

**Before the Hearing Panel Appointed by Wellington City Council
to Hear Submissions on the Proposed Wellington City District Plan**

In the matter of: **the Resource Management Act 1991**

And: **Submissions and Further Submissions
Lodged on the Proposed Wellington City
District Plan by Meridian Energy Limited**

**Statement of Evidence of Christine Anne Foster
Called by Meridian Energy Limited**

HEARING STREAM 1 – STRATEGIC DIRECTION

3 February 2023

1. Introduction

- 1.1. My name is Christine Anne Foster. I am a Planning Consultant and sole director of CF Consulting Services Limited, based in Wellington. I hold a Bachelor of Regional Planning and have worked as a resource management planner in New Zealand for over 40 years.
- 1.2. This statement of evidence is within my area of expertise as a resource management planner, except where I state that I rely on the evidence of others or evidence presented in the Council's section 42A reports. I have read the Code of Conduct for Expert Witnesses set out in the Environment Court 2023 Practice Note. While this hearing is not a hearing before the Court, I am aware of the obligations imposed on expert witnesses by the Code and agree to comply with the Code of Conduct. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.
- 1.3. My planning experience has included the compilation of resource consent applications, assessment of the environmental effects of a variety of projects, community consultation and the drafting and implementation of resource management plan provisions. That experience has been gained in a number of roles including as a staff planner for local authorities, policy analyst with the Ministry for the Environment and, since 1992, as a consultant planner working on contract for a variety of clients including private developers, territorial authorities, regional and unitary councils and central government departments. I have assisted local authorities with the preparation of district and regional plans under the Resource Management Act 1991 (the RMA) and with plan changes and variations. I am a qualified RMA decision-maker (with chairperson endorsement) under the 'Making Good Decisions' programme and have heard and determined a number of proposed Plan changes.
- 1.4. Based on previous work undertaken for Meridian Energy Limited ('Meridian') including appearing as a witness at Environment Court hearings, I have a broad understanding of the renewable energy generation sector generally, of the imperatives that drive the generation industry and of the realities that confront an energy generator in operating and developing wind farms under the RMA. I assisted Meridian in the preparation of its original (first-round) submission and further submissions on the proposed Wellington City District Plan ('PDP'). I was asked by Meridian to consider the analysis and recommendations of the Council's section 42A reports for Hearing Stream 1 that pertain to Meridian's submission and further submissions. I am authorised by Meridian to present this statement of evidence to the Panel.

2. Context and Purpose of Meridian's Submissions

- 2.1 Meridian operates two wind farms and a single wind turbine in Wellington City:
 - (a) West Wind (along the Makara coast, comprising 62 turbines generating up to 142.6 MW of electricity, commissioned in 2009);
 - (b) Mill Creek (Ohariu Valley, comprising 26 turbines generating up to 59.8 MW of electricity, commissioned in 2014); and
 - (c) The Brooklyn Turbine (a single Enercon E44 turbine with 0.9 MW generation capacity first installed in 1993 and upgraded in 2016).

2.2 Meridian also operates the following wind farms elsewhere in New Zealand:

- (a) Te Uku Wind farm (28 wind turbines on land near the western coast of the Waikato District);
- (b) Te Apiti (55 turbines on the lower Ruahine Ranges, Manawatu Gorge); and
- (c) White Hill (29 turbines in Southland).

2.3 Meridian's submission and further submissions on the PDP focus on the provisions that potentially affect the company's three existing wind farm interests in Wellington City but also seek to support the Council's net zero carbon emissions strategy (set out in the document *Te Atakura First to Zero 2022 Update*). Achievement of a net zero carbon emissions economy will require a transition from reliance on fossil fuels (in the vehicle fleet, industry and in energy generation) towards greater reliance on renewable energy, including electricity generated from renewable sources. This is acknowledged on page 27 of *Te Atakura* under the heading 'Energy', which references the Government's *Emissions Reduction Plan*:

'The Emissions Reduction Plan confirms the Government policy support for increasing renewable generation (wind, hydro, solar, and geothermal) as well as ensuring the system and market can support high levels of renewables. A high proportion of renewable electricity is key to reducing energy-related emissions within Wellington.'

2.4 Meridian is considering new opportunities nationwide for generation using renewable sources other than wind (solar in particular) and therefore has an interest in all district plan provisions. As well as its focus on the company's existing generation assets, Meridian's submission also highlights and responds to the challenges that exist in resource management planning for new and expanded renewable electricity generation. These are challenges that all district plans, including Wellington's PDP, will need to respond to if the goal of net zero carbon emissions is to be achieved nationally and locally. Apart from the passage quoted in paragraph 2.3 above, the focus of *Te Atakura* is on emissions reduction. The theme of Meridian's submission is that achievement of the net carbon zero emissions goal, and emissions reduction per se, will require additional renewable electricity generation nationwide and all districts will need to 'do their bit'. This will require district plan settings that actively enable new and expanded renewable electricity generation (of diverse types) in appropriate situations. In this respect, it is my view that perpetuating historical district plan settings will not be enough to support the transition required.

2.5 Wellington City Council's PDP Team initiated discussions with Meridian in developing the draft PDP provisions. I was involved in some of those discussions and contributed suggested wording for some provisions. In large measure, the suggestions Meridian made were included in the publicly notified PDP. There are some notable exceptions that Meridian will pursue in other Hearing Streams. Meridian's submission largely supports the PDP Strategic Direction provisions as they relate to renewable electricity generation. The submission requested relatively modest amendment to the Strategic Direction provisions, in the manner of minor refinement. The section 42A report agrees with most aspects of Meridian's submission and further submission points. This statement of evidence generally records my support for the amendments recommended by the section 42A author and provides a response to any issues raised in the section 42A report.

3. Scope of Evidence

3.1 This statement of evidence follows the order of the section 42A report titled *Hearing Stream 1 – Part 1, plan wide matters and strategic direction* dated 20 January 2023, authored by Adam McCutcheon and Andrew Wharton and addresses some key infrastructure definitions, Objectives SCA-O1 to SCA-O6 and Objective SRCC-O1.

4. Definitions

4.1 I discuss below the definitions of ‘functional need’, ‘operational need’, ‘regionally significant infrastructure’, ‘reverse sensitivity’ and ‘sensitive activity’.

4.2 ‘Functional Need’ and ‘Operational Need’:

Meridian Submission Points:	228.5 and 228.7
Meridian Further Submissions:	FS.101.4 and FS101.5 opposing the submissions of Woolworths NZ (359.5 and 359.6)
S. 42A References:	Sections 5.11 and 5.19 Paragraphs 574, 575, 613 and 616

4.3 Meridian’s submission supported the PDP definitions of ‘functional need’ and ‘operational need’. I agree with the comments of the s. 42A report author that these definitions should not be amended because they match the wording of the National Planning Standards. I therefore support the s. 42A report’s recommendation to retain the notified PDP definitions.

4.4 ‘Regionally Significant Infrastructure’:

Meridian Submission Point:	228.8
Meridian Further Submissions:	FS101.6 opposing the submission of Royal Forest and Bird Protection Society (345.10) FS101.7 opposing the submission of NZ Defence Force (423.3)
S. 42A References:	Section 5.22 Paragraph 638

4.5 Meridian’s submission supported the PDP definition of ‘regionally significant infrastructure’. The definition, as it relates to renewable electricity generation, matches the definition settled by consent through the recent Greater Wellington Regional Council proposed Natural Resources Plan hearing process and the operative Regional Policy Statement (‘RPS’). I agree with the comments of the s. 42A report author that there may be substantive amendments to the definition arising from future hearings of submissions on GWRC’s Regional Policy Statement Proposed Change No. 1 (‘RPS-PC1’). However, I do not consider there is any reason to amend the substantive content of the definition at this time, as requested by the Royal Forest and Bird Protection Society submission point 345.10.

4.6 Meridian’s opposition to the NZDF submission was on the basis of concern that the requested change to the opening words ‘means ~~regionally significant infrastructure including~~ includes’ did not make sense. It results in a sentence that says ‘Regionally significant infrastructures means includes:...’. I understand that Meridian has no view on the requested addition of defence facilities’ to the listed infrastructure.

4.7 The NZDF submission point highlights a small issue: The operative RPS and proposed Natural Resources Plan definitions simply say ‘*Regionally significant infrastructure includes:...’*. The wording of both of these policy instruments was settled prior to any obligation to adopt National Planning Standards wording formats. The National Planning Standards dictate that definitions are to be expressed as (for example): ‘Regionally significant infrastructure means...’. Therefore, the wording adopted by the PDP is appropriate. The amendments requested by submission points 345.10 and 423.3 would create inconsistency with the required National Planning Standards format.

4.8 I support the s. 42A report’s recommendation to retain the notified PDP definition unless this is altered prior by a settled decision from the RPS-PC1 process that amends the equivalent RPS definition.

4.9 ‘Reverse Sensitivity:

Meridian Submission Point:	228.11
Meridian Further Submission:	FS101.8 supporting the submission of KiwiRail Holdings Limited (408.15)
S. 42A References:	Section 5.27 Paragraphs 660 and 665

4.10 Meridian’s submission supported inclusion of a definition of ‘reverse sensitivity’. The expression is used in numerous objectives and policies in the PDP, in particular in relation to regionally significant infrastructure. Inclusion of the definition will assist implementation of those objectives and policies. There is no National Planning Standards definition of ‘reverse sensitivity’. I agree that the additions proposed by KiwiRail are appropriate. The amendments more fully capture the full scope of activities that warrant protection from reverse sensitivity effects in my opinion. I support the recommended amendments detailed in paragraph 660 of the s. 42A report:

*‘means the potential for the **development, upgrading, operation and maintenance** of an existing lawfully established activity to be compromised, constrained or curtailed by the more recent establishment or alteration of another activity which may be sensitive to the actual, potential or perceived environmental effects generated by the existing activity.’*

4.11 'Sensitive Activity':

Meridian Submission Point:	228.12
Meridian Further Submission:	FS101.10 opposing the submission of NZ Motor Caravan Association Ltd (314.8)
S. 42A References:	Section 5.28 Paragraph 670

4.12 Meridian's submission supported the PDP definition of 'sensitive activity'. I do not agree that the type of temporary accommodation described in the NZMCA submission can be considered to be sensitive in the same way that permanent homes and facilities currently listed in the definition are. In my opinion, the temporary nature of the requested additional items means that any potential adverse effect will be temporary and does not present the same risk to health and amenity values as for the listed permanent homes and facilities. The expression is used in standard REG-S9, in the Renewable Electricity Generation (REG) Chapter. Standard REG-S9 requires compliance with noise standards in respect of dwellings and noise sensitive activities. The standard references the definition of 'noise sensitive activity' in the relevant wind farm noise standard (NZS:6808. The listed activities in the PDP definition of 'sensitive activity' align with the dwellings and facilities listed in NZS:6808, which also includes the following statement:

'In some instances holiday cabins and camping grounds might be considered as noise sensitive locations. Matters to be considered include whether it is an established activity with existing rights'.

4.13 I am not aware of any established holiday cabins or camping grounds near Meridian's existing wind farms or the Brooklyn Wind Turbine that would warrant specific inclusion in the defined list of 'sensitive activities' in the PDP. The statement, appropriately in my view, intends that these should be listed as individual established facilities, not a general category as requested by submission point 314.8.

4.14 I support the s. 42A report's recommendation to retain the definition of 'sensitive activity' unchanged.

5. Objectives

5.1 Objective SCA-O1:

Meridian Submission Point:	228.17
Meridian Further Submissions:	FS101.14 opposing the submission of Royal Forest and Bird Protection Society (345.27) FS101.15 opposing the WCC ERG's submission point (377.22)
S. 42A References:	Section 14.7 Paragraphs 970 to 976 and 1002 to 1024

5.2 Meridian's submission requested the addition of a new clause 4 in Objective SCA-O1 as follows:

'Infrastructure is established, operated, maintained, and upgraded in Wellington City so that:

1. *The social, economic, cultural, and environmental benefits of this infrastructure are recognised;*
2. *The City is able to function safely, efficiently and effectively;*
3. *The infrastructure network is resilient in the long term;*
4. **Infrastructure, including renewable electricity generation facilities, contribute to the transition away from dependence on fossil fuels; and**
5. *Future growth and development is enabled and can be sufficiently serviced.'*

5.3 Referring back to my opening comments, it is my opinion that the PDP needs to provide support and guidance at the level of strategic objectives for the full suite of measures necessary to achieve the City's net zero carbon emissions goal. This includes recognising the important role of renewable energy generation facilities in contributing towards achievement of that goal. The s. 42A report accepts the point in principle, but does not consider that renewable electricity generation facilities should be singled out. His recommendation is to include the following new clause 4:

'Infrastructure is established, operated, maintained, and upgraded in Wellington City so that:

1. *The social, economic, cultural, and environmental benefits of this infrastructure are recognised;*
 2. *The City is able to function safely, efficiently and effectively;*
 3. *The infrastructure network is resilient in the long term;*
 4. **It contributes to meeting the city's zero carbon capital (net zero emissions) goal; and**
 5. *Future growth and development is enabled and can be sufficiently serviced.'*
6. I accept that the PDP definition of 'infrastructure' includes renewable electricity generation but consider that, in the context of what is required to assist the transition to reliance on renewable energy sources, it is appropriate to particularly highlight renewable electricity generation in clause 4 as suggested in Meridian's submission. I would make just one amendment to correct a spelling error: '**4. Infrastructure, including renewable electricity generation facilities, contribute to the transition away from dependence on fossil fuels; and**'.

5.4 Meridian's further submissions opposes the prioritisation of protection or enhancement of biodiversity and the (presumably natural) environment advocated by submission points 345.27 and 377.22. In my opinion, there is no basis in the RMA for absolute protection of all biodiversity in all situations. Section 6 of the RMA requires decision makers to recognise and provide for significant indigenous biodiversity and the habitats of indigenous fauna, including indigenous biodiversity and habitats in the coastal environment. The PDP explicitly addresses

these obligations in the ‘natural environment’ chapters (Ecosystems and Indigenous Biodiversity (ECO), Natural Character (NATC) and Coastal Environment (CE)). There is no need, and it is inappropriate in my opinion, to ‘weight’ strategic objective SCA-O1 in the manner requested. The relevant objectives and policies of the ‘natural environment’ chapters will be central considerations for any application for consent for significant infrastructure because all sizeable infrastructure requires consent under the rule framework. It is also relevant to note that the RMA does not require protection or enhancement of the environment as a pre-requisite to development, except to the extent specified by Part 2. As the PDP and Te Atakura acknowledge, infrastructure including regionally significant infrastructure will be important in the City’s future in achieving all of the strategic goals, including the net zero carbon emissions goal. A PDP objective that required protection or enhancement of the (presumably natural) environment as a pre-requisite to development would be a significant obstacle to establishing the infrastructure necessary to sustain the City’s future and to protect it from the adverse effects of climate change.

5.5 For these reasons, I support the s. 42A report’s recommendation to not amend Objective SCA-O1 as requested by submission points 345.27 and 377.22.

5.6 Objective SCA-O2:

Meridian Further Submission:	FS101.16 opposing the submission of Royal Forest and Bird Protection Society (345.28)
S. 42A References:	Section 14.7 Paragraphs 978 to 981 and 1002 to 1024

5.7 Submission point 345.28 considers that the objective does not adequately safeguard matters of national importance in s. 6 of the RMA or adequately give effect to the NPS-FW regarding Te Mana o Te Wai. Apart from the obvious point that the PDP is not a plan addressing freshwater resources, I reiterate the point made above that the PDP explicitly, but separately from SCA-O2, recognises and provides for the relevant s. 6 matters of national importance. It is not necessary, or appropriate in my opinion, for all plan objectives to attempt to individually reconcile all potentially competing values. Objective SCA-O2 must be considered alongside the relevant objectives and policies of the ‘natural environment’ chapters in any evaluation of an application for consent or a plan change. The requested amendment would result in unnecessary duplication of effort between chapters and is not warranted in my opinion.

5.8 For these reasons, I support the s. 42A report’s recommendation to not amend Objective SCA-O2 as requested by submission point 345.28.

5.9 Meridian’s further submission did not oppose the amendment to Objective SCA-O2 to delete the words ‘infrastructure’ and ‘development’ (*‘New urban development ... supported by sufficient development ~~infrastructure~~ capacity, meet the ~~development~~ infrastructure costs ...’*) and I raise no issues with that proposed amendment.

5.10 Objective SCA-O3:

Meridian Further Submission: **FS101.17 opposing the submission of Royal Forest and Bird Protection Society (345.29)**
S. 42A References: **Section 14.7**
Paragraphs 984 and 1002 to 1024

5.11 Submission point 345.29 is similar to 345.28 in its view that the objective does not adequately safeguard matters of national importance in s. 6 of the RMA. I reiterate my comments made above that the PDP already explicitly recognises and provides for the relevant s. 6 matters and support the s. 42A report's recommendation to not amend Objective SCA-O3 as requested by submission point 345.29.

5.12 For these reasons, I support the s. 42A report's recommendation to not amend Objective SCA-O4 as requested by submission point 345.28. I agree the correction of the referenced UFD objective is appropriate.

5.13 Objective SCA-O4:

Meridian Submission Point: **228.18**
Meridian Further Submissions: **FS101.18 opposing the submission of Yvonne Weeber (340.10)**
FSFS101.19 opposing the submission of Royal Forest and Bird Protection Society (345.30)
S. 42A References: **Section 14.7**
Paragraphs 989 to 991 and 1002 to 1024

5.14 Meridian's submission supported the publicly notified wording of Objective SCA-O4. Submission point 340.10 focuses somewhat on Wellington Airport and requests that SCA-O4 be re-worded to recognise that existing infrastructure is not always in the most appropriate place. The request overlooks the fact that existing infrastructure is lawfully established. The objective should not be used as a vehicle to relitigate RMA approvals lawfully obtained. Meridian's existing renewable electricity generation assets, and the distribution network associated with it, are lawfully established regionally significant infrastructure assets. The amendments requested by the submission point could have significantly adverse implications for those assets. Also, as I have already noted, the 'natural environment' and other chapters of the PDP address the quality of the natural environment, natural character of the coastal environment and amenity values. It is not necessary to reiterate those considerations in SCA-O4 (and bad practice to attempt to do so in my opinion). These matters must be considered, if they are relevant for any application for consent or plan change, already.

5.15 Submission point 345.30 asserts that Objective SCA-O4 provides for regionally significant infrastructure over environmental protections and, particularly, over the s. 6 obligations. For the reasons I have already stated, I do not accept that SCA-O4 has that effect. The objective does not prioritise regionally significant infrastructure ahead of other community and natural values. The requested amendment weakens the objective and

diminishes the importance of regionally significant infrastructure to the City's sustainable future and attainment of its net carbon zero emissions and climate change adaptation goals.

5.16 For these reasons, I support the s. 42A report's recommendation to not amend Objective SCA-O4 as requested by submission points 345.30 and 340.10.

5.17 **Objective SCA-O5:**

Meridian Submission Point:	228.20
Meridian Further Submission:	FSFS101.21 opposing the submission of Royal Forest and Bird Protection Society (345.31)
S. 42A References:	Section 14.7 Paragraphs 989 to 991, 993 and 1002 to 1024

5.18 Meridian's submission requested that the words 'technical and operational needs' in Objective SCA-O5 be changed to 'functional and operational needs'. The submission created some confusion because the requested change was recorded as: '*The adverse effects of infrastructure are managed having regard to the economic, social, environmental and cultural benefits, and the ~~technical~~ **technical functional** and operational needs of infrastructure*'. That was an error – and was entirely my error, for which I apologise. The requested amendment should have just been shown as the deletion of 'technical' and replacement with 'functional'. The s. 42A report supports the replacement of 'technical' with 'functional' and, as stated in the submission, it is my opinion that this better reflects the relevant language of the balance of the PDP and the National Planning Standards.

5.19 Acknowledging the error highlighted above may resolve one aspect of submission point 345.31 (i.e. it was not Meridian's intention to delete environmental or cultural benefits). The other aspect of submission point 345.31 is the request to replace 'managed' with 'avoided'. I do not support that requested change. There is no basis in the RMA for requiring avoidance of all adverse effects. Even where an 'avoidance' approach is adopted in a mitigation hierarchy the direction is typically to avoid significant adverse effects or adverse effects on significant values where practicable (such as in the PDP's Policy ECO-P1) and to avoid, remedy, mitigate, offset or compensate for other (non-significant adverse effects). The RMA does not demand avoidance of adverse effects in all situations or for all values. The expression 'managed' is appropriate, in my opinion, in the context used in SCA-O5. There are other objectives and policies in the 'natural environment' chapters of the PDP that directly address *how* effects are to be managed in areas that hold particular coastal or indigenous biodiversity values. The 'how' does not need to be spelled out in SCA-O5 and certainly not in the highly limiting way requested (i.e. by requiring avoidance of all adverse effects).

5.20 I support the s. 42A report's recommended amendments to Objective SCA-O5 detailed in paragraph 1031 of the report (i.e. the change from 'technical' to 'functional').

5.21 **Objective SCA-O6:**

Meridian Submission Point:	228.21
Meridian Further Submission:	FS101.22 supporting the submission of Transpower NZ Limited (315.45)
S. 42A References:	Section 14.7 Paragraphs 997, 998 and 1002 to 1024

5.22 Meridian’s submission supported objective SCA-O6 as notified because the reverse sensitivity effects have the potential to severely adversely affect the operation, maintenance, repair and upgrading of renewable electricity generation assets and other regionally significant infrastructure. The point made in Transpower’s submission is also valid. That is, that the risks are not confined to reverse sensitivity. There is also a risk of direct harm or compromise. I agree it is appropriate to acknowledge and respond to that risk in Objective SCA-O6.

5.23 For these reasons, I support the s. 42A report’s recommended amendments detailed in paragraph 1032 of the report:

‘Infrastructure ~~operates efficiently and safely and~~ is protected from incompatible development and activities that may create reverse sensitivity effects or compromise its efficient and safe operation.’

5.24 It follows that I do not support the deletion of Objective SCA-O6 requested by submission point 345.32. I note that Meridian did not specifically oppose this submission point but its own submissions (228.21 and FS101.22) seek retention of the objective (amended).

5.25 **Objective SRCC-O1:**

Meridian Submission Point:	228.22
Meridian Further Submission:	FSFS101.23 opposing the submission of the WCC ERG (377.24)
S. 42A References:	Section 14.8 Paragraphs 1046 to 1051, 1073 to 1101 and 1103

5.26 Meridian’s submission supported objective SRCC-O1. Submission point 377.24 seeks amendment to place a limit on the extent of increase in the use of renewable energy sources by 2030, expressed as ‘3. *An increase in the use of renewable energy sources **up to 100% by 2030***’. Meridian’s further submission questioned the rationale for the limit (maximum of doubling) and the date (2030), given that the PDP’s ambition is to achieve net zero carbon emissions by 2050. I support the amendment recommended by the s. 42A report to clause 1 of Objective SRCC-O1 (inserting the reference to ‘net zero emissions’). This is consistent with the language used elsewhere in the PDP and in Te Atakura. I also support retention of clause 3 unchanged (i.e. without the limits proposed by submission point 377.24). There is no rationale for those limits.

6. Conclusion

6.1 For the reasons explained in the foregoing statement, I support the following amendments to the named strategic direction objectives and the definition of 'reverse sensitivity':

Objective SCA-O1	<p><i>Infrastructure is established, operated, maintained, and upgraded in Wellington City so that:</i></p> <ol style="list-style-type: none"> 1. <i>The social, economic, cultural, and environmental benefits of this infrastructure are recognised;</i> 2. <i>The City is able to function safely, efficiently and effectively;</i> 3. <i>The infrastructure network is resilient in the long term;</i> 4. <u>Infrastructure, including renewable electricity generation facilities, contributes to the transition away from dependence on fossil fuels; and</u> 5. <i>Future growth and development is enabled and can be sufficiently serviced.</i>
Objective SCA-O2	<p><i>New urban development occurs in locations that are supported by sufficient development infrastructure capacity, or where this is not the case the development:</i></p> <ol style="list-style-type: none"> 1. <i>Can meet the development-infrastructure costs associated with the development, and</i> 2. <i>Supports a significant increase in development capacity for the City.</i>
Objective SCA-O3	<p><i>Additional infrastructure is incorporated into new urban developments of a nature and scale that supports Strategic Objective UFD-O67 or provides significant benefits at a regional or national scale.</i></p>
Objective SCA-O4	<p>No change</p>
Objective SCA-O5	<p><i>The adverse effects of infrastructure are managed having regard to the economic, social, environmental and cultural benefits, and the functional technical and operational needs of infrastructure.</i></p>
Objective SCA-O6	<p><i>Infrastructure operates efficiently and safely and is protected from incompatible development and activities that may create reverse sensitivity effects <u>or compromise its efficient and safe operation.</u></i></p>
Definition of 'Reverse Sensitivity'	<p><i>means the potential for the <u>development, upgrading, operation and maintenance</u> of an existing lawfully established activity to be compromised, constrained or curtailed by the more recent</i></p>

	<i>establishment or alteration of another activity which may be sensitive to the actual, potential or perceived environmental effects generated by the existing activity.</i>
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6.2 I will be available at the hearing to answer any questions about this statement.

Christine Foster
3 February 2023