

**SUBMISSION ON
PROPOSED WAITAKI DISTRICT PLAN
UNDER THE FIRST SCHEDULE TO THE RESOURCE MANAGEMENT ACT 1991**

To: Proposed Waitaki District Plan
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Meridian Energy Limited (**Meridian**) makes the general and specific submissions on the Proposed Waitaki District Plan (**pWDP**) that are set out in the attached document.

Meridian confirms that its submissions do not relate to trade competition or the effects of trade competition.

Meridian would like to be heard in support of its submissions.

If other persons make a similar submission, then Meridian would consider presenting joint evidence at the time of the hearing.



Andrew Feierabend
For and on behalf of Meridian Energy Limited

Dated this 16th day of May 2025

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STRUCTURE OF SUBMISSION

1. This submission is structured as follows:
 - Part One: About the submitter;
 - Part Two: Context for Meridian's submissions;
 - Part Three: Meridian's overarching submissions and relief sought; and
 - Part Four: Meridian's specific relief sought.
2. All of Parts 1 to 4 (inclusive) of this submission are to be read together, and together they form Meridian's submissions on the pWDP.

PART ONE: ABOUT THE SUBMITTER

3. Meridian is a limited liability company listed on the New Zealand Stock Exchange, with 51% of the company owned by the New Zealand Government. It is one of the three companies formed from the split of the Electricity Corporation of New Zealand on the 1st of April 1999. Meridian's core business is the generation, marketing, trading and retailing of electricity and the management of associated assets and ancillary structures in New Zealand. As well as being New Zealand's largest generator of electricity, Meridian is also the country's largest generator of renewable electricity.
4. Meridian has a significant interest in the pWDP, with large parts of the nationally significant Waitaki Power Scheme (hereafter referred to as the **WPS** or **the Scheme**) being located in the Waitaki District.
5. The Scheme consists of eight power stations, four canal systems and numerous dams, weirs, gates and other control structures that operate as a linked hydroelectricity generation chain. The chain includes large, modified storage lakes, a series of diversions via canals, and a cascade of in-river dams.
6. Of the eight power stations, Meridian owns and operates six of these, from Lake Pūkaki to Lake Waitaki. The portion of the Scheme that lies below Lake Ohau, the Ohau River and Lake Ruataniwha resides in the Waitaki District.
7. The scheme was progressively constructed between 1928 and 1985. It contributes an average of 18% of New Zealand's annual electricity supply, and at times this can be as high as 30% of the national requirement. The scheme supports the HVDC link (which starts at the Benmore Power Station and connects the electricity networks of the North and South Islands) along with additional essential ancillary services.
8. The national significance of the WPS is established in the National Policy Statement for Renewable Electricity Generation 2011 (**NPS-REG**) and reflected in the National Policy Statement for Freshwater Management 2020 (**NPS-FM**).

PART TWO: CONTEXT FOR MERIDIAN'S SUBMISSIONS

9. In 2011, New Zealand recognised the vital role that renewable electricity generation plays in reducing greenhouse gas emissions, and the growing demand for renewable electricity generation in New Zealand. In response, the NPS-REG was Gazetted, with the objective of recognising "*the national significance of renewable electricity generation activities by*

providing for the development, operation, maintenance and upgrading of new and existing renewable electricity generation activities, such that the proportion of New Zealand's electricity generated from renewable energy sources increases to a level that meets or exceeds the New Zealand Government's national target for renewable electricity generation".

10. In 2016 New Zealand ratified the Paris Agreement with the long-term goal of keeping the increase in the global average temperature to below 2°C above pre-industrial levels and to pursue efforts to limit the increase to 1.5°C. In 2019 New Zealand's Climate Change Response (Zero Carbon) Amendment Act 2019 was passed and set into law a domestic target of net zero emissions of long-lived greenhouse gases (other than biogenic methane) by 2050. In the same year, the Climate Change Commission was established to provide independent, evidence-based advice to the Government to help the transition to a climate-resilient and low emissions future.
11. The previous government had the goal of 100% of electricity generated in New Zealand being from renewable resources by 2030. The current government has not proposed changes to this goal, rather they have committed to doubling renewable electricity generation by 2050 as a key component to achieving the 'net zero 2050' target. With this, the Government has committed to a range of regulatory changes to better enable the development of renewable electricity generation.¹
12. Section 75(3) of the Resource Management Act 1991 (**the Act**) requires that all district plans must give effect to national policy statements. Accordingly, the pWDP must give effect to the NPS-REG (amongst other national policy statements).
13. As discussed previously, the objective of the NPS-REG is to recognise the national significance of renewable electricity generation activities by providing for the development, operation, maintenance and upgrading of new and existing renewable electricity generation activities, so that the proportion of New Zealand's electricity generated from renewable energy sources increases to meet or exceed the New Zealand Government's national target for the same.
14. The preamble of the NPS-REG recognises "*The contribution of renewable electricity generation, regardless of scale, towards addressing the effects of climate change plays a vital role in the wellbeing of New Zealand, its people and the environment*". Consistent with this, Policy A of the NPS-REG recognises the national significance of "*maintaining or increasing electricity generation capacity while avoiding, reducing or displacing greenhouse gas emissions*" and Policy 4 of the NPS-FM requires that "*Freshwater is managed as part of New Zealand's integrated response to climate change*".
15. Accordingly, to give effect to the NPS-REG, the pWDP must provide for the development, operation, maintenance and upgrading of new and existing renewable electricity generation activities. It must also have particular regard to protecting the assets and operational capacity of existing renewable electricity generation activities and to the need for significant development of new renewable electricity generation activities.
16. The NPS-REG also requires that decision makers have particular regard to the need to locate the renewable electricity generation activity where the renewable energy resource is available; the logistical or technical practicalities associated with developing, upgrading,

¹ *Our journey towards net zero, New Zealand's second emissions reduction plan 2026-30, Tā Aotearoa mahere whakaheke tukunga tuarua, December 2024, page 37*

operating or maintaining the renewable electricity generation activity; and the need to connect renewable electricity generation to the national grid (amongst other matters).

17. Policy C2 of the NPS-REG requires that when decision makers are considering any residual effects of renewable electricity generation activities that cannot be avoided, remedied or mitigated, they must have regard to offsetting measures or environmental compensation, including measures or compensation that benefit the local environment and community affected.
18. Policy D of the NPS-REG requires that decision-makers must manage activities to avoid (to the extent reasonably possible) reverse sensitivity effects on consented and on existing renewable electricity generation activities.
19. In addition to the NPS-REG, sections 7(i) and 7(j) of the Act expressly require that all persons exercising functions and powers under the Act, in relation to managing the use, development, and protection of natural and physical resources, have particular regard to the effects of climate change and the benefits to be derived from the use and development of renewable energy.
20. The vital role that renewable electricity generation plays in combating climate change is also reflected in the National Policy Statement for Indigenous Biodiversity (**NPS-IB**) which explicitly excludes the development, operation, maintenance or upgrade of renewable electricity generation assets and activities from the application of the NPS-IB (clause 1.3(3) of the NPS-IB).
21. The pWDP goes some way towards meeting the requirements of the NPS-REG and sections 7(i) and 7(j) of the Act, however Meridian considers that it does not go far enough.

PART THREE: MERIDIAN'S OVERARCHING SUBMISSIONS AND RELIEF SOUGHT

22. The Waitaki Power Scheme extends across both the Mackenzie District and the Waitaki District. Given the national significance of the Scheme and the policy direction set in the NPS-REG, Meridian considers that the provisions addressing the Scheme in both the Mackenzie District Plan and the Waitaki District Plan should be substantively the same unless there is a specific local need for them to differ. Concerning the Mackenzie District Plan, Environment Court directed mediation has recently been completed with agreement between the parties being reached on the provisions addressing the Waitaki Power Scheme and new renewable electricity generation activities. Meridian has looked to align their submissions on the pWDP with the outcomes of the mediation in the Mackenzie District's plan change process.
23. At the same time, Meridian is aware of the current government's pending regulatory changes to resource management in New Zealand, including the indicated changes to national policy statements. If the national direction changes for management of renewable electricity generation activities (including the WPS) the pWDP provisions will need to be consistent with any new direction set.
24. Within the context of the preceding matters, Meridian considers that the current NPS-REG (particularly requirements of Policies A, B, C and D of the NPS-REG) and Part 2 of the Act, lead to a district planning framework for renewable electricity generation activities that assigns the activity status set out in Table 1 of this submission.

Table 1: Activity Status Sought for Renewable Electricity Generation Activities

Activity	Activity status
a) Operation and maintenance ² of existing renewable electricity generation activities (including the WPS)	Permitted
b) Upgrade ³ of existing renewable electricity generation activities within the existing footprint of the renewable electricity generation activity (including the WPS)	Permitted
c) Upgrade of existing renewable electricity generation activities (other than the WPS) outside the existing footprint of the renewable electricity generation activity, while managing the potential effects of the upgrade on identified 'special' values of the area	Controlled with conditions & Restricted Discretionary
d) Upgrade the WPS in core sites of the Scheme ⁴	Permitted
e) Upgrade the WPS in the Scheme's operating easement ⁵ while managing the potential effects of the upgrade on identified 'special' values of the area	Permitted with conditions & Restricted Discretionary
f) Development of new hydro electricity generation activities associated with the WPS, while managing the potential effects of the development on identified 'special' values of the area	Controlled with conditions & Restricted Discretionary
g) Renewable electricity generation investigation activities	Permitted with conditions & Restricted Discretionary
h) Small-scale renewable electricity generation activities ⁶	Permitted with conditions &

² Where Meridian understands that *maintenance* means *undertaking work and activities, including erosion control works, necessary to keep renewable electricity generation activities (including the Waitaki Power Scheme) operating and/or functioning efficiently and safely* (as defined in the pWDP).

³ Where Meridian understands that *upgrade* means *activities undertaken to increase the capacity, operational efficiency, security or safety of existing assets and activities, but excludes maintenance and repairs* (as defined in the pWDP).

⁴ Where Meridian understands that *the WPS core sites* are defined as *land that is owned by the owner of the Waitaki Power Scheme and managed for hydro generation purposes associated with the Waitaki Power Scheme* (as defined in the pWDP).

⁵ Where Meridian understand that the *WPS operating easements* means *land that the owner of the Waitaki Power Scheme has a registered operating easement over, or where yet to be registered, the Crown has committed to provide such easements within the Deed of Operating Easement between the Ministers of Finance and State-Owned Enterprises and Electricity Corporation of New Zealand dated 16 April 1993* (as defined by the pWDP).

⁶ Where Meridian understands that *small scale renewable electricity generation activities* means *renewable electricity generation activities for the purpose of using electricity on a particular site, or supplying an immediate community, or connecting into the distribution network* (generally as defined in the pWDP).

	Restricted Discretionary
i) Outside areas identified in the plan as having special values, any other development of renewable electricity generation activities and renewable electricity generation activities not otherwise listed	Restricted Discretionary
j) Inside areas identified in the plan as having special values, any other development of renewable electricity generation activities and renewable electricity generation activities not otherwise listed	Discretionary

25. Meridian considers that the pWDP’s assignment of a non-complying activity status to renewable electricity generation activities is not consistent with the NPS-REG, rather the national significance of such activities means the rule framework should allow for consideration of whether the benefits of the activity outweigh the residual adverse effects. Meridian holds the same concern with respect to the pWDP’s policies that refer to ‘avoiding’ effects of renewable electricity generation activities, which when applied in a consenting process could lead to resource consent applications being declined regardless of whether the national significance of the activity outweighs the residual adverse effect. Meridian opposes adoption of such provisions.
26. Concerning the management of risks from potential hydroelectricity inundation, the national significance of renewable electricity generation activities necessitates protection of existing renewable electricity generation activities from reverse sensitivity effects. At the same time, the pWDP must manage the risks to people and property.
27. Part B of the Energy Chapter addresses (amongst other activities) occupied buildings in the Waitaki Power Scheme Hydroelectricity Inundation Hazard Area overlays. Meridian is concerned that the objective, policies and rules that apply to such activities, have been placed in the Energy chapter, yet they do not apply to energy activities. Meridian considers that when a user of the plan is looking for the provisions that address risks associated with a property, they will look to the Hazards and Risks chapter, not the Energy Chapter. For this reason, Meridian requests that a new subchapter in the Hazards and Risks chapter is established, with the title *Hydroelectricity Inundation Hazard*, and that all provisions in the pWDP that relate to the management of risks from potential hydroelectricity inundation are located in this new subchapter.

PART FOUR: SPECIFIC RELIEF SOUGHT

28. Based on the preceding context and overarching submissions, Appendix 1 sets out Meridian’s support for or opposition to specific provisions in pWDP, and their relief sought. With this, Meridian accepts that consequential amendments to the plan may be needed to give full effect to their submissions and seeks that such amendments are made where necessary.

APPENDIX 1: SPECIFIC RELIEF SOUGHT

PART 1 – INTRODUCTION AND GENERAL PROVISIONS - INTRODUCTION

pWDP content or provision	Support or Oppose	Reasons	Relief Sought
<p>Description of the District</p>	<p>Oppose in part</p>	<p>Meridian considers that along with acknowledging the farming, primary industry, ski fields, wine industry, mining, tourism, outdoor pursuits, restaurants within the district and recognition of the district as a UNESCO Global Geopark, the <i>Description of the District</i> should also recognise that the district includes the nationally significant Waitaki Power Scheme.</p>	<p>Amend the third paragraph of the Description of the District as follows:</p> <p><i>The District has traditionally Traditionally been a rural and farming district, and primary industries still predominate today. The District also includes the nationally significant Waitaki Power Scheme and a diverse The economy has also diversified and includes that benefits from ski fields, the wine industry, mining and outdoor pursuits including the Alps to Ocean cycle trail. Tourism is an important contributor to the District's economy with visitors attracted to the extensive Māori and Victorian heritage, wildlife, geological features, outdoor pursuits and award-winning restaurants on offer within the District. The District was recognised as a UNESCO Global Geopark in 2023.</i></p>

PART 1 – DEFINITIONS

pWDP Definitions	Support or Oppose	Reasons	Relief Sought
Enhancement	Oppose	<p>The notified definition of <i>Enhancement</i> reads:</p> <p><i>in relation to the Energy Chapter, Part B and Activities on the Surface of Water chapter, means the development of new machinery, buildings, plant, structures, facilities, works, networks or components and operating facilities enabling new electricity generation or transmission opportunities.</i></p> <p>The term <i>enhancement</i> is not used in the NPS-REG and the definition in the pWDP for this term describes <i>development</i>. Meridian considers that the term <i>development</i> should be adopted in the pWDP (rather than <i>enhancement</i>) as this is consistent with the NPS-REG and is clearer.</p>	Delete the notified definition of <i>Enhancement</i> in its entirety.
Maintenance	Oppose in part	<p>The notified definition of <i>Maintenance</i> reads:</p> <p><i>means in relation to the Notable Trees chapter, gardening and lawn mowing in the root protection area of a Notable Tree.</i></p> <p><i>means in relation to the Energy Chapter, Part B and Activities on the Surface of Water chapter, means undertaking work and activities, including erosion control works, necessary to keep the Waitaki Power Scheme operating at an efficient and safe level.</i></p>	<p>Amend the definition of <i>Maintenance</i> as follows:</p> <p><i>Maintenance</i></p> <p>...</p> <p><i>In relation to infrastructure, the Energy Chapter (Parts A and B) means in relation to the Energy Chapter, Part B and Activities on the Surface of Water chapter, means undertaking work and activities, including erosion control works, necessary to keep the <u>infrastructure and/or renewable electricity generation activities (including the Waitaki Power Scheme)</u> operating</i></p>

		<p>Meridian generally supports this definition and notes that it is generally consistent with the Mackenzie District Plan’s definition for the same term.</p> <p>However, the term <i>maintenance</i> is also used in several provisions in Part A of the Energy Chapter, with no corresponding definition provided. Meridian notes that there is a definition provided in the pWDP for <i>maintenance and repair</i> which would apply to Part A of the Energy Chapter, however in several Part A provisions only the term <i>maintenance</i> is used meaning the <i>maintenance and repair</i> definition would not apply.</p> <p>Meridian’s position is that the definition of <i>maintenance</i> should be amended so that it is applicable across the infrastructure, Energy Chapter (Parts A and B) and Activities on the Surface of Water provisions; and that the definition for <i>maintenance and repair</i> be deleted.</p>	<p><i>and/or functioning at an efficient efficiently and safe level safely. Maintenance does not include upgrading.</i></p> <p>and</p> <p>Delete, in its entirety, the notified definition of <i>Maintenance and repair</i>.</p>
<p>Maintenance and repair</p>	<p>Oppose</p>	<p>Meridian consider that <i>repairs</i> are part of the definition of maintenance, and that given the amendments sought to the definition of <i>maintenance</i> there is no need to retain the definition of <i>Maintenance and repair</i>.</p> <p>In addition, Meridian notes that:</p> <ul style="list-style-type: none"> a) <i>repair</i> is not used in the NPS-REG; b) the term <i>maintenance and repair</i> is only used once in the pWDP and that is in ENG-P2; and c) it is not clear why there is a distinction in the pWDP between the activities <i>maintenance and repair</i> and <i>maintenance</i> on its own. 	<p>Delete, in its entirety, the notified definition of <i>Maintenance and repair</i>, and amend the definition of <i>maintenance</i> as previously sought in this submission document.</p>

<p>Refurbishment</p>	<p>Oppose</p>	<p>The notified definition of <i>Refurbishment</i> reads:</p> <p><i>in relation to the Energy Chapter, Part B and Activities on the Surface of Water Chapter, means the upgrade, renewal or replacement (to gain efficiencies in generating and transmitting electricity) of existing machinery, buildings, plant, structures, facilities, works, networks or components and operating facilities associated with the Waitaki Power Scheme.</i></p> <p>For the following reasons, Meridian seeks that this definition be deleted in its entirety and replaced with a definition of <i>upgrade</i>:</p> <ul style="list-style-type: none"> a) The definition is specific to Waitaki Power Scheme activities and is said to only apply in respect of “<i>the Energy Chapter, Part B and Activities on the Surface of Water Chapter</i>”, yet the term is used in several provisions in Part A of the Energy Chapter, with no corresponding definition provided; b) The term <i>refurbishment</i> is not used in the NPS-REG, while <i>upgrade</i> is used in the NPS-REG. c) The term <i>refurbishment of the Waitaki Power Scheme</i> is used in the REG provisions in the Mackenzie District Plan (MDP). This has resulted from recent plan changes carrying over provisions from Plan Change 13 to the MDP. The definition of <i>refurbishment</i> in the MDP reads: <p><i>means the upgrade or renewal (to gain efficiencies in generating and transmitting electricity) of machinery, buildings, plant, structure, facilities, works or components</i></p> 	<p>Delete the definition of <i>Refurbishment</i> in its entirety and amend the definition of <i>Upgrading</i> as set out in this submission document.</p>
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		<p><i>and operating facilities associated with the infrastructure.</i></p> <p>There are subtle differences between the MDP and pWDP definitions (e.g. insertion of “<i>replacement</i>” and “<i>networks</i>” in the pWDP) and the reasons for these differences are not clear.</p> <p>d) Use of <i>refurbishment</i> in the MDP has been problematic, with parties with an interest in the plan being confused about the difference between <i>maintenance, renewal, refurbishment</i> and <i>upgrade</i>.</p> <p>e) Meridian prefers that the term <i>upgrade</i> is used rather than <i>refurbishment</i> and that <i>upgrade</i> is defined as:</p> <p><i>In relation to infrastructure and renewable electricity generation activities, means activities undertaken to increase the capacity, operational efficiency, security or safety of existing assets and activities.</i></p>	
Renewable electricity generation	Support	The notified definition of <i>Renewable electricity generation</i> adopts the same meaning as is set in the NPS-REG and Meridian supports this.	Retain the definition of <i>Renewable electricity generation</i> as notified.
Renewable electricity generation activities	Support	The notified definition of <i>Renewable electricity generation activities</i> adopts the same meaning as is set in the NPS-REG and Meridian supports this.	Retain the definition of <i>Renewable electricity generation activities</i> as notified.
Renewable electricity generation assets	Support	The notified definition of <i>Renewable electricity generation assets</i> adopts the same meaning as is set in the NPS-REG and Meridian supports this.	Retain the definition of <i>Renewable electricity generation assets</i> as notified.

<p>Upgrading</p>	<p>Oppose in part</p>	<p>While the definition of <i>infrastructure</i> includes facilities for the generation of electricity, Meridian considers that it is important to be explicit that the definition of <i>upgrading</i> or <i>upgrade</i> applies to the Waitaki Power Scheme and other renewable electricity generation activities.</p>	<p>Amend the definition of <i>Upgrading</i> as follows:</p> <p><i><u>means in relation to infrastructure and renewable electricity generation activities (including the Waitaki Power Scheme), means activities undertaken to improve, the improvement or increase in carrying the capacity, operational efficiency, security or safety of existing infrastructure, assets and activities. Upgrading does not include maintenance. but excludes maintenance and repair.</u></i></p> <p><i><u>Upgrade has the same meaning.</u></i></p>
<p>Waitaki Power Scheme</p>	<p>Support</p>	<p>The notified definition of <i>Waitaki Power Scheme</i> reads:</p> <p><i>means the structures, works, facilities, components, plant and activities undertaken to facilitate and enable the generation of electricity from water in the Waitaki River Catchment, including any mitigations associated with the Scheme. It includes power stations, dams, weirs, control structures, penstocks, canals, tunnels, siphons, spillways, intakes, storage of goods materials and substances, switchyards, fish and elver screens and passes, races, booms, site investigation works, erosion and flood control activities, land drainage, sediment and weed control, access requirements (including public access), jetties, slipways and landing places, signs, earthworks, monitoring, investigation and communication equipment and transmission network. It</i></p>	<p>Retain the definition of <i>Waitaki Power Scheme</i> as notified.</p>

		<p><i>includes the Waitaki Power Scheme Core Sites and the Waitaki Power Scheme Operating Easements.</i></p> <p>Meridian supports this definition and notes that it is generally consistent with the definition applied, through the Mackenzie District Plan, to that part of the Scheme that lies within the Mackenzie District.</p>	
Waitaki Power Scheme Core Sites	Oppose in part	<p>Meridian generally supports the definition of <i>Waitaki Power Scheme Core Sites</i>, while seeking an amendment for clarity purposes.</p>	<p>Amend the notified definition of <i>Waitaki Power Scheme Core Sites</i> as follows:</p> <p><i>means land that is owned by the owner of the Waitaki Power Scheme and managed for hydroelectricity generation purposes associated with the Waitaki Power Scheme.</i></p>
Waitaki Power Scheme Existing Footprint	Oppose	<p>The notified definition of <i>Waitaki Power Scheme Existing Footprint</i> reads:</p> <p><i>means those structures, works or components of the scheme that are located outside of the Waitaki Power Scheme Core Sites and the Waitaki Power Scheme Operating Easements existing on 1 March 2025.</i></p> <p>Meridian opposes this definition for the following reasons:</p> <ol style="list-style-type: none"> a. The definition does not include all parts of the possible footprint of renewable electricity generation activities (as defined by the NPS-REG) at the WPS; and b. The definition does not reflect the relationship between core sites, operating easements and the 	<p>Delete the notified definition of <i>Waitaki Power Scheme Existing Footprint</i> and replace it with the following:</p> <p><u><i>Waitaki Power Scheme Footprint means the area of the structures, works, facilities, components, plant and activities undertaken to facilitate and enable the generation of hydroelectricity at the Waitaki Power Scheme.</i></u></p>

		existing footprint of the WPS. The existing footprint can be within the core sites and operating easements of the WPS and outside these areas (for example metrological stations beyond cores sites and operating easements).	
Waitaki Power Scheme Operating Easements	Oppose in part	<p>The notified definition of <i>Waitaki Power Scheme Operating Easements</i> reads:</p> <p><i>means land that the owner of the Waitaki Power Scheme has a registered operating easement over, or where yet to be registered, the Crown has committed to provide such easements within the Deed of Operating Easement between the Ministers of Finance and State-Owned Enterprises and Electricity Corporation of New Zealand dated 16 April 1993.</i></p> <p>Meridian supports this definition and seekd that it be retained.</p>	Retain the definition of <i>Waitaki Power Scheme Operating Easements</i> as notified.

PART 2 - STRATEGIC DIRECTION

pWDP content or Provision	Support or Oppose	Reasons	Relief Sought
<p>All SD Objectives</p>	<p>Oppose</p>	<p>Meridian is concerned that:</p> <ul style="list-style-type: none"> a) There are 24 SD Objectives which dilutes the strategic direction setting purpose of this chapter; b) Many of the SD Objectives overlap in the matters they address; c) Amongst the SD Objectives there are inconsistencies with Part 2 of the Act and national policy statements; d) Many of the details in the SD Objectives would sit better in the chapters that follow the Strategic Direction chapter. 	<p>Meridian seeks that the SD Objectives are rewritten to address the <u>key</u> direction setting matters for the Waitaki District Plan, remove duplication, and be made consistent with Part 2 of the Act and the relevant national policy statements.</p> <p>With this, Meridian seeks the particular relief for the SD Objectives that follow in this submission document, or words of similar effect.</p>

<p>SD-CHI-O1 Character and Identity and SD-CHI-O2 Recognition, protection, and future opportunities for Waitaki's heritage and SD-CHI-O3 Waitaki's cultural heritage</p>	<p>Oppose</p>	<p>Meridian is concerned that SD-CHI-O1, SD-CHI-O2 and SD-CHI-O3 are repetitive and not consistent with Part 2 of the Act and the national direction set in the NPS-REG.</p> <p>In addition, reference to <i>protection</i> of the districts <i>character</i> and <i>identity</i> is unclear as to what would be protected.</p> <p>Protection of the district's <i>character</i> and <i>identity</i> and <i>historic and cultural heritage</i> would lead to the avoidance of any activity that detracted from the character and <i>identity</i> and <i>historic and cultural heritage</i> values.</p> <p>Given the national significance of renewable electricity generation activities (which may have functional needs or operational needs to be located in certain places), excluding such activities without consideration of their potential effects or merits is not consistent with the national policy direction set in the NPS-REG and the Act.</p>	<p>Amend SD-CHI-O1 as follows:</p> <p><i>Character and Identity</i></p> <p><i>Waitaki's character, historic and—cultural heritage,and identity is recognised identified and protected throughout—the—District—from <u>inappropriate subdivision, use and development.</u></i></p> <p>and</p> <p>Delete SD-CHI-O2 in its entirety;</p> <p>and</p> <p>Amend SD-CHI-O3 as follows:</p> <p><i>Waitaki's cultural heritage</i></p> <p><i>Wāhi tūpuna places, landscapes and features which that are significant to mana whenua are identified,recognised for their values and where <u>appropriate are managed or</u> protected for future generations.</i></p>
<p>SD-MW-O2 Mana whenua values, rights, and interests</p>	<p>Oppose in part</p>	<p>Meridian is concerned that SD-MW-O2 is not consistent with Part 2 of the Act and the national direction set in the NPS-REG.</p> <p>Protection of mana whenua values and interests would lead to the avoidance of any activity that detracted from such values and interests. This is not consistent national policy direction.</p>	<p>Amend SD-MW-O2 as follows:</p> <p><i>Mana whenua values, rights, and interests</i></p> <p><i>Protect and recognise <u>Recognise and provide for the relationships of</u> mana whenua <u>with their culture, values,</u>rights, and <u>interests,</u> and protect <u>their protected customary rights.</u></i></p>
<p>SD-NE-O1 Natural character, landscapes and</p>	<p>Oppose</p>	<p>Meridian is concerned that SD-NE-O1 is not consistent with Part 2 of the Act and the national direction set in the NPS-REG and the NPS-IB.</p>	<p>Delete SD-NE-O1 and replace it with the following:</p> <p><i><u>SD-NE-O1 Natural character and outstanding natural features and landscapes</u></i></p>

<p>features and ecosystems</p>		<p>Meridian is concerned that <i>protection of the natural character, landscapes, features, ecosystems and water quality of the district</i> would lead to the avoidance of any activity that detracted from these features. This is not consistent national policy direction.</p> <p>Meridian also considers that restoration and enhancement may not always be necessary or appropriate, given the requirements of national policy statements and the Act.</p>	<p><u><i>The Waitaki District's natural character and outstanding natural features and landscapes are protected from inappropriate subdivision, use and development, and where appropriate are restored or enhanced.</i></u></p> <p><u><i>SD-NE-01A Significant indigenous vegetation and significant habitats of indigenous fauna</i></u></p> <p><u><i>The Waitaki District's significant indigenous vegetation and significant habitats of indigenous fauna are maintained overall, and where appropriate are protected, restored or enhanced.</i></u></p>
<p>SD-RRNH-01 Natural hazards</p>	<p>Oppose in part</p>	<p>Meridian considers that 'avoid where possible' is unnecessarily restrictive and is not consistent with Part 2 of the Act and the broader national policy direction. Meridian considers that focusing on improving resilience by managing significant risks is more appropriate.</p>	<p>Amend SD-RRNH-01 as follows:</p> <p><i>SD-RRNH-01 Natural hazards</i></p> <p><i>Improve the District's resilience to natural hazards, and where possible, avoid or, where avoidance is not possible, mitigate by managing the <u>significant</u> risks to people, communities, property, and infrastructure.</i></p>
<p>SD-IEE-01 Infrastructure</p>	<p>Oppose in part</p>	<p>The pWDP's definition of <i>infrastructure</i> includes <i>facilities for the generation of electricity</i>. Given this, Meridian considers that to be consistent with Part 2 of the Act and the NPS-REG, recognition of the benefits of infrastructure should not be limited to only the <i>significant benefits</i>. For example, Policy B(b) of the NPS-REG requires that decision makers have particular regard to the issue of even minor reductions in the generation output of existing renewable electricity generation activities cumulatively having significant adverse effects on</p>	<p>Amend SD-IEE-01 as follows:</p> <p><i>Infrastructure</i></p> <p><i>The significant benefits and local, regional and national <u>importance benefits</u> of the use and development of regionally and nationally significant infrastructure are recognised, and <u>enabled and</u> provided for.</i></p>

		<p>national, regional and local renewable electricity generation output.</p> <p>In addition, Meridian considers that the operation, maintenance and upgrade of existing lawfully established renewable electricity generation activities should be enabled through permitted activity rules.</p>	
<p>SD-IEE-O2</p> <p>National Grid and the Waitaki Power Scheme</p>	Oppose	<p>Meridian considers that SD-IEE-O2 does not provide sufficient strategic direction to the rest of the plan. Meridian considers that the objective should be expanded to provide clear direction on how the national significance of the renewable electricity generation activities and National Grid must be recognised and provided for in the district. Such direction should include avoiding reverse sensitivity effects on renewable electricity generation activities and the National Grid; enabling the operation, maintenance and upgrade of the existing Waitaki Power Scheme and the National Grid; and providing for other renewable electricity generation activities.</p>	<p>Delete SD-IEE-O2 and replace it with the following:</p> <p><u>National significance of renewable electricity generation activities and the National Grid</u></p> <p><u>The national significance of renewable electricity generation activities and the National Grid is recognised by:</u></p> <ol style="list-style-type: none"> <u>1. enabling the operation, maintenance and upgrade of the Waitaki Power Scheme and the National Grid; and</u> <u>2. providing for the development, operation, maintenance and upgrade of new renewable electricity generation activities; and</u> <u>3. avoiding reverse sensitivity effects on renewable electricity generation activities and assets (including the Waitaki Power Scheme) and the National Grid.</u>
<p>SD-IEE-O3</p> <p>Energy</p>	Oppose	<p>Meridian considers that the term ‘Use of our energy resources’ leads to the objective being unclear whether it addresses efficient use of energy sources from which electricity is generated or addresses the efficient use of energy by the community. Meridian considers that the</p>	<p>Amend SD-IEE-O3 as follows:</p> <p><u>Energy efficiency</u></p> <p><u>Use our energyThe district’s end use of energy is efficient resources efficiently in how we live, work and move through the district.</u></p>

		objective should focus on the latter and seeks amendments to achieve this.	
SD-IEE-O4 Renewable energy	Oppose in part	Meridian considers that SD-IEE-O4's reference to <i>energy conservation</i> unnecessarily overlaps with the <i>efficient use of energy</i> that is addressed in SD-IEE-O3.	Amend SD-IEE-O4 as follows: <i>Renewable energy</i> <i>There is reduced reliance on non-renewable sources of energy and encouragement of increased use of renewable sources and energy conservation.</i>
SD-RA-O2 Protecting highly productive land	Oppose in part	Meridian is concerned that <i>protection</i> of productive soils would lead to the avoidance of any activity that detracted from the productive capability of soils. Given the national significance of renewable electricity generation activities (which may have functional needs or operational needs that lead it to be located in the rural zone), excluding such activities (without consideration of their potential effects or merits) from productive soils is not consistent with the national policy direction set in the NPS-REG and the Act.	Amend SD-RA-O2 as follows: <i>Protecting highly productive land</i> <i>Protect highly productive land from inappropriate subdivision, use or development, and recognise the need to protect productive soils for growing food.</i>

PART 2 – ENERGY

pWDP Content	Support or Oppose	Reasons	Relief Sought
<p>Sentence under the title of the Energy Chapter</p>	<p>Oppose</p>	<p>The sentence immediately below the title of the Energy Chapter reads:</p> <p><i>Part A of this chapter contains district-wide provisions relating to energy activities, specifically, renewable energy activities and renewable electricity generation activities. The nationally significant Waitaki Power Scheme is addressed in Part B of this chapter.</i></p> <p>Meridian considers that this sentence is not clear whether Part A and Part B operate separately from each other, or whether the activities they address overlap with each other. Meridian considers that Part A and Part B should operate separately with no overlap in the activities that they address.</p>	<p>Delete, in its entirety, the sentence under the title of the Energy Chapter and replace it with the following:</p> <p><u><i>The Energy Chapter is structured in 2 parts. Part A addresses renewable electricity generation activities, but not the Waitaki Power Scheme’s activities and assets. Part B addresses all of the Waitaki Power Scheme’s activities and assets and no other renewable electricity generation activities.</i></u></p>

PART 2 – PART A: GENERAL ENERGY (ENG)

pWDP Content or Provision	Support or Oppose	Reasons	Relief Sought
<p>Title of subchapter Part A: General Energy (ENG)</p>	<p>Oppose</p>	<p>The title of and provisions in Part A of the Energy Chapter inconsistently use the terms <i>renewable energy generation activities</i> and <i>renewable electricity generation activities</i>, and variations of the same.</p> <p>Meridian understands that the intent of Part A is to address <i>renewable electricity generation activities</i> (other than the Waitaki Power Scheme). The pWDP includes a definition of <i>renewable electricity generation activities</i> and does not include a definition of <i>renewable energy generation activities</i>.</p> <p>Other than ENG-O1 and ENG-P1, all provisions in Part A address <i>renewable electricity generation activities</i>. There are no rules that address <i>renewable energy generation activities</i>.</p> <p>Meridian considers that the title of this chapter should be consistent with the content of the chapter.</p>	<p>Amend the title as follows:</p> <p><u>Part A: General Energy Renewable Electricity Generation (ENG REG)</u></p> <p>and make all consequential amendments to the referencing of provisions in Parts A and B of the Energy Chapter.</p>
<p>Introduction</p>	<p>Oppose</p>	<p>The notified version of the Introduction is not consistent with the NPS-REG for example:</p> <ul style="list-style-type: none"> a) It fails to recognise the national significance of renewable electricity generation activities, instead only referring to “<i>benefits to the District</i>”; and b) It narrowly references the need to avoid, remedy or mitigate potential adverse effects resulting from renewable electricity generation activities and 	<p>Delete the notified version of the Introduction and replace it with the following:</p> <p><u><i>Energy efficiency and the benefits to be derived from the use and development of renewable energy are matters the District Plan must have particular regard to under section 7 of the Act. The District Plan must also give effect to the National Policy Statement for Renewable Electricity Generation 2011 (NPS-REG), which</i></u></p>

		<p>omits reference to offsetting and compensation as a means to address potential effects.</p> <p>In addition, the Introduction needs to clearly set out the relationship between the provisions in Part A of the Energy chapter and the provisions in the rest of the plan. Meridian considers that Part A should, as much as possible, be a standalone chapter addressing renewable electricity generation activities other than such activities associated with the Waitaki Power Scheme.</p>	<p><u>requires that the national significance of renewable electricity generation activities and the national, regional, and local benefits of such activities (such as increasing electricity capacity and security of supply while displacing greenhouse gas emissions) are recognised and provided for in district plans.</u></p> <p><u>The NPS-REG directs that the development, operation, maintenance and upgrading of both new and existing renewable electricity generation activities is provided for to increase the proportion of electricity generated from renewable energy sources, thereby displacing use of non-renewable energy sources and reducing carbon emissions. These activities often have a functional need or operational need to be in a particular location but also have the potential to adversely affect the environment.</u></p> <p><u>Part of the nationally significant Waitaki Power Scheme is located in the Waitaki District.</u></p> <p><u>Part A of the Energy Chapter (REG) addresses the development, operation, maintenance and upgrading of renewable electricity generation activities other than the Waitaki Power Scheme, while managing the potential adverse effects of such activities.</u></p> <p><u>Concerning the activities addressed by Part A of the Energy Chapter, the provisions in Table 1 also apply to such activities. Beyond the provisions listed in Table 1, no other provisions in this plan also apply to the activities addressed by Part A of</u></p>
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			<p><u>the Energy Chapter, except where specified within the provisions of Part A.</u></p> <p><u>Table 1 Provisions that also apply to the activities addressed by Part A of the Energy Chapter</u></p> <table border="1"> <thead> <tr> <th data-bbox="1415 405 1568 547"><u>Topic</u></th> <th data-bbox="1568 405 2029 547"><u>Plan Provisions that Apply to Activities Managed in this Chapter</u></th> </tr> </thead> <tbody> <tr> <td data-bbox="1415 547 1568 1342"><u>Strategic Direction</u></td> <td data-bbox="1568 547 2029 1342"> <p><u>SD-CHI-O1 Character and Identity</u> (as amended by Meridian’s submissions)</p> <p><u>SD-CHI-O3 Waitaki’s cultural heritage</u> (as amended by Meridian’s submissions)</p> <p><u>SD-MW-O2 Mana whenua values, rights, and interests</u> (as amended by Meridian’s submissions)</p> <p><u>SD-NE-O1 Natural character, landscapes and features and ecosystems</u> (as amended by Meridian’s submissions)</p> <p><u>SD-IEE-O1 Infrastructure</u> (as amended by Meridian’s submissions)</p> <p><u>SD-IEE-O2 National Grid and the Waitaki Power Scheme</u> (as amended by Meridian’s submissions)</p> </td> </tr> </tbody> </table>	<u>Topic</u>	<u>Plan Provisions that Apply to Activities Managed in this Chapter</u>	<u>Strategic Direction</u>	<p><u>SD-CHI-O1 Character and Identity</u> (as amended by Meridian’s submissions)</p> <p><u>SD-CHI-O3 Waitaki’s cultural heritage</u> (as amended by Meridian’s submissions)</p> <p><u>SD-MW-O2 Mana whenua values, rights, and interests</u> (as amended by Meridian’s submissions)</p> <p><u>SD-NE-O1 Natural character, landscapes and features and ecosystems</u> (as amended by Meridian’s submissions)</p> <p><u>SD-IEE-O1 Infrastructure</u> (as amended by Meridian’s submissions)</p> <p><u>SD-IEE-O2 National Grid and the Waitaki Power Scheme</u> (as amended by Meridian’s submissions)</p>
<u>Topic</u>	<u>Plan Provisions that Apply to Activities Managed in this Chapter</u>						
<u>Strategic Direction</u>	<p><u>SD-CHI-O1 Character and Identity</u> (as amended by Meridian’s submissions)</p> <p><u>SD-CHI-O3 Waitaki’s cultural heritage</u> (as amended by Meridian’s submissions)</p> <p><u>SD-MW-O2 Mana whenua values, rights, and interests</u> (as amended by Meridian’s submissions)</p> <p><u>SD-NE-O1 Natural character, landscapes and features and ecosystems</u> (as amended by Meridian’s submissions)</p> <p><u>SD-IEE-O1 Infrastructure</u> (as amended by Meridian’s submissions)</p> <p><u>SD-IEE-O2 National Grid and the Waitaki Power Scheme</u> (as amended by Meridian’s submissions)</p>						

				<p><u><i>SD-RA-02 Protecting highly productive land</i></u> (as amended by Meridian’s submissions)</p> <p><u><i>Activities on the Surface of Water</i></u></p> <p><u><i>Signs</i></u></p> <p><u><i>SIGN-R1</i></u> <u><i>SIGN-R4</i></u></p>
Introduction User Note	Oppose	Meridian is concerned that the User Note does not clearly set out the relationship between the provisions in Part A of the Energy chapter and the provisions in the rest of the plan. Meridian considers that Part A should, as much as possible, be a standalone chapter addressing renewable electricity generation activities other than such activities associated with the Waitaki Power Scheme.	Delete the User Note and amend the Introduction to clearly set out the relationship between the provisions in Part A of the Energy chapter and the provisions in the rest of the plan, as previously requested in this submission document.	
ENG-01 Recognising the benefits of renewable electricity generation	Oppose in part	<p>Meridian considers that “<i>use and development</i>” does not clearly reflect the activities that are recognised in the NPS-REG as being of national significance.</p> <p>The NPS-REG identifies the matters of national significance as:</p> <p>a) the need to develop, operate, maintain and upgrade renewable electricity generation activities; and</p> <p>b) the benefits of renewable electricity generation.</p>	<p>Amend ENG-01 as follows:</p> <p><u><i>ENG-01-REG-01</i></u></p> <p><i>Recognising the benefits of renewable electricity generation</i></p> <p><i>The significant local, regional and national benefits from the use and development, <u>operation, maintenance and upgrade</u> of renewable energy <u>electricity generation activities</u> are recognised and <u>these activities are enabled</u></i></p>	

			<i>where appropriate or are otherwise renewable electricity generation activities are provided for.</i>
ENG-O2 Design and location of renewable electricity generation AND ENG-O3 Protecting the values and qualities of any overlay	Oppose in part	<p>Meridian considers that the matters addressed in ENG-O3 are already addressed in ENG-O2. The duplication is not needed. Meridian recommends merging the two objectives.</p> <p>In addition, Meridian considers that <i>minimise</i> is not an appropriate term to use in ENG-O2. The NPS-REG does not require that the potential effects of renewable electricity generation activities are minimised. Rather the NPS-REG establishes a framework whereby the potential effects of renewable electricity generation activities can be managed to avoid, remedy or mitigate potential environmental effects, and when considering any residual effects that cannot be avoided, remedied or mitigated decision makers must have regard to offsetting measures and environmental compensation. Importantly, the NPS-REG also leads to the need to consider whether the benefits of the activity outweigh any residual effects that remain.</p>	<p>Amend ENG-O2 as follows and delete ENG-O3 in its entirety:</p> <p><u>ENG-O2 REG-O2</u></p> <p><i>Design and location of renewable electricity generation</i></p> <p><i>Renewable electricity generation activities are designed and located to minimise <u>manage</u> adverse effects on the environment while recognising their <u>the</u> functional needs and operational needs <u>of these activities</u>.</i></p>
ENG-P1 Recognising the benefits of renewable electricity generation	Oppose in part	<p>Meridian is concerned that ENG-P1 is unclear and is not consistent with the NPS-REG. The NPS-REG addresses “renewable electricity generation activities”, and the objective of the NPS-REG refers to meeting or exceeding “the New Zealand Government’s national target for renewable electricity generation”.</p> <p>ENG-P1’s references to <i>renewable energy</i>, and <i>renewable energy targets</i> is not consistent with the NPS-REG.</p>	<p>Amend ENG-P1 as follows:</p> <p><u>ENG-P1 REG-P1</u></p> <p><i>Recognising the benefits of renewable electricity generation activities</i></p> <p><i>Recognise the local, regional and national benefits of renewable energy <u>electricity</u> generation activities, including:</i></p> <ol style="list-style-type: none"> <i>1. the their contribution to central government energy policy objectives and renewable</i>

		<p>It is also unclear why security of supply has been addressed in ENG-P1, but “maintaining or increasing electricity generation capacity while avoiding, reducing or displacing greenhouse gas emissions” has not been addressed (see Policy A of the NPS-REG). The latter is of particular importance and is central to the national significance of renewable electricity generation activities.</p>	<p>energy—targets the New Zealand Government’s national targets for renewable electricity generation; and</p> <ol style="list-style-type: none"> 2. the their contribution the proposal will make to maintaining or increasing electricity generation capacity while avoiding, reducing or displacing greenhouse gas emissions; 3. their contribution to maintaining or improving the local, regional and national the security of supply—and increased energy interdependence for the district and region; and 4. their the contribution to economic benefits for the regional and local economy; and 5. any other positive benefits.
<p>ENG-P2 Existing activities</p>	<p>Oppose in part</p>	<p>The pWDP’s definition of “refurbishment” only applies to the activities and assets of the Waitaki Power Scheme. There is no definition provided for when the term is used in Part A of the Energy chapter. In addition, the definition of refurbishment refers to <i>upgrading</i>.</p> <p><i>Refurbishment</i> and <i>repair</i> are not used in the NPS-REG, while <i>upgrading</i> is. For this reason, Meridian has sought an amendment to the definition of <i>upgrading</i> in the pWPS, and seeks corresponding changes to ENG-P2 to better reflect the requirements of the NPS-REG.</p>	<p>Amend ENG-P2 as follows:</p> <p><u>ENG-P2-REG-P2 Existing Renewable Electricity Generation Activities</u></p> <p>Enable the ongoing refurbishment, operation, maintenance and repair, and operation upgrade of existing renewable electricity generation activities.</p>
<p>ENG-P3 Effects on renewable</p>	<p>Oppose in part</p>	<p>Meridian supports protecting the Waitaki Power Scheme and other renewable electricity generation activities from reverse sensitivity effects. However, this provision addresses activities other than renewable electricity</p>	<p>Address reverse sensitivity effects on renewable electricity generation activities in the Strategic</p>

<p>electricity generation activities</p>		<p>generation activities that can result in reverse sensitivity effects on renewable electricity generation activities. Users of the plan that are not associated with renewable electricity generation are not likely to look to the Energy chapter for provisions that apply to activities beyond energy related activities.</p> <p>For this reason, Meridian considers that a Strategic Direction Objective is needed to protect the Waitaki Power Scheme and other renewable electricity generation activities from reverse sensitivity effects. See Meridian’s submissions on the Strategic Direction Objectives.</p> <p>Otherwise, if ENG-P3 is to be retained in the Energy Chapter, it should clearly reference the Waitaki Power Scheme.</p>	<p>Direction objectives as set out in Meridian’s submission on SD-IEE-O2; or</p> <p>Amend ENG-P3 as follows:</p> <p><u>ENG-P3-REG-P3</u></p> <p><u>Prevent reverse sensitivity effects</u> Effects on renewable electricity generation activities</p> <p><i>Only allow new sensitive activities to establish in proximity to existing or consented renewable electricity generation activities <u>(including the Waitaki Power Scheme)</u> where they are designed and located to avoid or mitigate reverse sensitivity effects.</i></p>
<p>ENG-P4</p> <p>Small scale renewable electricity generation activities and investigation activities outside of overlays</p>	<p>Oppose in part</p>	<p>Meridian considers that combining investigation activities and small-scale renewable electricity generation activities in the same policy leads to a policy that does not recognise the differences in the nature and potential effects of these activities.</p> <p>Concerning c., this addresses potential effects on an overlay, yet the activity is described in the policy’s title as being outside overlays. Also in c., it is unclear what “<i>appropriately offsets or compensates</i>” requires.</p> <p>In addition, and as previously discussed in this submission document, Meridian considers that <i>minimise</i> is not an appropriate term to use in ENG-P4. The NPS-REG does not require that the potential effects of renewable electricity generation activities are minimised. Rather the NPS-REG establishes a framework</p>	<p>Amend ENG-P4 as follows:</p> <p><u>ENG-P4-REG-P4</u></p> <p><i>Small scale renewable electricity generation activities and investigation activities outside of overlays</i></p> <p><i>Enable small scale renewable electricity generation activities and activities associated with the investigation, identification and assessment of potential sites and energy sources for renewable electricity generation activities, where:</i></p> <p><i>a. it is of a form, location and scale that minimises adverse effects on the environment; and</i></p>

		<p>whereby the potential effects of renewable electricity generation activities can be managed to avoid, remedy or mitigate potential environmental effects, and when considering any residual effects that cannot be avoided, remedied or mitigated decision makers must have regard to offsetting measures and environmental compensation. This framework requires consideration of whether the benefits of the activity outweigh any residual effects that remain.</p>	<p>b.—it is consistent with the anticipated amenity values and character of the zone <u>and otherwise provide for such activities while managing the potential effects of the activity.</u>; and</p> <p>c.—where it is demonstrated that all adverse effects on an overlay cannot be avoided, it appropriately offsets or compensates the adverse effects.</p> <p>and</p> <p>Insert a new policy as follows:</p> <p><u>REG-P4A</u></p> <p><u>Investigation activities</u></p> <p><u>Enable investigation, identification and assessment of potential sites and energy sources for renewable electricity generation activities while managing adverse effects on the environment.</u></p>
<p>ENG-P5</p> <p>Small scale renewable electricity generation activities and investigation activities in overlays</p>	<p>Oppose</p>	<p>The chapeau of ENG-P5 reads “<i>Only allow small scale renewable electricity generation activities and activities associated with the investigation, identification and assessment of potential sites and energy sources for renewable electricity generation activities within an overlay where</i>”. This chapeau would lead to declining a resource consent application for such activities (or a prohibited activity rule) when the matters listed in the policy are not met.</p> <p>This is not consistent with the NPS-REG.</p>	<p>Amend ENG-P4 and insert REG-P4A as requested and delete ENG-P5 in its entirety.</p>

		<p>The national significance of renewable electricity generation activities and the requirements of the NPS-REG mean that there should always be opportunity to consider the benefits of the renewable electricity generation activities relative to the residual adverse effects of the activity.</p> <p>Meridian considers that the amendments that Meridian has sought to ENG-P4 suitably address the activities that ENG-P5 address. For this reason, Meridian seeks the deletion of ENG-P5.</p>	
<p>ENG-P6 Large scale renewable electricity generation activities</p>	<p>Oppose in part</p>	<p>The chapeau to the notified version of ENG-P6 reads:</p> <p><i>Provide for large scale renewable electricity generation activities in the General Rural Zone where they can demonstrate that:</i></p> <p>The policy then lists 9 requirements that must be fulfilled before the activity can be <i>provided for</i>, which effectively prevents some renewable electricity generation activities from being able to have their benefits considered relative to the residual adverse effects of the activity.</p> <p>This is not consistent with the NPS-REG. The NPS-REG leads to a framework of providing for all potential renewable electricity generation activities, while managing their potential effects through avoiding, remedying or mitigating the effects, and when residual effects remain decision-makers must have regard to offsetting measures or environmental compensation. For this reason, Meridian seeks that ENG-P6 be deleted and replaced with policy that provides for large scale renewable electricity generation activities outside of</p>	<p>Delete ENG-P6 and replace it with the following:</p> <p><u>REG-P5</u></p> <p><u>Large scale renewable electricity generation activities outside of overlays</u></p> <p><u>Provide for large scale renewable electricity generation activities outside of overlays while managing the potential adverse effects on the environment.</u></p>

		overlays while managing the potential adverse effects on the environment.	
ENG-P7 Large scale renewable electricity generation activities in other zones and within overlays	Oppose	<p>The notified version of ENG-P7 reads:</p> <p><i>Restrict locating large scale renewable electricity generation activities within:</i></p> <ol style="list-style-type: none"> 1. <i>any zone, other than the General Rural Zone;</i> <i>and</i> 2. <i>any overlay.</i> <p>It is not clear in what circumstances restrictions would apply and what the restrictions would consist of. Blanket restrictions are not consistent with the NPS-REG.</p>	<p>Delete ENG-P7 and replace it with the following:</p> <p><u>REG-P6</u></p> <p><u>Large scale renewable electricity generation activities in overlays</u></p> <p><u>Provide for renewable electricity generation activities in overlays, where there is a functional need or operational need for the activity to be in that location, while managing the potential adverse effects on the environment.</u></p>
ENG-P8 New technology	Oppose	<p>Meridian is concerned that ENG-P8 duplicates management of the effects of new renewable electricity generation activities that is already addressed by ENG-P6 and ENG-P7.</p> <p>Meridian also notes that requiring <i>avoidance</i> of “any adverse effects on the values protected by any adjoining overlay” and <i>avoidance</i> of “any adverse effects on the values protected by any overlay it is located within” is not consistent with the NPS-REG.</p> <p>Concerning “<i>reverse sensitivity effects</i>”, this term is generally understood to mean:</p> <p><i>the potential for an approved (whether by consent or designation), lawfully established existing or permitted activity to be compromised, constrained, or curtailed by the more recent establishment, intensification, or alteration of another activity that may be sensitive to the</i></p>	<p>Delete ENG-P8 in its entirety.</p>

		<p><i>actual, potential or perceived adverse environmental effects generated by the approved, lawfully established existing or permitted activity.</i></p> <p>Use of the term in the notified policy appears to be referring to avoidance of the new renewable electricity generation technology resulting in a reverse sensitivity effect on an existing sensitive activity. Any effect of a new renewable electricity generation activity on an adjoining activity and property would be assessed under policies ENG-P4 to ENG-P7. It is not likely that a new renewable electricity generation activity itself will be sensitive to the environmental effects generated by an approved and lawfully established existing or permitted activity.</p> <p>For these reasons, Meridian seeks the deletion of ENG-P8</p>	
<p>ENG-P9 Decommissioning of renewable electricity generation activities</p>	Oppose	<p>Meridian considers that the term <i>remediated</i> is unclear and that it will not in all cases be appropriate to remove <i>all surface equipment, all concrete surfacing, steel and cables</i> when decommissioning a renewable electricity generation activity.</p> <p>It is also not clear why decommissioning of renewable electricity generation activities is addressed in the pWDP and the decommissioning of other infrastructure or structures is not.</p> <p>There is no explanation in the s32 Report for inclusion of this policy.</p>	Delete ENG-P9 in its entirety.
ENG-R1	Oppose	Meridian considers that:	Amend ENG-R1 as follows:

<p>The operation, maintenance, and refurbishment of existing renewable electricity generation activities outside of Significant Natural Areas</p>		<p>a. in all zones the operation and maintenance of any existing renewable electricity generation activity should be enabled; and</p> <p>b. in the existing footprint of an existing renewable electricity generation activity, in all zones and locations, an upgrade to the activity should be enabled.</p> <p>This recognises that the existing environment of the activity will already be highly modified; that safety requirements must be met; and that the national significance of existing renewable electricity generation activities (set out in the NPS-REG) leads to such provisions.</p> <p>See Meridian’s submission on ENG-R2 for Meridian’s position on upgrades outside the existing footprint and outside a Significant Natural Area.</p>	<p><u>ENG-R1REG-R1</u></p> <p>The operation and, maintenance, and refurbishment of existing renewable electricity generation activities outside of Significant Natural Areas</p> <p>All zones</p> <p>Activity status: Permitted</p> <p>And insert the following new rule:</p> <p><u>REG-R1A</u></p> <p><u>The upgrade of existing renewable electricity generation activities within the existing footprint of the renewable electricity generation activity</u></p> <p><u>All zones</u></p> <p><u>Activity status: Permitted</u></p>
<p>ENG-R2</p> <p>The operation, maintenance, and refurbishment of existing renewable electricity generation activities within Significant Natural Areas</p>	<p>Oppose</p>	<p>For the reasons given concerning ENG-R1, Meridian considers that ENG-R2 should be limited to addressing upgrades of existing renewable electricity generation activities that are outside the existing footprint of the renewable electricity generation activity.</p>	<p>Insert REG-R1A as previously requested and amend ENG-R2 as follows:</p> <p><u>ENG-R2-REG-R2</u></p> <p>The operation, maintenance, and refurbishment upgrade of existing renewable electricity generation activities outside the existing footprint of the renewable electricity generation activity within Significant Natural Areas</p> <p>All zones</p> <p>Activity status: Permitted</p> <p>Where:</p>

			<p><i>PER-1</i></p> <p><i><u>The activity is outside a Significant Natural Area;</u></i> <i><u>or</u></i></p> <p><i><u>PER-2</u></i></p> <p><i><u>The activity is inside a Significant Natural Area and the The standard ENG-S6 Trimming, pruning or removal of indigenous vegetation for the operation of renewable electricity generation activities is complied with.</u></i></p> <p>Activity status when compliance is not achieved: Controlled</p> <p>Where:</p> <p>CON-1</p> <p><i>Compliance is not achieved with PER-12</i></p> <p>Matters of control are restricted to:</p> <p>1. <i>the matters of discretion listed in ENG-S6.</i></p>
<p>ENG-R3</p> <p>Small scale renewable electricity generation activities outside of an overlay</p>	<p>Support</p>	<p>ENG-R3 permits small scale renewable electricity generation activities outside of an overlay when conditions relating to the scale of the activity, associated earthworks and noise are met. When the conditions are unable to be met the activity becomes a restricted discretionary activity with matters of discretion limited to addressing the matters in the conditions of the permitted activity that cannot be met.</p> <p>Meridian supports this rule.</p>	<p>Retain ENG-R3 as notified while renumbering it as follows:</p> <p>ENG-R3 <u>REG-R3</u></p>

<p>ENG-R4 Investigation activities outside of an overlay</p>	<p>Support</p>	<p>ENG-R4 permits investigation activities outside of an overlay when conditions relating to the location and scale of associated earthworks, mast heights and noise are met. When the conditions are unable to be met the activity becomes a restricted discretionary activity with matters of discretion limited to addressing the matters in the conditions of the permitted activity that cannot be met.</p> <p>Meridian supports this rule.</p>	<p>Retain ENG-R4 as notified while renumbering it as follows:</p> <p><u>ENG-R4 REG-R4</u></p>
<p>ENG-R5 Small scale renewable electricity generation activities and investigation activities in overlays, excluding Notable Trees</p>	<p>Oppose in part</p>	<p>ENG-R5 assigns small scale renewable electricity generation activities and investigation activities in overlays a restricted discretionary activity status when the activity complies with the <i>ENG-S5 Renewable energy generation investigation activities</i> standard and the <i>ENG-S6 Trimming, pruning or removal of indigenous vegetation for the operation of renewable electricity generation activities</i> standard. When these standards are not complied with, the notified version of the ENG-R5 assigns a non-complying activity status.</p> <p>Meridian considers that the non-complying activity status is unnecessarily restrictive and not consistent with the NPS-REG.</p> <p>Meridian considers that when RDIS-2 and RDIS-4 cannot be complied with, a discretionary activity status should be applied. The amendment sought by Meridian is more consistent with the NPS-REG by allowing greater opportunity for consideration of whether the benefits of the activity outweigh the residual adverse effects.</p>	<p>Amend ENG-R5 as follows:</p> <p><u>ENG-R5-REG-R5</u></p> <p><i>Small scale renewable electricity generation activities and investigation activities in overlays, excluding Notable Trees</i></p> <p><i>All zones</i></p> <p><i>Activity status: Restricted Discretionary</i></p> <p><i>Where:</i></p> <p><i>RDIS-1</i></p> <p><i>The activity is located:</i></p> <ol style="list-style-type: none"> <i>on items identified in SCHED2 – Historic Heritage Items, on contributing buildings identified in SCHED3 – Character Contributing Buildings and Non-Contributing Buildings, or sites identified in SCHED5 - Sites and Areas of Significance to Māori; or</i>

			<p>2. <i>within an area identified in SCHED7 - Outstanding Natural Features or SCHED8 – Outstanding Natural Landscapes; or</i></p> <p><i>RDIS-2</i></p> <p><i>If the activity is located within an area identified in SCHED6 - Significant Natural Areas; and ENG-S6 Trimming, pruning or removal of indigenous vegetation for the operation of renewable electricity generation activities is complied with;</i></p> <p>or</p> <p><i>RDIS-3</i></p> <p><i>The activity is located within a Natural Hazard Overlay or Coastal Natural Hazard Overlay; and</i></p> <p><i>RDIS-4</i></p> <p><i>Investigation activities comply with ENG-S5 Renewable energy generation investigation activities.</i></p> <p>Matters of discretion are restricted to:</p> <ol style="list-style-type: none"> <i>1. the benefits arising; and</i> <i>2. any mitigation, offset or compensation measures offered; and</i> <i>3. the location, size, colour and reflectivity of any structure; and</i> <i>4. any adverse effects on the amenity values of adjoining properties; and</i> <i>5. any health and safety effects, including noise; and</i>
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			<p>6. any adverse effects on any identified item, building, site, feature, landscape, or area; and</p> <p>7. any adverse effects on the identified values and qualities of any item, building, site, feature, landscape or area; and</p> <p>8. for activities under RDIS-2, the matters of discretion listed in ENG-S6; and</p> <p>9. for activities under RDIS-4, the matters of discretion listed in ENG-S5.</p> <p>Activity status when compliance is not achieved: Non-Complying-Discretionary</p> <p>Where: NCDISC-1</p> <p>Compliance is not achieved with RDIS-2 and/or RDIS-4</p>
<p>ENG-R6 Small scale renewable electricity generation activities and investigation activities within the root protection area of a tree, identified in SCHED4 - Notable Trees</p>	<p>Oppose in part</p>	<p>ENG-R6 assigns small scale renewable electricity generation activities and investigation activities in the root protection area of a tree that is identified in <i>SCHED4-Notable Trees</i> a restricted discretionary activity status when the activity does not involve the removal of a Notable Tree and when the investigation activity complies with ENG-S5. When these conditions cannot be met the activity is assigned a non-complying activity status.</p> <p>Meridian considers that the non-complying activity status is unnecessarily restrictive and not consistent with the NPS-REG.</p>	<p>Amend ENG-R6 as follows:</p> <p>ENG-R6-REG-R6</p> <p><i>Small scale renewable electricity generation activities and investigation activities within the root protection area of a tree, identified in SCHED4 - Notable Trees</i></p> <p>All zones</p> <p>Activity status: Restricted Discretionary</p> <p>Where: RDIS-1</p>

		<p>Meridian considers that when RDIS-1 and RDIS-2 cannot be complied with, a discretionary activity status should be applied. The amendment sought by Meridian is more consistent with the NPS-REG by allowing consideration of whether the benefits of the activity outweigh the residual adverse effects.</p>	<p><i>The activity does not involve the removal of a Notable Tree; and</i></p> <p><i>RDIS -2</i></p> <p><i>Investigation activities comply with ENG-S5.</i></p> <p><i>Matters of discretion are restricted to:</i></p> <ol style="list-style-type: none"> <i>1. the benefits arising; and</i> <i>2. any mitigation, offset or compensation measures offered; and</i> <i>3. any adverse effects on the Notable Tree; and</i> <i>4. the location of the structure; and</i> <i>5. for activities under RDIS-2, the matters of discretion listed in ENG-S5.</i> <p><i>Activity status when compliance is not achieved: Discretionary</i></p> <p><i>Where:</i></p> <p><i>DIS-1</i></p> <p><i>Compliance is not achieved with <u>RDIS 1 and</u> RDIS-2</i></p> <p><i>Activity status when compliance is not achieved: Non-Complying</i></p> <p><i>Where:</i></p> <p><i>NC-1</i></p> <p><i>Compliance is not achieved with RDIS-1</i></p>
<p>ENG-R7</p>	<p>Oppose</p>	<p>Meridian considers that the discretionary and non-complying activity status applied to large scale renewable</p>	<p>Delete ENG-R7 in its entirety and address this activity in provision ENG-R8 in the notified version.</p>

<p>Large scale renewable electricity generation activities</p>		<p>electricity generation activities are unnecessarily restrictive and not consistent with the NPS-REG.</p> <p>Meridian considers that large scale renewable electricity generation activities outside of the overlays should be assigned a restricted discretionary activity status with clear matters of discretion identified that address the potential effects of the activity.</p> <p>Inside the overlays, a discretionary activity status should be applied to large scale renewable electricity generation activities.</p> <p>Both of these categories of activity are more consistent with the NPS-REG and allow for consideration of whether the benefits of the activity outweigh the residual adverse effects.</p> <p>Meridian considers that a catch-all rule can achieve this approach, as is set out in Meridian’s submission on ENG-R8.</p>	
<p>ENG-R8</p> <p>Other renewable electricity generation activities not otherwise provided for</p>	<p>Oppose</p>	<p>Meridian considers that the discretionary and non-complying activity status applied to “<i>Other renewable electricity generation activities not otherwise provided for</i>” are unnecessarily restrictive and not consistent with the NPS-REG.</p> <p>Further to this, and as discussed in the submission on ENG-R7, Meridian considers that the ‘catch all rule’ can address any large scale renewable electricity generation activity and “<i>Other renewable electricity generation activities not otherwise provided for</i>” since the rule construct and activity status should be the same for both.</p>	<p>Amend ENG-R8 as follows:</p> <p>ENG-R8-REG-R7</p> <p>Other <u>Any</u> renewable electricity generation activities not otherwise provided for <u>listed</u></p> <p>All zones</p> <p>Activity status: <u>Restricted</u> Discretionary</p> <p>Where:</p> <p>DIS-1 <u>RDIS-1</u></p> <p><i>The activity is not located <u>within</u> <u>outside</u> an overlay.</i></p>

		<p>In this light, and as previously discussed, Meridian considers that large scale renewable electricity generation activities outside of the overlays should be assigned a restricted discretionary activity status with clear matters of discretion identified that address the potential effects of the activity.</p> <p>Inside the overlays, a discretionary activity status should be applied to large scale renewable electricity generation activities.</p> <p>Both of these categories of activity are more consistent with the NPS-REG and allow for consideration of whether the benefits of the activity outweigh the residual adverse effects.</p>	<p>Matters of discretion are restricted to:</p> <ul style="list-style-type: none"> a) <u>The appropriateness of measures to avoid, remedy or mitigate adverse effects.</u> b) <u>The effectiveness of any proposed offsetting or compensation measures to manage any significant residual adverse effects that cannot be avoided, remedied or mitigated.</u> c) <u>The functional needs and operational needs of the activity and the need to locate the renewable electricity generation activity where the renewable energy resource is available.</u> d) <u>The location of existing electricity generation, transmission and distribution infrastructure and the extent to which the proposal contributes to its efficient use.</u> e) <u>The significance and benefits of the proposal.</u> f) <u>The nature of any adverse effects on the environment from construction of any building or structure including earthworks, dust, run-off, sedimentation, noise and traffic.</u> g) <u>The location, bulk, height, cladding or colour of the proposed work.</u> h) <u>The extent of landscaping, revegetation, and fencing.</u> i) <u>The extent and location of earthworks.</u>
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			<p>j) <u>The location and construction of vehicle entry and exit points.</u></p> <p>k) <u>Vehicle manoeuvring and parking areas.</u></p> <p>Activity status when compliance is not achieved with RDIS-1: Non-Complying-Discretionary</p> <p>Where:</p> <p>NC-1</p> <p>Compliance is not achieved with DIS-1</p>
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PART 2 –PART B: WAITAKI POWER SCHEME (ENG(WPS))

pWDP Content or Provision	Support or Oppose	Reasons	Relief Sought
Title of subchapter Waitaki Power Scheme (ENG(WPS))	Oppose in part	Consistent with the submissions made elsewhere in this document, Meridian considers that the title of Part B of the Energy Chapter should reflect the focus of the chapter on renewable electricity generation activities, while being clear that Part B addresses the assets and activities of the Waitaki Power Scheme.	Amend the title of Part B of the Energy Chapter as follows: <i>Part B: Waitaki Power Scheme (ENG-REG(WPS))</i> and make all consequential amendments to the referencing of provisions as set out in this submission document.
Introduction	Oppose in part	Meridian considers that the Introduction should clearly state that Part B addresses the operation, maintenance and upgrade of the Waitaki Power Scheme, and that all other chapters of the District Plan do not apply to the Scheme.	Amend the Introduction to Part B of the Energy Chapter as follows: <i>Part B of the Energy chapter Chapter addresses those parts the operation, maintenance and upgrade of the nationally significant Waitaki Power Scheme that are where it is located in the</i>

		<p>In addition, Meridian considers that risks associated with an inundation event from the Waitaki Power Scheme should be addressed in the Hazards and Risks Chapter of the plan, and the need to protect the Scheme from potential reverse sensitivity effects should be addressed in the Strategic Direction Objectives and other parts of this plan.</p> <p>Concerning use of the term <i>significant infrastructure</i> in the third paragraph of the notified version of the Introduction, this term is defined and managed in the plan outside of the Energy Chapter. Its use in the Introduction of Part B of the Energy Chapter is misleading, particularly as Part B should be a standalone section of the plan.</p>	<p>Waitaki district, including ongoing operation of the Waitaki Power Scheme activities, the different activities that occur on site and provides a framework for how any new development may occur.</p> <p>The provisions in Part B apply to the Waitaki Power Scheme Core Sites Waitaki Power Scheme Operating Easements or the Hydroelectricity Inundation Hazard Areas overlays and underlying zones.</p> <p>The Waitaki Power Scheme is currently the largest hydro-electric power scheme in New Zealand, and is significant infrastructure, with local, regional and national benefits. The Waitaki Power Scheme was progressively constructed between 1928 and 1985 and consists of eight power stations, four canal systems and numerous dams, weirs, gates and other control structures that operate as a linked hydroelectricity generation chain. The chain includes large, modified storage lakes, a series of diversions via canals, and a cascade of in-river dams. The power stations and associated structures and assets, including storage lakes and canals, represent a significant physical resource within the Waitaki District. The Waitaki Power Station was the first to be constructed in the Waitaki district.</p> <p>The Scheme commences at Lake Tekapō in the Mackenzie District, and from Lake Ōhau to Lake Waitaki, the Scheme lies within the Waitaki district District. The Scheme contributes an average of 18% of New Zealand's annual</p>
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			<p>electricity supply and at times as much as 30% of the national requirement. The Scheme supports the HVDC link, which is connected to the South Island transmission network at the site of the Benmore Power Station.</p> <p>The national significance of the Waitaki Power Scheme is established in the National Policy Statement for Renewable Electricity Generation 2011 and the National Policy Statement for Freshwater Management 2020.</p> <p>Due to its<u>the</u> significance and importance of the<u>Waitaki Power Scheme</u> to the country as a whole, this part of the chapter also addresses the potential reverse sensitivity effects on the Waitaki Power Scheme that could constrain its ongoing operation <u>must be avoided, as set out in the Strategic Direction Objectives and other parts of this plan.</u> And</p> <p>the <u>The</u> potential risks associated with an inundation event from the Waitaki Power Scheme <u>are addressed in the Hazards and Risks Chapter of this plan.</u></p> <p><u>The provisions in Part A of the Energy Chapter and all other chapters of this District Plan, other than Part B: Waitaki Power Scheme (REG(WPS)), do not apply to the Waitaki Power Scheme except where specifically identified in Part B of the Energy Chapter or where listed in Table 2.</u></p>
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			<p><u>Table 2 Provisions that also apply to the activities addressed by Part B of the Energy Chapter</u></p> <table border="1"> <thead> <tr> <th data-bbox="1415 320 1565 459"><u>Topic</u></th> <th data-bbox="1565 320 2031 459"><u>Plan Provisions that Apply to Activities Managed in this Chapter</u></th> </tr> </thead> <tbody> <tr> <td data-bbox="1415 459 1565 975"><u>Strategic Direction</u></td> <td data-bbox="1565 459 2031 975"> <p><u>SD-CHI-O3 Waitaki's cultural heritage</u> (as amended by Meridian's submissions)</p> <p><u>SD-MW-O2 Mana whenua values, rights, and interests</u> (as amended by Meridian's submissions)</p> <p><u>SD-IEE-O1 Infrastructure</u> (as amended by Meridian's submissions)</p> <p><u>SD-IEE-O2 National Grid and the Waitaki Power Scheme</u> (as amended by Meridian's submissions)</p> </td> </tr> <tr> <td data-bbox="1415 975 1565 1150"><u>Activities on the Surface of Water</u></td> <td data-bbox="1565 975 2031 1150"><u>ASW-R4</u> (as amended by Meridian's submissions)</td> </tr> <tr> <td data-bbox="1415 1150 1565 1273"><u>Signs</u></td> <td data-bbox="1565 1150 2031 1273"> <p><u>SIGN-R1</u></p> <p><u>SIGN-R4</u></p> </td> </tr> </tbody> </table>	<u>Topic</u>	<u>Plan Provisions that Apply to Activities Managed in this Chapter</u>	<u>Strategic Direction</u>	<p><u>SD-CHI-O3 Waitaki's cultural heritage</u> (as amended by Meridian's submissions)</p> <p><u>SD-MW-O2 Mana whenua values, rights, and interests</u> (as amended by Meridian's submissions)</p> <p><u>SD-IEE-O1 Infrastructure</u> (as amended by Meridian's submissions)</p> <p><u>SD-IEE-O2 National Grid and the Waitaki Power Scheme</u> (as amended by Meridian's submissions)</p>	<u>Activities on the Surface of Water</u>	<u>ASW-R4</u> (as amended by Meridian's submissions)	<u>Signs</u>	<p><u>SIGN-R1</u></p> <p><u>SIGN-R4</u></p>
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ENG(WPS)-O1	Oppose in part	Meridian considers that the objective is not consistent with the NPS-REG. To be consistent with the NPS-REG, the operation and maintenance of the Scheme should be	<p>Amend ENG(WPS)-O1 as follows:</p> <p><u>ENGREG(WPS)-O1</u></p>								

<p>Recognising the significance and benefits of the Waitaki Power Scheme</p>		<p>enabled, and upgrades to the Scheme should also be enabled where potential effects are appropriately managed in accordance with the policies in the NPS-REG.</p> <p>In addition, Meridian considers that <i>minimise</i> is not an appropriate term to use in ENG(WPS)-O1. The NPS-REG does not require that the potential effects of renewable electricity generation activities are minimised. Rather the NPS-REG establishes a framework whereby the potential effects of renewable electricity generation activities can be managed to avoid, remedy or mitigate potential environmental effects, and when considering any residual effects that cannot be avoided, remedied or mitigated decision makers must have regard to proposed offsetting measures and environmental compensation. The NPS-REG framework requires consideration of whether the benefits of the activity outweigh any residual effects that remain.</p> <p>If the changes sought to SD-IEE-O2 in this submission document are not accepted, then bullet 4. should be retained and amended as sought in this submission point.</p>	<p>Recognising the <u>national</u> significance and benefits of the Waitaki Power Scheme</p> <p><i>The local, regional and national significance and benefits of the Waitaki Power Scheme <u>are recognised by:</u> and its</i></p> <ol style="list-style-type: none"> <i>1. <u>enabling the operation, and maintenance of the Scheme, refurbishment and enhancement;</u></i> <i>2. <u>enabling the upgrade of the Scheme where adverse effects are appropriately managed;</u> are recognised and provided for and</i> <i>3. <u>providing for the development of new hydroelectricity generation activities associated with the Waitaki Power Scheme;</u> and</i> <i>4. protected <u>protecting the Scheme from reverse sensitivity effects</u> while minimising any adverse effects on the environment.</i>
<p>ENG(WPS)-O2 Protecting the overlays in which the Waitaki Power Scheme is located</p>	<p>Oppose in part</p>	<p>Meridian is concerned that “<i>are protected and not degraded</i>” is too encompassing and could lead to the ongoing operation, maintenance and upgrade of the Waitaki Power Scheme being unnecessarily constrained.</p> <p>The national direction set in the Act and associated national policy statements does not lead to blanket protection of <i>Outstanding Natural Landscapes and Features, Significant Natural Areas, Sites and Areas of Significance to Māori, Historic Heritage, Significant Natural Features and Rural Scenic Landscape overlays</i> from the potential adverse effects of renewable</p>	<p>Amend ENG(WPS)-O2 as follows:</p> <p><u>ENGREG(WPS)-O2</u></p> <p><u>Protecting Managing potential effects on identified values in the overlays in which the Waitaki Power Scheme is located</u></p> <p><i>The <u>potential effects of upgrades to the Waitaki Power Scheme or the development of new hydroelectricity generation activities associated with the Waitaki Power Scheme on the identified characteristics and values of the areas containing</u></i></p>

		<p>electricity generation activities. Rather the <i>significance</i> of the values being considered for protection and the <i>appropriateness</i> of the activity are to be assessed, and decisions are to be made on whether the national significance of the renewable electricity generation activity outweighs the residual adverse effect.</p> <p>In addition, Meridian notes that the list of Overlays in ENG(WPS)-O2 does not match the list provided in the notified version of the section of plan titled <i>Relationship between spatial layers</i>. The amendments sought by Meridian adopts the <i>Overlay Name</i> from the <i>Relationship between spatial layers</i> section of the plan.</p>	<p><u><i>identified as Outstanding Natural Landscapes, and Outstanding Natural Features, Significant Natural Feature Areas, Sites and Areas of Significance to Māori, Historic Heritage Items, Significant Natural Features and Rural Scenic Landscape overlays, in which the Waitaki Power Scheme is located, are protected and not degraded, are avoided, remedied or mitigated, and when considering any residual environmental effects that cannot be avoided, remedied or mitigated, regard is had to proposed offsetting measures or environmental compensation while recognising the national significance of renewable electricity generation activities. having regard to any offsetting measures or environmental compensation which may benefit the local environment and community affected.</i></u></p>
<p>ENG(WPS)-O3 Inundation risks</p>	<p>Oppose</p>	<p>The notified version of ENG(WPS)-O3 reads as follows:</p> <p><i>The risks associated with a potential inundation event from the Waitaki Power Scheme are recognised and potential adverse effects on people, occupied buildings and the ongoing operation of the Waitaki Power Scheme are avoided or mitigated.</i></p> <p>Meridian is concerned that the objective, policies and rules that apply to activities (other than renewable electricity generation activities) in the Waitaki Power Scheme Hydroelectricity Inundation Hazard areas, have been placed in the Energy Chapter, yet they do not apply to energy activities.</p>	<p>Delete ENG(WPS)-O3 and insert new HI-O1 into a new <i>Hydroelectricity Inundation Hazard</i> subchapter in the <i>Hazards and Risks</i> chapter:</p> <p><u><i>HI-O1 Waitaki Power Scheme Hydroelectricity Inundation Hazard</i></u></p> <p><u><i>Development in the Waitaki Power Scheme Hydroelectricity Inundation Hazard Area minimises risks to human health and property from hydroelectricity inundation and avoids reverse sensitivity effects on the Waitaki Power Scheme.</i></u></p>

		<p>Meridian considers that when a user of the plan is looking for the provisions that address risks associated with a property, they will look to the Hazards and Risks Chapter, not the Energy Chapter.</p> <p>For this reason, Meridian requests that a new subchapter in the Hazards and Risks chapter is established, with the title <i>Hydroelectricity Inundation Hazard</i>, and that all provisions in the pWDP that relate to the management of risks from potential Waitaki Power Scheme Hydroelectricity Inundation are located in this new subchapter.</p> <p>In addition, Meridian considers that ENG(WPS)-O3 is unclear and that reference to protecting the Waitaki Power Scheme “<i>as far as practicable</i>” from reverse sensitivity effects is not consistent with the NPS-REG.</p>	
<p>ENG(WPS)-P1 Recognising the importance and benefits of the Waitaki Power Scheme</p>	<p>Oppose in part</p>	<p>The Waitaki Power Scheme is not just <i>important</i>, rather the Scheme and its benefits are recognised in the NPS-REG as being of <i>national significance</i>, and this is reinforced in the NPS-FM and the NPS-IB. This needs to be reflected in ENG(WPS)-P1.</p> <p>Meridian considers that the national significance of the Scheme leads to the need to protect its structural and operational integrity and avoid reverse sensitivity effects on the Scheme. If the changes sought to SD-IEE-O2 in this submission document are not accepted, then bullet 5. needs to be added as sought in this submission point.</p>	<p>Amend ENG(WPS)-P1 as follows:</p> <p><i>ENGREG(WPS)-P1</i></p> <p><i>Recognising the <u>importance national and local significance</u> and benefits of the Waitaki Power Scheme</i></p> <p><i>Recognise the importance of the <u>national and local significance and benefits of the</u> Waitaki Power Scheme and its local, regional and national benefits, including by recognising:</i></p> <ol style="list-style-type: none"> <i>1. the need to provide for the operational <u>needs, and functional needs of the Scheme, and the</u> locational and technical <u>requirements practicalities</u> of the Scheme; and</i>

			<p>2. <i>the need to maintain and increase generation output and capacity and ensure security of supply; and</i></p> <p>3. the need for maximum electricity supply benefit to be obtained; and</p> <p>2. 4. the need to ensure that protect the structural and operational integrity of the Scheme is not compromised; and</p> <p>3. 5. it's the Scheme's role in meeting national targets for renewable electricity generation; and</p> <p>4. 6. it's the Scheme's role in assisting New Zealand's response to international climate change obligations; and</p> <p>5. the need to manage activities to avoid reverse sensitivity effects on the Scheme.</p>
<p>ENG(WPS)-P2 Identifying areas potentially affected by inundation events</p>	<p>Oppose in part</p>	<p>Meridian generally supports Policy ENG(WPS)-P2, however Meridian considers that this policy should be moved to the Hazards and Risks chapter.</p> <p>Meridian is concerned that the objective, policies and rules that apply to activities (other than renewable electricity generation activities) in the hydroelectricity inundation hazard areas, have been placed in the Energy Chapter, yet they do not apply to energy activities.</p> <p>Meridian considers that when a user of the plan is looking for the provisions that address risks associated with a property, they will look to the Hazards and Risks Chapter, not the Energy Chapter.</p>	<p>Amend ENG(WPS)-P2 as set out below, and move ENG(WPS)-P2 to become new HI-P1 in the new <i>Hydroelectricity Inundation Hazard</i> subchapter in the <i>Hazards and Risks</i> chapter:</p> <p><i>HI-P1 Identifying areas potentially affected by hydroelectricity inundation</i></p> <p><i>Identify and map areas that may be potentially affected by an a hydroelectricity inundation event from the Waitaki Power Scheme as the Waitaki Power Scheme Hydroelectricity Inundation Hazard Areas on the Planning Maps.</i></p>

		<p>For this reason, Meridian requests that a new subchapter in the Hazards and Risks chapter is established, with the title <i>Hydroelectricity Inundation Hazard</i>, and that all provisions in the pWDP that relate to the management of risks from potential hydroelectricity inundation are located in this new subchapter.</p> <p>In addition, Meridian seeks small amendments to ENG(WPS)-P2. These amendments are for clarity purposes.</p>	
<p>ENG(WPS)-P3 Maintenance and improvement of the Waitaki Power Scheme</p>	<p>Oppose</p>	<p>ENG(WPS)-P3, and the other policies in Part B of the Energy Chapter fail to enable the <i>operation</i> of the Waitaki Power Scheme. Further, <i>improvement</i> and <i>refurbishment</i> are not used in the NPS-REG, while <i>upgrading</i> is. Reference to amending the definition of <i>upgrade</i> is made elsewhere in this submission document.</p> <p>To give effect to the NPS-REG, Meridian seeks a rewrite of ENG(WPS)-P3 to enable the operation, maintenance and (where appropriate) the upgrade of the Waitaki Power Scheme.</p> <p>In addition, Meridian notes that the list of Overlays in ENG(WPS)-P3 does not match the list provided in the notified version of the section of plan titled <i>Relationship between spatial layers</i>. The replacement policy sought by Meridian adopts the <i>Overlay Name</i> from the <i>Relationship between spatial layers</i> section of the plan.</p>	<p>Delete ENG(WPS)-P3 in its entirety and replace it with the following:</p> <p><u>REG(WPS)-P2</u></p> <p><u>Operation, maintenance and upgrade of the Waitaki Power Scheme</u></p> <ol style="list-style-type: none"> <u>1. Enable the operation and maintenance of the Waitaki Power Scheme within the Scheme’s existing footprint, core sites and operating easements;</u> <u>2. Enable the upgrade of the Waitaki Power Scheme within the Scheme’s existing footprint and core sites;</u> <u>3. Provide for the upgrade of the Waitaki Power Scheme within the Scheme’s operating easement while managing the potential adverse effects on identified values of the areas identified as Outstanding Natural Landscapes, Outstanding Natural Features, Significant Natural Features, Sites and Areas</u>

			<u><i>of Significance to Māori, Historic Heritage Item and Rural Scenic Landscape overlays.</i></u>
ENG(WPS)-P4 Enhancement of the Waitaki Power Scheme outside overlays	Oppose	<p>The notified definition of <i>Enhancement</i> reads:</p> <p><i>in relation to the Energy Chapter, Part B and Activities on the Surface of Water chapter, means the development of new machinery, buildings, plant, structures, facilities, works, networks or components and operating facilities enabling new electricity generation or transmission opportunities.</i></p> <p>The term <i>enhancement</i> is not used in the NPS-REG and the definition in the pWDP for this term describes <i>development</i>. Meridian considers that the term <i>development</i> should be adopted in the pWDP (rather than <i>enhancement</i>) as this is consistent with the NPS-REG and is clearer.</p>	Delete ENG(WPS)-P4 in its entirety and replace it with the policy sought in Meridian’s relief to ENG(WPS)-P5.
ENG(WPS)-P5 Any other development of the Waitaki Power Scheme	Oppose	<p>The chapeau of ENG(WPS)-P5 reads “<i>Only allow for...</i>”. This chapeau would lead to declining a resource consent application where the <i>development</i> did not meet the criteria listed in the policy. This is not consistent with the NPS-REG.</p> <p>The national significance of renewable electricity generation activities and the requirements of the NPS-REG mean that the benefits of the renewable electricity generation activities relative to the residual adverse effects of the activity should be considered.</p>	<p>Delete ENG(WPS)-P5 and replace it with the following:</p> <p><u><i>REG(WPS)-P3</i></u></p> <p><u><i>New hydroelectricity generation activities associated with the Waitaki Power Scheme</i></u></p> <p><u><i>Provide for new hydroelectricity generation activities associated with the Waitaki Power Scheme where:</i></u></p> <p><u><i>a. adverse effects associated with changes in water levels in lakes, rivers and water storage areas are appropriately managed; and</i></u></p>

			<p><u>b. regard is had to the practical constraints associated with renewable electricity generation activities, including the;</u></p> <p><u>i. location and efficient use of existing electricity generation, transmission and distribution infrastructure; and</u></p> <p><u>ii. the need to locate the renewable electricity generation activity where the renewable energy resource is located.</u></p>
<p>ENG(WPS)-P6 Occupied buildings in Hydroelectricity Inundation Hazard Areas</p>	<p>Oppose in part</p>	<p>Meridian is concerned that the objective, policies and rules that apply to activities (other than renewable electricity generation activities) in the hydroelectricity inundation hazard areas, have been placed in the Energy Chapter, yet they do not apply to energy activities.</p> <p>Meridian considers that when a user of the plan is looking for the provisions that address risks associated with a property, they will look to the Hazards and Risks chapter, not the Energy Chapter.</p> <p>For this reason, Meridian requests that a new subchapter in the Hazards and Risks Chapter is established, with the title <i>Hydroelectricity Inundation Hazard</i>, and that all provisions in the pWDP that relate to the management of risks from potential hydroelectricity inundation are located in this new subchapter.</p> <p>In addition, Meridian considers that the policy should apply more broadly to any change in land use activities that could increase the likelihood or scale of harm to people or property from hydroelectricity inundation, or the potential for reverse sensitivity effects on the Waitaki</p>	<p>Amend ENG(WPS)-P6 as set out below, and move ENG(WPS)-P6 to become new HI-P2 in the new <i>Hydroelectricity Inundation</i> subchapter in the <i>Hazards and Risks</i> Chapter:</p> <p><u>HI-P2 Development in the Waitaki Power Scheme Hydroelectricity Inundation Hazard Areas</u></p> <p><i>Within the Waitaki Power Scheme Hydroelectricity Inundation Hazard Areas:</i></p> <ol style="list-style-type: none"> 1. <u>avoid the establishment of occupied buildings within the identified Waitaki Power Scheme Hydroelectricity Inundation High Hazard Area; and</u> 2. <u>avoid changes to existing land use activities that may increase the likelihood or scale of harm to people or property from hydroelectricity inundation, or the potential for reverse sensitivity effects on the Waitaki Power Scheme. only allow occupied buildings</u>

		Power Scheme. Meridian also considers that the reference to ‘acceptable’ risk is not clear; and that the avoidance of reverse sensitivity effects on the Waitaki Power Scheme should extend to all renewable electricity generation activities of the Scheme, not just the Scheme’s operation.	<p>within the Waitaki Power Scheme Hydroelectricity Inundation Hazard Area where it can be demonstrated that:</p> <p>a. the building and associated activity incorporates mitigation measures that demonstrate that the risk to lives and wellbeing and building damage from an uncontrolled release of water from the Waitaki Power Scheme is acceptable; and</p> <p>b. the ongoing operation of the Waitaki Power Scheme will not be compromised.</p>
ENG(WPS)-P7 Reverse sensitivity	Oppose in part	Meridian is concerned that ENG(WPS)-P7 is not consistent with the NPS-REG. The national significance of the Waitaki Power Scheme leads to the need for new activities to avoid reverse sensitivity effects on the Scheme. Further to this, Meridian considers that SD-IEE-O2 is the appropriate place to locate ENG(WPS)-P7 in the plan, since users of the plan are not likely to look to the Energy provisions when managing activities that are not energy focused.	<p>Delete ENG(WPS)-P7 and amend SD-IEE-O2 as sought elsewhere in this submission.</p> <p>If ENG(WPS)-P7 is not deleted and in combination the corresponding amendment to SD-IEE-O2 is not made, then Meridian’s relief (which is their less preferred option) is to amend ENG(WPS)-P7 as follows:</p> <p><u>ENGREG(WPS)-P7</u></p> <p>Reverse Sensitivity</p> <p><i>Reverse sensitivity effects on the Waitaki Power Scheme are avoided, remedied or mitigated.</i></p>
ENG(WPS)-R1 Operation, maintenance and refurbishment of the Waitaki Power Scheme	Oppose	<p>The notified version of ENG(WPS)-R1 permits the operation, maintenance and refurbishment of the Waitaki Power Scheme in the General Rural Zone and Open Space Zone provided certain conditions are met.</p> <p>As previously discussed in this submission document, Meridian considers that the term <i>refurbishment</i> is</p>	<p>Delete ENG(WPS)-R1 and replace it with the following three rules:</p> <p><u>REG(WPS)-R1</u></p> <p><u>Operation and maintenance of the Waitaki Power Scheme</u></p>

	<p>problematic and prefers use of the terms <i>operation, maintenance and upgrade</i>.</p> <p>Condition 3 reads:</p> <p><i>PER-3</i></p> <p><i>Where the activity involves trimming, pruning and activities within the root protection area of a Notable Tree in SCHED4 – Notable Trees all of the following standards are complied with where relevant:</i></p> <ol style="list-style-type: none"> <i>1. EW-S5 Infrastructure earthworks – slope, height, depth;</i> <i>2. EW-S6 Infrastructure earthworks – area in a 12-month period per site, excluding the road reserve and rail corridor; and</i> <p>It is unclear to Meridian why this condition is needed. No Notable Trees have been identified in the pWDP as associated with the Waitaki Power Scheme, and EW-S5 and EW-S6 are substantively more restrictive than would be necessary to protect a Notable Tree.</p> <p>Meridian considers that the NPS-REG leads to a rules framework that permits the operation and maintenance of the Waitaki Power Scheme; permits upgrades to the Scheme in the Scheme’s existing footprint and core sites; and permits upgrades to the Scheme in the Scheme’s operating easement where noise, earthworks and indigenous vegetation clearance requirements are met.</p>	<p><u><i>General Rural Zone, Open Space Zone</i></u></p> <p><u><i>Activity Status: PER</i></u></p> <p><u><i>REG(WPS)-R2</i></u></p> <p><u><i>Upgrade of the Waitaki Power Scheme within the Scheme’s existing footprint or core sites</i></u></p> <p><u><i>General Rural Zone, Open Space Zone</i></u></p> <p><u><i>Activity Status: PER</i></u></p> <p><u><i>REG(WPS)-R3</i></u></p> <p><u><i>Upgrade of the Waitaki Power Scheme within the Scheme’s operating easement</i></u></p> <p><u><i>General Rural Zone, Open Space Zone</i></u></p> <p><u><i>Activity Status: PER</i></u></p> <p><u><i>Where:</i></u></p> <p><u><i>PER-1</i></u></p> <p><u><i>The standard REG(WPS)-S1 Construction Noise is complied with; and</i></u></p> <p><u><i>PER-2</i></u></p> <p><u><i>Where the activity is located in a natural hazard overlay all of the following standards are complied with where relevant:</i></u></p> <ol style="list-style-type: none"> <u><i>1. EW-S5 Infrastructure earthworks – slope, height, depth;</i></u>
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			<p><u>2. EW-S6 Infrastructure earthworks – area in a 12-month period per site, excluding the road reserve and rail corridor; and</u></p> <p><u>PER-3</u></p> <p><u>The standard EW-S7 Infrastructure earthworks in relation to Historic Heritage and Sites and Areas of Significance to Māori is complied with where the activity is located on a Heritage Item, or within the setting of a Heritage Item identified in SCHED2 – Historic Heritage Items or within an area identified in SCHED5 – Sites and Areas of Significance to Māori; and</u></p> <p><u>PER-4</u></p> <p><u>The standard EW-S8 Infrastructure earthworks – in relation to Outstanding Natural Features and Landscapes, Significant Natural Features and Rural Scenic Landscape Overlays is complied with where the activity is located within an area identified in SCHED7 – Outstanding Natural Features, SCHED8 – Outstanding Natural Landscapes or SCHED9 – Significant Natural Features; and</u></p> <p><u>PER-5</u></p> <p><u>The standard INF-S14 Trimming, pruning or removal of indigenous vegetation and earthworks within an area identified in SCHED6 – Significant Natural Areas is complied with where the activity is located within an area identified in SCHED6 – Significant Natural Areas.</u></p>
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			<p><u>Activity status when compliance is not achieved:</u> <u>Restricted Discretionary</u></p> <p><u>Matters of discretion are restricted to:</u></p> <p><u>Where PER-1 is not complied with, the matters listed in REG(WPS)-S1 Construction Noise</u></p> <p><u>Where PER-2 is not complied with, the matters listed in EW-S5 and ES-S6</u></p> <p><u>Where PER-3 is not complied with, the matters listed in EW-s7</u></p> <p><u>Where PER-4 is not complied with, the matters listed in EW-S8</u></p> <p><u>Where PER-5 is not complied with, the matters listed in INF-S14</u></p>
<p>ENG(WPS)-R2 Occupied buildings in Waitaki Power Scheme Hydroelectricity Inundation Hazard Areas</p>	<p>Oppose in part</p>	<p>Meridian is concerned that the objective, policies and rules that apply to activities (other than renewable electricity generation activities) in the hydroelectricity inundation hazard areas, have been placed in the Energy Chapter, yet they do not apply to energy activities.</p> <p>Meridian considers that when a user of the plan is looking for the provisions that address risks associated with a property, they will look to the Hazards and Risks Chapter, not the Energy Chapter.</p> <p>For this reason, Meridian requests that a new subchapter in the Hazards and Risks Chapter is established, with the title <i>Hydroelectricity Inundation Hazard</i>, and that all provisions in the pWDP that relate to the management of risks from potential hydroelectricity inundation are located in this new subchapter.</p>	<p>Amend ENG(WPS)-R2 as set out below, and move ENG(WPS)-R2 to become new HI-R1 in the new <i>Hydroelectricity Inundation</i> subchapter in the <i>Hazards and Risks</i> chapter:</p> <p><u>HI-R1 Occupied Buildings in the Waitaki Power Scheme Hydroelectricity Inundation Hazard Area</u></p> <p>All zones</p> <p>Activity status: Permitted</p> <p>Where:</p> <p>PER-1</p> <p><i>The occupied building is:</i></p>

		<p>Concerning PER-1, Meridian considers that the habitable floor area of any residential building in the Waitaki Power Scheme Hydroelectricity Inundation Hazard Area should be at least 300mm above the maximum inundation level that would result from a dam or canal breach.</p> <p>Concerning PER-2, Meridian considers that greater clarity is needed.</p>	<ol style="list-style-type: none"> 1. <i>located at least 150m from the toe of the embankment of any canal, in fill or any dam or associated structure; and</i> 2. <i>designed so that any habitable <u>floor area of any residential building</u> room of any building or structure used for residential activities is a minimum of 100mm <u>300mm</u> above the maximum inundation level that would result from a dam <u>or canal</u> breach; and</i> <p><i>PER-2</i></p> <p><i>A certificate is submitted from a suitably qualified engineer confirming that the building will not raise <u>or change</u> the Potential Impact Classification (PIC) level (Low, Medium, High) under the Building Act 2004 from its current level, or where the Potential Impact Classification is already Medium or High, will not increase the Population at Risk in a manner that would lead to a requirement to cease to operate, or to a requirement to upgrade, modify, or replace the hydroelectricity related structures or to significantly alter the operation of an affected portion of a hydroelectricity scheme; and</i></p> <p><i>PER-3</i></p> <p><i>The occupied building is not located in a Waitaki Power Scheme Hydroelectricity Inundation High Hazard Area on the Planning Maps</i></p> <p>Activity status when compliance is not achieved: Discretionary</p>
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			<p>Where:</p> <p>DIS-1</p> <p>Compliance is not achieved with PER-1 and/or PER-2</p> <p>Activity Status where compliance is not achieved: Non-complying</p> <p>Where:</p> <p>NC-1</p> <p>Compliance is not achieved with PER-3.</p>
<p>ENG(WPS)-R3</p> <p>Waitaki Power Scheme enhancement activity</p>	<p>Oppose</p>	<p>The notified version of ENG(WPS)-R3 assigns enhancement of the Waitaki Power Scheme a controlled activity status within the Scheme’s core sites, operating easements and existing footprint when the activity is outside an overlay identified in the plan.</p> <p>Where the activity is outside the Waitaki Power Scheme’s core sites, operating easements and existing footprint and/or the activity is inside an overlay identified in the plan, then the activity is a discretionary activity.</p> <p>Concerning Part B of the Energy Chapter, “<i>Enhancement</i>” is defined in the pWDP as “<i>means the development of new machinery, buildings, plant, structures, facilities, works, networks or components and operating facilities enabling new electricity generation or transmission opportunities</i>”.</p> <p>As discussed earlier in this submission document, the term <i>enhancement</i> is not used in the NPS-REG and the definition in the pWDP for this term describes <i>development</i>. Meridian considers that the term</p>	<p>Delete ENG(WPS)-R3 and replace it with the following:</p> <p><u>REG(WPS)-R4</u></p> <p><u>Development of new hydro electricity generation activities associated with the Waitaki Power Scheme that are located in the existing footprint or core sites of the Waitaki Power Scheme</u></p> <p><u>All zones</u></p> <p><u>Activity Status: Controlled</u></p> <p><u>Where:</u></p> <p><u>1. The development will not result in an increase in the maximum operating level of a lake or water storage area authorised at the date this rule was notified, or create a new lake or water storage area.</u></p> <p><u>Matters over which control is reserved:</u></p>

		<p><i>development</i> should be adopted in the pWDP (rather than <i>enhancement</i>) as this is consistent with the NPS-REG and is clearer.</p> <p>Meridian considers that development of new hydro electricity generation activities associated with the Waitaki Power Scheme that are within the existing footprint or core sites of the Scheme should be a controlled activity provided the development does not result in an increase in the maximum operating level of a lake or water storage area authorised at the date the rule was notified, or create a new lake or water storage area.</p> <p>Development of new hydro electricity generation activities that are outside of the existing footprint or core sites of the Scheme would not be considered to be ‘associated with the Scheme’ and would therefore be managed under Part A of the Energy Chapter.</p>	<p><u><i>a) The nature of any visual effects of the building or the structure on the skyline and open landscape;</i></u></p> <p><u><i>b) The nature of any adverse effects on the environment from construction of structures, including from associated earthworks, dust, runoff, noise and traffic;</i></u></p> <p><u><i>c) The location, bulk, height, cladding or colour of the proposed work;</i></u></p> <p><u><i>d) The landscaping, revegetation and fencing;</i></u></p> <p><u><i>e) The nature and scale of earthworks;</i></u></p> <p><u><i>f) The location and construction of vehicle entry and exit points;</i></u></p> <p><u><i>g) Vehicle manoeuvring and parking areas;</i></u></p> <p><u><i>h) Where the activity is located in a Site or Area of Significance to Māori (SASM), the nature and scale of adverse effects on the values identified by the relevant rūnaka for the SASM, the appropriateness and adequacy of any mitigation measures proposed, and the functional need or operational need for the location of the activity.</i></u></p> <p><u>Activity status when compliance is not achieved with CON.1: Restricted Discretionary</u></p> <p><u>Matters of discretion are restricted to:</u></p> <p><u><i>a) The matters of control a) to h);</i></u></p> <p><u><i>b) The extent to which surrounding land would be inundated;</i></u></p>
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			<p><i><u>c) The productive quality of soils of an area to be inundated;</u></i></p> <p><i><u>d) The degree to which the visual quality of the landscape will be affected;</u></i></p> <p><i><u>e) The social and economic impact on local communities;</u></i></p> <p><i><u>f) The extent to which an increased water body will affect the provision of roading and services within the locality</u></i></p> <p><i><u>g) The potential for increased recreational opportunities;</u></i></p> <p><i><u>h) The degree to which Outstanding Natural Landscapes, listed Historic Heritage Items, and significant vegetation and significant habitats of indigenous fauna will be affected;</u></i></p> <p><i><u>i) The extent of effects on Sites and Areas of Significance to Māori; and</u></i></p> <p><i><u>j) The extent to which the activity exacerbates lakeshore erosion and/or weakening of hillslopes.</u></i></p>
<p>ENG(WPS)-R4 Any Waitaki Power Scheme land use activity which results in the creation of a new lake or water storage area</p>	<p>Oppose</p>	<p>The notified version of ENG(WPS)-R4 assigns a discretionary activity status to any Waitaki Power Scheme land use activity that results in the creation of a new lake or water storage area.</p> <p>For the same reasons as set out in Meridian’s submission on ENG(WPS)-R3, Meridian opposes this rule.</p>	<p>Delete ENG(WPS)-R4 and replace it with <u>REG(WPS)-R4</u> as set out in Meridian’s relief sought on ENG(WPS)-R3.</p>

<p>ENG(WPS)-R5 The construction and installation of new power generation facilities below the Waitaki Dam</p>	<p>Oppose</p>	<p>The notified version of ENG(WPS)-R5 assigns a discretionary activity status to the construction and installation of new power generation facilities below the Waitaki Dam, in all zones.</p> <p>Meridian considers that this rule is unclear and duplicates activities addressed in Part A of the Energy Chapter and in Rule REG(WPS)-R4 that is discussed elsewhere in this submission document.</p>	<p>Delete ENG(WPS)-R5 and replace it with REG(WPS)-R4 as set out in Meridian’s relief sought on ENG(WPS)-R3.</p>
<p>ENG(WPS)-R6 Any other activity, not otherwise provided for, associated with the Waitaki Power Scheme</p>	<p>Oppose</p>	<p>The notified version of ENG(WPS)-R6 assigns “<i>Any other activity, not otherwise provided for, associated with the Waitaki Power Scheme</i>” a discretionary activity status in all zones.</p> <p>Meridian considers that this rule duplicates activities addressed in Part A of the Energy Chapter and in Rule REG(WPS)-R4 that is discussed elsewhere in this submission document.</p>	<p>Delete ENG(WPS)-R6 in its entirety.</p>
<p>ENG(WPS)-S1 Construction Noise</p>		<p>The notified version of ENG(WPS)-S1 reads:</p> <p><i>Any construction activities must not exceed the noise levels set in NZS 6803:1999 measured from the façade of any building that is not associated with the Waitaki Power Scheme and is not within:</i></p> <ol style="list-style-type: none"> <i>1. the Waitaki Power Scheme Existing Footprint; or</i> <i>2. Waitaki Power Scheme Core Sites; or</i> <i>3. Waitaki Power Scheme Operating Easements.</i> <p><i>Matters of control where compliance is not met:</i></p>	<p>Retain ENG(WPS)-S1, while renumbering it as follows:</p> <p>ENGREG(WPS)-S1</p>

		<ol style="list-style-type: none"> 1. <i>duration and hours of construction; and</i> 2. <i>methods to reduce noise.</i> <p>Meridian generally supports this standard.</p>	
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PART 2 – HAZARDS AND RISKS

pWDP Content or Provision	Support or Oppose	Reasons	Relief Sought
New subchapter <i>Hydroelectricity Inundation Hazard</i>	NA	<p>Meridian is concerned that the objective, policies and rules that apply to activities (other than renewable electricity generation activities) in the hydroelectricity inundation hazard areas, have been placed in the Energy Chapter, yet they do not apply to energy activities.</p> <p>Meridian considers that when a user of the plan is looking for the provisions that address risks associated with a property, they will look to the Hazards and Risks Chapter, not the Energy Chapter.</p> <p>For this reason, Meridian requests that a new subchapter in the Hazards and Risks Chapter is established, with the title <i>Hydroelectricity Inundation Hazard</i>, and that all provisions in the pWDP that relate to the management of risks from potential hydroelectricity inundation are located in this new subchapter.</p>	Insert a new subchapter titled “ <i>Hydroelectricity Inundation Hazard</i> ” in the <i>Hazards and Risks</i> chapter of the pWDP and move all provisions in the pWDP that relate to the management of risks from potential hydroelectricity inundation to this new subchapter.
New Objective HI-O1	NA	Meridian is concerned that the objective, policies and rules that apply to activities (other than renewable electricity generation activities) in the hydroelectricity	Delete ENG(WPS)-O3 and insert new HI-O1 into the new <i>Hydroelectricity Inundation Hazard</i> subchapter in the <i>Hazards and Risks</i> chapter:

<p>Hydroelectricity Inundation Hazard</p>		<p>inundation hazard areas, have been placed in the Energy chapter, yet they do not apply to energy activities.</p> <p>Meridian considers that when a user of the plan is looking for the provisions that address risks associated with a property, they will look to the Hazards and Risks chapter, not the Energy Chapter.</p> <p>For this reason, Meridian requests that a new subchapter in the Hazards and Risks chapter is established, with the title <i>Hydroelectricity Inundation Hazard</i>, and that all provisions in the pWDP that relate to the management of risks from potential hydroelectricity inundation are located in this new subchapter.</p>	<p><u>HI-O1 Waitaki Power Scheme Hydroelectricity Inundation Hazard</u></p> <p><u><i>Development in the Waitaki Power Scheme Hydroelectricity Inundation Hazard Area minimises risks to human health and property from hydroelectricity inundation and avoids reverse sensitivity effects on the Waitaki Power Scheme.</i></u></p>
<p>New Policy HI-P1</p> <p>Identify areas potentially affected by hydroelectricity inundation</p>	<p>NA</p>	<p>Meridian is concerned that the objective, policies and rules that apply to activities (other than renewable electricity generation activities) in the hydroelectricity inundation hazard areas, have been placed in the Energy Chapter, yet they do not apply to energy activities.</p> <p>Meridian considers that when a user of the plan is looking for the provisions that address risks associated with a property, they will look to the Hazards and Risks Chapter, not the Energy Chapter.</p> <p>For this reason, Meridian requests that a new subchapter in the <i>Hazards and Risks</i> Chapter is established, with the title <i>Hydroelectricity Inundation Hazard</i>, and that all provisions in the pWDP that relate to the management of risks from potential hydroelectricity inundation are located in this new subchapter.</p>	<p>Amend ENG(WPS)-P2 as set out below, and move ENG(WPS)-P2 to become new HI-P1 in the new <i>Hydroelectricity Inundation Hazard</i> subchapter in the <i>Hazards and Risks</i> chapter:</p> <p><u>HI-P1 Identifying areas potentially affected by hydroelectricity inundation</u></p> <p><i>Identify and map areas that may be potentially affected by an a hydroelectricity inundation event from the Waitaki Power Scheme as the Waitaki Power Scheme Hydroelectricity Inundation Hazard Areas on the Planning Maps.</i></p>
<p>New Policy</p>	<p>NA</p>	<p>Meridian is concerned that the objective, policies and rules that apply to activities (other than renewable</p>	<p>Amend ENG(WPS)-P6 as set out below, and move ENG(WPS)-P6 to become new HI-P2 in the new</p>

<p>HI-P2</p> <p>Hydroelectricity Inundation Hazard</p>		<p>electricity generation activities) in the hydroelectricity inundation hazard areas, have been placed in the Energy Chapter, yet they do not apply to energy activities.</p> <p>Meridian considers that when a user of the plan is looking for the provisions that address risks associated with a property, they will look to the Hazards and Risks Chapter, not the Energy Chapter.</p> <p>For this reason, Meridian requests that a new subchapter in the Hazards and Risks chapter is established, with the title <i>Hydroelectricity Inundation Hazard</i>, and that all provisions in the pWDP that relate to the management of risks from potential hydroelectricity inundation are located in this new subchapter.</p> <p>In addition, Meridian considers that the policy should apply more broadly to any change in land use activities that could increase the likelihood or scale of harm to people or property from hydroelectricity inundation, or the potential for reverse sensitivity effects on the Waitaki Power Scheme. Meridian also considers that the reference to ‘acceptable’ risk is not clear; and that the avoidance of reverse sensitivity effects on the Waitaki Power Scheme should extend to all renewable electricity generation activities of the Scheme, not just the Scheme’s operation.</p>	<p><i>Hydroelectricity Inundation</i> subchapter in the <i>Hazards and Risks</i> chapter:</p> <p><u><i>HI-P2 Development in the Waitaki Power Scheme Hydroelectricity Inundation Hazard Areas</i></u></p> <p><i>Within the Waitaki Power Scheme Hydroelectricity Inundation Hazard Areas:</i></p> <ol style="list-style-type: none"> 3. <i>avoid the establishment of occupied buildings within the identified Waitaki Power Scheme Hydroelectricity Inundation High Hazard Area; and</i> 4. <u><i>avoid changes to existing land use activities in the Waitaki Power Scheme Hydroelectricity Inundation Hazard Area that may increase the likelihood or scale of harm to people or property from hydroelectricity inundation, or the potential for reverse sensitivity effects on the Waitaki Power Scheme. where it can be demonstrated that:</i></u> <ol style="list-style-type: none"> <i>e. the building and associated activity incorporates mitigation measures that demonstrate that the risk to lives and wellbeing and building damage from an uncontrolled release of water from the Waitaki Power Scheme is acceptable; and</i> <i>d. the ongoing operation of the Waitaki Power Scheme will not be compromised.</i>
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<p>New Policy</p> <p>HI-R1</p> <p>New Occupied Buildings</p>	<p>NA</p>	<p>Meridian is concerned that the objective, policies and rules that apply to activities (other than renewable electricity generation activities) in the hydroelectricity inundation hazard areas, have been placed in the Energy Chapter, yet they do not apply to energy activities.</p> <p>Meridian considers that when a user of the plan is looking for the provisions that address risks associated with a property, they will look to the Hazards and Risks chapter, not the Energy Chapter.</p> <p>For this reason, Meridian requests that a new subchapter in the Hazards and Risks Chapter is established, with the title <i>Hydroelectricity Inundation Hazard</i>, and that all provisions in the pWDP that relate to the management of risks from potential hydroelectricity inundation are located in this new subchapter.</p> <p>Concerning PER-1, Meridian considers that the habitable floor area of any residential building in the Waitaki Power Scheme Hydroelectricity Inundation Hazard Area should be at least 300mm above the maximum inundation level that would result from a dam or canal breach.</p> <p>Concerning PER-2, Meridian considers that greater clarity is needed.</p>	<p>Amend ENG(WPS)-R2 as set out below, and move ENG(WPS)-R2 to become new HI-R1 in the new <i>Hydroelectricity Inundation</i> subchapter in the <i>Hazards and Risks</i> chapter:</p> <p><i>HI-R1 Occupied Buildings in the Waitaki Power Scheme Hydroelectricity Inundation Hazard Area</i></p> <p><i>All zones</i></p> <p><i>Activity status: Permitted</i></p> <p><i>Where:</i></p> <p><i>PER-1</i></p> <p><i>The occupied building is:</i></p> <ol style="list-style-type: none"> 3. <i>located at least 150m from the toe of the embankment of any canal, in fill or any dam or associated structure; and</i> 4. <i>designed so that any habitable <u>floor area of any residential building room of any building or structure used for residential activities</u> is a minimum of <u>100mm 300mm</u> above the maximum inundation level that would result from a dam <u>or canal</u> breach; and</i> <p><i>PER-2</i></p> <p><i>A certificate is submitted from a suitably qualified engineer confirming that the building will not raise <u>or change</u> the Potential Impact Classification (PIC) level (Low, Medium, High) under the Building Act 2004 <u>from its current level, or where the Potential Impact Classification is already Medium</u></i></p>
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			<p><u>or High, will not increase the Population at Risk in a manner that would lead to a requirement to cease to operate, or to a requirement to upgrade, modify, or replace the hydroelectricity related structures or to significantly alter the operation of an affected portion of a hydroelectricity scheme;</u> and</p> <p>PER-3</p> <p><i>The occupied building is not located in a Waitaki Power Scheme Hydroelectricity Inundation High Hazard Area on the Planning Maps</i></p> <p>Activity status when compliance is not achieved: Discretionary</p> <p>Where:</p> <p>DIS-1</p> <p><i>Compliance is not achieved with PER-1 and/or PER-2</i></p> <p>Activity Status where compliance is not achieved: Non-complying</p> <p>Where:</p> <p>NC-1</p> <p><i>Compliance is not achieved with PER-3.</i></p>
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PART 2 – HISTORIC HERITAGE

pWDP content or provision	Support or Oppose	Reasons	Relief Sought
User note	Oppose	<p>The first paragraph of the User Note in the Historic Heritage Chapter reads:</p> <p><i>Objectives, policies and rules relating to infrastructure activities on or within historic heritage items or their heritage settings are found in the Infrastructure Chapter and Energy Chapter.</i></p> <p>Meridian considers that while this is somewhat consistent with Meridian’s position that Parts A and B of the Energy chapter are standalone chapters in the plan, the user note is not clear enough to provide certainty to plan users.</p>	<p>Amend the first paragraph of the User Note in the Historic Heritage Chapter as follows:</p> <p><i>Objectives, policies and rules relating to infrastructure activities on or within historic heritage items or their heritage settings are found in the Infrastructure Chapter and Energy Chapter.</i></p> <p>and</p> <p>insert the following:</p> <p><u><i>Objectives, policies and rules relating to the renewable electricity generation and the Waitaki Power Scheme are provided in the Energy Chapter. Beyond the provisions listed in the Energy Chapter, no other provisions in this plan apply to renewable electricity generation and the Waitaki Power Scheme.</i></u></p>

PART 2 – NOTABLE TREES

pWDP content or provision	Support or Oppose	Reasons	Relief Sought
User note	Oppose	The user note states that	Amend the third paragraph of the User Note in the Notable Trees Chapter as follows:

		<p><i>Additional objectives, policies and rules relating to infrastructure activities when involving Notable Trees are found in the Infrastructure Chapter and Energy Chapter.</i></p> <p>Meridian considers that while this is somewhat consistent with Meridian’s position that Parts A and B of the Energy chapter are standalone chapters in the plan, the user note is not clear enough to provide certainty to plan users.</p>	<p><i>Additional objectives, policies and rules relating to infrastructure activities when involving Notable Trees are found in the Infrastructure Chapter and Energy Chapter.</i></p> <p>and insert the following:</p> <p><u><i>Objectives, policies and rules relating to the renewable electricity generation and the Waitaki Power Scheme are provided in the Energy Chapter. Beyond the provisions listed in the Energy Chapter, no other provisions in this plan apply to renewable electricity generation and the Waitaki Power Scheme.</i></u></p>
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PART 2 – SITES AND AREAS OF SIGNIFICANCE TO MĀORI

pWDP content or provision	Support or Oppose	Reasons	Relief Sought
User note	Oppose	<p>The first paragraph of the User Note in the Sites and Areas of Significance to Māori Chapter reads:</p> <p><i>Objectives, policies and rules relating to infrastructure activities within Sites and Areas of Significance to Māori are found in the Infrastructure Chapter and Energy Chapter.</i></p> <p>Meridian considers that while this is somewhat consistent with Meridian’s position that Parts A and B of the Energy chapter are standalone chapters in the plan,</p>	<p>Amend the first paragraph of the User Note in the Sites and Areas of Significance to Māori Chapter as follows:</p> <p><i>Objectives, policies and rules relating to infrastructure activities within Sites and Areas of Significance to Māori are found in the Infrastructure Chapter and Energy Chapter.</i></p> <p>and insert the following:</p> <p><u><i>Objectives, policies and rules relating to the renewable electricity generation and the Waitaki</i></u></p>

		the user note is not clear enough to provide certainty to plan users.	<u><i>Power Scheme are provided in the Energy Chapter. Beyond the provisions listed in the Energy Chapter, no other provisions in this plan apply to renewable electricity generation and the Waitaki Power Scheme.</i></u>
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PART 2 – ECOSYSTEMS AND INDIGENOUS BIODIVERSITY

pWDP content or provision	Support or Oppose	Reasons	Relief Sought
User note	Oppose	<p>The second paragraph of the User Note in the Ecosystems and Indigenous Biodiversity Chapter reads:</p> <p><i>Objectives, policies and rules relating to infrastructure activities within Significant Natural Areas are found in the Infrastructure Chapter and Energy Chapter.</i></p> <p>Meridian considers that while this is somewhat consistent with Meridian’s position that Parts A and B of the Energy chapter are standalone chapters in the plan, the user note is not clear enough to provide certainty to plan users.</p>	<p>Amend the second paragraph of the User Note in the Ecosystems and Indigenous Biodiversity Chapter as follows:</p> <p><i>Objectives, policies and rules relating to infrastructure activities within Significant Natural Areas are found in the Infrastructure Chapter and Energy Chapter.</i></p> <p>and</p> <p>insert the following:</p> <p><u><i>Objectives, policies and rules relating to the renewable electricity generation and the Waitaki Power Scheme are provided in the Energy Chapter. Beyond the provisions listed in the Energy Chapter, no other provisions in this plan apply to renewable electricity generation and the Waitaki Power Scheme.</i></u></p>

PART 2 – NATURAL CHARACTER

pWDP content or provision	Support or Oppose	Reasons	Relief Sought
User note	Oppose	<p>The second paragraph of the User Note in the Natural Character Chapter reads:</p> <p><i>Provisions related to infrastructure activities within riparian margins are also found in the Infrastructure Chapter and Energy Chapter.</i></p> <p>Meridian is concerned that “also” implies that the Natural Character provisions apply in addition to the Energy provisions. This is not consistent Parts A and B of the Energy chapter being two standalone chapters in the plan.</p>	<p>Amend the second paragraph of the User Note in the Natural Character Chapter as follows:</p> <p><i>Provisions related to infrastructure activities within riparian margins are also found in the Infrastructure Chapter and Energy Chapter.</i></p> <p>and insert the following:</p> <p><u><i>Objectives, policies and rules relating to the renewable electricity generation and the Waitaki Power Scheme are provided in the Energy Chapter. Beyond the provisions listed in the Energy Chapter, no other provisions in this plan apply to renewable electricity generation and the Waitaki Power Scheme.</i></u></p>

PART 2 – NATURAL FEATURES AND LANDSCAPES

pWDP content or provision	Support or Oppose	Reasons	Relief Sought
User note	Oppose	<p>The second paragraph of the User Note in the Natural Features and Landscapes Chapter reads:</p>	<p>Amend the second paragraph of the User Note in the Natural Features and Landscapes Chapter as follows:</p>

		<p><i>Objectives, policies and rules relating to infrastructure activities within Significant Natural Areas are found in the Infrastructure Chapter and Energy Chapter.</i></p> <p>Meridian considers that while this is somewhat consistent with Meridian’s position that Parts A and B of the Energy chapter are standalone chapters in the plan, the user note is not clear enough to provide certainty to plan users.</p>	<p><i>Objectives, policies and rules relating to infrastructure activities within Significant Natural Areas are found in the Infrastructure Chapter and Energy Chapter.</i></p> <p>and insert the following:</p> <p><u><i>Objectives, policies and rules relating to the renewable electricity generation and the Waitaki Power Scheme are provided in the Energy Chapter. Beyond the provisions listed in the Energy Chapter, no other provisions in this plan apply to renewable electricity generation and the Waitaki Power Scheme.</i></u></p>
<p>Introduction</p>	<p>Support</p>	<p>The introduction to the Natural Features and Landscape Chapter includes the following statement:</p> <p><i>The Waitaki district contains some of New Zealand’s most outstanding and distinctive landscapes, with spectacular vistas through the Mackenzie and Ōmārama Basins as well as the impressive man-made lakes which are actively managed as part of the Waitaki Power Scheme.</i></p> <p>Meridian supports the positive acknowledgement of the benefits of the Waitaki Power Scheme that extend well beyond the generation of renewable electricity generation. The man-made lakes are a substantive and positive feature in the District’s landscape and provide enormous on-water and off-water recreation and leisure pursuits.</p>	<p>Retain the acknowledgement of the man-made lakes associated with the Waitaki Power Scheme and their positive contribution to the District’s landscape.</p>

PART 2 – PUBLIC ACCESS

pWDP content or provision	Support or Oppose	Reasons	Relief Sought
<p>PA-O2 Provision of public access minimises adverse effects</p>	<p>Oppose in part</p>	<p>Meridian considers that <i>minimising</i> the effects of public access to lakes and rivers does not go far enough to be consistent with the NPS-REG. Meridian considers that such effects should be avoided.</p>	<p>Amend PA-O2 as follows:</p> <p><i>PA-O2</i> <i>Provision of public access minimises adverse effects</i></p> <p><i>Public access to and along the District’s rivers, lakes and coastal marine area is undertaken in a way that minimises adverse effects on critical facilities and regionally significant infrastructure, natural hazard mitigation works and vegetation, public health and safety, land based activities and primary production, natural character, ecological, landscape, historic heritage, cultural heritage or amenity values, <u>and avoids adverse effects on the Waitaki Power Scheme.</u></i></p>
<p>PA-P1 Activities that protect and maintain public and customary access</p>	<p>Oppose in part</p>	<p>Meridian considers that this policy risks exposing the Waitaki Power Scheme to adverse effects from public access to lakes and rivers and is not consistent with the NPS-REG. Meridian considers that such effects should be avoided.</p>	<p>Amend PA-P1 as follows:</p> <p><i>PA-P1</i> <i>Activities that protect and maintain public and customary access</i></p> <p><i>Enable activities that protect, maintain and, where practicable, enhance public and customary access to and along the coastal marine area, lakes and rivers <u>where the activities avoid adverse effects on the Waitaki Power Scheme.</u></i></p>

PART 2 – SUBDIVISION

pWDP Provision	Support or Oppose	Reasons	Relief Sought
<p>SUB-O4 Subdivision and Regionally Significant Infrastructure</p>	<p>Support</p>	<p>The notified version of SUB-O4 reads:</p> <p><i>Subdivision does not compromise the operation or safety of Regionally Significant Infrastructure.</i></p> <p>Meridian support this objective and notes that renewable electricity generation is part of the definition of <i>Regionally Significant Infrastructure</i>. For this reason, this objective is consistent with the NPS-REG.</p>	<p>Retain SUB-O4 as notified.</p>
<p>SUB-P6 Effects of subdivision on infrastructure</p>	<p>Oppose in part</p>	<p>The notified version of SUB-P6 reads:</p> <p><i>Require subdivisions to be designed to minimise any adverse effects, including reverse sensitivity effects on the safe and efficient operation, maintenance of, and access to Regionally Significant Infrastructure.</i></p> <p>Meridian considers that minimising the effects of subdivision on the Waitaki Power Scheme does not go far enough to be consistent with the NPS-REG. Meridian considers that such effects should be avoided.</p>	<p>Amend SUB-P6 as follows:</p> <p><i>Require subdivisions to be designed to minimise any adverse effects, including reverse sensitivity effects on the safe and efficient operation, maintenance of, and access to Regionally Significant Infrastructure, <u>and to avoid adverse effects on the Waitaki Power Scheme.</u></i></p>
<p>SUB-P8 Subdivision in Waitaki Power Scheme Hydroelectricity</p>	<p>Oppose in part</p>	<p>While Meridian generally supports the focus of SUB-P8, Meridian considers that to be consistent with the NPS-REG condition 2 needs to:</p> <p>a. clearly reference managing the potential for <i>reverse sensitivity</i> effects; and</p>	<p>Amend SUB-P8 as follows:</p> <p>SUB-P8</p> <p><i>Subdivision in Waitaki Power Scheme Hydroelectricity Inundation Hazard Areas</i></p>

<p>Inundation Hazard Areas</p>		<p>b. ensure that the management of reverse sensitivity effects applies to <i>maintenance</i> and <i>upgrade</i> activities (as well as the <i>operation</i>) of the Waitaki Power Scheme.</p> <p>Meridian is also concerned that condition 3’s reference to risks being <i>acceptable</i> is unclear. Meridian seeks amendments to more clearly prevent an increase in the likelihood or scale of harm to people or property from hydroelectricity inundation.</p>	<p><i>Only allow subdivision in Waitaki Power Scheme Hydroelectricity Inundation Hazard Areas, where it can be demonstrated that:</i></p> <ol style="list-style-type: none"> 1. <i>any building platforms will be located outside of any identified Waitaki Power Scheme Hydroelectricity High Hazard Area; and</i> 2. <i>the subdivision will not <u>increase the potential for reverse sensitivity effects that would compromise the ongoing operation, maintenance, or upgrade</u> of the Waitaki Power Scheme; and</i> 3. <i><u>the subdivision will not increase the likelihood or scale of harm to people or property from hydroelectricity inundation any risk to lives and well-being from an uncontrolled release of water from the Waitaki Power Scheme is acceptable.</u></i>
<p>SUB-R12</p> <p>Subdivision in the Waitaki Power Scheme Hydroelectricity Inundation Hazard Areas</p>	<p>Support</p>	<p>SUB-R12 reads:</p> <p><i>SUB-R12</i></p> <p><i>Subdivision in the Waitaki Power Scheme Hydroelectricity Inundation Hazard Areas</i></p> <p><i>All zones</i></p> <p><i>Activity status: Discretionary</i></p> <p><i>Note: This rule applies in addition to any other applicable Subdivision Rules.</i></p> <p><i>Activity status when compliance is not achieved: Not Applicable.</i></p>	<p>Retain SUB-R12 as notified</p>

		Meridian supports the notified version of SUB-R12 and considers that along with SUB-P8, as amended by Meridian’s submission on that provision, appropriate protection can be provided to the nationally significant Waitaki Power Scheme, while at the same time protecting people and property.	
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PART 2 – ACTIVITIES ON THE SURFACE OF WATER

pWDP Content or Provision	Support or Oppose	Reasons	Relief Sought
Introduction	Oppose in part	<p>The introduction to the Activities on the Surface of Water Chapter includes the following statement:</p> <p><i>Regionally significant infrastructure, such as the Waitaki Power Scheme operate within and adjacent to waterbodies across the District. To achieve the outcomes for the District relating to regionally significant infrastructure, the activities on the surface of water provisions need to allow for their continued safe, efficient and effective use.</i></p> <p>Meridian supports acknowledgement of the importance of continued safe and efficient operation of regionally significant infrastructure. However, Meridian considers that the statement should be clearer about the need to avoid adverse effects on the operation, maintenance and upgrade of the Waitaki Power Scheme and other regionally significant infrastructure.</p>	<p>Amend the fifth paragraph in the Introduction to the Activities on the Surface of Water Chapter as follows:</p> <p><i>Regionally significant infrastructure, such as the Waitaki Power Scheme, operate within and adjacent to waterbodies across the District. To achieve the outcomes for the District relating to regionally significant infrastructure <u>and renewable electricity generation</u>, the activities <u>undertaken</u> on the surface of water provisions need to allow for their continued safe, efficient and effective use <u>avoid adverse effects on the operation, maintenance and upgrade of the Waitaki Power Scheme and other regionally significant infrastructure.</u></i></p>

<p>User Note</p>	<p>Oppose</p>	<p>The User Note states the following:</p> <p><i>Objectives, policies and rules relating to the Waitaki Power Scheme infrastructure are found in Part B of the Energy Chapter.</i></p> <p>It is not just the Scheme’s infrastructure that Part B of the Energy Chapter applies to, rather it is all renewable electricity generation activities associated with the Waitaki Power Scheme.</p> <p>The Waitaki Power Scheme is defined in the pWDP as:</p> <p><i>means the structures, works, facilities, components, plant and activities undertaken to facilitate and enable the generation of electricity from water in the Waitaki River Catchment, including any mitigations associated with the Scheme. It includes power stations, dams, weirs, control structures, penstocks, canals, tunnels, siphons, spillways, intakes, storage of goods materials and substances, switchyards, fish and elver screens and passes, races, booms, site investigation works, erosion and flood control activities, land drainage, sediment and weed control, access requirements (including public access), jetties, slipways and landing places, signs, earthworks, monitoring, investigation and communication equipment and transmission network. It includes the Waitaki Power Scheme Core Sites and the Waitaki Power Scheme Operating Easements.</i></p> <p>In addition, Meridian considers that while the user note is somewhat consistent with Meridian’s position that</p>	<p>Delete the second paragraph of the User Note and replace it with the following:</p> <p><u><i>Objectives, policies and rules relating to the renewable electricity generation and the Waitaki Power Scheme are provided in the Energy Chapter. Beyond the provisions listed in the Energy Chapter, no other provisions in this plan apply to renewable electricity generation and the Waitaki Power Scheme.</i></u></p>
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		Parts A and B of the Energy chapter are two standalone chapters in the plan, it is not clear enough to provide certainty to plan users.	
ASW-O1 Protecting the values of waterbodies	Support	<p>The notified version of ASW-O1 reads:</p> <p><i>ASW-O1</i></p> <p><i>Protecting the values of waterbodies</i></p> <p><i>The surface of waterbodies in the Waitaki district can be used for a range of activities, including recreational activities and commercial activities, where natural environment values, mana whenua values, amenity values, public health and safety, and the Waitaki Power Scheme, are protected from adverse effects.</i></p> <p>Meridian supports the need to protect the Waitaki Power Scheme from the potential adverse effects of activities undertaken on the surface of waterbodies.</p>	Retain ASW-O1 as notified.
ASW-P1 Providing for recreational activities	Oppose in part	Meridian is concerned that ASW-P1 does not go far enough to protect the Waitaki Power Scheme from the potential adverse effects of recreational activities.	<p>Amend ASW-P1 as follows:</p> <p><i>ASW-P1</i></p> <p><i>Providing for recreational activities</i></p> <p><i>Provide for recreational activities on the surface of water where:</i></p> <p><i>a) <u>adverse effects on natural environment values, mana whenua values, current recreational values, amenity values, public health and safety, and any values associated with the Waitaki Power Scheme, are avoided, remedied or mitigated; <u>and</u></u></i></p>

			<u><i>b) adverse effects on the Waitaki Power Scheme are avoided.</i></u>
ASW-P2 Commercial activities	Oppose in part	Meridian is concerned that ASW-P2 does not go far enough to protect the Waitaki Power Scheme from the potential adverse effects of commercial activities on the surface of water.	<p>Amend ASW-P2 as follows:</p> <p>ASW-P2</p> <p>Commercial activities</p> <p><i>Provide for commercial surface water activities where:</i></p> <p><u><i>a) it can be demonstrated that they maintain or enhance the natural environment values, mana whenua values, current recreational values, amenity values, and public health and safety; and any values associated with the Waitaki Power Scheme; and</i></u></p> <p><u><i>b) adverse effects on the Waitaki Power Scheme are avoided.</i></u></p>
ASW-P3 Structures and swing moorings	Oppose in part	Meridian is concerned that ASW-P3 does not go far enough to protect the Waitaki Power Scheme from the potential adverse effects of structures and swing moorings on the surface of water.	<p>Amend ASW-P3 as follows:</p> <p>ASW-P3</p> <p>Structures and swing moorings</p> <p><i>Only allow structures and swing moorings to pass across or through the surface of water where:</i></p> <p><u><i>a) any adverse effects on natural environment values, mana whenua values, amenity values, and public health and safety; and the Waitaki Power Scheme are avoided, remedied or mitigated; and</i></u></p>

			<i>b) <u>adverse effects on the Waitaki Power Scheme are avoided.</u></i>
ASW-P6 Providing for the use of vessels associated with the Waitaki Power Scheme	Oppose in part	Meridian is concerned that ASW-P6 does not go far enough to enable the operation, maintenance and upgrade of the Waitaki Power Scheme.	Amend ASW-P6 as follows: ASW-P6 <i>Providing for the use of vessels associated with the Waitaki Power Scheme</i> <i><u>Enable the use of surface water by Provide for the use of vessels associated with the operation, maintenance, refurbishment, enhancement, monitoring, and upgrading and development of the Waitaki Power Scheme.</u></i>
ASW-R4 Use of vessels for the operation, maintenance, refurbishment, enhancement, monitoring, upgrading and development of the Waitaki Power Scheme	Oppose in part	While Meridian supports permitting the use of surface water by vessels associated with the Waitaki Power Scheme, Meridian considers there is overlap and lack of clarity in use of the terms refurbishment, enhancement, upgrading and development. Meridian’s relief sought resolves the overlap and uncertainty.	Amend ASW-R4 as follows: ASW-R4 <i>Use of vessels <u>on the surface of water</u> for the operation, maintenance, refurbishment, enhancement, upgrading and monitoring, upgrading and development of the Waitaki Power Scheme and for the development of new <u>hydro electricity generation activities associated with the Waitaki Power Scheme</u></i> <i>All zones</i> <i>Activity status: Permitted</i>

PART 2 – EARTHWORKS

pWDP Content	Support or Oppose	Reasons	Relief Sought
User Note	Oppose	Meridian considers that Parts A and B of the Energy should be standalone chapters. Other chapters of the notified version of the pWDP appear to apply this approach with user notes in each chapter. The User Note in the Earthworks Chapter has omitted to clarify this relationship.	<p>Amend the User Noted in the Earthworks Chapter by inserting the following:</p> <p><i><u>Objectives, policies and rules relating to the renewable electricity generation and the Waitaki Power Scheme are provided in the Energy Chapter. Beyond the provisions listed in the Energy Chapter, no other provisions in this plan apply to renewable electricity generation and the Waitaki Power Scheme.</u></i></p>

PART 2 – LIGHT

pWDP Content	Support or Oppose	Reasons	Relief Sought
User Note	Oppose	Meridian considers that Parts A and B of the Energy should be standalone chapters. Other chapters of the notified version of the pWDP appear to apply this approach with user notes in each chapter. The User Note in the Light Chapter has omitted to clarify this relationship.	<p>Amend the User Noted in the Light Chapter by inserting the following:</p> <p><i><u>Objectives, policies and rules relating to the renewable electricity generation and the Waitaki Power Scheme are provided in the Energy Chapter. Beyond the provisions listed in the Energy Chapter, no other provisions in this plan apply to renewable electricity generation and the Waitaki Power Scheme.</u></i></p>

PART 2 – NOISE

pWDP Content	Support or Oppose	Reasons	Relief Sought
User Note	Oppose	Meridian considers that Parts A and B of the Energy should be standalone chapters. Other chapters of the notified version of the pWDP appear to apply this approach with user notes in each chapter. The User Note in the Noise Chapter has omitted to clarify this relationship.	<p>Amend the User Noted in the Noise Chapter by inserting the following:</p> <p><i><u>Objectives, policies and rules relating to the renewable electricity generation and the Waitaki Power Scheme are provided in the Energy Chapter. Beyond the provisions listed in the Energy Chapter, no other provisions in this plan apply to renewable electricity generation and the Waitaki Power Scheme.</u></i></p>

PART 2 – SIGNS

pWDP Content	Support or Oppose	Reasons	Relief Sought
User Note	Oppose	Meridian considers that Parts A and B of the Energy should be standalone chapters. Other chapters of the notified version of the pWDP appear to apply this approach with user notes in each chapter. The User Note in the Signs Chapter has omitted to clarify this relationship.	<p>Amend the User Noted in the Signs Chapter by inserting the following:</p> <p><i><u>Objectives, policies and rules relating to the renewable electricity generation and the Waitaki Power Scheme are provided in the Energy Chapter. Beyond the provisions listed in the Energy Chapter, no other provisions in this plan apply to renewable electricity generation and the Waitaki Power Scheme.</u></i></p>

PART 3 – GENERAL RURAL ZONE

pWDP Content	Support or Oppose	Reasons	Relief Sought
User Note	Oppose	Meridian considers that Parts A and B of the Energy should be standalone chapters. Other chapters of the notified version of the pWDP appear to apply this approach with user notes in each chapter. The User Note in the General Rural Zone Chapter has omitted to clarify this relationship.	<p>Amend the User Noted in the General Rural Zone Chapter by inserting the following:</p> <p><i><u>Objectives, policies and rules relating to the renewable electricity generation and the Waitaki Power Scheme are provided in the Energy Chapter. Beyond the provisions listed in the Energy Chapter, no other provisions in this plan apply to renewable electricity generation and the Waitaki Power Scheme.</u></i></p>

PART 3 – DESIGNATIONS - WDC – WAITAKI DISTRICT COUNCIL

pWDP Provision	Support or Oppose	Reasons	Relief Sought
<p>Ohau C Campground Designation Unique Identifier</p> <p>WDC-28</p> <p>Condition 1</p>	Support	<p>Concerning the Ohau C Campground designation, Condition 1 of the designation reads:</p> <p><i>There shall be no new occupied buildings constructed or relocated to the site due to the Waitaki Power Scheme Hydroelectricity Inundation High Hazard Area overlay.</i></p>	<p>Retain Condition 1 of the Ohau C Campground designation, as notified.</p>

		Meridian supports this condition as it provides some protection against reverse sensitivity effects on the Waitaki Power Scheme.	
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PLANNING MAPS

pWDP Provision	Support or Oppose	Reasons	Relief Sought
<p>Planning map</p> <p>Map layers</p> <p>WPS Hydroelectricity Inundation Hazard Areas</p> <p>and</p> <p>WPS Hydroelectricity Inundation High Hazard Areas</p>	Oppose in part	<p>The planning maps refer to <i>WPS Hydroelectricity Inundation Hazard Areas</i> and <i>WPS Hydroelectricity Inundation High Hazard Areas</i>.</p> <p>The plan provisions (and the <i>Overlay Name</i> table in the section titled <i>Introduction and General Provisions, How the Plan Works, Relationship Between Spatial Layers, Overlays</i>) refer to the <i>Waitaki Power Scheme Hydroelectricity Inundation Hazard Areas</i> and <i>Waitaki Power Scheme Hydroelectricity Inundation High Hazard Areas</i>.</p> <p>Meridian considers that consistency in the terms and labels used is needed.</p> <p>In addition, Meridian is concerned that the map layers titled <i>WPS Hydroelectricity Inundation Hazard Areas</i> and <i>WPS Hydroelectricity Inundation High Hazard Areas</i> are located under the heading <i>Infrastructure</i> in the planning maps. None of the provisions addressing hydroelectricity inundation reside in the <i>Infrastructure</i> chapter of the pWDP.</p>	<p>Amend the Map Tools, Map Layers by</p> <ol style="list-style-type: none"> 1. Renaming the <i>Natural Hazards</i> section as <i>Hazard and Risks</i>; and 2. Renaming the <i>WPS Hydroelectricity Inundation Hazard Areas</i> and <i>WPS Hydroelectricity Inundation High Hazard Areas</i> as <i>Waitaki Power Scheme Hydroelectricity Inundation Hazard Areas</i> and <i>Waitaki Power Scheme Hydroelectricity Inundation High Hazard</i>; and 3. Locating the <i>Waitaki Power Scheme Hydroelectricity Inundation Hazard Areas</i> and <i>Waitaki Power Scheme Hydroelectricity Inundation High Hazard</i> layers under the heading <i>Hazards and Risks</i>.

		Meridian considers that the <i>Natural Hazards</i> heading in the <i>Map Tools</i> should be changed to <i>Hazards and Risks</i> and that map layers <i>WPS Hydroelectricity Inundation Hazard Areas</i> and <i>WPS Hydroelectricity Inundation High Hazard Areas</i> should be renamed and located under the <i>Natural Hazards</i> heading.	
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