

DDPR_feedback_0094s	
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Response Date	Aug 31 22
Notes	
Q1	Select the chapter you want to provide feedback on
Q2	In general, to what extent do you support the contents of this chapter?
Q3	Objective/Policy/Rule/Standard reference:
Q4	Feedback/Comments
Q5	Objective/Policy/Rule/Standard reference:
Q6	Feedback/Comments
Q7	Objective/Policy/Rule/Standard reference:
Q8	Feedback/Comments
Q9	Objective/Policy/Rule/Standard reference:
Q10	Feedback/Comments
Q11	supporting documents?
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Q12	If you need more space, or have any other general comments, please leave them here
	Hi Find attached Meridian Energy Limited's feedback on the draft Waitaki District Plan. Meridian would be happy to meet and work through the issues it has raised. Can you please send acknowledge the receipt of the feedback? Regards Andrew

**FEEDBACK ON
THE DRAFT WAITAKI DISTRICT PLAN JUNE 2022**

To: Draft Waitaki District Plan, June 2022
Waitaki District Council
Private Bag 50058
Oamaru 9444

planreview@waitaki.govt.nz

From: Meridian Energy Limited
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Attention: Andrew Feierabend
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Meridian Energy Limited (**Meridian**) thanks Waitaki District Council (**WDC**) for engaging with Meridian during the development of the Draft Waitaki District Plan June 2022 (**DWDP**). Many of the changes requested by Meridian are reflected in the DWDP.

Meridian also thanks WDC for the opportunity to provide feedback on the current DWDP. Meridian's feedback is set out in the attached document.

Meridian would like the opportunity to discuss this feedback with WDC.



Andrew Feierabend
For and on behalf of Meridian Energy Limited

Dated this 31st day of August 2022

STRUCTURE OF FEEDBACK

1. Meridian's feedback is structured as follows:
 - Part One: About Meridian
 - Part Two: Context for Meridian's feedback
 - Part Three: Relief sought
2. All of Parts 1 to 3 of this feedback are to be read together, and together they form Meridian's feedback on the DWDP.

PART ONE: ABOUT MERIDIAN

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 Waitaki District Plan, with large parts of the Waitaki Power Scheme being located in the 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. From Lake Ohau to Lake Waitaki, the Scheme lies within 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 is connected to the South Island transmission network at the site of the Benmore Power Station, and it provides essential ancillary services to the electricity system.
8. The national significance of the Waitaki Power Scheme is established in the National Policy Statements for Renewable Electricity Generation 2011 and for Freshwater 2020.

PART TWO: CONTEXT

9. Meridian has previously advised WDC on the energy provisions of the DWDP, during their drafting stages. Meridian considers that these provisions need to reflect the importance of renewable electricity generation to New Zealand, and the need to protect the existing Waitaki Power Scheme.
10. 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 National Policy Statement for Renewable Electricity Generation 2011 (**NPSREG**) 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".

11. 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. Amongst the current Government's targets is the goal of phasing out the use of coal in electricity generation and to achieve 100% of electricity generated from renewable resources in 2030.
12. Section 75(3) of the Resource Management Act 1991 (**the Act**) requires that all district plans must give effect to a national policy statement. Accordingly, the DWDP must give effect to the NPSREG (amongst others).
13. As discussed previously, the objective of the NPSREG 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 NPSREG 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 NPSREG recognises the national significance of "*maintaining or increasing electricity generation capacity while avoiding, reducing or displacing greenhouse gas emissions*" and Policy 4 of the National Policy Statement for Freshwater Management 2020 requires that "*Freshwater is managed as part of New Zealand's integrated response to climate change*".
15. Accordingly, to give effect to the NPSREG, the DWDP must provide for the development, operation, maintenance and upgrading of new and existing renewable electricity generation activities. At the same time, decision makers must 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 NPSREG 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, 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 NPSREG 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. In addition to the NPSREG, 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.
19. Meridian considers that the best way to give effect to the NPSREG and have regard to sections 7(i) and 7(j) of the Act, is to have a separate chapter that contains all provisions that address the Waitaki Power Scheme activities. This allows for the necessary nuances that need to be provided to the Scheme (that differ to other activities) to be consistent with the NPSREG.
20. Meridian considers that the DWDP has gone along way to achieving this, however there are many inconsistencies and duplications in the DWDP that detract from achieving a stand-alone chapter for the Scheme. Meridian’s feedback seeks to address these concerns.

PART THREE: RELIEF SOUGHT

21. Based on the preceding context, Table 1 of this feedback sets out Meridian’s concerns with specific provisions in the DWDP, and the relief sought to address these concerns. With this, Meridian accepts that consequential amendments to DWDP may be needed to give full effect to their feedback, and seeks that such amendments are made where necessary.
22. In addition to the matters set out in Table 1, Meridian has worked closely with WDC, and will continue to do so, to ensure that the maps and Overlay boundaries related to the WPS core sites and operating easements, and the WPS hydroelectricity inundation hazard areas and high hazard areas are correct.
23. With this, Meridian recommends the following changes to the titles of Overlays related to the WPS. These changes improve clarity and understanding of the Overlay content.

Overlay titles in the DWDP	Amendments requested by meridian
Waitaki Power Scheme Core Sites	No changes requested
Waitaki Power Scheme Operating Easements	No changes requested
Hydroelectricity Inundation High Hazard Areas	<u>Waitaki Power Scheme</u> Hydroelectricity Inundation High Hazard Areas
Hydroelectricity Inundation Hazard Areas	<u>Waitaki Power Scheme</u> Hydroelectricity Inundation Hazard Areas

24. With respect to the Historic Heritage Item Overlay and SCHED2, Meridian requests that any references to sites or structures that are part of the WPS core sites, operating easements and existing footprint be removed from the overlays and schedule. Meridian has previously discussed with WDC options for managing historic values related to WPS sites or assets outside of the DWDP. Meridian continues to request that alternative options are adopted.

TABLE 1: SPECIFIC FEEDBACK

PROVISION OF DWDP	SUPPORT / OPPOSE	REASONS	RELIEF SOUGHT
HOW THE PLAN WORKS, GENERAL APPROACH			
<p>General Approach, Hydroelectricity Inundation Hazard Areas page 8</p>	<p>Support in part</p>	<p>Meridian supports locating objectives, policies and rules relating to Hydroelectricity Inundation Hazard Areas in the Part B of the Energy chapter. However, Meridian notes the reference to <i>Hydroelectricity Inundation Hazard Areas</i> in the General Approach chapter is not complete and fails to correctly refer to the correct provisions. On this basis Meridian seeks amendments to the General Approach, Hydroelectricity Inundation Hazard Areas.</p>	<p>Amend the <i>General Approach, Hydroelectricity Inundation Hazard Areas</i> as follows: <i>Hydroelectricity Inundation Hazard Areas: Occupied buildings in the Hydroelectricity Inundation Hazard Areas are subject to <u>ENG(WPS)-O3, ENG(WPS)-P6 and ENG(WPS)-R2 in Part B of the Energy chapter</u> Rule WPS-R2 in the Waitaki Power Scheme Chapter, in addition to any zone rules.</i></p>
<p>General Approach, Renewable energy page 9</p>	<p>Oppose in part</p>	<p>The DWDP, at <i>Part 1, Introduction and General Provisions, How the Plan Works, General Approach, Guidance notes</i> (page 9), states that “<i>Renewable energy infrastructure activities are only subject to the objectives, policies, rules and standards in the Renewable Energy Chapter and the Strategic Direction objectives</i>”. Meridian generally supports this approach, but considers the statement is not sufficiently clear since there is no chapter titled <i>Renewable Energy</i>, there is no definition of <i>renewable energy infrastructure</i>, and the term “<i>Renewable energy infrastructure activities</i>” is only used once in the DWDP and that is in the guidance note itself on page 9 of DWDP.</p>	<p>Delete the guidance note on page 9 that addresses renewable energy provisions, and replace it with the following: <u><i>Renewable energy generation activities, other than Waitaki Power Scheme Activities, are only subject to the objectives, policies, rules and standards in Part A of the Energy Chapter, that is Part A: General Energy (ENG), and to the objectives in the Strategic Direction chapter.</i></u> <u><i>Waitaki Power Scheme activities are only subject to the objectives, policies, rules and standards in Part B of the Energy Chapter, that is Part B: Waitaki Power Scheme (ENG(WPS)), and to the objectives in the Strategic Direction chapter.</i></u></p>

		<p>The relevant DWDP chapter is the “Energy” chapter, and this helpfully consists of <i>Part A: General Energy (ENG)</i>, and <i>Part B: Waitaki Power Scheme (ENG(WPS))</i>. Meridian requests that the guidance note referring to <i>Renewable energy</i> be replaced with a guidance note that clarifies:</p> <ul style="list-style-type: none"> a) the relationship of the General Energy provisions with the rest of the plan, and b) the relationship of the WPS provisions with the General Energy provisions and with the rest of the plan. 	
<p>New General Approach, Reverse sensitivity effects on the Waitaki Power Scheme</p>	<p>NA</p>	<p>Meridian supports inserting an objective and policy of avoiding, remedying or mitigating reverse sensitivity effects on the Waitaki Power Scheme in Part B of the Energy chapter. Similar to the policy on Hydroelectricity Inundation Hazard Areas, Meridian considers that the <i>General Approach</i> should direct users of the plan to Part B of the Energy chapter to find this policy.</p>	<p>Add a new guidance note as follows: <u><i>Activities that have the potential to result in reverse sensitivity effects on the Waitaki Power Scheme are subject to ENG-O1, ENG-P3, ENG(WPS)-O1(b) and ENG(WPS)-P7 in the Energy chapter, in addition to any zone rules.</i></u></p>
<p>Cross Boundary Matters</p>	<p>Support</p>	<p>Meridian supports inclusion of the fourth paragraph on page 15 which reads: <i>Notable cross boundary issues for Waitaki include ongoing mining activity at Macraes that involve Dunedin City and Otago Regional Council. Unique to the Waitaki, Waimate and Mackenzie Districts is the management of the Waitaki hydro lakes and their margins.</i></p>	<p>Retain the fourth paragraph of the Cross Boundary Matters on page 15</p>

DEFINITIONS			
Investigation activities	Support	Meridian supports the definition of <i>Investigation activities</i> and requests that it be retained.	Retain the definition of <i>Investigation activities</i> , as drafted.
Large scale renewable electricity generation activities	Support in part	Meridian generally supports the definitions of <i>Large scale renewable electricity generation activities</i> , however parts of it are unclear.	Amend the definition as follows: <i>Large scale renewable electricity generation activities</i> <i>means <u>renewable electricity generation activities, including the land, buildings, substations, turbines, structures, underground cabling earthworks, access tracks and roads,</u> associated with the generation of electricity from a renewable energy source and the operation of the renewable energy generation activity generated for the purpose of exporting electricity directly into the distribution or transmission network. It does not include small scale renewable <u>electricity energy</u> generation activities.</i>
New definition for <i>Minimise</i>	NA	The term “ <i>minimise adverse effects</i> ” is used extensively throughout the DWDP, however it is not defined in the DWDP. Further to this, some policies and rules in the DWDP require that where adverse effects cannot be minimised then certain activities must be avoided. To provide greater clarity (and therefore certainty) to the plan, Meridian requests that a definition for minimise be added to the DWDP.	Insert new definition as follows: <i>Minimise</i> <i>means to reduce to the smallest amount reasonably practicable.</i>
Regionally significant infrastructure	Oppose in part	Meridian is concerned that, as drafted, the national significance of the Waitaki Power Scheme is lost, and it reads as if the Scheme is only of regional significance.	Amend the definition of <i>Regionally significant infrastructure</i> as follows: is:

			<ol style="list-style-type: none"> 1. <i>strategic land transport network and arterial roads;</i> 2. <i>telecommunication facilities;</i> 3. <i>national, regional and local renewable electricity generation activities of any scale, including the <u>nationally significant</u> Waitaki Power Scheme;</i> 4. <i>the electricity transmission network;</i>
<p>New definition for <i>Renewable energy generation</i></p>	<p>NA</p>	<p><i>Part A: General Energy (ENG), Introduction</i> refers to both “renewable energy activities” and “renewable electricity generation activities”. While the DWDP provides definitions for “renewable electricity generation” and “renewable electricity generation activities”, it does not provide definitions for “renewable energy” and “renewable energy generation activities”. Further to this, these terms are not used consistently, and there are places where reference is made to “renewable energy generation activities” where it should read “renewable electricity generation activities” (for example in the last line of the definition for “Large scale renewable electricity generation activities”).</p> <p>With respect to a definition for <i>renewable energy generation</i>, renewable energy is energy that is generated from natural processes that are continuously replenished. This includes sunlight, wind, water, geothermal heat, biomass, tides, waves, and ocean current. This energy cannot be exhausted and is constantly renewed.</p> <p>Renewable electricity is a subset of renewable energy, and refers specifically to the electricity that comes from renewable sources, and is used to power, for example,</p>	<p>Insert new definition as follows:</p> <p><u>Renewable energy generation</u> <u>means the generation of energy from natural processes that are continuously replenished. This includes sunlight, wind, water, geothermal heat, biomass, tides, waves, and ocean current. This energy cannot be exhausted and is constantly renewed. Renewable electricity is a subset of renewable energy, and refers specifically to the electricity that comes from renewable sources.</u></p>

		<p>homes, businesses and vehicles. Other types of renewable energy can provide fuel for transportation (e.g., biofuels) or heating and cooling for buildings (e.g., geothermal), however, most renewable energy is used to make electricity.</p> <p>On this basis, Meridian requests that a new definition for “renewable energy generation” be inserted into the Definitions chapter.</p>	
Small scale renewable electricity generation activities	Support in part	<p>Meridian generally supports the definitions of <i>Small scale renewable electricity generation activities</i>, however parts of it are unclear.</p>	<p>Amend the definition as follows:</p> <p><i>Small scale renewable electricity generation activities</i> means renewable electricity generation activities for the purpose of system and equipment that generates electricity from renewable sources for the purpose of using or generating the electricity on a particular site (single household, business premise or network utility) or supplying an immediate community, with or without exporting surplus electricity generated back into the distribution network, includes generation using solar, wind, hydro and biomass energy resource.</p>
Waitaki Power Scheme	Support in part	<p>Meridian supports this definition but considers that it is important to acknowledge that the WPS is a nationally significant renewable electricity generation activity.</p> <p>Further to this, Meridian considers ownership of the WPS needs to be referred to, otherwise the definition includes any generation of electricity from water in the Waitaki River Catchment and is not limited to the Scheme itself.</p>	<p>Amend the definition of <i>Waitaki Power Scheme</i> as follows:</p> <p><i>Waitaki Power Scheme</i> means the <u>nationally significant renewable electricity generation activities, owned or undertaken by the owner of the Waitaki Power Scheme, in the Waitaki River Catchment including the</u> 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</p>

			<p><i>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 scheme core sites and scheme operating easements.</i></p>
Waitaki Power Scheme Core Sites	Support in part	Meridian supports this definition but considers that it should refer to the core sites being owned by the Scheme	<p>Amend the definition of <i>Waitaki Power Scheme Core Sites</i> as follows:</p> <p><i>Waitaki Power Scheme Core Sites</i></p> <p><i>means land <u>that is owned by the owner of the Waitaki Power Scheme and that</u> is managed for hydro generation purposes associated with the Waitaki Power Scheme</i></p>
Waitaki Power Scheme Operating Easements	Support in part	Meridian supports this definition but considers that it should be future-proofed by referring to the Scheme owner and not specifically referring to Meridian Energy Limited.	<p>Amend the definition of <i>Waitaki Power Scheme Operating Easements</i> as follows:</p> <p><i>means land Meridian Energy that the owner of the Waitaki Power Scheme has registered operating easements_s 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>

Waitaki Power Scheme Existing Footprint	Support	Meridian supports this definition as drafted.	Retain the definition of <i>Waitaki Power Scheme Existing Footprint</i> as drafted.
Waitaki Power Scheme Maintenance	Support in part	Meridian supports this definition, but considers that the last sentence is not necessary as maintenance of these assets are covered by the first sentence in the definition.	Amend the definition of <i>Waitaki Power Scheme Maintenance</i> as follows: <i>Waitaki Power Scheme Maintenance</i> <i>means undertaking work and activities, including erosion control works, necessary to keep the Waitaki Power Scheme operating at an efficient and safe level. Maintenance also includes machinery, buildings, plant, structures, facilities, works, networks or components.</i>
Waitaki Power Scheme Refurbishment	Support in part	Meridian supports this definition, but considers that the last sentence is not necessary given the clarity of the associated definitions.	Amend the definition of <i>Waitaki Power Scheme Refurbishment</i> as follows: <i>Waitaki Power Scheme Refurbishment</i> <i>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. It does not include maintenance or enhancement</i>
STRATEGIC DIRECTION			
SD-RREE-O4 Renewable energy	Support in part	While Meridian partially supports this objective, Meridian is also concerned that SD-RREE-O4 does not go far enough in terms of providing for WPS activities, and ensuring consistency with the NPSREG. Meridian considers that this replacement objective (in the 'relief sought' cell) better gives effect to the NPSREG and	Delete SD-RREE-O4 and replace it with the following: <i><u>SD-RREE-O4 Renewable energy</u></i> <i><u>The national and local benefits of renewable energy are recognised, including its contribution to displacing greenhouse gas emissions and associated climate</u></i>

		provides direction to the strategic goal of the District becoming 'fuelled' from renewable energy sources. Further, the reference to <i>energy conservation</i> is not needed as efficient use of energy is addressed in SD-RREE-O3.	<u><i>change; a resilient supply of renewable energy, including renewable electricity, is available nationally and locally; and there is a greater uptake of such energy within the District.</i></u>
ENERGY, PART A: GENERAL ENERGY			
introduction	Support in part	Meridian considers that a clear issues or opportunities statement helps provide focus to the drafting of objectives, policies and rules; and helps users of the plan to understand the context behind such provisions. The Introduction to Part A: General Energy (page 98) in the DWDP helpfully introduces some of the benefits of renewable energy, the links to section 7 of the Resource Management Act and the NPSREG, and the types of sources of renewable energy. However, the Introduction lacks a clear connection to the fundamentally important role that renewable electricity generation plays in reducing greenhouse gas emissions and the adverse effects of associated climate change.	<p>Amend the Introduction as follows:</p> <p><u><i>Part A of the Energy chapter This chapter contains district-wide provisions relating to energy activities, specifically, renewable energy activities and renewable electricity generation activities. The objectives, policies and rules specifically addressing the nationally significant Waitaki Power Scheme activities are is addressed located in Part B of this chapter.</i></u></p> <p><u><i>New Zealand's energy demand is growing and is forecast to keep growing. At the same time, the effects of greenhouse gas induced climate change are becoming increasingly evident. These effects are challenging urban and rural communities, and they can adversely impact biological systems. Renewable energy plays a vital role in reducing greenhouse gas emissions, and meeting the growing demand for 'clean' electricity in New Zealand.</i></u></p> <p><u><i>Renewable energy is energy that is generated from natural processes that are continuously replenished. This includes sunlight, wind, water, geothermal heat, biomass, tides, waves, and ocean current. This energy cannot be exhausted and is constantly renewed.</i></u></p> <p><u><i>Renewable electricity is a subset of renewable energy, and refers specifically to the electricity that comes from</i></u></p>

			<p><u>renewable sources, and is used to power, for example, homes, businesses and vehicles. Other types of renewable energy can provide fuel for transportation (e.g., biofuels) or heating and cooling for buildings (e.g., geothermal), however, most renewable energy is used to make electricity.</u></p> <p><u>Section 7 of the Act requires that all persons exercising functions and powers under the Act have particular regard to the efficient use and development of natural and physical resources and the benefits to be derived from the use and development of renewable energy.</u></p> <p><u>More specifically, the national significance of renewable electricity generation is recognised in the National Policy Statement for Renewable Electricity Generation 2011 and in the National Policy Statement for Freshwater 2020. Together these statements establish a national policy framework that provides for renewable electricity generation activities and sets out the matters that must be recognised or provided for, or had particular regard to, when making decisions on renewable electricity generation activities.</u></p> <p><u>The District Plan must give effect to the National Policy Statement on Renewable Electricity Generation 2011. In doing so, the District Plan must The use and development of renewable energy also provides benefits to the District and can deliver clean, secure, affordable energy. It is important to recognise the benefits that <u>renewable electricity energy related activities can</u> provide our communities while <u>at the same time</u> ensuring that <u>their associated</u> adverse effects are <u>avoided, remedied or mitigated appropriately managed.</u></u></p>
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			<p>Energy efficiency and 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 on Renewable Electricity Generation 2011 which requires recognition of the benefits of renewable electricity generation.</p> <p>The types <u>Examples</u> of renewable energy sources <u>that are</u> relevant to this District are solar, biomass, hydro and wind. At a domestic scale, there are various ways to use natural sources of energy, including solar water heating or solar panels and small wind turbines. In addition, emerging technologies for other sources of energy, such as hydrogen, offer potential for a transition to a low-emission economy.</p>
ENG-O1 ENG-O2 ENG-O3	Oppose in part	<p>Meridian generally supports ENG-O1, however Meridian notes that the content of the objective does not match the title of the objective, and the objective is not consistent with Policy A of the NPSREG.</p> <p>Meridian does not support ENG-O2 and ENG-O3 as they are not consistent with Policy C2 of the NPSREG. ENG-O2 refers to the potential effects of renewable electricity generation activities being minimised, and ENG-O3 refers to the Overlays being protected. Both objectives can unnecessarily constrain renewable electricity generation activities as they do not reflect the nature and scale of effect that is to be minimised or that is to be avoided so that the Overlay is protected.</p>	<p>Delete ENG-O1 and ENG-O2 and ENG-O3, and replace them with the following:</p> <p><u>ENG-O1 Renewable Electricity Generation Activities</u></p> <p><u>Renewable electricity generation activities are:</u></p> <ol style="list-style-type: none"> <u>1. recognised for their local, regional and national benefits, including reducing greenhouse gas emissions;</u> <u>2. provided for, including their operation, maintenance, refurbishment and enhancement;</u> <u>3. protected from reverse sensitivity effects; and</u> <u>4. managed to minimise its environmental effects and when considering any significant residual environmental effects that cannot be avoided,</u>

			<u>remedied or mitigated, regard is had to offsetting measures or environmental compensation.</u>
ENG-P1	Support in part	Meridian generally supports this policy. However, Meridian considers that the policy can be made clearer.	<p>Amend ENG-P1 as follows:</p> <p><u>ENG-P1 Recognising the benefits of renewable electricity generation activities</u></p> <p><i>Recognise the local, regional and national benefits of renewable <u>energy electricity</u> generation activities, including:</i></p> <ol style="list-style-type: none"> 1. <i>the contribution to central government <u>renewable electricity energy policy policies</u>, objectives and <u>renewable energy</u> targets; and</i> 2. <i>the contribution the proposal will make to the security of <u>electricity</u> supply and increased energy <u>interdependence independence</u> for the district and region; and</i> 3. <i>the contribution to economic benefits for the regional and local economy; and</i> 4. <i>any other positive benefits.</i>
ENG-P2	Support in part	ENG-P2 addresses existing renewable electricity generation activities. Meridian considers that to be consistent with the NPSREG, the policy should be extended to include enabling of the operation and refurbishment of such activities, providing for enhancement of such activities, and protecting existing capacity and output.	<p>Delete ENG-P2 and replace it with the following:</p> <p><u>ENG-P2 Existing activities</u></p> <p><u>For existing renewable electricity generation activities:</u></p> <ol style="list-style-type: none"> 1. <u>the generation capacity and output are protected by enabling the operation, maintenance, and refurbishment of such activities,</u>

			<p><u>2. the enhancement of such activities is provided for, and</u></p> <p><u>3. with respect to enhancement activities, when considering any significant residual environmental effects that cannot be avoided, remedied or mitigated, regard is had to offsetting measures or environmental compensation.</u></p>
ENG-P3	Support in part	Meridian does not support the reference in this policy to sensitive activities as these are defined in the DWDP and limited to residential activities, marae, hospital activities, healthcare activities, educational facilities, retirement villages, visitor accommodation activities, and places of worship. Meridian considers that there are other activities that can establish in close proximity to renewable electricity generation activities that can result in reverse sensitivity effects (e.g., restaurants and tourism activities).	<p>Delete ENG-P3 and replace it with the following:</p> <p><u>ENG-P3 Reverse sensitivity</u></p> <p><u>Activities that may result in reverse sensitivity effects on authorised renewable electricity generation activities are avoided.</u></p>
ENG-P4	Support in part	Meridian considers that the requirement to minimise adverse effects is not consistent with Policy C2 of the NPSREG.	<p><u>ENG-P4 Small scale renewable electricity generation activities and investigation activities in any zones</u></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, <u>in any zone</u>, where:</i></p> <p>1. <u><i>it is of a form, location and scale that minimises adverse effects on the environment unavoidable adverse effects can be remedied or mitigate, or</i></u></p>

			<p><u>significant residual adverse effects can be offset or compensated for; and</u></p> <p>2. <u>it is consistent sympathetic to with the anticipated amenity and character of the zone.</u></p>
ENG-P5 ENG-P7	Oppose in part	<p>With respect to ENG-P5, Meridian notes the following:</p> <p>a) The chapeaux to this policy reads “<i>Only allow...where:</i>”. This means that any activity that is not provided for in subparts 1. to 4. of the policy would be supported by a rule that prohibits the activity, or alternatively would lead a decision maker to have decline a resource consent application for the activity. Meridian considers that this is not consistent with the NPSREG.</p> <p>b) With respect to subpart 1. b), constraining the visibility of structures associated with the activity in adjoining public areas can be appropriate where it is a Historic Heritage Item that the structure is located on, but such a constraint is not necessarily needed when the structure is located on a <i>Site and Area of Significance to Māori</i>.</p> <p>c) With respect to subpart 2., this constraint is unnecessarily restrictive and fails to consider opportunities for remedying, mitigating offsetting and compensation that could advance notable tree values within the District to a greater degree than subpart 2. could achieve.</p> <p>d) With respect to subparts 3. and 4., these constraints are unnecessarily restrictive as they fail to make provision for considering compensation when</p>	<p>Delete ENG-P5 and ENG-P7 and replace them with the following:</p> <p><u>ENG-P5 Renewable electricity generation activities and investigation activities in overlays</u></p> <p><u>Provide for renewable electricity generation activities and investigation activities in any overlay, where:</u></p> <p>1. <u>the activity is sympathetic to the values identified for the site within SCHED2, SCHED4, SCHED5, SCHED6, SCHED7 and SCHED8;</u></p> <p>2. <u>significant adverse effects on the values identified for the site within SCHED2, SCHED4, SCHED5, SCHED6, SCHED7 and SCHED8 are avoided, remedied or mitigated and for any significant residual environmental effect that cannot be avoided, remedied or mitigated, the effect is adequately offset or compensated for; and</u></p> <p>3. <u>when avoiding, remedying, mitigating, offsetting or compensating for adverse effects of the activity, regard is had to ECO-P2, ECO-P3, ECO-P6, ECP-P7, CE-P4,</u></p>

		<p>residual environmental effects cannot be avoided, remedied or mitigated.</p> <p>With respect to Policy ENG-P7, Meridian considers that this policy is unclear and unnecessarily restrictive. In particular, it is not clear what is meant by “Restrict” and Meridian considers that the particular values that require ‘protection’ should be identified in the policy. On this basis, Meridian requests that Policy ENG-P7 be deleted, and that ENG-P5 be amended to include provision for large scale renewable electricity generation activities.</p>	<p><u><i>NH-P4, NH-P6 and the Strategic Objectives of this plan.</i></u></p>
ENG-P6	Oppose in part	<p>Meridian considers that it is unnecessarily restrictive to require that adverse effects on adjacent overlays are avoided as such an approach is not consistent with the NPSREG. Meridian also considers that the policy as drafted is unclear in some parts and recommends relief to address this.</p>	<p>Amend ENG-P6 as follows:</p> <p><i>ENG-P6 Large scale renewable electricity generation activities in zones</i></p> <p><i>Provide for large scale renewable electricity generation activities in the General Rural Zone where they can demonstrate that:</i></p> <ol style="list-style-type: none"> 1. they have <u><i>there is</i></u> a particular operational or functional need to locate <u><i>the activity</i></u> where the renewable energy resources are available; 2. there is sufficient roading and infrastructure capacity <u><i>available or proposed as part of the activity</i></u> to accommodate the activity; 3. they avoid any adverse effects on <u><i>the values of an any adjacent overlay, or the following values, are avoided, remedied or mitigated and when considering any significant residual environmental effects</i></u>

			<p><i><u>that cannot be avoided, remedied or mitigated, regard is had to offsetting measures or environmental compensation;</u></i></p> <p>4. they minimise any adverse effects on:</p> <p>a) <i>the amenity values of the site and surrounding area, having regard to:</i></p> <ul style="list-style-type: none"> i. <i>the scale, intensity, duration or frequency of the activity's effects;</i> ii. <i>the size and shading of any structures;</i> iii. <i>the design and site layout of the activity and its ability to internalise effects, including any glare, reflection or blade or shadow flicker; and</i> iv. <i>traffic generation, earthworks and construction effects, and lighting and the potential to cause sleep disturbance or annoyance; and</i> <p>b) <i>ecology, including effects on terrestrial ecology and avifauna; having regard to any offsetting measures or environmental compensation which may benefit</i></p>
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			<p>the local environment and community affected; and</p> <p>c) any existing navigation, electricity distribution and transmission and telecommunication facilities;</p> <p>5. they the activity is are separated from sensitive activities at a distance that ensures conflict between activities, including potential adverse reverse sensitivity effects, is minimised;</p> <p>6. in respect of a wind farm, it complies with NZS6806:2010 Acoustics – Wind Farm Noise</p>
ENG-P8	Oppose	Meridian considers that this policy is not needed, since existing and new technologies are adequately provided for through amended policies ENG-P1 to ENG-P6. On this basis Meridian requests that Policy ENG-P8 be deleted	Delete ENG-P8
ENG-P9	Oppose	Meridian considers that provided the preceding requested changes are adopted, then ENG-P9 is not needed and should be deleted	Provided the preceding requested changes are adopted, delete ENG-P9
ENG-P10	Oppose in part	Meridian considers that requiring removal of all equipment, concrete surfacing steel and cables is unnecessary and that there is the potential for their reuse on the site for a new purpose post the generation of electricity.	<p>Amend ENG-P10 as follows:</p> <p>ENG-P10 - Decommissioning of renewable electricity generation activities</p> <p>Require that, during or following decommissioning of any renewable electricity generation activity, all renewable electricity generation structures are remediated, including, but not limited to, the removal <u>or reuse</u> of all</p>

			<i>surface equipment, all concrete surfacing, steel and cables.</i>
Rules, Note on page 103	Oppose	This note contradicts <i>Part 1, Introduction and General Provisions, How the Plan Works, General Approach, Guidance notes</i> (page 9), which states that “ <i>Renewable energy infrastructure activities are only subject to the objectives, policies, rules and standards in the Renewable Energy Chapter and the Strategic Direction objectives</i> ”. Meridian supports a ‘one-stop-shop’ approach to Part A of the Energy chapter, where all objectives, policies and rules that apply to renewable electricity generation activities, other than those that apply to the WPS, are identified within that chapter. The ENG chapter should explicitly address all renewable electricity generation activities, and avoid the potential for provisions in other parts of the DWDP to unintentionally restrict such activities. For these reasons, Meridian requests that the “ <i>Note</i> ” that is inserted before ENG-R1 is deleted.	Delete the <i>Note</i> (under the heading <i>Rules</i>) on page 103.
ENG-R1	Support in part	Meridian supports the permitted activity status for the maintenance of renewable electricity generation activities in any zone but outside of a Significant Natural Area. Meridian considers that this rule should be extended to include the operation and refurbishment of existing renewable electricity generation activities.	Amend ENG-R1 as follows: <i>ENG-R1 The <u>operation, maintenance and refurbishment</u> of existing renewable electricity generation activities outside of Significant Natural Areas</i> <i>All zones</i> <i>Activity status: Permitted</i> <i>Activity status when compliance is not achieved: Not applicable.</i>
ENG-R2	Support in part	Meridian supports the permitted activity status for the maintenance of renewable electricity generation	Amend ENG-R2 as follows: <i>ENG-R2</i>

		<p>activities within a Significant Natural Area in any zone. Meridian considers that this rule should be extended to include the operation and refurbishment of existing renewable electricity generation activities. Meridian also considers that when PER-1 cannot be complied with, then the activity status should become controlled (not restricted discretionary) and the matters of control should be limited to the matters of control of any infringed standard.</p>	<p><i>The <u>operation, maintenance and refurbishment</u> of existing renewable electricity generation activities within Significant Natural Areas</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>When it is located within an area identified in SCHED6 - Significant Natural Areas and ENG-S6 is complied with.</i></p> <p><i>Activity status when compliance is not achieved:</i> <i><u>Restricted Discretionary Controlled</u></i></p> <p><i>Where:</i></p> <p><i><u>RDISCON-1</u></i></p> <p><i>Compliance is not achieved with PER-1</i></p> <p><i>Matters of <u>discretion control</u> are restricted to:</i></p> <p><i>1. the matters of <u>discretion control</u> of any infringed standard.</i></p>
ENG-R3	NA	<p>Meridian provides no feedback as this rule addresses small scale renewable electricity generation activities and Meridian does not have an interest in such activities.</p>	NA
ENG-R4	Support in part	<p>Meridian supports the permitted activity status for investigation activities outside of an overlay. However, Meridian considers that when PER-1 cannot be complied with, then the activity status should become controlled (not restricted discretionary) and the matters of control</p>	<p>Amend ENG-R4 as follows:</p> <p><i>ENG-R4</i></p> <p><i>Investigation activities outside of an overlay</i></p> <p><i>All zones</i></p>

		<p>should be limited to the matters of control of any infringed standard.</p>	<p>Activity status: Permitted</p> <p>Where:</p> <p>PER-1</p> <p>ENG-S5 and the earthworks and noise standards applying to the underlying zone are complied with.</p> <p>Activity status when compliance is not achieved: Restricted Discretionary Controlled</p> <p>Where:</p> <p>RDISCON-1</p> <p>Compliance is not achieved with PER-1</p> <p>Matters of discretion control are restricted to:</p> <p>1. the matters of discretion control of any infringed standard.</p>
ENG-R5	Support in part	<p>Meridian supports the restricted discretionary activity status for investigation activities in overlays excluding Notable Trees. However, Meridian considers that where RDIS-1 to RDIS-4 cannot be complied with, then the activity status should become discretionary (i.e., not non-complying). A discretionary activity status allows for the positive and adverse effects of the activity to be fully considered and for an appropriate decision to be made on whether a resource consent should be granted, or not, and on the conditions that should be applied to the activity.</p>	<p>Amend ENG-R5 as follows:</p> <p>ENG-R5</p> <p>Small scale renewable electricity generation activities and investigation activities in overlays, excluding Notable Trees</p> <p>All zones</p> <p>Activity status: Restricted Discretionary</p> <p>Where:</p> <p>RDIS-1</p> <p>The activity is located:</p> <p>1. on items identified in SCHED2 – Historic Heritage Items, on contributing buildings identified in</p>

			<p><i>SCHED3 – Character Contributing Buildings and Non-Contributing Buildings, or sites identified in SCHED5 - Sites and Areas of Significance to Māori; or</i></p> <p><i>2. within an area identified in SCHED7 - Outstanding Natural Features or SCHED8 – Outstanding Natural Landscapes; or</i></p> <p>RDIS-2</p> <p><i>The activity is located within an area identified in SCHED6 - Significant Natural Areas; and ENG-S6 is complied with; or</i></p> <p>RDIS-3</p> <p><i>The activity is located within a Natural Hazard Overlay or Coastal Natural Hazard Overlay; and</i></p> <p>RDIS-4</p> <p><i>Investigation activities comply with ENG-S5.</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 offset or compensation measures offered; and</i> <i>3. the location, size, colour and reflectivity any structure; and</i> <i>4. any adverse effects on the amenity of adjacent properties; and</i> <i>5. any health and safety effects, including noise; and</i> <i>6. any adverse effects on any identified protected item, feature or area; and</i>
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			<p>7. any adverse effects on the identified values and qualities of any feature, landscape or area; and</p> <p>8. for activities under RDIS-2, the matters of discretion for any infringed standard; and</p> <p>9. for activities under RDIS-4, the matters of discretion for any infringed standard.</p> <p>Activity status when compliance is not achieved: Non-Complying-Discretionary</p> <p>Where:</p> <p>RDIS-1</p> <p>Compliance is not achieved with RDIS-2 or RDIS-4.</p>
ENG-R6	Support in part	Meridian supports the restricted discretionary activity status for investigation activities in the root protection area of a Notable Tree. However, Meridian considers that when RDIS-1 and RDIS-2 cannot be complied with, then the activity status should be discretionary (i.e., not non-complying).	<p>Amend ENG-R6 as follows:</p> <p>ENG-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:</p> <p>RDIS-1</p> <p>The activity does not involve the removal of a Notable Tree; and</p> <p>RDIS-2</p> <p>Investigation activities comply with ENG-S5.</p> <p>Matters of discretion are restricted to:</p>

			<ol style="list-style-type: none"> 1. <i>the benefits arising; and any offset or compensation measures offered; and</i> 2. <i>any adverse effects on the Notable Tree; and</i> 3. <i>the location of the structure; and</i> 4. <i>for activities under RDIS-2, the matters of discretion for any infringed standard.</i> <p>Activity status when compliance is not achieved: Non-Complying-Discretionary</p> <p>Where: RDIS-1</p> <p><i>Compliance is not achieved with RDIS-1</i></p>
ENG-R7	Support in part	<p>Meridian considers that this rule should not only provide for large scale renewable electricity generation activities in the General Rural Zone, but also provide for such activities in the Open Space Zone. Further to this, Meridian considers that the activity status of such activities should be Restricted Discretionary (i.e., not discretionary).</p> <p>Meridian does not agree with inclusion of DIS-2. Rather Meridian supports a restricted discretionary activity consenting route for large scale renewable electricity generation activities, and allowing the activity to be assessed against the relevant policies and conditions imposed to manage potential adverse effects on overlay values. On this basis, Meridian considers that DIS-2 should be deleted and the matters of discretion address effects on the values of overlays.</p>	<p>Amend ENG-R7 as follows:</p> <p>ENG-R7</p> <p><i>Large scale renewable electricity generation activities</i></p> <p><i>General Rural Zone, <u>Open Space Zone</u></i></p> <p>Activity status: <u>Restricted</u> Discretionary</p> <p>Where: <u>RDIS-1</u></p> <p><i>NZS6808:2010 Acoustics – Wind farm noise is complied with for any proposal involving wind generation; and</i></p> <p>DIS-2</p> <p><i>The activity is not located within an overlay.</i></p> <p><u>Matters of discretion are restricted to:</u></p>

			<p><u>1. the benefits arising; and any offset or compensation measures offered; and</u></p> <p><u>2. any adverse effects on associated overlay values</u></p> <p>Activity status when compliance is not achieved: Non-Complying-Discretionary</p> <p>Where:</p> <p>NGDIS-1</p> <p>Compliance is not achieved with RDIS-1</p> <p>All other zones</p> <p>Activity status: Non-Complying</p> <p>Activity status when compliance is not achieved: Not Applicable</p>
ENG-R8	Support in part	Meridian supports the discretionary activity status for <i>Other renewable electricity generation activities not otherwise provided for</i> . However, Meridian does not support DIS-1 or the non-complying status that applies if DIS-1 cannot be complied with. Rather Meridian supports providing a discretionary activity route for renewable electricity generation activities that are not otherwise for in the DWDP, and allowing the activity to be assessed against the relevant policies and conditions imposed to manage potential adverse effects on overlay values	<p>Amend ENG-R8 as follows:</p> <p>ENG-R8</p> <p><i>Other renewable electricity generation activities not otherwise provided for</i></p> <p>All zones</p> <p>Activity status: Discretionary</p> <p>Where:</p> <p>DIS-1</p> <p>The activity is not located within an overlay.</p> <p>Activity status when compliance is not achieved: Non-Complying-Not applicable</p> <p>Where:</p>

			<p>NC-1</p> <p><i>Compliance is not achieved with DIS-1</i></p>
New rule	NA	<p>Meridian respects that there are prohibited activities in the DWDP that should equally apply to the Energy chapter. On this basis, Meridian requests that the Energy Chapter state that the following rules must be complied with:</p> <p>SASM-R15, ECO-R6, ECO-R7, NATC-R5, and NFL-R15</p>	<p>Add a new rule that states that the following rules must be complied with:</p> <p>SASM-R15, ECO-R6, ECO-R7, NATC-R5, and NFL-R15</p>
ENG-S1 ENG-S2 ENG-S3 ENG-S4	NA	<p>Meridian provides no feedback on ENG-S1, ENG-S2, ENG-S3 and ENG-S4, as these standards address <i>small scale renewable electricity generation activities</i> and Meridian does not have an interest in such activities.</p>	NA
ENG-S5	Support	Meridian supports this standard	Retain ENG-S5 as drafted.
ENG-S6	Support in part	<p>Meridian considers that this standard needs to address the operation, maintenance and refurbishment of renewable electricity generation activities.</p> <p>Meridian considers that the 2m limit, either side of the existing renewable electricity generation activity, or associated access track or fence, is too small to be of practical value to the renewable electricity generation activity. Meridian considers that a 10m limit is more appropriate given the national significance of renewable electricity generation activities, and since these activities are required on an ongoing basis as indigenous vegetation can repopulate the 'buffer' area.</p>	<p>Amend ENG-S6 as follows:</p> <p>ENG-S6</p> <p><i>Trimming, pruning or removal of indigenous vegetation for the operation, maintenance and refurbishment of renewable electricity generation activities</i></p> <p><i>1. —It must be limited to within 2 10m either side of the existing renewable electricity generation activity, or associated access track or fence; and</i></p> <p><i>2. —it must not result in the removal of more than 20m² of indigenous vegetation, except where:</i></p>

		<p>Meridian considers that the reference to not resulting in the removal of more than 20m² of indigenous vegetation is unclear. For example, is this a contiguous area or total for the full activity but scattered over a large site. Further to this, given the 10m limit in part 1. of this standard, Meridian considers that part 2. Is not needed.</p>	<p><i>a) — it is located within the formation width of an existing road; or</i></p> <p><i>b) — the works are being undertaken in accordance with the Electricity (Hazards from Trees) Regulations 2003</i></p> <p>Matters of control or discretion are restricted to:</p> <ol style="list-style-type: none"> 1. any local, regional and national benefits; and 2. any offset or compensation measures offered; and 3. design and siting of the renewable electricity generation activities; and 4. any operational or functional needs of the renewable electricity generation activities; and 5. any topographical and other site constraints make compliance with the permitted standard impractical; and 6. the matters in ECO-P2; and 7. the matters in ECO-P3 (2)(a).
ENERGY, PART B: WAITAKI POWER SCHEME			
Introduction	Oppose in part	<p>As discussed previously, Meridian considers that a clear issues or opportunities statement helps provide focus to the drafting of objectives, policies and rules; and helps users of the plan understand the context behind such provisions. While the Introduction to Part B: Waitaki Power Scheme (page 112) generally introduces the WPS and refers to it as significant, no context or explanation is provided as to why it is significant. Further to this, the Introduction to Part A: General Energy (page 98) also</p>	<p>Amend the <i>Introduction</i> to Part B: Waitaki Power Scheme as follows:</p> <p><i>Part B <u>of the Energy chapter</u> addresses those parts of the nationally significant Waitaki Power Scheme <u>that are located in the Waitaki District.</u></i></p> <p><i><u>The Waitaki Power Scheme is the largest hydro-electric power scheme in New Zealand. The scheme consists of eight power stations, four canal systems and numerous</u></i></p>

		<p>lacks a connection to the fundamental role that renewable electricity generation plays in reducing greenhouse gas emissions and associated climate change.</p> <p>As Part B of the Energy chapter focuses on the WPS, the issues statement in Part B should be focused on the WPS only. In this regard, Meridian considers that a clearer explanation is needed of the national significance of the WPS and the need to enable existing WPS activities.</p> <p>As previously discussed, Meridian also considers that clarification should be provided in Part B that if/when conflict arises between the implementation of the ENG(WPS) objectives, policies and rules, and the objectives, policies and rules in other sections of this district plan, the ENG(WPS) objectives, policies and rules prevail.</p>	<p><u><i>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.</i></u></p> <p><u><i>The Scheme commences at Lake Tekapo and from Lake Ohau to Lake Waitaki, the Scheme lies within the Waitaki District.</i></u></p> <p><u><i>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 is connected to the South Island transmission network at the site of the Benmore Power Station, and it provides essential ancillary services to the electricity system.</i></u></p> <p><u><i>The national significance of the Waitaki Power Scheme is established in the National Policy Statements for Renewable Electricity Generation 2011 and for Freshwater 2020.</i></u></p> <p><i>The Waitaki Power Scheme is significant infrastructure, with local, regional and national benefits. The Waitaki Power Scheme was progressively constructed between 1928 and 1985. 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.</i></p> <p><i>This part of the Energy chapter addresses the ongoing Waitaki Power Scheme activities operation of the Scheme, the different activities that occur on site and</i></p>
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			<p><i>provides a framework for how any new development may occur.</i></p> <p><i>Due to its significance and importance to the country as a whole, this part of the chapter also addresses potential reverse sensitivity effects on the Waitaki Power Scheme that could constrain its ongoing operation and the potential risks associated with an inundation event from the Waitaki Power Scheme.</i></p> <p><u><i>Where conflict arises between the implementation of the ENG(WPS) objectives, policies and rules, and the objectives, policies and rules in other sections of this district plan, the ENG(WPS) objectives, policies and rules prevail.</i></u></p>
ENG(WPS)-O1, and ENG(WPS)-O2	Support in part	<p>Meridian is concerned that ENG(WPS) O1 and O2 are not sufficiently clear and do not fully give effect to Policies C2 and D of the NPSREG.</p> <p>Meridian is also concerned that ENG(WPS)-O2 aims to ‘protect’ and ‘not degrade’ the characteristics and values in certain overlays. These terms provide no room for less than minor effects on such values and characteristics, and do not give effect to Policy C2 of the NPSREG.</p> <p>On this basis, Meridian requests that ENG(WPS)O1 and ENG(WPS)-O2 be merged, made clearer, and include a component that protects the WPS from reverse sensitivity effects.</p>	<p>Delete ENG(WPS)-O1 and ENG(WPS)-O2 and replace them with the following:</p> <p><u><i>ENG(WPS)-O1 Waitaki Power Scheme</i></u></p> <p><u><i>The operation, maintenance and refurbishment of the Waitaki Power Scheme is enabled, its enhancement is provided for, and it is:</i></u></p> <ol style="list-style-type: none"> <u><i>1. recognised for its national, regional and local benefits, including reducing greenhouse gas emissions;</i></u> <u><i>2. protected from reverse sensitivity effects; and</i></u> <u><i>3. managed to minimise its environmental effects and when considering any significant residual environmental effects that cannot be avoided, remedied or mitigated, regard is had to offsetting measures or environmental compensation.</i></u>

ENG(WPS)-O3	Support in part	Meridian supports ENG(WPS)-O3, while noting that it will require renumbering as a consequence of Meridian's relief that merges ENG(WPS)-O1 and ENG(WPS)-O2).	Retain ENG(WPS)-O3.
ENG(WOS)-P1	Support in part	Meridian appreciates that ENG(WPS)-P1 reflects earlier feedback provided by Meridian to WDC. Meridian requests additional changes to further improve clarity of this policy.	<p>Amend NG(WPS)-P1 as follows:</p> <p><i>ENG(WPS)-P1 Recognising the importance and benefits of the Waitaki Power Scheme</i></p> <p><i>Recognise the importance of the Waitaki Power Scheme and its local, regional and national benefits, including <u>by recognising</u>:</i></p> <ol style="list-style-type: none"> <i>1. the need to provide for the operational, functional, locational and technical requirements of the Scheme; and</i> <i>2. the need to maintain and increase generation output and capacity and ensure security of supply; and</i> <i>3. the need for maximum electricity supply benefit to be obtained; and</i> <i>4. the need to ensure that the structural and operational integrity of the Scheme is not compromised; and</i> <i>5. its role in meeting national targets for renewable electricity generation; and</i> <i>6. its role in assisting <u>New Zealand's response with responding</u> to international climate change obligations.</i>
ENG(WPS)-P2	Support	Meridian supports ENG(WPS)-P2 and requests that it be retained.	Retain ENG(WPS)-P2 as drafted.

ENG(WPS)-P3	Support in part	<p>Meridian supports enabling the operation, maintenance, and refurbishment of the Scheme, and providing for enhancement of the Scheme.</p> <p>Meridian considers that the explicit references, in ENG(WPS)-P3 to ENG(WPS)-P5, to the Overlays, and maintaining values, avoiding adverse effects and remedying or mitigating effects, are unnecessarily restrictive for an existing nationally significant renewable electricity generation scheme and are not consistent with the policies within the NPSREG.</p> <p>On this basis, Meridian seeks the following changes to ENG(WPS) P3 to ENG(WPS)-P5.</p>	<p>Delete ENG(WPS)-P3 and replace it with the following:</p> <p><u>ENG(WPS)-P3 Protect generation capacity</u></p> <p><u>The generation capacity of the Waitaki Power Scheme is protected by enabling the operation, maintenance, and refurbishment of the Scheme while managing potential adverse effects of the Scheme in accordance with Policy ENG(WPS)-P6.</u></p>
ENG(WPS)-P4	Support in part	<p>For the same reasons as discussed with respect to WNG(WPS)-P3.</p>	<p>Delete ENG(WPS)-P4 and replace it with the following:</p> <p><u>ENG(WPS)-P4 Enhancement</u></p> <p><u>Provide for enhancement of the Waitaki Power Scheme while managing potential adverse effects of the Scheme in accordance with Policy ENG(WPS)-P6.</u></p>
ENG(WPS)-P5	Support in part	<p>For the same reasons as discussed with respect to WNG(WPS)-P3.</p>	<p>Delete ENG(WPS)-P5 and replace it with the following:</p> <p><u>ENG(WPS)-P5 New lake, water storage or power generation facility</u></p> <p><u>Provide for the creation of a new lake, or water storage area, or new power generation facilities where:</u></p> <ol style="list-style-type: none"> <u>1. there is a functional or operational need that means the location cannot be avoided; and</u> <u>2. the potential adverse effects of the activity are managed in accordance with Policy ENG(WPS)-P6.</u>

New policy	NA	For the same reasons as discussed with respect to WNG(WPS)-P3.	<p>Insert new ENG(WPS)-P6 as follows:</p> <p><u>ENG(WPS)-P6 Management of adverse effects</u></p> <p><u>Manage potential adverse effects of the Waitaki Power Scheme by having regard to:</u></p> <ol style="list-style-type: none"> <u>1. The need to locate the Scheme’s activities where the renewable energy resources are available and to connect the generation activities to the national grid or electricity sub-transmission infrastructure; and</u> <u>2. The degree to which unavoidable adverse effects can be remedied or mitigated, or significant residual adverse effects can be offset or compensated for.</u>
New policy	NA	Meridian requests insertion of a policy that protects the WPS from reverse sensitivity effects.	<p>Insert new ENG(WPS)-P7 as follows:</p> <p><u>ENG(WPS)-P7 Reverse sensitivity</u></p> <p><u>Reverse sensitivity effects on the Waitaki Power Scheme are avoided, remedied or mitigated.</u></p>
New Policy	NA	Meridian respects that policy ASW-P6 (which provides for the use of vessels on surface water that are associated with the operation, maintenance, refurbishment, enhancement, monitoring, upgrading and development of the Waitaki Power Scheme), be included in Part B of the Energy chapter.	<p>Insert new ENG(WPS)-P8 as follows:</p> <p><u>ENG(WPS)-P8 Providing for the use of vessels associated with the Waitaki Power Scheme on the surface of water</u></p> <p><u>Provide for the use of vessels on the surface of water associated with the operation, maintenance, refurbishment, enhancement, monitoring, upgrading and development of the Waitaki Power Scheme.</u></p>

ENG(WPS)-P6	Support	Meridian supports inclusion of ENG(WPS)-P6, but notes that it will need to be renumbered as ENG(WPS)-P9 as a consequence the preceding relief sought.	Retain ENG(WPS)-P6 as drafted and renumber it following acceptance of the previous relief sought.
Rules, Note on page 116	Oppose	<p>Meridian does not support the note that reads:</p> <p><i>“For certain activities, a resource consent may be required by rules in more than one chapter in the District Plan. Unless expressly stated otherwise by a rule, resource consent is required under each of those rules. The steps to determine the status of an activity are set out in the General Approach Chapter.”</i></p> <p>This note contradicts <i>Part 1, Introduction and General Provisions, How the Plan Works, General Approach, Guidance notes</i> (page 9), which states that <i>“Renewable energy infrastructure activities are only subject to the objectives, policies, rules and standards in the Renewable Energy Chapter and the Strategic Direction objectives”</i>.</p> <p>As discussed previously, Meridian considers that all objectives, policies and rules that apply to the WPS should be included in Part B of the Energy chapter, and that no further rules elsewhere in the plan should apply to the WPS.</p>	Delete the note under the heading <i>Rules</i> on page 116.
ENG(WPS)-R1	Support in part	<p>Meridian supports the operation, maintenance and refurbishment of the WPS in the General Rural and Open Space Zones being a permitted activity, provided certain conditions are met.</p> <p>PER-1: This condition requires compliance with ENG(WPS)-S1, and Meridian supports this.</p>	<p>Amend ENG(WPS)-R1 as follows:</p> <p>ENG(WPS)- R1</p> <p>Operation, maintenance and refurbishment of the Waitaki Power Scheme</p> <p>General Rural Zone, Open Space Zone</p> <p>Activity status: Permitted</p>

		<p>Where ENG(WPS)-S1 cannot be complied with, Meridian supports CON-1.</p> <p>PER-2: This condition limits the permitted status for refurbishment to only apply in the WPS Existing Footprint, Core Sites, and Operating Easements, and Meridian supports this. DIS-1 states that when this condition cannot be complied with, the activity is a discretionary activity. This scenario is not possible, since refurbishment is limited to upgrading, renewing or replacement of existing machinery, buildings etc. Therefore, it is not possible for refurbishment to occur outside of the WPS Existing Footprint, Core Sites, and Operating Easements.</p> <p>On this basis, Meridian requests that PER-2 and reference to PER-2 in DIS-1 be deleted.</p> <p>PER-3: This condition requires that INF-S13 and INF-s14 are complied with where the activity involves trimming, pruning and activities within the root protections area of a Notable Tree in SCHED4. Meridian does not support this condition since there are no Notable Trees identified within, or close to, the WPS Existing Footprint, Core Sites, and Operating Easements and as these areas are 'working environments' for nationally significant renewable electricity generation activities, new Notable Trees are unlikely to be identified in these areas in the future.</p> <p>On this basis, Meridian requests that PER-3 be deleted, and that NC-1 (which assigns a non-</p>	<p>Where:</p> <p>PER-1 ENG(WPS)-S1 is complied with; and</p> <p>PER-2 Any refurbishment activity is limited to the following areas: 1. the existing footprint of the Waitaki Power Scheme; or 2. Waitaki Power Scheme Core Sites; or 3. Waitaki Power Scheme Operating Easements; and</p> <p>PER-3 INF-S13 and INF-S14 are complied with where the activity involves trimming, pruning and activities within the root protection area of a Notable Tree in SCHED4 – Notable Trees; and</p> <p>PER-4 INF-S13 and INF-S14 are complied with where the activity is located in a natural hazard overlay; and</p> <p>PER-5 <u>For refurbishment activities only,</u> INF-S15 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</p> <p>PER-6</p>
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		<p>complying activity status to the removal of a Notable Tree) also be deleted.</p> <p>PER-4: This condition requires that INF-S13 and INF-s14 are complied with where the activity is located in a “<i>natural hazard overlay</i>”. Meridian does not support this condition since there is no “<i>natural hazard overlay</i>” listed in the list of Overlays (pages 19 and 20 of the DWDP), and there is no definition of “<i>natural hazard overlay</i>” provided in the DWDP. This leaves this condition unclear. If the term is intended to refer to a group of the Overlays in the list of Overlays (pages 19 and 20 of the DWDP), then the individual Overlay titles should be referred to, or the term “<i>natural hazard overlay</i>” should be defined. As it is not clear what Overlay(s) PER-4 is referring to, Meridian has not been able to check whether such Overlays apply to areas in the WPS Existing Footprint, Core Sites, and Operating Easements.</p> <p>On this basis, Meridian requests that the particular Overlays that PER-4 is to be applied to are specifically identified, and that if such Overlays are not present in areas of the WPS Existing Footprint, Core Sites, and Operating Easements, then Meridian requests that PER-4 be deleted and reference to PER-4 in DIS-1 also be deleted. This is the relief that Meridian has included in the Relief column.</p> <p>If the areas of the WPS Existing Footprint, Core Sites, and Operating Easements lie within the Overlays that are yet to be identified in PER-4, then PER-4 requires that INF-S13 and INF-S14 are</p>	<p><u>For refurbishment activities only</u>, INF-S16 is complied with where the activity is located within an area identified in SCHED7 – Outstanding Natural Features or SCHED8 – Outstanding Natural Landscapes; and</p> <p>PER-7</p> <p><u>For refurbishment activities only</u>, INF-S17 is complied with where the activity is located within an area identified in SCHED6 – Significant Natural Areas.</p> <p>Activity status when compliance is not achieved: Controlled</p> <p>Where:</p> <p>CON-1 Compliance is not achieved with PER-1, <u>PER-5, PER-6 and PER-7</u></p> <p>Matters of control are restricted to:</p> <ol style="list-style-type: none"> 1. the matters of control of any infringed standard. <p>Activity status when compliance is not achieved: Restricted Discretionary</p> <p>Where:</p> <p>RDIS-1</p> <p>Compliance is not achieved with PER-6 or PER-7</p> <p>Matters of discretion are restricted to:</p> <ol style="list-style-type: none"> 1. the matters of discretion of any infringed standard. <p>Activity status when compliance is not achieved: Discretionary</p> <p>Where: DIS-1</p>
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		<p>complied with. These standards relate to earthworks. The operation, maintenance and refurbishment of the WPS is limited to ensuring that the existing WPS operates at an efficient and safe level. Any associated earthworks would be fundamental to maintaining current generation capacity and to ensuring that maximum efficiency is gained from the current WPS activities. Therefore, Meridian considers that the discretionary activity status (DIS-1) when INF-S13 and/or INF-S14 cannot be complied with is overly restrictive and is not consistent with the NPSREG. Meridian also considers that Per-4 should be limited to addressing refurbishment activities only, since the operation and maintenance of the WPS is an existing and ongoing activity.</p> <p>Meridian requests that, if the areas of the WPS Existing Footprint, Core Sites, and Operating Easements lie within the Overlays that are yet to be identified in PER-4, and WPS refurbishment activities cannot comply with INF-S13 and INF-S14, then the WPS refurbishment activity becomes a controlled activity and the matters of control are restricted to the matters of discretion listed in INF-S13 and INF-S14. For completeness, this would mean that reference to PER-4 in DIS-1 is removed and PER-4 is added to CON-1.</p> <p>PER-5: This condition requires that INF-S15 be complied with where the activity is located on a <i>“Heritage Item, or within the setting of a Heritage Item identified in SCHED2”</i> or within <i>“an area in</i></p>	<p>Compliance is not achieved with PER-2, PER-4 or PER-5</p> <p>Activity Status where compliance is not achieved: Non-Complying</p> <p>Where:</p> <p>NC 1 Compliance is not achieved with PER-3 and the works involve the removal of a Notable Tree identified in SCHED4 – Notable Trees</p>
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		<p><i>SCHE5 – Sites and Areas of Significance to Māori</i>". INF-S15 requires that earthworks are limited to trenching less than 600mm in width directly above existing underground infrastructure, and directly adjacent to existing infrastructure located above ground. Where INF-S15 cannot be complied with, the operation, maintenance or refurbishment activity becomes a discretionary activity.</p> <p>Meridian considers that the discretionary activity status is unnecessarily restrictive and not consistent with the NPSREG, particularly since PER-5 extends beyond the <i>Heritage Item</i> itself to also including the <i>setting of the Heritage Item</i>. In some instances, the <i>setting</i> can be extensive and the potential effects that are being managed by INF-S15 are unlikely to occur beyond the immediacy of the <i>Heritage Item</i> or <i>Site or Area of Significance to Māori</i>.</p> <p>As the operation, maintenance and refurbishment of the WPS is limited to ensuring that the existing WPS operates at an efficient and safe level, any associated earthworks would be fundamental to maintaining current generation capacity and to ensuring that maximum efficiency is gained from the current WPS activities. With this, the potential effects being managed by INF-S15 are limited and known and, on this basis, can readily be addressed through the provisions of a controlled activity status.</p> <p>Meridian also considers that Per-5 should be limited to addressing refurbishment activities</p>	
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		<p>only, since the operation and maintenance of the WPS is an existing and ongoing activity.</p> <p>Based on the preceding assessment, Meridian requests that PER-5 only address WPS refurbishment activities, and that PER-5 be removed from DIS-1 and be added to CON-1.</p> <p>PER-6: This condition requires that INF-S16 be complied with where the activity is located in an Outstanding Natural Feature (SCHED7) or an Outstanding Natural Landscape (SCHED8). INF-S16 requires that certain constraints on earthworks are complied with. Where compliance with INF-S16 cannot be achieved, the activity is a restricted discretionary activity under RDIS-1.</p> <p>For the same reasons as previously discussed, Meridian considers that PER-6 and RDIS-1 are overly restrictive and not consistent with the NPSREG. On this basis, Meridian requests that PER-6 only address WPS refurbishment activities, and that PER-6 be removed from RDIS-1 and be added to CON-1.</p> <p>PER-7: This condition requires that INF-S17 be complied with where the activity is located in Significant Natural Area identified in SCHED6. INF-S17 requires that certain constraints on trimming, pruning or removal of indigenous vegetation and earthworks are complied with. Where compliance with INF-S17 cannot be achieved, the activity is a restricted discretionary activity under RDIS-1.</p>	
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		For the same reasons as previously discussed, Meridian considers that PER-7 and RDIS-1 are overly restrictive and not consistent with the NPSREG. On this basis, Meridian requests that PER-7 only address WPS refurbishment activities, and that PER-7 be removed from RDIS-1 and be added to CON-1.	
ENG(WPS)-R2	Support	Meridian supports inclusion of this rule in Part B of the Energy chapter.	Retain as drafted
New permitted rule	NA	Meridian requests that a new rule be inserted that permits the use of vessels for the operation, maintenance, refurbishment, enhancement, monitoring, upgrading and development of the Waitaki Power Scheme, and consequently that rule ASW-R4 be deleted.	<p>Insert new permitted rule as follows:</p> <p><u>ENG(WPS)-R?</u></p> <p><u>Use of vessels for the operation, maintenance, refurbishment, enhancement, monitoring, upgrading and development of the Waitaki Power Scheme</u></p> <p><u>All zones</u></p> <p><u>Activity status: Permitted</u></p> <p><u>Activity status when compliance is not achieved: Not applicable</u></p>
ENG(WPS)-R3	Support in part	<p>Meridian supports the controlled activity status where the activity is within the WPS Core Sites and Operating Easements. However, Meridian considers that activities within the Waitaki Power Scheme Existing Footprint should also be included in the controlled activity status. On this basis, Meridian requests that CON-1 be extended to include “3. Waitaki Power Scheme Existing Footprint”.</p> <p>Where CON-1 and CON-2 are not complied with, WPS enhancement activities become a discretionary activity (DIS-1). Meridian considers that a discretionary activity</p>	<p>Amend ENG(WPS)-R3 as follows:</p> <p>ENG(WPS)-R3</p> <p>Waitaki Power Scheme enhancement activity</p> <p>All zones</p> <p>Activity status: Controlled</p> <p>Where:</p>

		<p>status is unnecessarily restrictive and requests that this be changed to a restricted discretionary activity. With this, Meridian requests that the matters of discretion be limited to those listed as “<i>Matters of control</i>” in the DWDP for Rule ENG(WPS)-R3 and the values that are specific to the particular Overlay that may apply to the area of the enhancement works.</p>	<p><i>CON-1</i></p> <p><i>The works are located within the following areas:</i></p> <ol style="list-style-type: none"> 1. <i>Waitaki Power Scheme Core Sites; or</i> 2. <i>Waitaki Power Scheme Operating Easements; <u>or</u></i> 3. <i><u>Waitaki Power Scheme Existing Footprint; and</u></i> <p><i>CON-2</i></p> <p><i>The works are not located within an overlay.</i></p> <p><i>Matters of control are restricted to:</i></p> <ol style="list-style-type: none"> 1. <i>location, bulk, height, cladding or colour of the proposed activity; and</i> 2. <i>landscaping, revegetation and fencing; and</i> 3. <i>location and construction of vehicle access and exit points; and</i> 4. <i>vehicle manoeuvring and parking areas; and</i> 5. <i>effects on existing public access rights to margins of a waterbody; and</i> 6. <i>hours of operation; and</i> 7. <i>noise effects; and</i> 8. <i>lighting effects; and</i> 9. <i>dust effects; and</i> 10. <i>effects on indigenous vegetation and habitats of indigenous fauna and indigenous biodiversity.</i>
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			<p>Activity status when compliance is not achieved: <i>Restricted</i> Discretionary</p> <p>Where: RDIS-1</p> <p>Compliance is not achieved with CON-1 or CON-2</p> <p><i>Matters of discretion are restricted to:</i></p> <ol style="list-style-type: none"> 1. <u><i>The matters of control identified in ENG(WPS)-R3: and</i></u> 2. <u><i>The values that are specific to any Overlay within which the Waitaki Power Scheme enhancement activity is located.</i></u>
ENG(WPS)-R4 ENG(WPS)-R5 ENG(WPS)-R6	Support	Meridian supports ENG(WPS)-R4 to R6 inclusive.	Retain ENG(WPS)-R4 to R6 inclusive as drafted.
New rule	NA	Meridian respects that there are prohibited activities in the DWDP that should equally apply to the Energy chapter. On this basis, Meridian requests that the ENG(WPS) cChapter state that the following rules must be complied with: SASM-R15, ECO-R6, ECO-R7, NATC-R5, and NFL-R15	Add a new rule that states that the following rules must be complied with: SASM-R15, ECO-R6, ECO-R7, NATC-R5, and NFL-R15
ENG(WPS)-S1	Support in part	Meridian seeks an amendment to the phrase “ <i>existing footprint of the Waitaki Power Station</i> ”, to align it with the definition of “ <i>Waitaki Power Scheme Existing Footprint</i> ”.	Amend ENG(WPS)-S1 as follows: <i>Any construction activities must not exceed the noise levels set in NZS6803:1999 measured from the façade of any building that is not associated with the Waitaki Power Scheme and is not within:</i>

			<ol style="list-style-type: none"> 1. The existing footprint of the Waitaki Power Scheme <u>Existing Footprint</u>; or 2. Waitaki Power Scheme Core Sites; or 3. Waitaki Power Scheme Operating Easements.
INFRASTRUCTURE			
Introduction, fourth paragraph	Support in part	<p>The fourth paragraph in the Introduction of the Infrastructure chapter (page 123) that states:</p> <p><i>Infrastructure includes facilities for the generation of electricity. This would include renewable electricity generation facilities, where these facilities supply power to other people (i.e. community or large-scale activities). However, these activities are addressed separately under the Energy Chapter. Given the importance of the Waitaki Power Scheme locally, regionally, and nationally, this is addressed in the Energy Chapter – Part B: Waitaki Power Scheme.</i></p> <p>While Meridian generally supports the intent of this paragraph, Meridian considers that it could be clearer.</p>	<p>Delete the fourth paragraph in the Introduction and replace it as follows:</p> <p><i>Infrastructure includes facilities for the generation of electricity. This would include renewable electricity generation facilities, where these facilities supply power to other people (i.e. community or large-scale activities). However, these activities are addressed separately under the Energy Chapter. Given the importance of the Waitaki Power Scheme locally, regionally, and nationally, this is addressed in the Energy Chapter – Part B: Waitaki Power Scheme.</i></p> <p><u><i>While renewable energy generation activities may involve infrastructure, renewable energy generation activities are not subject to the provisions in the Infrastructure chapter, rather they are only subject to the objectives, policies, rules and standards in the Energy chapter, and to the objectives in the Strategic Direction chapter.</i></u></p>
Introduction, fifth paragraph	Oppose in part	<p>Meridian does not support the fifth paragraph in the introduction of the Infrastructure chapter (page 123) that states:</p> <p><i>Note: Unless specifically stated otherwise, only the objectives and policies in the Strategic Direction</i></p>	<p>Amend the fifth paragraph of the introduction as follows:</p> <p><i>Note: Unless specifically stated otherwise, only the objectives and policies in the Strategic Direction Chapter, Energy Chapter, Part B: Waitaki Power Scheme and this Infrastructure Chapter apply to infrastructure activities.</i></p>

		<p><i>Chapter, Energy Chapter, Part B: Waitaki Power Scheme and this Infrastructure Chapter apply to infrastructure activities.</i></p> <p>Meridian considers that all provisions that apply to renewable energy generation should be included in Part B of the Energy chapter, and that this note is not consistent with this approach.</p>	
<p>General interpretation of rules, second paragraph, page 134</p>	<p>Support in part</p>	<p>Meridian supports in part the second paragraph of the <i>General interpretation of rules</i> section on page 134, however Meridian considers that the relationship between the Infrastructure chapter and the Energy chapter could be made clearer, and Meridian seeks amendments on this basis.</p>	<p><i>Infrastructure activities are only subject to the objectives, policies, rules and standards in this chapter and the Strategic Direction objectives, unless: ...</i></p> <ul style="list-style-type: none"> • <i>the activity is a renewable <u>electricity energy generation activity, other than Waitaki Power Scheme Activities, in which case only the objectives, policies, rules and standards in Part A of the Energy Chapter, and the objectives in the Strategic Direction chapter, apply-addressed in the Energy Chapter</u>; or</i> • <i>the activity is associated with the nationally significant Waitaki Power Scheme <u>in which case only the objectives, policies, rules and standards in Part B of the Energy Chapter, and the objectives in the Strategic Direction chapter, apply-addressed in the Energy Chapter, Part B: Waitaki Power Scheme</u>; or</i> • <i>the activity is transport-related and addressed in the Transport Chapter; or</i> • <i>a rule specifically states otherwise.</i>

NATURAL FEATURES AND LANDSCAPES			
Introduction	Support	<p>Meridian supports inclusion of the first sentence of the introduction which reads:</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>Recognition of this is consistent with the Regional Policy Statement (at page 311) that recognises “<i>The Waitaki Hydro Electric Power Scheme with its long standing history and distinctive features, including lakes, dams and canals, forms part of this large-scale landscape. The hydro lakes including Lake Tekapo and Pukaki are subject to active management to facilitate hydro-electricity generation as part of the Waitaki Hydro Electric Power Scheme.</i>”</p>	Retain the first sentence of the Introduction as drafted.
ACTIVITIES ON THE SURFACE OF WATER			
Introduction	Support in part	<p>Meridian generally supports the fourth paragraph on page 358, however Meridian considers that it is not sufficiently consistent with the General Approach set out on page 9 of the plan. On this basis, Meridian seeks amendments to the paragraph.</p>	<p>Amend the fourth paragraph on page 358 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—renewable electricity generation, the activities on the surface of water provisions <u>plan</u> needs to allow for their continued safe, efficient and effective use. <u>All objectives, policies and rules that apply to the Waitaki</u></i></p>

			<i>Power Scheme are contained in Part B of the Energy chapter and in the Strategic Direction chapter.</i>
ASW-P1 ASW-P2 ASW-P3	Support	Meridian supports the 'protection' provided to the WPS in Policies ASW-P1, ASW-P2 and ASW-P3	Retain ASW-P1, ASW-P2 and ASW-P3 as drafted.
ASW-R4	Oppose	Meridian has previously requested that this Rule be inserted in Part B of the Energy chapter. On this basis ASW-R4 should be deleted.	Delete ASW-R4