

From: [Andrew Feierabend](#)
To: [RPS](#)
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Subject: pORPS 2021 - Further Submission of Meridian Energy Limited - FINAL (002)
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Attachments: [image001.png](#)
[pORPS 2021 - Further Submission of Meridian Energy Limited - FINAL \(002\).pdf](#)

Good afternoon

Please find attached Meridian's further submissions on the Proposed Otago Regional Policy Statement.

Could you please send an acknowledgment of the same.

Kind regards

Andrew

Andrew Feierabend

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**FURTHER SUBMISSION ON
THE PROPOSED OTAGO REGIONAL POLICY STATEMENT JUNE 2021
UNDER THE FIRST SCHEDULE TO THE RESOURCE MANAGEMENT ACT 1991**

To: Proposed Otago Regional Policy Statement June 2021
Otago Regional Council
Private Bag 1954
Dunedin 9054
Attention: ORC Policy Team

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From: Meridian Energy Limited
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Meridian Energy Limited (**Meridian**) makes the specific further submissions on the Proposed Otago Regional Policy Statement June 2021 (**pORPS21**) that are set out in the attached document.

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

In accordance with Clause 8(1)(b) of the First schedule of the Resource Management Act 1991 (**the Act**), Meridian has an interest in the pORPS21 that is greater than the interest of the general public.

Meridian could not gain an advantage in trade competition through this submission.

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



Andrew Feierabend
For and on behalf of Meridian Energy Limited

Dated this 11th day of November 2021

FURTHER SUBMISSIONS OF MERIDIAN ON THE PROPOSED OTAGO REGIONAL POLICY STATEMENT JUNE 2021

Acronyms used in this further submission include:

The Act	The Resource Management Act 1991
FMU	Freshwater Management Unit (as required in the NPSFM)
NPSFM	National Policy Statement for Freshwater Management 2020
NPSREG	National Policy Statement for Renewable Electricity Generation 2011
NZCPS	New Zealand Coastal Policy Statement 2010
pORPS21	Proposed Otago Regional Policy Statement June 2021

ORIGINAL SUBMISSION REFERENCE	PLAN PROVISION	SUPPORT OR OPPOSE	REASONS
0311 Trustpower Limited	Whole of the pORPS21	Support	The submitter seeks that, throughout the pORSP21, 'energy' be replaced with 'electricity' to ensure consistency with the NPSREG. Meridian agrees that such consistency is necessary and, on this basis, supports the submission.
0314 Transpower NZ Ltd	Definition of "Regionally significant infrastructure"	Support	The submitter seeks to add the National Grid to the definition of regionally significant infrastructure, or alternatively to add the same to the definition of 'specified infrastructure'. Given the national significance of this infrastructure, Meridian considers that it is appropriate that it also be recognised as being of regional significance.

0311 Trustpower Limited	Definition of “Regionally significant infrastructure”	Support	The submitter seeks that amendments be made to the definition of “ <i>regionally significant infrastructure</i> ” so that the definition specifically identifies that regionally significant infrastructure includes “ <i>nationally significant infrastructure</i> ”. Meridian considers this to be appropriate and supports the submission.
0137 Director General of Conservation	Definition of “Effects management hierarchy”	Oppose	The submitter is seeking that the definition of “ <i>Effects management hierarchy</i> ” be amended, however drafting of such amendments has not been provided by the submitter, meaning the impact of the relief sought is not able to be determined at this point in time. On this basis, Meridian opposes the submission. As set out in Meridian’s submission, Meridian supports adoption of the definition of “ <i>Effects management hierarchy</i> ” that is set out in clause 3.21 of the NPSFM, with alternative wording adopted for managing the adverse effects of renewable electricity generation that are consistent with the NPSREG.
0305 Waka Kotahi NZ Transport Agency	New definition for reverse sensitivity	Support in part	The submitter has sought inclusion of the following definition: Reverse sensitivity means “ <i>The potential for the operation of an existing lawfully established activity to be constrained or curtailed by the more recent establishment or intensification of other activities which are sensitive to the established activity</i> ” Meridian supports inclusion of a definition for reverse sensitivity, and considers that the following definition better reflects the meaning of the term: “ <i>The potential for the operation of an existing lawfully established activity to be constrained, or curtailed, or otherwise compromised by the more recent establishment, alteration or intensification of another activities activity which may be are sensitive to the actual, potential or perceived adverse environmental effects generated by the existing established activity</i> ”
0231 Otago Fish and Game Council	SRMR-I2	Oppose	The submitter is seeking insertion of the following sentence into SRMR-I1: “ <i>Human adaptation to climate change, such as building or expanding dams or flood protection schemes, may impose adverse impacts upon ecosystems in addition to those imposed by climate change itself</i> ”.

			Meridian considers that this sentence overstates the potential for adverse impacts on ecosystems given the national, regional and district regulations that set about to manage such potential. The NPSREG recognises New Zealand’s growing demand for electricity and for such electricity to be generated from renewable resources. Potential effects of future development of renewable electricity generation will be assessed in the context of the changing climate.
0311 Trustpower Limited	SRMR-I2	Support	<p>The submitter seeks inclusion of the following paragraph under the heading “<i>Regional Industry</i>”.</p> <p><u>“A number of hydroelectric power schemes are located within the Otago Region. The current Government has set a target for increasing renewable electricity to 100% by 2030. Alongside that sits New Zealand’s commitment to the Paris Climate Change Agreement – to reduce greenhouse gas emissions to 30% below the 2005 levels, and a domestic ‘net zero’ commitment of all greenhouse gas emissions (except methane) by 2050. For these commitments to be achieved, rapid electrification of the economy will be required, and this will require a significant increase in the installed capacity of emissions free renewable electricity generation.”</u></p> <p>Meridian supports inclusion of this paragraph. Meridian considers that it is important to recognise this context, and the need for new renewable electricity generation to address greenhouse gas emissions.</p>
0318 Contact Energy Limited	SRMR-I9	Support	<p>The submitter has sought the following changes to SRMR-I9:</p> <p><u>“Natural features and landscape values are also <u>can be</u> adversely impacted by tourism and urban growth, and energy production.</u></p> <p><u>A number of hydroelectric power schemes are located within the Otago Region. Some of these have directly influenced the surrounding environment in which they operate. These assets are significant to the region in providing renewable electricity generation, contributing to economic development and also attracting visitors to the area.”</u></p> <p>Meridian supports these changes on the basis that they helpfully reflect the relationship between existing hydroelectric power schemes and the landscape.</p>

<p>0231 Otago Fish and Game Council</p>	<p>SRMR – Seek insertion</p>	<p>Oppose</p>	<p>The submitter is seeking insertion of an additional issue into the SRMR chapter addressing “<i>the positive issue of the ways in which people interact with the environment in Otago for recreation and amenity, including but not limited to how resource management decisions impact upon this capability</i>”. With this, the submitter is seeking reference to “<i>the fact that where a water body supports positive recreation and amenity values, that that water body is a "highly valued feature" in accordance with both the definition and APP9</i>”.</p> <p>Meridian opposes this submission and considers that APP9 should focus on ‘outstanding natural features and landscapes (including seascapes)’ to give proper effect to section 6 of the Act. By merging ‘outstanding’ with ‘highly valued’, with no distinction in their identification and management, the necessary recognition of and provision for outstanding natural features and landscapes is inappropriately diminished.</p> <p>Further, Meridian considers that the notified definition of ‘highly valued natural features and landscapes’ should be deleted from the pORPS21.</p>
<p>0231 Otago Fish and Game Council</p>	<p>IM-O1</p>	<p>Oppose</p>	<p>The submitter seeks a number of changes to the drafting of IM-O1. Meridian considers that the changes lead to unnecessary duplication with the elements already captured in the notified version of IM-O1, and therefore opposes the submission.</p>
<p>0231 Otago Fish and Game Council</p>	<p>IM-P1</p>	<p>Oppose</p>	<p>The submitter seeks the following changes to IM-P1:</p> <p><i>“(1) all activities are carried out within the environmental constraints <u>limits of directed by this RPS,</u>”</i>.</p> <p>Meridian opposes this submission on the basis that it is inconsistent with the NPSREG and with Policy 4 of the NPSFM.</p>

<p>0311 Trustpower Limited</p>	<p>IM-P1</p>	<p>Support</p>	<p>The submitter has requested insertion of the following: <i>“except that (5) ‘clauses (3) - (4) of this policy, and all provisions of the RPS other than those contained in EIT – EN, do not apply to renewable electricity generation activities.’”</i> Meridian supports this change and agrees that it would be beneficial to have all matters related to renewable electricity generation activities located in one self-contained part of the pORPS21. This would avoid confusion and ensure that the NPSREG is given effect to.</p>
<p>0137 Director General of Conservation</p>	<p>IM-P4</p>	<p>Oppose</p>	<p>The submitter seeks that IM-P4 be amended as follows “1. <i>protects and enhances their intrinsic values...</i>”. Meridian considers that this is unnecessarily restrictive and that enhancement should be limited to values that have been degraded. On this basis, Meridian opposes the submission.</p>
<p>0230 Royal Forest and Bird Protection Society NZ (Forest and Bird)</p>	<p>IM-P12</p>	<p>Oppose</p>	<p>The submitter seeks to delete references to environmental offsetting and compensation from IM-P12. Meridian opposes this submission. Meridian considers that both options have a legitimate place in achieving the purpose of the Act, and Policy C2 of the NPSREG requires that “<i>When considering any residual environmental effects of renewable electricity generation activities that cannot be avoided, remedied or mitigated, decision-makers shall have regard to offsetting measures or environmental compensation including measures or compensation which benefit the local environment and community affected.</i>” On this basis, Meridian opposes the submission.</p>

0311 Trustpower Limited	IM-P10	Support	<p>The submitter seeks that the following be added to IM-P10 <i>“(4) recognise and provide for renewable electricity generation activities as part of achieving national climate change obligations.”</i></p> <p>Meridian supports this submission as it recognises renewable electricity generation as a key climate change adaptation and mitigation method.</p>
0231 Otago Fish and Game Council	IM-M1	Oppose	<p>The submitter seeks the following change to IM-M1(4):</p> <p><i>“(4) ensure cumulative effects of activities on natural and physical resources <u>the natural environment</u> are accounted for in resource management decisions by recognising and managing such effects, including.”</i></p> <p>Meridian opposes this submission since integrated management involves managing potential effects on both the natural and physical environment, not just the ‘natural environment’. There are parts of the environment that are physical, rather than natural (such as historic buildings) and the Act requires management of the use, development, and protection of natural and physical resources.</p>
0137 Director General of Conservation	CE-O1(1)	Oppose	<p>The submitter is seeking that CE-O1(1) be amended as follows <i>“the mauri of coastal water is protected and enhanced, and restored where it has become degraded it is <u>restored</u>”</i>. Meridian considers that this is unnecessarily restrictive and that enhancement should be limited to values that have been degraded. Further to this, Meridian considers that there is duplication in the meanings of ‘enhance’ and ‘restore’ and note that the submitter’s relief does not include definitions for these terms. On this basis, Meridian opposes the submission.</p>
0137 Director General of Conservation	CE-O1(3)	Oppose	<p>The submitter is seeking that CE-O1(3) be amended as follows <i>“the dynamic and interdependent natural biological and physical processes in the coastal environment are maintained or <u>and enhanced</u>”</i>.</p> <p>Meridian considers that this is unnecessarily restrictive and that enhancement should be limited to values that have been degraded. On this basis, Meridian opposes the submission.</p>

0137 Director General of Conservation	CE-O1(4)	Support	The submitter is seeking that CE-O1(4) be amended as follows " representative or areas of significant areas of indigenous biodiversity (as identified in APP2) are protected, and... ". Meridian considers that the amendments improve the clarity of this objective and are more consistent with section 6(c) of the Act.
0230 Forest and Bird	CE-O1(4)	Oppose	The submitter seeks to amend CE-O1(4) as follows: <i>"4. representative or significant areas of indigenous biodiversity are is protected, and</i> Meridian opposes this submission on the basis that section 6(c) of the Act requires protection of " <i>areas of significant indigenous vegetation and significant habitats of indigenous fauna</i> ". Extending such protection to all indigenous biodiversity will in some cases be unnecessarily restrictive (for example when referring to landscaping plantings, indigenous scrub under plantation forests or improved pastures).
0137 Director General of Conservation	CE-O2	Oppose	The submitter is seeking that CE-O2 be amended as follows " <i>Public access, recreation opportunities, and highly valued natural features and landscapes in the coastal environment are maintained or and enhanced</i> ". Meridian considers that this is unnecessarily restrictive and that enhancement should be limited to values that have been degraded. On this basis, Meridian opposes the submission.
0230 Forest and Bird	CE-O5	Oppose in part	The submitter is seeking to add a new provision to CE-O5 as follows: <i>"(3) maintain and improve the quality of water in waterbodies and coastal water"</i> . Meridian considers that improvements should only be necessary where a value has been degraded. On this basis, if the decision was made to accept the submission, then Meridian supports adoption of the following wording. <i>"(3) maintain and, where degraded, improve the quality of water in waterbodies and coastal water"</i>

0230 Forest and Bird	CE-P2(7)	Oppose	<p>The submitter seeks to add the following to CE-P2:</p> <p><i><u>“(7) Areas where preserving natural character requires objectives, policies and rules, and include those provisions,”</u></i></p> <p>Meridian opposes this provision since it is duplicative with CE-P2(1)(f), and any value identified for addressing in a plan requires associated objectives, policies and rules meaning the proposed words are redundant.</p>
0137 Director General of Conservation	CE-P3(1)	Oppose	<p>The submitter seeks that CE-P3(1) be amended as follows <i>“healthy coastal ecosystems, indigenous habitats provided by the coastal environment, <u>indigenous vegetation and fauna</u>, and the migratory patterns of indigenous coastal water species are maintained or enhanced”</i>.</p> <p>Meridian considers that ‘maintaining indigenous vegetation and fauna’ is unclear and has the potential to be read in an absolute sense, such as meaning no gathering of, or impacts on, coastal indigenous vegetation and fauna. Meridian considers such a policy to be unnecessarily restrictive.</p>
0230 Forest and Bird	CE-P4	Oppose	<p>Meridian opposes this submission as it seeks to add methods to give effect to Policy 14 of the NZCPS, however the submitter has not proposed words for such a provision meaning the impact of the relief sought is not able to be determined at this point in time. ON this basis, Meridian opposes this submission.</p>
0137 Director General of Conservation	CE-P5	Oppose	<p>The submitter is seeking that CE-P5 be amended as follows <i>“Protect <u>and enhance indigenous biodiversity in the coastal environment, including by:...”</u></i>”.</p> <p>Meridian considers that this is unnecessarily restrictive and that enhancement should be limited to values that have been degraded. Further to this, the words <i>“including by”</i> are open-ended and do not provide the clarity that is needed in this policy. On this basis, Meridian opposes this submission.</p>

0230 Forest and Bird	CE-P6	Oppose	The submitter seeks to make amendments to give effect to Policy 15 of the NZCPS and to clarify the relationship with provisions in the NFL chapter. The submitter has, however, not proposed words for such amendments meaning the impact of the relief sought is not able to be determined at this point in time. On this basis, Meridian opposes the submission.
0230 Forest and Bird	CE-P8	Oppose	The submitter seeks to change subclause (9) to change “ <i>lawfully established</i> ” to “ <i>consented</i> ”. Meridian opposes this submission, since lawfully established activities include both permitted and consented activities, and permitted activities may also require restrictions of public access for public health and safety reasons.
0230 Forest and Bird	CE-AER1	Oppose	The submitter seeks adoption of the following changes to CE-AER1: <i>“The values of the coastal environment are <u>safeguarded and preserved for future generations not adversely affected or lost because of inappropriate uses of the natural and physical resources in the coastal environment.</u>”</i> Meridian opposes this submission and seeks that the notified version of CE-AER1 is retained. Meridian considers that the notified version of this provision is more consistent with the NZCPS and the NPSREG.
0230 Forest and Bird	LF-WAI-P1	Oppose	The submitter is seeking to explicitly position hydroelectricity generation in the third priority of LF-WAI-P1. Meridian opposes this submission. Meridian considers that the use of water for renewable electricity generation should be prioritised alongside the health needs of people since it is a lifeline utility and without electricity there will be little or no medical services available to meet the health needs of people. Further to this, Policy 4 of the NPSFM requires that “ <i>Freshwater is managed as part of New Zealand’s integrated response to climate change</i> ”, and clause 3.31 of the NPSFM requires that regard be given to the importance of large hydro-electricity schemes in terms of their “ <i>contribution to meeting New Zealand’s greenhouse gas emission targets</i> ” and “ <i>to maintaining the security of New Zealand’s electricity supply</i> ”.

			On this basis, Meridian considers that the second priority level of LF-WAI-P1 should explicitly include the use of water resources for hydro electricity generation
0136 Minister for the Environment	LF-WAI-P1	Support	The submitter has sought that LF-WAI-P1 be amended to read " <i>In all management of decision making affecting fresh water in Otago, prioritise:</i> " Meridian supports this amendment as it provides clarity to the policy.
0409 Ballance Agri-Nutrients Limited	LF-WAI-P3	Support	The submitter seeks that LF-WAI-P3 (4) and (7) be amended as follows: <i>"(4) manages the effects of the use and development of land to maintain or <u>where degraded to the point that it cannot achieve the applicable water quality standards, enhance the health and well-being of fresh water and coastal water,</u>"</i> <i>"(7) has regard to cumulative effects and the need to apply a precautionary approach where there is limited available information or uncertainty about potential adverse effects, <u>while noting that the application of the precautionary approach may include the adoption of adaptive management methods.</u>"</i> Meridian supports both amendments. Meridian considers that enhancement of fresh and coastal water should not be a requirement in all instances, rather it is appropriate when a value has been degraded; and that adaptive management methods can be a helpful management response when moving forward with a precautionary approach.
0231 Otago Fish and Game Council	LF-WAI-P3	Oppose	The submitter seeks to include the following in LF-WAI-P3: <i>"(3a) sustains and restores the habitats of trout and salmon species associated with the water body, insofar as this is consistent with ECO-P11"</i> Meridian opposes this submission on the basis that it goes beyond the requirements of Policies 9 and 10 of the NPSFM. These policies focus on the protection of habitats of indigenous freshwater species and habitat of trout and salmon and they do not extend to requiring 'sustaining' or 'restoration' of such habitats. While Meridian considers that restoration of such habitats may be appropriate where they are degraded, such expectations need to be consistent with the requirements of the NPSFM and NPSREG in combination.

0230 Forest and Bird	LF-FW-P10	Oppose	<p>The submitter is seeking to amend LF-FW-P10 as follows:</p> <p><i>“Improve the ecosystem health, hydrological functioning, water quality and extent of natural wetlands that have been degraded or lost by requiring, where possible.”</i></p> <p>Meridian opposes the submission on the basis that it goes beyond the requirements of the Act, NPSFM, and NPSREG. Meridian considers that improvements may be appropriate when a value(s) has been degraded, however, such expectations need to be consistent with the requirements of the NPSFM and NPSREG in combination.</p>
00502 Aotearoa Water Action (AWA)	LF-WAI-new policy	Oppose in part	<p>The submitter seeks that a new policy be added to LF-WAI as follows <i>“(5) fifth, the taking and use of water for water export will be a prohibited activity”</i>. Meridian considers that if this policy was to be adopted in the pORPS, then the export should clearly refer to the <i>“...<u>international</u> export of water...”</i> (and not export from a district or region to another district or region within New Zealand)</p>
0230 Forest and Bird	New objective LF-VM-O1	Oppose	<p>The submitter is seeking inclusion of a new <i>“All of Otago catchment vision”</i>. Meridian opposes this submission completely. Many of the changes made are unnecessarily restrictive and fail to reflect the requirements of the NPSFM and the NPSREG. In addition, Meridian considers that the FMU visions (in the LF-VM section of the pORPS21) provide clearer objectives than the submitter’s relief provides; and that the addition of a region wide vision adds a further and unnecessary layer for decision makers to interpret and apply, and risks detracting from the distinct FMU visions.</p>
0318 Contact Energy Limited	LF-VM-O2(5) and (6)	Support in part	<p>The submitter is seeking the following amendments to LF-VM-O2:</p> <p><i>“(5) <u>effective migration of indigenous species migrate easily and as naturally as possible along and within the river system is maintained or where practicable improved,</u>”</i></p> <p><i>“(7)(b)(i) flows in water bodies sustain and, wherever possible, restore the natural form and function of main stems and tributaries to support Kāi Tahu values and practices, and”</i></p>

			<p>Meridian supports these amendments on the basis that they are more consistent with the NPSFM and NPSREG.</p> <p>Meridian also notes that restoration of a waterbody's natural form and function can place lives and nationally or regionally significant infrastructure at risk. Accordingly, an objective of restoration of the natural form and function of main stems and tributaries needs to be accompanied by criteria/circumstances when such an activity would be appropriate.</p>
0230 Forest and Bird	LF-VM-O2 to LF-VM-O6	Oppose	<p>The submitter is seeking consequential amendments to the specific FMU visions in LF-VM-O2 to LF-VM-O6 to ensure that their 'All of Otago catchment vision' is achieved.</p> <p>Meridian opposes this submission completely for the reasons given on Forest and Bird's 'New objective LF-VM-O1'.</p>
0231 Otago Fish and Game Council	LF-VM-O2 to LF-VM-O6 & insertion of new LF-VN-OA2	Oppose	<p>The submitter has sought substantive changes to LF-VM-O2 to LF-VM-O6 and insertion of new LF-VN-OA2. Meridian opposes this submission completely. Many of the changes made are unnecessarily restrictive and fail to reflect the requirements of the NPSFM and the NPSREG.</p> <p>Meridian opposes references to restoring the habitats of trout and salmon species for the reasons set out with respect to the Otago Fish and Game Council's submission on LF-WAI-P3.</p>
0409 Ballance Agri-Nutrients Limited	LF-VM-P6	Support	<p>The submitter seeks to add "<i>in consultation with Kāi Tahu and the community</i>" to subclauses (2)(a) and (3) of LF-VM-P6. These subclauses address the setting of target attribute states, limits and action plans to achieve environmental outcomes. Meridian agrees that consultation should be undertaken with Kāi Tahu and the community during these processes.</p>
0231 Otago Fish and Game Council	LF-FW-O8	Oppose	<p>The submitter seeks to add the following to LF-FW-O8:</p> <p><u>"(A1) the health, well-being and resilience of water bodies is prioritised,"</u> and <u>"(4a) trout and salmon can migrate easily and their habitats are protected and restored, insofar as this is consistent with that of indigenous species, and"</u>.</p>

			<p>Meridian opposes new (A1) on the basis that these matters are already provided for within (1) to (5) of LF-FW-O8.</p> <p>With respect to new (4a), Meridian opposes references to restoring the habitats of trout and salmon species for the reasons set out with respect to the Otago Fish and Game Council's submission on LF-WAI-P3.</p>
0137 Director General of Conservation	LF-FW-O9	Oppose	<p>The submitter seeks that LF-FW-O9 be amended as follows "<i>Otago's natural wetlands, including ephemeral wetlands, are protected or <u>and</u> restored so that...</i>".</p> <p>Meridian considers that this is unnecessarily restrictive and that restoration should be limited to values that have been degraded.</p>
0409 Ballance Agri-Nutrients Limited	LF-FW-P7	Support	<p>The submitter seeks the following amendment to LF-FW-P7:</p> <p><i>"Environmental outcomes, attribute states (including target attribute states) and limits are set <u>in consultation with Kāi Tahu and the community ...</u>"</i></p> <p>Meridian agrees that consultation should be undertake with Kāi Tahu and the community during these processes.</p>
0231 Otago Fish and Game Council	LF-FW-P7	Oppose	<p>The submitter seeks inclusion of the following:</p> <p><i>"(2a) the habitats of trout and salmon associated with water bodies are protected and restored, including by providing for fish passage, insofar as it is consistent with ECO-P11, and"</i></p> <p>Meridian opposes references to restoring the habitats of trout and salmon species for the reasons set out with respect to the Otago Fish and Game Council's submission on LF-WAI-P3.</p>

<p>0231 Otago Fish and Game Council</p>	<p>LF-FW-P10</p>	<p>Oppose</p>	<p>The submitter is seeking inclusion of the following: <i><u>“(1a) an increase in the extent and quality of habitat for trout and salmon, insofar as it is consistent with ECO-P11”</u></i></p> <p>Meridian opposes references to increasing the extent and quality of the habitats of trout and salmon species for the reasons set out with respect to the Otago Fish and Game Council’s submission on LF-WAI-P3.</p>
<p>0202 Central Otago Environmental Society</p>	<p>LF-FW-P13</p>	<p>Oppose</p>	<p>The submitter seeks the following changes to LF-FW-P13: <i>“Preserve <u>and where possible enhance</u> the natural character of lakes and rivers and their beds and margins by:</i></p> <p><i>(1) avoiding the loss of values or extent of a river, unless:</i></p> <p><i>(a) there is a functional need for the activity in that location <u>that justifies the adverse effect being created”</u></i></p> <p>Meridian considers that a policy of enhancing the natural character “where possible”, without targeting degraded natural character values, is unnecessarily onerous; and considers that the submitter’s additions to LF-FW-P13(1)(a) are not consistent with the NPSFN and NPSREG. On this basis, Meridian opposes the submission.</p>
<p>0231 Otago Fish and Game Council</p>	<p>LF-FW-P13</p>	<p>Oppose</p>	<p>The submitter seeks changes to a number of the provisions within LF-FW-P13. The changes sought make the provisions too absolute and fail to reflect the requirements of the NPSFM and the NPSREG.</p>
<p>0318 Contact Energy Limited</p>	<p>LF-FW-P14</p>	<p>Support</p>	<p>The submitter seeks the deletion of LF-FW-P14(1) as follows: <i>“(1) restore a form and function that reflect the natural behaviours of the water body;”</i></p> <p>Meridian supports this submission. Restoration of a waterbody’s natural form and function can place lives and nationally or regionally significant infrastructure at risk.</p>

0231 Otago Fish and Game Council	LF-FW-P14	Oppose	<p>The submitter seeks changes to a number of the provisions within LF-FW-P14. The changes sought make the provisions too absolute and fail to reflect the requirements of the NPSFM and the NPSREG.</p> <p>Further to this, Meridian opposes references to restoring the habitats of trout and salmon species for the reasons set out with respect to the Otago Fish and Game Council's submission on LF-WAI-P3.</p>
0311 Trustpower Limited	LF-MW-M6	Support	<p>The submitter seeks changes to LF-FW-M6 (4)(g), (5)(a) and (5)(c). Each of these changes better reflect the significance of renewable electricity generation activities and thereby better address the requirements of the NPSREG.</p>
0230 Forest and Bird	LF-LS-M12	Oppose	<p>The submitter is seeking to change "<i>minimising</i>" to "<i>avoiding</i>" the removal of tall tussock grasslands.</p> <p>Meridian considers that this relief is too absolute, it extends to 'less than minor effects' on tall tussock grasslands, and is not consistent with the NPSREG. Meridian supports the notified version of LF-LS-M12.</p>
0137 Director General of Conservation	LF-LS-M13	Support	<p>The submitter seeks that LF-LS-M13 (1) be amended as follows "<i>maintain existing indigenous biodiversity values</i>".</p> <p>Meridian considers that the amendment improves the clarity of this method and is more consistent with section 6(c) of the Act.</p>
0137 Director General of Conservation	ECO-O1	Oppose	<p>The submitter is seeking to add four further components to ECO-O1.</p> <p>Meridian prefers the relief sought in the Meridian submission on ECO-O1, and considers that their relief adequately addresses the matters in the Director General of Conservation's four additional components. On this basis, Meridian opposes the submission.</p>

<p>0231 Otago Fish and Game Council</p>	<p>ECO-O4 (new)</p>	<p>Oppose</p>	<p>The submitter seeks inclusion of a new objective as follows: <i><u>“ECO-O4 – Trout and salmon</u></i> <i><u>The habitat of trout and salmon in Otago is protected and restored in a manner that is consistent with the protection of habitat of indigenous freshwater species.”</u></i></p> <p>Meridian opposes references to restoring the habitats of trout and salmon species for the reasons set out with respect to the Otago Fish and Game Council’s submission on LF-WAI-P3.</p> <p>Meridian also considers that <i>“in a manner that is consistent with”</i> (as sought by the submitter) is not the same as <i>“insofar as this is consistent with ...”</i> (in Policy 10 of the NPSFM); and that <i>“protecting and restoring”</i> (with respect to trout in the submission) is not the same as <i>“protecting”</i> (with respect to indigenous freshwater species in the submission and Policy 9 of the NPSFM). In summary, the submitter’s relief is inconsistent with the NPSFM and NPSREG, and on this basis Meridian opposes the relief sought.</p>
<p>0230 Forest and Bird</p>	<p>ECO-P3</p>	<p>Oppose</p>	<p>The submitter is seeking a number of changes to ECO-P3, including (amongst others) deleting from the leading sentence the following words: <i>“Except as provided for by ECO-P4 and ECO-P5”</i>.</p> <p>Meridian opposes the submission in its entirety, on the basis that it is not consistent with the NPSFM and the NPSREG.</p>
<p>0230 Forest and Bird</p>	<p>ECO-P4</p>	<p>Oppose</p>	<p>The submitter is seeking substantive changes to the leading sentence in ECO-P4. Meridian opposes the submission on the basis that it reduces clarity of the provision as a whole and is inconsistent with the NPSFM and the NPSREG.</p>
<p>0311 Trustpower Limited</p>	<p>ECO-P4</p>	<p>Support</p>	<p>The submitter seeks to change ECO-P4 as follows: <i>“(1) the development, operation, maintenance or upgrade of nationally and regionally significant infrastructure that has a functional or operational need to locate within the relevant significant natural area(s) or where they may adversely affect indigenous species or ecosystems that are taoka,”</i></p>

			Meridian supports this submission as it better reflects the components of new nationally and regionally significant infrastructure activities.
0230 Forest and Bird	ECO-P5	Oppose	<p>The submitter is seeking substantive changes to ECO-P5, including the addition of the following:</p> <p><i><u>“(3) the activity is not within 10m of a freshwater body or within the coastal environment”</u></i></p> <p>Meridian opposes this submission in its entirety. More specifically with respect to the addition of subclause (3), Meridian considers this to be in conflict with the leading sentence which is providing for ‘lawfully established activities’.</p>
0140 Waitaki District Council	ECO-P5	Support	<p>The submitter notes that <i>“There is no commentary provided around the determination of existing activities –eg. lawfully established with existing use rights as per section 10 of the RMA91”</i> and raises concerns that <i>“the proposed provisions could disadvantage existing lawfully established land uses that may be operating lawfully within a special zone within a District Plan, or under the conditions of an existing land use consent”</i>. The submitter seeks that <i>“The PRPS is not any stronger on existing activities than s10 of the RMA”</i> and that it <i>“Provide for existing activities within SNA’s”</i>.</p> <p>Meridian agrees with these concerns and supports the relief sought.</p>
0137 Director General of Conservation	ECO-P6	Oppose	<p>The submitter is seeking that the definition of <i>“Effects management hierarchy”</i> be amended, however drafting of such amendments has not been provided by the submitter, meaning the impact of the relief sought is not able to be determined at this point in time. On this basis, Meridian opposes the submission.</p> <p>As set out in Meridian’s submission, Meridian supports adoption of the definition of <i>“Effects management hierarchy”</i> that is set out in clause 3.21 of the NPSFM, with alternative wording adopted for managing the adverse effects of renewable electricity generation that are consistent with the NPSREG.</p>

0230 Forest and Bird	ECO-P7	Oppose	The submitter seeks changes to ECO-P7, including (amongst others), reference to indigenous biodiversity being “ <i>protected under CE-P5</i> ”. Meridian considers that use of “ <i>protected</i> ” is not consistent with the content of CE-P5, and on this basis opposes the submission.
0231 Otago Fish and Game Council	ECO-P11	Oppose	The submitter is seeking that a new policy (P11) be inserted. Meridian opposes this submission in its entirety. Meridian opposes all references to restoring the habitats of trout and salmon species for the reasons set out with respect to the Otago Fish and Game Council’s submission on LF-WAI-P3.
0230 Forest and Bird	ECO-M4	Oppose	The submitter is seeking (amongst other changes) inclusion of the following in ECO-M4: <u>“(X) in all cases consider whether it may be appropriate to grant consent with conditions or for consent to be declined due to locational circumstances and to achieve other policy and objectives of the RPS.”</u> Meridian considers that reference to “ <i>locational circumstances</i> ” is unclear, and on this basis opposes the submission.
0230 Forest and Bird	ECO-M5	Oppose	The submitter is seeking (amongst other changes) inclusion of the following in ECO-M5: <u>“(X) in all cases consider whether it may be appropriate to grant consent with conditions or for consent to be declined due to locational circumstances and to achieve other policy and objectives of the RPS.”</u> Meridian considers that reference to “ <i>locational circumstances</i> ” is unclear, and on this basis opposes the submission.
0231 Otago Fish and Game Council	ECO-M5	Oppose	Meridian opposes all references to restoring the habitats of trout and salmon species for the reasons set out with respect to the Otago Fish and Game Council’s submission on LF-WAI-P3.

0231 Otago Fish and Game Council	ECO-new method (M9)	Oppose	<p>The submitter is seeking that a new method (M9) be inserted. Meridian opposes this submission in its entirety.</p> <p>Meridian opposes all references to restoring the habitats of trout and salmon species for the reasons set out with respect to the Otago Fish and Game Council’s submission on LF-WAI-P3.</p>
0231 Otago Fish and Game Council	ECO-PR1	Oppose	<p>The submitter is seeking that a new paragraph be inserted into ECO-PR1. Meridian opposes this submission in its entirety.</p> <p>Meridian opposes all references to restoring the habitats of trout and salmon species for the reasons set out with respect to the Otago Fish and Game Council’s submission on LF-WAI-P3.</p>
0311 Trustpower Limited	EIT-EN Energy chapter generally	Support	<p>The submitter seeks that the EIT-EN Chapter is self-contained, and on this basis, they are seeking inclusion of the following note in the introduction to the EIT-EN Chapter:</p> <p><i><u>“Note: The provisions of the RPS, other than those contained in EIT – EN, do not apply to renewable electricity generation activities”</u></i></p> <p>Meridian supports these submissions on the basis that they would narrow the possibility of confusion about which provisions apply and when.</p>
0230 Forest and Bird	EIT-EN-O2	Oppose	<p>The submitter is seeking the following changes to EIT-EN-O2:</p> <p><i>“EIT–EN–O2 – Renewable electricity generation</i></p> <p><i>The generation capacity of renewable electricity generation activities in Otago:</i></p> <p><i>(1) is maintained and, if practicable maximised <u>where appropriate increased, while maintaining and restoring ecosystem health, within environmental limits, and</u></i></p> <p><i>(2) contributes to meeting New Zealand’s national target for renewable electricity generation.”</i></p> <p>Meridian opposes this submission on the basis that it is inconsistent with the NPSFM and NPSREG.</p>

<p>0231 Otago Fish and Game Council</p>	<p>EIT-EN-O2</p>	<p>Oppose</p>	<p>The submitter has proposed the following amendments to IET-EN-O2</p> <p><i>“The generation capacity of renewable electricity generation activities in Otago: (1) is maintained <u>across the region</u> and, if practicable maximised <u>increased, but only where it is consistent</u> within environmental limits, and”</i></p> <p>Meridian opposes these changes as they are inconsistent with the NPSFM and NPSREG.</p>
<p>0311 Trustpower Limited</p>	<p>EIT-EN-O2</p>	<p>Support</p>	<p>The submitter seeks the following amendments to EIT-EN-O2:</p> <p><i>“The generation capacity of renewable electricity generation activities in Otago:</i></p> <p><i>(1) is <u>protected and maintained</u> and, if practicable, <u>increased</u>, maximised <u>within environmental limits</u> and</i></p> <p><i>(2) <u>contributes to meeting New Zealand’s national target for renewable electricity generation and climate change commitments</u>”</i></p> <p>Meridian supports this submission and agrees that it is more consistent with the NPS-REG.</p>
<p>0230 Forest and Bird</p>	<p>EIT-EN-P1</p>	<p>Oppose</p>	<p>The submitter seeks the following amendments to EIT-EN-P1:</p> <p><i>“The operation and maintenance of existing renewable electricity generation activities is provided for while, <u>avoiding adverse effects as far as practicable, then minimising its adverse effects and restoring freshwater where it is degraded or degradation is occurring</u>”</i></p> <p>Meridian opposes this submission on the basis that it is inconsistent with the NPSFM and the NPSREG. In particular the ‘hierarchy’ or ‘order’ created in the sought amendments is not consistent with the NPSREG, and restoring degraded water is unnecessarily restrictive in an existing, lawfully established, environment.</p>

0231 Otago Fish and Game Council	EIT-EN-P1	Oppose	<p>The submitter has proposed the following amendments to EIT-EN-P1</p> <p><i>"The operation and maintenance of existing renewable electricity generation activities is provided for <u>where it occurs within environmental limits</u> while minimising its adverse effect."</i></p> <p>Meridian opposes these changes as they are inconsistent with the NPSREG.</p>
0230 Forest and Bird	EIT-EN-P2	Oppose	<p>The submitter seeks insertion of the word "<i>includes</i>". Meridian considers that this inclusion is grammatically incorrect and detracts from the clarity of the policy, and on this basis opposes the submission.</p>
0231 Otago Fish and Game Council	EIT-EN-P2	Oppose	<p>The submitter has sought to delete subclause (3) from EIT-EN-P2.</p> <p>Meridian opposes these changes as they are inconsistent with the NPSREG.</p>
0311 Trustpower Limited	EIT-EN-P2	Support	<p>The submitter has sought a number of changes to EIT-EN-P2. Amongst these are a change to the policy name and the leading sentence. Both changes refer to 'recognising and providing for renewable electricity generation'. Such changes assist EIT-EN-P2 to better give effect to the NPSREG, particularly Policy A. On this basis, Meridian supports this submission. Further to this however, Meridian considers that the leading sentence of the policy should refer to "<i>renewable electricity generation activities</i>".</p>
0137 Director General of Conservation	EIT-EN-P2	Support in part	<p>The submitter is seeking the following amendments to EIT-EN-P2</p> <p><i>"...1. Recognise the national, regional and local benefits of existing renewable electricity generation activities, 2. take into account the needs to <u>at least maintain current renewable electricity generation capacity and to provide for increased capacity to enable a shift from non-renewable energy, and...</u>"</i>.</p> <p>Meridian supports the intent of these amendments. However, rather than include these in EIT-EN-P2(2), Meridian prefers that the matter be addressed in a separate component of the same policy as follows:</p>

			<i>“(4) provide for increased renewable electricity generation capacity to enable a shift from non-renewable energy sources”</i>
0230 Forest and Bird	EIT-EN-P4	Oppose	The submitter seeks deletion of the words <i>“or, at the very least, minimised”</i> . Meridian opposes this submission on the basis that it is inconsistent with the NPSFM and the NPSREG.
0231 Otago Fish and Game Council	EIT-EN-P4	Oppose	The submitter is seeking the following amendments to EIT-EN-P4 <i>“The <u>overall</u> security of renewable electricity supply is maintained or improved in Otago through:</i> <i>(1) appropriate provision for the development or upgrading of renewable electricity generation activities and diversification of the type or location of electricity generation activities, <u>where it is consistent with environmental limits, and</u></i> <i>(2) allowing for the possibility of reductions in renewable electricity supply at a specific location”</i> Meridian opposes these changes as they are inconsistent with the NPSREG.
0223 Waihopai Runaka Te Runanga Oraka Aparima Te Runanga O Awarua	EIT-EN-P4	Oppose	The relief sought by the submitter is <i>“Consider how an effects management hierarchy could assist to understand and implement EITEN-P4”</i> . The submitter has however not proposed words for such a provision, meaning the impact of the relief sought is not able to be determined at this point in time. On this basis, Meridian opposes the submission.
0223 Waihopai Runaka Te Runanga Oraka Aparima Te Runanga O Awarua	EIT-EN-P11	Oppose	The relief sought by the submitter is <i>“Consider how an effects management hierarchy could assist to understand and implement EITINF-P11”</i> . The submitter has however not proposed words for such a provision, meaning the impact of the relief sought is not able to be determined at this point in time. On this basis, Meridian opposes the submission.

0311 Trustpower Limited	EIT-EN-New Policy	Support	The submitter seeks inclusion of a new policy titled " <u>Climate Change Mitigation</u> ". Inclusion of such a policy contributes to the EIT-EN chapter being self-contained (or standalone) and Meridian supports such an approach. On this basis, Meridian supports the submission. The exception to this support relates to sub-clause (2). Meridian does not support inclusion of the following words " <u>(2) the activity is consistent with other regional and national climate change mitigation activities</u> ". Consistency can prevent technological change and new sources of renewable electricity that could be important to New Zealand.
0230 Forest and Bird	EIT-EN-M1	Oppose	The submitter seeks deletion of the words " <i>or, at the very least, minimised</i> ". Meridian opposes this submission on the basis that it is inconsistent with the NPSFM and the NPSREG.
0231 Otago Fish and Game Council	EIT-EN-M1	Oppose	The submitter seeks to remove subclause (4) from the method. Meridian opposes this change as it is inconsistent with the NPSREG.
0311 Trustpower Limited	EIT-EN-M1	Support	The submitter seeks to strengthen the renewable electricity generation matters that Otago Regional Council provide for in their regional plans. Amongst the relief sought the submitter proposes inclusion of the following: <u>"(1) provide for the ongoing operation, maintenance and upgrading of existing renewable electricity generation activities including maintenance of generation output and protection of operational capacity"</u> , and <u>"(4) provide opportunities to increase the installed capacity of renewable electricity generation assets and enable development of renewable electricity generation activities"</u> . Meridian supports inclusion of these sub-clauses and considers that their inclusion better reflects the requirements of the NPSREG.

<p>0311 Trustpower Limited</p>	<p>EIT-EN-M2</p>	<p>Support</p>	<p>The submitter seeks to strengthen the renewable electricity generation matters that territorial authorities must provide for in their district plans. Amongst the relief sought the submitter proposes inclusion of the following:</p> <p><u>“(1) provide for the ongoing operation, maintenance and upgrading of existing renewable electricity generation activities including maintenance of generation output and protection of operational capacity”, and</u></p> <p><u>“(4) provide opportunities to increase the installed capacity of renewable electricity generation assets and enable development of renewable electricity generation activities”.</u></p> <p>Meridian supports inclusion of these sub-clauses and considers that their inclusion better reflects the requirements of the NPSREG.</p>
<p>0230 Forest and Bird</p>	<p>EIT-EN-M5</p>	<p>Oppose</p>	<p>The submitter seeks deletion of the words “<i>or, at the very least, minimised</i>”. Meridian opposes this submission on the basis that it is inconsistent with the NPSFM and the NPSREG.</p>
<p>0311 Trustpower Limited</p>	<p>EIT-EN-E1- Explanation</p>	<p>Support</p>	<p>The submitter seeks a number of changes to EIT-EN-E1. Meridian supports each of the changes sought in the submission as they better reflect the requirements of the NPSREG.</p> <p>In particular, Meridian supports deletion of the words “<i>It is noted that renewable electricity generation activities will come within the definition of infrastructure, and that provisions relating to infrastructure also apply</i>” and prefers that the EIT-EN chapter be self-contained.</p>
<p>0311 Trustpower Limited</p>	<p>EIT-EN-AER3</p>	<p>Support</p>	<p>The submitter seeks the following adjustment to EIT-EN-AER3:</p> <p><u>“The adverse effects associated with renewable energy generation activities are minimised avoided, remedied or mitigated, or where appropriate, offset or compensated for.”</u></p> <p>Meridian supports this submission as it better reflects the requirements of the NPSREG.</p>

0223 Waihopai Runaka Te Runanga Oraka Aparima Te Runanga O Awarua	EIT-EN transport general	Oppose	The relief sought by the submitter is “ <i>Ensure there are no gaps or inconsistencies between the way infrastructure is management between this chapter and the Coastal Environment chapter</i> ”. The submitter has however not proposed words for such a provision, meaning the impact of the relief sought is not able to be determined at this point in time. On this basis, Meridian opposes the submission.
0223 Waihopai Runaka Te Runanga Oraka Aparima Te Runanga O Awarua	EIT-EN transport general	Oppose	The relief sought by the submitter is “ <i>Introduce an Anticipated Environmental Result similar to EIT-INF-AER8</i> ”. The submitter has however not proposed words for such a provision, meaning the impact of the relief sought is not able to be determined at this point in time. On this basis, Meridian opposes the submission.
0230 Forest and Bird	EIT-INF-O4	Oppose	The submitter seeks that EIT-INF-O4 be amended “ <i>to define what is meant by environmental limits</i> ”. The submitter has however not proposed words for such amendments, meaning the impact of the relief sought is not able to be determined at this point in time. On this basis, Meridian opposes the submission.
0137 Director General of Conservation	EIT-INF-O4 and O5	Oppose	The submitter seeks that EIT-INF-O4 and/or EIT-INF-O5 be amended “ <i>to ensure that adverse effects are required to be minimised in all cases.</i> ” The submitter has however not proposed words for such changes, meaning the impact of the relief sought is not able to be determined at this point in time. On this basis, Meridian opposes the submission.
0137 Director General of Conservation	EIT-INF-P10 to P17	Oppose	The submitter seeks that EIT-INF-P10 to P17 be amended “ <i>for consistency with relief sought for EIT-INF-O4 and O5.</i> ” The submitter has however not proposed words for such changes, meaning the impact of the relief sought is not able to be determined at this point in time. On this basis, Meridian opposes the submission.
0230 Forest and Bird	EIT-INF-P11	Oppose	The submitter seeks that EIT-INF-P11(1) and (2) be amended as follows: “(1) <i>avoiding, as the first priority, significant adverse effects on the environment, and</i> (2) <i>if avoidance is not <u>demonstrably practicable</u>, and for other adverse effects, <u>minimising remedy any remaining adverse effects on the environment, if</u></i> ”

			<p><u>remaining adverse effects cannot be demonstrably completely remedied then mitigate remaining adverse effects</u></p> <p>Meridian considers that removal of 'significant' from subclause (1) leads to less than minor effects needing to be avoided and considers that this is unnecessarily restrictive; and that the sought changes to subclause (2) are duplicative and unnecessary.</p>
0230 Forest and Bird	EIT-INF-P12	Oppose	<p>The submitter seeks addition of the following to EIT-INF-P12, "<u>adverse effects on indigenous biodiversity are avoided and managed as set out in the BIO and CE chapters and natural character in the CE chapter</u>".</p> <p>The submitter also seeks "amendments to additional policies as needed so that provisions which would provide for or enable infrastructure activities, must be in the context of also protecting, maintaining and restoring indigenous biodiversity"</p> <p>Meridian considers that the sought cross referencing between the chapters is not necessary as the plan stands to be read as a whole. Further to this, the submitter has not proposed words for the 'additional policies' meaning the impact of the relief sought is not able to be determined at this point in time. On this basis, Meridian opposes the submission.</p>
0137 Director General of Conservation	EIT-INF-P13	Support in part	<p>The submitter is seeking amendments to EIT-INF-P13, or insertion of a new policy "to address new infrastructure within the coastal environment, in accordance with the relevant provisions of the NZCPS." Meridian generally supports the inclusion of such a policy, while noting for completeness that the submitter has not proposed the wording of such a provision.</p>
0223 Waihopai Runaka Te Runanga Oraka Aparima Te Runanga O Awarua	EIT-INF-P13	Oppose	<p>The relief sought by the submitter is "Establish an effects management hierarchy in EIT-INF-P13 sub-clause (2)". The submitter has however not proposed words for such a provision, meaning the impact of the relief sought is not able to be determined at this point in time. On this basis, Meridian opposes the submission.</p>

0231 Otago Fish and Game Council	EIT-EN-M1	Oppose	The submitter seeks the deletion of subclause (4) in its entirety. Meridian opposes this submission and considers that subject to the changes outlined in Meridian's submission, subclause (4) be retained to enable the operation and maintenance of existing renewable electricity generation activities. Meridian considers that this gives better effect to the NPSREG.
0223 Waihopai Runaka Te Runanga Oraka Aparima Te Runanga O Awarua	EIT-INF-M4(2) and EIT-INF-M5(7)	Oppose	The relief sought by the submitter is " <i>Amend EIT-INF-M4(2) and EIT-INF-M5(7) to reference an effects management hierarchy</i> ". The submitter has however not proposed words for such a provision, meaning the impact of the relief sought is not able to be determined at this point in time. On this basis, Meridian opposes the submission.
0305 Waka Kotahi NZ Transport Agency	EIT-TRAN-O7	Support	The submitter has requested that EIT-TRAN-O7 be amended to ensure that the operational and functional needs of nationally and regionally significant infrastructure are protected from the establishment of new activities that may result in reverse sensitivity effects. Meridian supports this relief based on the fundamentally critical nature of the services provided by such infrastructure.
0137 Director General of Conservation	HCV-WT-P2	Oppose	The submitter is seeking insertion of the following into HCV-WT-P2 <i>"Avoiding, as the first priority, other adverse effects on the cultural values associated with wāhi tupuna"</i> . HCV-WT-P2 lists how Wāhi tūpuna are to be protected. Meridian considers that the appropriate methods are listed in the notified version of HCV-WT-P2, and that no further changes are needed. Further to this, Meridian considers that the Director General of Conservation's proposed insertion lacks clarity and that if something is to be given " <i>first priority</i> " it needs to be clear what this statement applies to. On this basis Meridian opposes the submission.

0311 Trustpower Limited	NFL-O2	Support	<p>The submitter seeks that NFL-O1(1) be amended as follows: <i>“the protection of outstanding natural features and landscapes <u>from inappropriate subdivision, use and development</u>, and”</i>.</p> <p>Meridian supports the submission as it provides greater clarity of the outcome sought and better reflects the requirements of section 6 of the Act.</p>
0311 Trustpower Limited	NFL-P2	Support	<p>The submitter seeks that NFL-P2(1) be amended as follows: <i>“protect outstanding natural features and landscapes <u>from inappropriate subdivision, use and development by</u>”</i>.</p> <p>Meridian supports the submission as it provides greater clarity to the policy and better reflects the requirements of section 6 of the Act.</p>
0305 Waka Kotahi NZ Transport Agency	NFL-P2	Support	<p>While the submitter generally supports NFL-P2, they consider that it could be confusing and seek that it be reworded.</p> <p>Meridian supports this submission. In particular, Meridian considers that as worded, the notified version of NFL-P2(1) leads to adverse effects on values that contribute to a natural feature or landscape being outstanding, that are not themselves outstanding, being required to be avoided. This is unnecessarily restrictive, and in Meridian’s opinion is unjustifiable under the Act.</p>
0137 Director General of Conservation	APP1	Oppose	<p>The submitter has requested that APP1 be amended to <i>“include all appropriate values and provide clear guidance for assessing whether values are outstanding”</i>. The submitter has however not proposed words for such ‘values’, meaning the impact of the relief sought is not able to be determined at this point in time. On this basis, Meridian opposes the submission.</p>
0231 Otago Fish and Game Council	APP1	Oppose	<p>The submitter is seeking that the table in APP1 be further developed, but does not identify the particular amendments to APP1 that are considered to be necessary. The impact of the relief sought is therefore not able to be determined at this point in time. On this basis, Meridian opposes the submission.</p>

0137 Director General of Conservation	APP2	Oppose	The submitter has requested substantive changes to APP2. Many of the changes sought are considered by Meridian to be unnecessary (duplicative) or inappropriate and on this basis, Meridian opposed the submission.
0230 Forest and Bird	APP3	Oppose	The submitter is seeking to add the following criteria to APP3(2), where 'observed' means " <i>the decision maker must take these considerations into account</i> ": <i>"(j) limits to offsetting have been observed, including where the loss of rare or vulnerable species or a naturally rare or uncommon ecosystem type makes an offset inappropriate or where there is uncertainty of success"</i> . Meridian opposes this submission on the basis that the criteria is unclear and is not consistent with the NPSREG.
0230 Forest and Bird	APP4	Oppose	The submitter is seeking to add the following criteria to APP4(2), where 'observed' means " <i>the decision maker must take these considerations into account</i> ": <i>"(x) limits to compensation have been observed, including where the loss of rare or vulnerable species or a naturally rare or uncommon ecosystem type makes an offset inappropriate or where there is uncertainty of success"</i> Meridian opposes this submission on the basis that the criteria is unclear and is not consistent with the NPSREG.
0137 Director General of Conservation	APP3	Oppose	The submitter has requested that the criteria in APP3 for biodiversity offsetting be amended. Meridian considers some of the components of the submitter's APP3 to be unnecessary and some are in tension with each other (e.g. (d) and (f)); and that the notified version of APP3 (subject to the changes sought in Meridian's submissions) is clearer than the submitter's relief. On this basis, Meridian opposes the submission.

<p>0231</p> <p>Otago Fish and Game Council</p>	<p>APP3</p>	<p>Oppose</p>	<p>The submitter proposes to add the following to APP3(2)(b):</p> <p><i>“(b) the offset achieves no net loss and preferably a net gain in indigenous biodiversity and the habitat of trout and salmon where consistent with ECO-P11, as measured by type, amount and condition at both the impact and offset sites using an explicit loss and gain calculation,”</i></p> <p>Meridian opposes all references to restoring the habitats of trout and salmon species for the reasons set out with respect to the Otago Fish and Game Council’s submission on LF-WAI-P3.</p>
<p>0137</p> <p>Director General of Conservation</p>	<p>APP4</p>	<p>Oppose</p>	<p>The submitter has requested that the criteria in APP4 for biodiversity compensation be amended. Meridian considers some of the components of the submitter’s APP4 to be unnecessary and that the notified version of APP4 (subject to the changes sought in Meridian’s submissions) is clearer than the submitter’s relief. On this basis, Meridian opposes the submission.</p>
<p>0231</p> <p>Otago Fish and Game Council</p>	<p>APP9</p>	<p>Oppose</p>	<p>The submitter is seeking that the table in APP9 be further developed, but does not identify the particular amendments to APP9 that are considered to be necessary. The impact of the relief sought is therefore not able to be determined at this point in time. On this basis, Meridian opposes the submission.</p>
<p>0223</p> <p>Waihopai Runaka Te Runanga Oraka Aparima Te Runanga O Awarua</p>	<p>General</p>	<p>Oppose</p>	<p>The submitter makes the following statement in a manner that is not specific to any particular provision of the pORSP21.</p> <p><i>“There is a lack of clarity regarding management expectations, including the relationship between dams and weirs and natural hazard management. The pORPS would benefit from expansion of Explanation and/or Principal Reasons in a number of chapters relevant to the effects of damming of waterbodies beyond the infrastructure related chapters, such as Land and Freshwater, Coastal Environment, Ecosystems and Indigenous Biodiversity, and Natural Features and Landscapes, to assist users of the document to better understand intended outcomes. The provisions in those chapters may be implicitly managing the effects of dams, but explicit references would be helpful.”</i></p>

			As no specific drafting was offered with this submission, the impact of the relief sought is not able to be determined at this point in time. On this basis, Meridian opposes the submission.
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Address List for Further Submissions

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