



meridian

Proposed Canterbury Land and Water Regional Plan

Summary of statement of Jeffrey Allen Page

28 February 2013

Tabled at hearing 28/02/2013

Introduction

- Meridian's focus is the management of the natural and physical resources associated with the Waitaki Power Scheme.
- Ultimately, Meridian is seeking a robust plan framework to provide for the use, development and protection of natural and physical resources within the Waitaki catchment. (Statement para 48)



Meridian's approach to the Proposed Plan

- Meridian's reasons for involvement in the Proposed Plan:
 - The Proposed Plan:
 - contains some significant changes from the Canterbury Natural Resources Regional Plan (the "NRRP")
 - has the potential to result in future changes to the Waitaki Catchment Water Allocation Regional Plan (the "WAP") of unknown significanceboth of which have the potential to affect the operation and management of the Waitaki Power Scheme.
 - It is possible that replacement operating consents for the Waitaki Power Scheme could be sought and determined under the Proposed Plan.
 - Meridian considers the Waitaki catchment and its resource management issues are unique and the Proposed Plan does not appropriately recognise this and provide a coherent management framework. (Statement para 9)

Current authorisations for the Waitaki Power Scheme

- Meridian's operation and management of the Waitaki Power Scheme is, in resource management terms, authorised as follows:
 - Key water management (take, use, dam, divert and discharge), are subject to ~43 individual resource consents (the operating consents) which expire on 30 April 2025.
 - Use and maintenance of existing structures, including dams, on beds of lakes and rivers are (generally) permitted by Rule BLR2 of NRRP, although a number of minor ancillary structures are subject to resource consent.
 - Existing land uses (as controlled by territorial authorities), including maintenance, are either subject to existing use rights or permitted by specific approaches in each of the relevant three district plans.
 - Ancillary management activities are either permitted or where necessary subject to a range of resource consents. (Statement para 17 to 19)

Waitaki Power Scheme and the Waitaki Catchment

- The Waitaki Power Scheme:
 - Is nationally important in the context of the NZ electricity system.
 - Represents significant investment in physical resources (infrastructure).
 - Is reliant on the ability to use water and land and the developed infrastructure. (Statement para 21)
 - Has a significant influence on the resource management outcomes for the Waitaki Catchment. (Statement para 22)
- Meridian:
 - Considers regional plans should provide for the continued operation and management of the Waitaki Power Scheme in an even-handed manner. (Statement para 25)
 - Accepts that the Waitaki Power Scheme will be subject to appropriate regulation that recognises its existence and leads to better resource management outcomes. (Statement para 26)

Resource management direction and regulation

- Meridian neither supports nor opposes ECAN's objective of a single land and water regional plan, but seeks a relatively stable resource management framework unless there are robust reasons for change. (Statement para 29)
- A number of changes in provisions from the NRRP to the Proposed Plan are of concern to Meridian, particularly as it can see no compelling reason for these. (Statement para 33 to 35)
- The potential to replace the WAP with a sub-chapter in the Proposed Plan is predicted to result in further changes in resource management approach and regulation in the Waitaki Catchment when this does not appear to be needed and there is a level of acceptance of the current provisions. (Statement para 36 to 42)

Use, development and protection of natural and physical resources

- Meridian is concerned that the Proposed Plan does not provide a robust framework to address the specific use, development and protection of natural and physical resource management issues in the Waitaki Catchment. (Statement para 44)
- Meridian seeks:
 - Greater recognition of the positive contribution the use and development of natural and physical resources makes to the promotion of sustainable management.
 - Various protection related objectives and policies are redrafted.
 - Retention of the water quality approach in the Proposed Plan as it relates to the Waitaki. (Statement para 45)



Framework for consideration of replacement consents

- Meridian is concerned that there is no clear recognition in the Proposed Plan of the Waitaki Power Scheme as an accepted and ongoing part of the Waitaki Catchment. (Statement para 51)
- This is because:
 - The future of the resource management direction and regulation in the WAP is unclear. (Statement para 52)
 - The Proposed Plan provisions may have the effect of introducing additional objectives, policies or rules that influence the consideration of replacement consents. (Statement para 53)



Framework to manage the Waitaki Power Scheme

- Meridian is concerned about a number of regulatory impacts of the Proposed Plan on its management of the Waitaki Power Scheme. (Statement para 56)
- Meridian is seeking to avoid consent processes where these are unlikely to produce material resource management benefits. (Statement para 70)
- Most immediate concern is the need to seek consent (Rule 5.132) for its structures (or dams if the officers' recommendation is adopted) six months after the rule in Proposed Plan becomes operative. (Statement para 56 to 68)
- There are a range of other matters in the Proposed Plan which would result in an increase in regulation of Meridian's management activities as identified in its submission. (Statement para 71)

Conclusion

- Meridian is concerned the Proposed Plan:
 - Will result in an unnecessary change to the WAP water allocation regime in the future, which in turn will influence the operation of the Waitaki Power Scheme.
 - Does not provide an appropriate planning framework within which the Waitaki Power Scheme can be operated and managed now and into the future.
 - Includes rules that result in further regulation of Meridian's management of the Waitaki Power Scheme in circumstances where it is not apparent there are compelling resource management reasons for this. (Statement para 74)
- Meridian is generally supportive of the Proposed Plan provisions relating to the management of water quality in the Waitaki Catchment. (Statement para 75)