

Proposed Natural Resources Plan:

Submitter:

**Meridian Energy Limited**

Submitter Number:

**S82**



# GWRC PROPOSED NATURAL RESOURCES PLAN FOR THE WELLINGTON REGION (JULY 2015):

## SUBMISSION POINTS OF MERIDIAN ENERGY LIMITED (MEL):

Page	Reference	Policy or Provision	MEL Submission Points & Reasons
<b>GENERAL COMMENTS</b>			
10	1.5.2 Issues	<p>The key natural resource management issues identified are:</p> <ul style="list-style-type: none"> <li>- Fresh water quality (urban + rural);</li> <li>- allocation and efficient use of water;</li> <li>- The state of the coastal environment;</li> <li>- the management of natural hazards,</li> </ul>	<p>MEL supports the statement of issues because it focuses on the core functions of the Council.</p> <p><b>Decision Requested:</b> Retain the list of key natural resource management issues identified for the region.</p>
<b>DEFINITIONS</b>			
23	Definition	<p><b>Functional need:</b> <i>When an activity is dependent on having its location in the coastal marine area or in the beds of lakes and rivers.</i></p>	<p>MEL supports the definition.</p> <p><b>Decision Requested:</b> Retain the definition of 'functional need'.</p>
29	Definition	<p><b>Operational requirement:</b> <i>When an activity needs to be carried out in a particular location or way in order to be able to function effectively and efficiently.</i></p>	<p>MEL supports the definition.</p> <p><b>Decision Requested:</b> Retain the definition of 'operational requirement'.</p>
30	Definition	<p><b>Regionally significant infrastructure includes:</b></p> <ul style="list-style-type: none"> <li>- pipelines for the distribution or transmission of natural or manufactured gas or petroleum</li> <li>- strategic facilities to the telecommunication network, as defined in section 5 of the Telecommunications Act 2001</li> <li>- strategic facilities to the radio communications network, as</li> </ul>	<p>MEL supports the definition.</p> <p><b>Decision Requested:</b> Retain the definition of 'regionally significant infrastructure'.</p>

Page	Reference	Policy or Provision	MEL Submission Points & Reasons
30		<p>defined in section 2(1) of the Radio Communications Act 1989</p> <ul style="list-style-type: none"> <li>- the <b>national electricity grid</b> facilities for the generation and transmission of electricity where it is supplied to the electricity distribution network, including the <b>national grid</b></li> <li>- the local authority water supply network and water treatments plants....</li> </ul> <p><b>Renewable energy generation activities:</b>  The construction, operation and maintenance of structures associated with renewable energy generation, including small and community-scale distributed renewable generation activities and the system of electricity conveyance required to convey electricity to the distribution network and/or the national grid and electricity storage technologies associated with renewable electricity.</p>	<p>MEL supports the definition but with amendment to include all necessary ancillary supporting infrastructure such as access roads that are not strictly 'structures' but which are integral and essential to the establishment, operation and maintenance of renewable energy generation activities.</p> <p><b>Decision Requested:</b> Amend the definition of 'renewable energy generation activities' to include necessary ancillary activities and facilities as follows (or similar wording):</p> <p><i>The construction, operation and maintenance of structures <b>and ancillary facilities (including access tracks and roads)</b> associated with renewable energy generation, including small and community-scale distributed renewable generation activities and the system of electricity conveyance required to convey electricity to the distribution network and/or the national grid and electricity storage technologies associated with renewable electricity.</i></p>
31	<b>Definition</b>	<p><b>Reverse sensitivity:</b>  The vulnerability of an existing lawfully-established activity to other activities in the vicinity which are sensitive to adverse environmental effects that may be generated by such existing activities, thereby creating the potential for the operation of such existing activity to be constrained.</p>	<p>MEL supports the definition.</p> <p><b>Decision Requested:</b> Retain the definition of 'reverse sensitivity'.</p>

Page 35	Reference Definition	Policy or Provision <b>Upgrade:</b> <i>Use and development to bring existing structures or facilities up to current standards provided that the effects of the activity are the same or similar in character, intensity and scale as the existing structure and activity.</i>	<p><b>MEL Submission Points &amp; Reasons</b></p> <p>The definition reflects the wording proposed in the Draft NRP. However, the definition is perhaps somewhat simplistic and confining the upgrading to 'current standards' may be unnecessarily restrictive. Provided the upgrading does not introduce material new adverse environmental effects, a broad scope of upgrading should be provided for. The definition in the Horizons One Plan provides a useful guide.</p> <p><b>Decision Requested:</b> Amend the definition of 'upgrade' as follows (or similar wording):</p> <p><i>Use and development to bring existing structures or facilities up to current standards or to improve the <u>functional characteristics of structures or facilities, provided the upgrading itself does not give rise to any significant adverse effects on the environment and provided that the effects of the activity are the same or similar in character, intensity and scale as the existing structure and activity and (a) in relation to renewable electricity generation activities, includes increasing the generation or transmission capacity, efficiency or security of regionally significant infrastructure and replacing support structures within the footprint of authorised activities.</u></i></p>
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Page	Reference	Policy or Provision	MEL Submission Points & Reasons
	<b>OBJECTIVES</b>		
38	Objective O12	The social, economic, cultural and environmental benefits of regionally significant infrastructure and renewable energy generation activities are recognised.	MEL supports the objective. <b>Decision Requested:</b> Retain Objective O12.
38	Objective O13	The use and ongoing operation of regionally significant infrastructure and renewable energy generation activities in the coastal marine area are protected from new incompatible use and development occurring under, over, or adjacent to the infrastructure or activity.	MEL supports the objective but requests amendment to ensure regionally significant infrastructure is protected from reverse sensitivity created by new incompatible use and development <u>or</u> by any substantive change to existing uses that is incompatible with the existing infrastructure. MEL also requests that, as in the draft NRP, the objective should apply region-wide and not only in the coastal marine area. <b>Decision Requested:</b> Amend Objective O13 in the following manner (or similar wording):  <i>The use and ongoing operation of regionally significant infrastructure and renewable energy generation activities <del>in the coastal marine area</del> are protected from <del>new</del> incompatible use and development occurring under, over, or adjacent to the infrastructure or activity.</i>
39	Objective O19	The interference from use and development on natural processes is minimised.	MEL opposes Objective O19 in the absence of clarity about what 'interference' means. <b>Decision Requested:</b> Delete Objective O19.
45	Objective O38	Identified special amenity landscape values are maintained or enhanced.	MEL opposes the proposed policy in the absence of clear specification of the location and reasons for identifying any geographic areas as 'special amenity landscapes'. <b>Decision Requested:</b> Delete Objective O38.

Page	Reference	Policy or Provision	MEL Submission Points & Reasons
<b>SCHEDULES</b>			
407	<p>Schedule G: Principles to be applied when proposing and considering mitigation and offsetting in relation to biodiversity</p>		<p>MEL supports the proposed provision of guidelines to assist the determination of whether and what type of mitigation or offset is appropriate in a given situation. However, some of the wording is ambiguous and unnecessarily limiting.</p> <p><b>Decision Requested:</b> Amend clause 2 in the following manner or similar to clarify that mitigation or offsetting is appropriate where adverse effects, including significant adverse effects are anticipated:</p> <p>2. <i>Limits to what can be mitigated or offset</i></p> <p><i>Consideration of mitigation or biodiversity offsetting is inappropriate when an activity has the potential to cause <b>significant</b> adverse effects or residual adverse effects <b>that contribute to significant cumulative adverse effects on an area:</b></i></p> <p>(a) <i>on any area where the values of that area are highly vulnerable or irreplaceable, or</i></p> <p>(b) <i>where there is no appropriate site, knowledge, proven methods, expertise or mechanism available to design and implement an adequate mitigation or biodiversity offset.</i></p>

Page	Reference	Policy or Provision	MEL Submission Points & Reasons
	<b>POLICIES</b>		
53	<p><b>Policy P12:</b> Benefits of regionally significant infrastructure and renewable electricity generation facilities</p>	<p>The benefits of regionally significant infrastructure and renewable energy generation activities are recognised by having regard to:</p> <ul style="list-style-type: none"> <li>(a) the strategic integration of infrastructure and land use, and</li> <li>(b) the location of existing infrastructure and structures, and</li> <li>(c) the need for renewable energy generation activities to locate where the renewable energy resources exist, and</li> <li>(d) the functional need for port activities to be located within the coastal marine area, and</li> <li>(e) operational requirements associated with developing, operating, maintaining and upgrading regionally significant infrastructure and renewable energy generation activities.</li> </ul>	<p>MEL supports Policy P12.</p> <p><b>Decision Requested:</b> Retain Policy P12.</p>
53	<p><b>Policy P13:</b> Existing regionally significant infrastructure and renewable electricity generation facilities</p>	<p>The use, operation, maintenance, and upgrade of existing regionally significant infrastructure and renewable energy generation activities are beneficial and generally appropriate.</p>	<p>MEL supports Policy P13.</p> <p><b>Decision Requested :</b> Retain Policy P13.</p>
53	<p><b>Policy P14:</b> Incompatible activities adjacent to regionally significant infrastructure and renewable</p>	<p>Regionally significant infrastructure and renewable energy generation activities shall be protected from new incompatible use and development occurring under, over or adjacent to it, by locating and designing any new use and development to avoid, remedy or mitigate any reverse sensitivity effects.</p>	<p>MEL supports Policy P14 with amendment to more explicitly address reverse sensitivity arising from changes in existing activities as well as new inappropriate activities nearby.</p> <p><b>Decision Requested:</b> Amend Policy P14 as follows (or similar wording): <i>Regionally significant infrastructure and renewable energy generation</i></p>



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	electricity generation activities		<p><i>activities shall be protected from new-incompatible use and development occurring under, over or adjacent to it, by locating and designing any new use and development to avoid, remedy or mitigate any reverse sensitivity effects.</i></p>
59	<p><b>Policy P33:</b> Protecting indigenous fish habitat</p>	<p><i>The more than minor adverse effects of activities on the species known to be present in any water body identified in Schedule F1 (rivers/lakes) as habitat for indigenous fish species, and Schedule F1b (inanga spawning habitats), particularly at the relevant spawning and migration times identified in Schedule F1a (fish spawning/migration) for those species, shall be avoided.</i></p>	<p>MEL opposes Policy P33 and seeks amendment to provide for a cascading management approach (avoidance in the first instance, followed by remediation, mitigation) to address all adverse effects on fish habitat.</p> <p><b>Decision Requested:</b> Amend Policy P33 to provide for a cascading approach (with avoidance in the first instance, followed by remediation then mitigation) as is adopted in Policy P32 or similar.</p>
	<p><b>Policy P40:</b> Ecosystems and habitats with significant indigenous biodiversity values</p>	<p><i>Protect and restore the following ecosystems and habitats with significant indigenous biodiversity values:</i></p> <ul style="list-style-type: none"> <li><i>(a) the rivers and lakes with significant indigenous ecosystems identified in Schedule F1 (rivers/lakes), and</i></li> <li><i>(b) the habitats for indigenous birds identified in Schedule F2 (bird habitats), and</i></li> <li><i>(c) significant natural wetlands, including the significant natural wetlands identified in Schedule F3 (significant wetlands), and</i></li> <li><i>(d) the ecosystems and habitat-types with significant indigenous biodiversity values in the coastal marine area identified in Schedule F4 (coastal sites) and Schedule F5 (coastal habitats).</i></li> </ul>	<p>MEL requests amendment of Policy P40 to make it consistent with Policy P31 in requiring protection or restoration.</p> <p><b>Decision Requested:</b> Amend Policy P40 as follows (or similar wording):</p> <p><i>Protect <u>or</u> restore the following ecosystems and habitats with significant indigenous biodiversity values:</i></p> <ul style="list-style-type: none"> <li><i>(a) the rivers and lakes with significant indigenous ecosystems ...</i></li> </ul>
	<p><b>Policy P41:</b> Managing adverse effects</p>	<p><i>In order to protect the ecosystems and habitats with significant indigenous biodiversity values identified in Policy P40, in the first instance</i></p>	<p>MEL opposes the reference to 'precautionary approach' in Policy P41 because the RMA inherently provides, and the proposed NRP also provides, a decision-making framework that is inherently precautionary.</p>

Page	Reference	Policy or Provision	MEL Submission Points & Reasons
	<p>on ecosystems and habitats with significant indigenous biodiversity values</p>	<p>activities, other than activities carried out in accordance with a restoration management plan, shall avoid these ecosystems and habitats. If the ecosystem or habitat cannot be avoided, the adverse effects of activities shall be managed by:</p> <p>(a) avoiding more than minor adverse effects, and</p> <p>(b) where more than minor adverse effects cannot be avoided, remedying them, and</p> <p>(c) where more than minor adverse effects cannot be remedied, mitigating them, and</p> <p>(d) where residual adverse effects remain it is appropriate to consider the use of biodiversity offsets.</p> <p>Proposals for mitigation and biodiversity offsets will be assessed against the principles listed in Schedule G (biodiversity offsetting). A precautionary approach shall be used when assessing the potential for adverse effects on ecosystems and habitats with significant indigenous biodiversity values.</p>	<p><b>Decision Requested:</b> Delete the last sentence of Policy P41 ('A precautionary approach shall....indigenous biodiversity values.')</p>
61	<p><b>Policy P44:</b> Protection and restoration of sites with significant mana whenua values</p>	<p>Sites with significant <i>mana whenua</i> values identified in Schedule C (<i>mana whenua</i>) shall be protected and/or restored.</p>	<p>MEL considers that the cascade approach adopted in proposed Policy P32 is equally appropriate for the management of Schedule C values.</p> <p><b>Decision Requested:</b> Amend Policy P44 to make the approach consistent with other policy by using the expression 'protect or restore' or a cascade approach as in Policy P32 (involving avoidance in the first instance followed by remediation, mitigation).</p>

Page	Reference	Policy or Provision	MEL Submission Points & Reasons
63	<p>Policy P48: Protection of outstanding natural features and landscapes</p>	<p>The natural features and landscapes (including seascapes) of the coastal marine area, rivers, lakes and their margins and natural wetlands shall be protected from inappropriate use and development by:</p> <p>(a) avoiding adverse effects of activities on outstanding natural features and landscapes, and</p> <p>(b) avoiding significant adverse effects and avoiding, remedying or mitigating other adverse effects of activities on natural features and landscapes.</p>	<p>MEL opposes the approach proposed by Policy P48 that all adverse effects of activities on outstanding natural features and landscapes must be avoided always.</p> <p><b>Decision Requested:</b> Amend Policy P48 as follows (or similar wording):</p> <p><i>The natural features and landscapes (including seascapes) of the coastal marine area, rivers, lakes and their margins and natural wetlands shall be protected from inappropriate use and development by:</i></p> <p>(a) <i>avoiding significant adverse effects of activities on outstanding natural features and landscapes, and</i></p> <p>(b) <i>avoiding significant adverse effects and avoiding, remedying or mitigating other adverse effects of activities on natural features and landscapes.</i></p>
63	<p>Policy P49: Use and development adjacent to outstanding natural features and landscapes and special amenity landscapes</p>	<p>Use and development in the coastal marine area on sites adjacent to an outstanding natural feature or landscape or special amenity landscape identified in a district plan shall be managed by:</p> <p>(a) protecting visual and biophysical linkages between the site and the outstanding natural feature or landscape, and</p> <p>(b) avoiding adverse cumulative effects on the values of an outstanding natural feature or landscape.</p>	<p>MEL opposes Policy P49 to the extent that it refers to special amenity landscapes and goes further than is required by the RPS.</p> <p><b>Decision Requested:</b> Delete from Policy P49 the reference to 'special amenity landscapes':</p> <p><i>Use and development in the coastal marine area on sites adjacent to an outstanding natural feature or landscape or special amenity landscape identified in a district plan shall be managed by:</i></p> <p>(a) <i>protecting visual and biophysical linkages between the site and the outstanding natural feature or landscape, and</i></p> <p>(b) <i>avoiding adverse cumulative effects on the values of an outstanding natural feature or landscape.</i></p>

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79	<p><b>Policy P102:</b> Reclamation or drainage of the beds of lakes and rivers</p>	<p>The reclamation or drainage of the beds of lakes and rivers and natural wetlands shall be avoided except where the reclamation or drainage is:</p> <p>(a) partial reclamation of a river bank for the purposes of flood prevention or erosion control, or</p> <p>(b) associated with a qualifying development within a special housing area, or</p> <p>(c) associated with a growth and/or development framework or strategy approved by a local authority under the Local Government Act 2002,</p> <p>or</p> <p>(d) <b>necessary to enable the development, operation, maintenance and upgrade of regionally significant infrastructure, or</b></p> <p>(e) associated with the creation of a new river bed and does not involve piping of the river, and</p> <p>(f) in respect of (a) to (e) there are no other practicable alternative methods of providing for the activity, or</p> <p>(g) the reclamation or drainage is of an ephemeral flow path.</p> <p>For the purpose of this policy the piping or covering of a stream for a distance greater than that required to form a reasonable crossing point is considered to be reclamation of the river bed.</p>	<p>MEL supports Policy P102.</p> <p><b>Decision Requested:</b> Retain Policy P102.</p>
87	<p><b>Policy P134:</b> Public open space values and visual amenity</p>	<p>The adverse effects of new use and development on public open space and visual amenity viewed within, to and from the coastal marine area shall be minimised by:</p> <p>(a) having particular regard to any relevant provisions contained in any bordering territorial authorities' proposed and/or operative district plan, and</p>	<p>MEL requests amendment to clarify that 'new use and development' does not include 'upgrading'.</p> <p><b>Decision Requested:</b> Amend Policy P134 as follows (or similar wording):</p> <p><b>The adverse effects of new use and development (excluding</b></p>

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88	<p><b>Policy P138:</b> Structures in sites with significant values</p>	<p>(b) managing use and development to be of a scale, location, density and design which is compatible with the natural character, natural features and landscapes and amenity values of the coastal environment; and</p> <p>(c) taking account of the future need for public open space in the coastal marine area.</p> <p>New structures, replacement of a structure or any addition or alteration to a structure in a site identified in Schedule C (mana whenua), Schedule F4 (coastal sites), Schedule F5 (coastal habitats) and Schedule J (geological features) shall be avoided, <b>except where:</b></p> <p>(a) the new structure, replacement of the structure or any addition or alteration to the structure is for the specific purpose of providing protection for the values identified in Schedule C (mana whenua), Schedule F4 (coastal sites), Schedule F5 (coastal habitats) or Schedule J (geological features), or</p> <p>(b) the structure is for educational, scientific or research purposes that will enhance the understanding and long-term protection of the coastal marine area, or</p> <p>(c) the structure will provide for navigational safety, or</p> <p><b>(d) it is necessary to enable the development, operation, maintenance and upgrade of regionally significant infrastructure, and in respect of (a) to (d):</b></p> <p>(e) there are no practicable alternative methods of providing for the activity.</p>	<p><u>upgrading of existing authorised activities</u> on public open space and visual amenity viewed within, to and from the coastal marine area shall be minimised by:</p> <p>MEL supports Policy P138.</p> <p><b>Decision Requested:</b> Retain Policy P138</p>

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	<b>RULES</b>		
	Rule R49: Stormwater to land (permitted activity)	The discharge of stormwater onto or into land, including where contaminants may enter groundwater, from an individual property is a permitted activity provided the following conditions are met: (a) the discharge is not from, onto or into contaminated land, and (b) the discharge shall not cause or exacerbate the flooding of any other property.	MEL supports Rule R49.  <b>Decision Requested:</b> Retain Rule R49.
121	Rule R53: All other stormwater (discretionary activity)	The discharge of stormwater into water or onto or into land where it may enter water that is not permitted by Rules R48 or R49, or controlled by Rule R50, or a restricted discretionary activity under Rules R51 or R52, is a discretionary activity.	MEL seeks a rule regime that provides for stormwater discharges to land and to water as a permitted activity provided they comply with minimum standards (as is the case under the operative plans). Stormwater discharges that do not meet permitted activity standards should be provided for as controlled activities, again subject to meeting performance standards and, if necessary subject to management plans to address effects through the term of the consent.  <b>Decision Requested:</b> Make explicit provision, either in the Chapter 5.3 or 5.4 rules, for stormwater discharges to water and to land in circumstances where stormwater may enter water as permitted and controlled activities including within scheduled significant sites.
125	Rule R67: Discharges inside sites of significance (non-complying Activity)	The discharge of water or contaminants into water, or onto or into land where it may enter water: (a) inside a site or habitat identified in Schedule A (outstanding water bodies), Schedule F1 (rivers/lakes), Schedule F3 (significant wetland), or Schedule F4 (coastal sites), and (b) that is not permitted by Rules R42, R43, R44 or R45 is a non-complying activity.	MEL opposes the non-complying activity status.  <b>Decision Requested:</b> Amend Rule R67 by exempting stormwater discharges that are otherwise permitted or controlled or restricted discretionary activities or changing the consent status as follows:  The discharge of water or contaminants into water, or onto or into land where it may enter water, <b>except stormwater discharges:</b> (a) inside a site or habitat identified in Schedule A (outstanding water bodies), Schedule F1 (rivers/lakes), Schedule F3 (significant wetland), or Schedule F4 (coastal sites), and

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125	<p><b>Rule R68:</b> All other discharges (discretionary activity)</p>	<p>The discharge of water or contaminants into water, or onto or into land where it may enter water, that is not: (a) permitted by Rules R42, R43, R44 or R45, and (b) is not provided for by Rule R67 or any other rule in this Plan is a discretionary activity.</p>	<p>(b) that is not permitted by Rules R42, R43, R44 or R45 is a <u>non-complying discretionary activity</u>.</p> <p>MEL supports adoption of this rule for discharges that are not otherwise permitted or controlled activities or restricted discretionary activities including those addressed by Rule R67 (noting that MEL has also requested, under Rule R53 above) that some stormwater discharges be provided for as controlled activities).</p> <p><b>Decision Requested:</b> Clarify in Rule R68 that all discharge activities that are not <u>permitted activities</u> or <u>controlled activities</u> or <u>restricted discretionary activities</u> are discretionary activities.</p>
149	<p><b>Rule R93:</b> All other discharges to land (discretionary activity)</p>	<p>The discharge of contaminants . that are not permitted, controlled, restricted discretionary, or non-complying is a discretionary activity.</p>	<p>MEL supports Rule R93.</p> <p><b>Decision Requested:</b> Retain Rule R93.</p>
154	<p><b>Rule R101:</b> Earthworks and vegetation clearance (discretionary Activity)</p>	<p>The use of land, and the discharge of stormwater into water or onto or into land where it may enter water from earthworks or vegetation clearance that is not permitted by Rule R99 or Rule R100 is a discretionary activity.</p>	<p>MEL notes that the draft NRP proposed restricted discretionary activity status for earthworks and vegetation clearance not otherwise permitted (Rule LWR100) and for earthworks and associated stormwater discharge from areas over 3,000m<sup>2</sup>. MEL supports restricted discretionary activity status for these activities.</p> <p><b>Decision Requested:</b> Amend Rule R101 to provide for these activities as restricted discretionary activities and insert relevant discretionary matters similar to those proposed in draft Rules LWR100 and LWR102 (or similar wording):</p> <p>The use of land, and the discharge of stormwater into water or onto or into land where it may enter water from earthworks or vegetation</p>

Page	Reference	Policy or Provision	MEL Submission Points & Reasons
			<p>MEL Submission Points &amp; Reasons</p> <p>clearance that is not permitted by Rule R99 or Rule R100 is a <u>restricted</u> discretionary activity.</p> <p><u>Matters for discretion:</u></p> <ul style="list-style-type: none"> <li>- <u>The impacts of sediment on any downstream receiving environments;</u></li> <li>- <u>The location, duration and timing of works;</u></li> <li>- <u>The area, location and volume of earthworks;</u></li> <li>- <u>Methods of erosion and sediment control;</u></li> <li>- <u>Methods and timeframes for stabilisation of earthworks and rehabilitation of land;</u></li> <li>- <u>Measures to avoid, remedy or mitigate slope failure hazard.</u></li> </ul>
183	<p><b>Rule R140:</b> Dewatering (permitted activity)</p>	<p>The take of water and the associated diversion and discharge of that water for the purpose of dewatering a site, including but not limited to, maintenance, excavation, construction or geotechnical testing, is a permitted activity, provided the following conditions are met:</p> <ul style="list-style-type: none"> <li>(a) the take continues only for the time required to carry out the work but does not exceed one month, and</li> <li>(b) the take and diversion and discharge is not from, onto or into contaminated land or potentially contaminated land, and</li> <li>(c) the take does not cause ground subsidence, and</li> <li>(d) the take does not deplete water in a water body, and</li> <li>(e) there is no flooding beyond the boundary of the property.</li> </ul> <p>Note</p> <p>Discharges to water, or onto or into land where it may enter water related to dewatering are provided for by Rule R42.</p>	<p>MEL supports Rule R140.</p> <p><b>Decision Requested:</b> Retain Rule R140.</p>
186	<p><b>Rule R146:</b></p>	<p>The use of land and the associated diversion and discharge of</p>	<p>MEL supports Rule R146.</p>



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	Geotechnical investigation bores (permitted activity)	<p>water or contaminants for the drilling, construction or alteration of a geotechnical investigation bore is a permitted activity, provided the following conditions are met:</p> <p>(a) the bore is not located within a community drinking water supply protection area shown on Map 26, Map 27a, Map 27b, or Map 27c, and</p> <p>(b) there is compliance with the NZS 4411:2001 Environmental Standard for Drilling of Soil and Rock, and</p> <p>(c) a Wellington Regional Council bore/well log form is submitted to the Wellington Regional Council within one month of the bore being constructed, and</p> <p>(d) there is no flooding beyond the boundary of the property.</p>	<p>Decision Requested: Retain Rule R146.</p>



**SUBMISSION ON THE PROPOSED NATURAL RESOURCES PLAN  
FOR THE WELLINGTON REGION**

**Pursuant to Clause 6 of Schedule 1 of the Resource Management Act  
1991 (Form 5)**

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**Trade Competition:** I could not gain an advantage in trade competition through this submission.

The specific provisions of the proposed Natural Resources Plan that this submission relates to are detailed in the table attached to this submission. The table of submission points includes a statement of whether Meridian Energy Limited supports or opposes the provisions referred to, the reasons for the submission points and the decisions requested.

Meridian Energy Limited **wishes to be heard** in support of this submission. If others make a similar submission, Meridian Energy Limited will consider presenting a joint case with them at a hearing.



On behalf of Andrew Feierabend

Authorised signatory - Meridian Energy Limited

24 September 2015

## **CONTEXT FOR MERIDIAN'S SUBMISSION**

1. Meridian Energy Limited is a mixed ownership model company under the Public Finance Act 1989. Meridian listed on the New Zealand and Australian stock exchanges in 2013. The Government retains majority ownership (51%) of the company which is one of three formed from the split of the Electricity Corporation of New Zealand (ECNZ) in 1989.
2. Meridian's core business is the generation, marketing, trading and retailing of electricity and the management of assets and ancillary structures for that purpose in New Zealand.
3. Meridian is the single largest generator of renewable energy in New Zealand. The company's hydro generation and storage capacity account for approximately 28% of New Zealand's electricity generating capacity and 48% of its storage capacity. Meridian is the largest wind farm developer and operator in New Zealand and owns and operates the following generation assets within the Wellington Region:
  - The Brooklyn Wind Turbine in Wellington City
  - The West Wind Farm at Makara
  - The Mill Creek Wind Farm at Ohariu
4. Meridian is also actively investigating and pursuing options for new renewable generation capacity nationally, as part of its ongoing business, including a site in the northern Wairarapa.
5. Meridian is therefore interested in the provisions of the proposed Natural Resources Plan which may affect the regulatory environment for its existing assets and for the consenting, construction and operation of future renewable energy generation facilities in the region.