10 of the National Policy Statement for Highly Productive Land are met, otherwise it is a Non-Complying Activity. The applicable parts of the relevant rules (SUB-R2 and SUB-R4) are identified as having immediate legal effect.

- Under rule SUB-R2, subdivision of land which is not identified as Highly Productive Land requires resource consent as a Restricted Discretionary Activity if it results in allotments smaller than 40ha.

- Any boundary adjustment is a Controlled Activity where the resultant allotments are at least 0.5ha in size. If this restriction is not met, then resource consent is required as a Discretionary Activity. The applicable parts of this rule (SUB-R1) are identified as having immediate legal effect.

17. Given the above, I am of the view that a dwelling could be built on a currently vacant site without needing a resource consent. However I agree with Mr McGahan that it is difficult to predict with certainty where future development is likely to take place and on what basis.

18. The definition of a 'site' in the PWCDP (which is the definition from the National Planning Standards) is also relevant. This definition is:

a. *an area of land comprised in a single record of title under the Land Transfer Act 2017; or*

b. *an area of land which comprises two or more adjoining legally defined allotments in such a way that the allotments cannot be dealt with separately without the prior consent of the council; or*

c. *the land comprised in a single allotment or balance area on an approved survey plan of subdivision for which a separate record of title under the Land Transfer Act 2017 could be issued without further consent of the Council; or*

d. *despite paragraphs (a) to (c), in the case of land subdivided under the Unit Titles Act 1972 or the Unit Titles Act 2010 or a cross lease*

system, is the whole of the land subject to the unit development or cross lease.

19. This means that any individual legally defined allotments which are held together under the same Record of Title must be treated as a single site for the purposes of the relevant activity status for dwellings and subdivision as I outline above.

20. From my review of the Hastwell area (being the area east of Opaki Kaiparoro road where that road is north of its intersection with Mt Munro Road, and the properties accessed from Opaki Kaiparoro Road, North Road, Hall Road, Smiths Line and Bowen Road), and using the Masterton District Council GIS as a basis, there are a number of properties outside of, but in proximity to, the wind farm site which do not have dwellings on them, but on which a dwelling could be constructed as a permitted activity.

21. In considering potential effects on these I note that Mr Girvan has stated that the nature of a visual effect is not 'automatic' and cites that people have a range of responses to changes in character.

22. Mr Girvan is also of the opinion that any new dwelling, where owners or developers are averse to views of the windfarm, would likely be orientated to limit available open views in that direction, and may also use vegetation screening, and thereby reduce adverse effects.

23. I agree with Mr Girvan on this matter. In my view, should resource consent be granted, after the decision the proposed wind farm would form part of the existing environment. Any developer of dwellings on existing vacant allotments would be able to take into account actual and potential effects of the wind farm, and be able to design accordingly, as the developer considers appropriate.

24. Mr Halstead in his Noise Effects Assessment included as part of the AEE provides predictions of the 40dBA turbine noise contour, being the point at which compliance will be achieved with NZS6808:2010 (Acoustics – Wind farm noise). This contour does not appear to extend over any of the vacant properties I refer to above.

25. I understand that there has been only very limited subdivision and development of new dwellings on properties in the Hastwell area in recent times. Based on this, it appears unlikely that all of these sites will be developed. Owners of these sites could attribute this to the uncertainty created by Meridian applying for resource consents in 2011 and subsequently withdrawing it (2013) and then applying again in 2023. There was however a period of approximately eight years between the withdrawal of the previous application and community engagement commencing on this current application. During this period, the property owners could have developed these sites without giving specific consideration as to whether a wind farm would be proposed. It is noteworthy that this has not occurred.

26. It is clear that there is significant uncertainty regarding how any future dwellings which may be constructed as of right would be affected by the wind farm. I have considered whether Condition VM1 should be extended to include vacant allotments where Mr Girvan considers a high or moderate-high visual effect could be experienced. However, there is no certainty as to whether or not the visual effect on these properties would meet this threshold, let alone be considered adverse. Similarly, the effects of any onsite mitigation, such as building, window and outdoor living area orientation or vegetation planting are unknown.

27. Further, the inclusion of the future unknown dwellings on these vacant sites in the condition could lead to a situation where the property owner takes advantage of the mitigation offer required by the condition, in that a dwelling is deliberately designed to create the highest level of visual effect, which Meridian would then need to mitigate. In my view this would be a perverse outcome.

28. Therefore, I do not consider that the existing environment should consider potential dwellings on vacant properties in this area, in the absence of an actual plan for a dwelling that can be assessed. There are too many variables, and consequently too much uncertainty, for this to be a reasonable position to take.

Actual and potential effects

29. There is now a high level of alignment between my assessment and conclusions and the conclusions reached by Mr McGahan, Ms Vivian and Ms Edwards regarding the actual and potential effects of the proposal.

30. However, I hold a different opinion to the Councils' planners with regard to the following effects, and address these accordingly:

- Effects on Rangitāne o Wairarapa and Rangitāne o Tāmaki nui-ā-Rua; and
- Construction noise.

31. I also comment on freshwater ecology, water quality and natural character and traffic and transportation matters.

32. I note that I have reviewed Ms Rebecca Foy's rebuttal evidence regarding social impacts and am informed by the conclusions reached in her evidence.

Effects on Rangitāne o Wairarapa and Rangitāne o Tāmaki nui-ā-Rua

33. With regard to actual and potential effects on Rangitāne o Wairarapa and Rangitāne o Tāmaki nui-ā-Rua, I outlined in my Evidence in Chief [Paragraphs 134-141] that there has been ongoing consultation with the relevant iwi. To date, I understand that no substantial matters have been raised by either Rangitāne o Wairarapa or Rangitāne o Tāmaki nui-ā-Rua regarding cultural effects (noting that a comment raised during consultation regarding the placement of turbines on ridgelines has been clarified as not applicable to this project).

34. I have also reviewed the update from Rangitāne o Tāmaki nui-ā-Rua outlining their ongoing support for the project, and have updated the conditions attached as Appendix A to this evidence as a result of their latest recommendations (attached to the rebuttal evidence of Mr Bowmar).

35. Further, Meridian is continuing to work towards achieving a Memoranda of Partnership with Rangitāne o Wairarapa and Rangitāne o Tāmaki nui-ā-Rua.

36. Mr Bowmar in his Evidence in Chief states that Meridian will work with iwi, including engagement of cultural and kaitiaki monitors on site during construction if this is of interest to them. The intent was to provide for this through the Memoranda of Partnership. However as this is yet to be signed, I recommend that the conditions of consent include a requirement for the Consent Holder to invite all four relevant iwi to provide for appropriate cultural and kaitiaki monitoring during the construction phase. This proposed condition is included in the 6 September Proposed Conditions.

37. In my view, the proposed consent conditions create significant opportunities for Rangitāne o Wairarapa and Rangitāne o Tāmaki nui-ā-Rua, alongside Ngāti Kahungunu ki Wairarapa and Ngāti Kahungunu ki Tamaki nui a Rua, to continue to be involved in the project. This includes through participation in the Stakeholder Liaison Group, through specific provision in the accidental discovery of material, cultural and kaitiaki monitoring, and being included in the pre-construction and annual site meetings.

38. I note that Mr Bowmar has provided a copy of this set of conditions to Rangitāne o Wairarapa, Rangitāne o Tāmaki nui-ā-Rua, Ngāti Kahungunu ki Wairarapa and Ngāti Kahungunu ki Tamaki nui a Rua, and that the letter from Rangitāne o Tāmaki nui-ā-Rua confirms that they do not object to the consent being granted on the proposed conditions. I will provide an update at the hearing should any further feedback on the conditions be received from these iwi.

39. In the absence of such feedback, I note that other opportunities for iwi to participate can be secured through ongoing discussion and agreement, and are also provided for in the conditions themselves.

40. Meridian has made best endeavours to secure appropriate input on cultural matters. I do not consider that Meridian can do any more than this. There are no cultural matters of significant concern that have been raised by iwi or that I am otherwise aware of in the context of this

site, that have not been assessed by the ecological experts, or that cannot be taken into account in the management plan development and during cultural monitoring.

Construction and Operational Noise

41. I also note that there is significant alignment between Mr Halstead and Mr Lloyd as to noise effects and management. I agree with Mr Halstead that the concrete batching plant and mobile aggregate crushing facility are construction activities, and I also note (and agree with) Mr Halstead's proposed hours of operation for blasting activities. These matters are reflected in the 6 September Proposed Conditions.

Freshwater Ecology, Water Quality and Natural Character

42. With regard to freshwater, I note that based on the Second Joint Witness Statement of the Freshwater Ecology Experts (dated 6 September), there now appears to be significant alignment between Dr Keesing and Dr Forbes as the freshwater ecology experts (regarding conditions and the extent of a stream offset). Meridian accepts Council's proposed conditions relating to ecology, with the exception of the requirement for regular monitoring, as explained in the Rebuttal Evidence of Dr Keesing. The 6 September Proposed Conditions have been updated to include the offset ratios now agreed between the experts.

Traffic and Transportation

43. While I consider that traffic and transportation matters are settled between experts (noting some changes sought to the conditions, as outlined below), I note that Mr McGahan at Paragraph 35(b) of his evidence notes the usefulness of an update in regard to a maintenance agreement being entered into between Meridian and Tararua District Council (TDC) concerning Old Coach Road.

44. Meridian has sought an agreement in principle regarding a suitable road maintenance regime with TDC. This matter has not been progressed by TDC. In the absence of an agreed position, I consider

that direct negotiation is the most appropriate method by which such arrangements should be made.

45. I note that Harriet Fraser on behalf of the Councils has recommended a condition of consent addressing this matter, but that such a condition is not included in the August Proposed Conditions as set out in Mr McGahan's evidence.

46. I note that Meridian cannot commence work to upgrade the road without the agreement of the road controlling authority. Upgrading the road is a pre-condition to commencement of wind farm construction. This means that TDC is not exposed to risk of an outcome it is not comfortable with (unless it acts in bad faith or unreasonably – which is considered highly unlikely and is a risk Meridian is prepared to take), and the details of such a regime therefore do not need to be the subject of a condition of resource consent.

Statutory Planning Framework

47. As with the planning assessments and conclusions regarding actual and potential effects, there is a high degree of alignment between myself and the Councils' planners regarding the content and application of the statutory planning framework.

48. In particular I note there is agreement concerning the higher level policy document support for wind farms to be established in this area, as outlined at Paragraph 73 of Mr McGahan's evidence.

49. I agree with Mr McGahan (at Paragraph 78 of his evidence) that, based on the statutory planning framework, wind farms are both an anticipated and appropriate land use within the rural environment, and that the proposal is not contrary to the district plan framework.

50. The only remaining areas of disagreement concern the relevant objectives and policies that relate to Tangata Whenua values.

51. With respect to Tangata Whenua values, for the reasons provided above, and in my Evidence in Chief, I continue to be of the view that the project is consistent with the processes and outcomes envisaged by the statutory planning framework on this matter.

52. Turning to freshwater ecology, the work undertaken by Dr Keesing and Dr Forbes since the Freshwater Ecology joint witness conference (including the Second JWS) in my view addresses concerns around the adequacy of assessment and measures to achieve consistency with the statutory planning framework in regard to water quality and freshwater ecology.

53. In particular, and based on the results of the eDNA sampling undertaken by Dr Keesing, I agree with Ms Edwards that with the proposed conditions in place, the proposal is not contrary to what Policy 5-4 of the One Plan is intending to achieve in safeguarding trout spawning values.

Lapse period

54. I remain of the view that a 10 year lapse period for the exercise of the consents sought is appropriate. I note that additional detail, as sought by Mr McGahan, Ms Vivian and Ms Edwards, has been provided in Mr Telfar's rebuttal evidence. I also note that Ms Foy has expressed in her rebuttal evidence that from a social perspective, a 10 year lapse period is preferrable as it provides greater certainty to the surrounding community, and avoids the reignition of any feelings of bad sentiment.

55. On the basis of this evidence, I continue to support a 10 year lapse period.

Conditions

56. As with other matters, there is a high degree of alignment between myself and the Council planning experts regarding proposed conditions of consent. Attached at Appendix A are the "6 September Proposed Conditions", which include my proposed amendments to the "August Proposed Conditions" (as attached to Mr McGahan's evidence). My reasoning for these changes is outlined below.

RESPONSE TO S 274 EVIDENCE

57. I have reviewed the evidence provided by the Section 274 parties, and consider that the matters raised in that evidence have been

appropriately responded to in the evidence of other relevant experts, and where necessary, reflected in the 6 September Proposed Conditions.

CONDITIONS

58. There are a small number of changes that I propose to the 'August Proposed Conditions'. These amendments are provided in Appendix A (shown in red, with deletions in ~~strikethrough~~ and additions underlined, except for amendments resultant from the latest advice from Rangitāne o Tāmaki nui-ā-Rua, which is shown in blue in the same manner).

59. My reasoning for the amendments is as follows:

60. I have included reference to 'Hybrid Decanting Earth Bunds' in the term/definition of 'Erosion and Sediment Control Structures' in the Abbreviations/Acronyms table, as Hybrid Decanting Earth Bunds are proposed to be used during construction.

61. I have included the abbreviations 'SAM2' and 'SAM5' in the Abbreviations/Acronym table. SAM2 and SAM5 are ecological assessments which Dr Keesing and Dr Forbes have agreed to use as part of Condition EC17 (Freshwater ecology monitoring during construction).

62. The word 'includes' has been removed from 'The Councils' in the Abbreviations/Acronyms table as the Councils referred to are an exhaustive not inclusive list.

63. I have added plan references where there were previously placeholders in the Abbreviations/ Acronyms table for 'Transmission Corridor', 'Turbine Envelope Zone' and 'Turbine Exclusion Zone' and under Condition GA1 (General Accordance).

64. I have added the word 'other' to Condition GA1 so that it is clear that the other more specific conditions of consent shall prevail over GA1 should there be inconsistency between GA1 and the remaining conditions.

65. I have amended the lapse date for the resource consents from 5 to 10 years under Condition GA2, for the reasons provided above.

66. I have added expiry dates for the resource consents that are aligned with the discussion at Issue 6 of the Planning JWS (noting the Council position is to continue to consider these dates) under Condition GA3 (Expiry condition).

67. I have added clarification under WFL7. The condition as attached to Mr McGahan's evidence sought that the construction laydown area be removed within 3 months of the completion of construction. However, as was stated in Section 2.4.6 of the AEE, Meridian proposes that *"post construction, some or all of this storage laydown area will be retained for spare parts storage"*. As such I have suggested an amendment which allows for the retention of this area as needed for operational purposes. From an effects perspective, Condition WFL7(b) requires that landscape planting be provided along the adjoining boundary with the neighbouring property to the north, which will screen effects of the laydown area, regardless of whether they occur during construction or operation of the wind farm.

68. I have added cultural and kaitiaki monitoring conditions, as well as amended AH1 (Accidental Discovery Protocol) for the reasons provided above.

69. I have deleted CM1(a)(xii). This stated that the location of the temporary laydown areas, the concrete batching plant and the mobile crushing plant be provided in the final design drawings, 40 working days prior to the commencement of construction. I have done this because:

- the laydown areas are detailed on a drawing which is referenced under GA1;
- the concrete batching plant is already subject to location requirements under Condition CB1 (and the timeframes do not align with CM1); and

- the *mobile* aggregate crushing facility is not subject to a fixed location (noting Condition MACF1 provides limits as to where it can operate).

70. I have removed the word ‘construction’ from CM1(b)(4). CM1(b)(4) sets out a requirement for the consent holder to prove compliance with the relevant permitted activity provisions in the regional and district plans for operational stormwater. Resource consents have been sought for management of construction water, with conditions (in particular ES1 to ES7) providing an appropriate management regime.

71. I also have removed the word ‘construction’ from CM4(c)(ix) for the same reason.

72. I have removed the term ‘air discharges’ from CM4(c)(ix) for similar reasons, as resource consents have been sought for air discharges, where these are required.

73. I have provided a cross reference from CM4(c)(xv) to PCS1 as both conditions relate to procedures to be followed in the event of unexpected discovery of contaminants, and the process should be consistent between these two conditions.

74. I have updated the reference to a ‘suitably qualified and experienced professional’ at Condition EW2(g)(v) to provide consistency with how this is referred to in other conditions.

75. I have updated the reference from ‘performance standards’ to ‘performance targets’ at conditions ES2, ES3, ES9, EC17, for the reasons set out in Mr Ridley’s rebuttal.

76. I have amended ES3(q) so that only sediment retention ponds are quantitatively monitored, for the reasons set out in Mr Ridley’s rebuttal.

77. I have amended conditions CB4, MACF4 and CN1 as they relate to the use of the Concrete Batching Plant and Mobile Aggregate Crushing Facility, to require the noise from these activities to comply with the construction noise rather than operational noise limits, for the reasons outlined in Mr Halstead’s rebuttal evidence.

78. I have updated CTM2 (roading and intersection upgrades) to align with the recommendations in Mr Shield's evidence, which reflect the agreements reached in the Traffic and Transport JWS.

79. I have updated CTM2 (pavement impact assessment and maintenance) to align with the recommendations in Mr Shield's evidence, which reflect the agreements reached in the Traffic and Transport JWS.

80. I have inserted Table 2 of 'NZS6803:1999 Acoustics – Construction Noise' as per the placeholder in Condition CN1 (Construction Noise – General).

81. I have added the wording 'at least' to the requirement under CN1(b) regarding the 7 day timeframe for informing residents who may experience noise that exceeds the night-time noise limits from use of the Concrete Batching Plant. The use of the Concrete Batching Plant, which is for turbine foundation pours, is weather dependent, so flexibility is necessary to take weather into account.

82. I have inserted Table J4.5(A) of 'Appendix J of Australian Standard AS 2187-2:2006 "Explosives – Storage and use Part 2: Use of explosives' and Table DIN 4150-3:2016-12 as per the placeholders in Condition CN2 (Construction Noise – Controlled Blasting).

83. I have amended the times which blasting is limited to in Condition CN2 (Construction Noise – Controlled Blasting) for the reasons set out in Mr Halstead's rebuttal evidence.

84. I have updated Condition SF2 (Shadow Flicker), removing the sky irradiance factor, for the reasons set out in Mr Faulkner's rebuttal evidence.

85. I have amended Conditions SF3 and SF4 (Shadow Flicker), so that they do not require certification (or recertification) *in accordance with Conditions MP1 and MP2*. This is because conditions MP1 and MP2 require the use of an independent expert. However, persons with expertise in the assessment of shadow flicker are not necessarily

independent of the consent holder, and Council retains its independent certifier function.

86. I have provided clarification to EC6(d) (biosecurity) to clarify what is meant by a "material supply site". I understand that these are quarries, which have not yet been identified by Meridian.

87. I have updated the specific values regarding offset ratios and riparian planting areas in Conditions EC19 (measures to offset residual effects on freshwater ecology) and EC20 (environmental compensation performance targets), based on the Second Freshwater Ecology JWS dated 6 September 2024.

88. I have added in the words "unless different characteristics are required to meet CAA guidance" to WFO12 (Operational Lighting), in case the Civil Aviation Authority have a different aviation warning light requirement to those which are anticipated in the table under WFO(g). I consider it is not unreasonable to provide some flexibility, as long as CAA requirements are met.

89. I have excluded the Terminal Substation from DT1 (Decommissioning of Wind Farm), for the reasons set out in Mr Bowmar's rebuttal evidence.

90. I have included Schedule 1 and 2 to the conditions, as anticipated by agreed conditions SLG1 and VM1.

91. Lastly, I have identified and corrected typographical errors under Conditions SLG2, SLG6, WFL1, WFL6, VM1(e), CM3(c), ES2(d)(iii), CB4, CN3(c), EC9 and EC17.

CONCLUSIONS

92. Overall, I consider there is a significant degree of alignment between myself and the Council Planners, about the degree of effects, alignment with the planning framework, and conditions. In my view, the outstanding matters identified in the Council Planners' evidence have been closed through the further work undertaken since that evidence

has been produced. There are a few outstanding matters in relation to conditions which I have identified and explained.

Thomas Anderson

6 September 2024

Appendix A: 6 September Proposed Conditions