

**From:** [Jeff Page](#)  
**To:** [Mailroom Mailbox](#)  
**Subject:** Plan Change 4 to the Canterbury Land and Water Regional Plan: Submission by Meridian Energy  
**Date:** Tuesday, 22 September 2015 10:16:13 a.m.  
**Attachments:** [Meridian\\_Final\\_PC4\\_LWRP\\_Submission\\_22Sept2015.pdf](#)

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Please find attached.

Kind provide confirmation of receipt.

Regards

Jeff

**Jeff Page – Environmental Strategy Manager**

**Meridian Energy Limited**

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**SUBMISSION ON PLAN CHANGE 4 TO THE  
CANTERBURY LAND AND WATER REGIONAL PLAN  
UNDER CLAUSE SIX OF THE FIRST SCHEDULE TO THE RESOURCE MANAGEMENT ACT 1991**

**To:** Plan Change 4 to the Canterbury Land and Water Regional Plan  
Environment Canterbury  
**CHRISTCHURCH**

**By email:** mailroom@ecan.govt.nz

**Submitter:** Meridian Energy Limited  
PO Box 2146  
**CHRISTCHURCH 8140**

Attention: Jeff Page, Environmental Strategy Manager  
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Meridian Energy Limited ("Meridian") makes the submission on the Plan Change 4 to the Canterbury Land and Water Regional Plan set out in the **attached** document.

Meridian confirms its submission does not relate to trade competition or the effects of trade competition.

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

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



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**Jeff Page**

For and on behalf of Meridian Energy Limited

22<sup>nd</sup> day of September 2015

## OVERVIEW OF SUBMISSION

1. Meridian Energy Ltd (Meridian) is a limited liability company, majority owned by the New Zealand Government. It is one of three companies formed from the split of the Electricity Corporation of New Zealand ("ECNZ") on the 1<sup>st</sup> of April 1999.
2. Meridian's core business is the generation, marketing, trading and retailing of electricity and the management of associated assets and ancillary structures in New Zealand. Meridian is the single largest generator of electricity in New Zealand.
3. Meridian's interest in Plan Change 4 (PC4) to the Canterbury Land and Water Regional Plan (CLWRP) stems from its ownership of six power stations within the Waitaki catchment that make up part of the Waitaki Power Scheme. The Waitaki Power Scheme consists of eight power stations, four canal systems and numerous dams, weirs, gates and other control structures that operate as a linked hydro-electricity generation chain. This chain includes; large modified storage lakes, a series of diversions via canals, and a cascade of in-river dams. The scheme was progressively constructed between 1928 and 1985.
4. The Waitaki Power Scheme is the largest hydro-electric power scheme in New Zealand, with controllable and flexible generating capacity of 1,723MW. This scheme contributes on average some 18% of New Zealand's annual electricity supply, although at times this can be as high as 30% of the national requirement. Lakes Tekapo and Pukaki provide approximately 2,500GWh of energy storage capacity, almost 60% of New Zealand's hydro storage. The scheme supports the HVDC link, which is connected to the South Island transmission network at the site of Benmore Power Station. In addition, the scheme provides essential ancillary services to the electricity system in relation to; frequency keeping, spinning reserve, over frequency reserve and voltage support.
5. The continued development, operation, maintenance and upgrading of Waitaki Power Scheme are matters of national significance (National Policy Statement for Renewable Energy Generation 2001 and Canterbury Regional Policy Statement 2013). The Waitaki Power Scheme is to be enabled (CLWRP, Objective 3.3) and considered part of the existing environment (CLWRP, Policy 4.51). PC4 must various give effect to and implement these statutory documents, policies and provisions.
5. The changes proposed in PC4 that are of primary interest to Meridian are: Policy 4.85A and Rules 5.140A, 5.141A, 5.146, 5.163, 5.168 and 5.169.
6. Meridian seeks the relief set out below, any relief of similar effect, and any consequential amendment necessary in response to Meridian's submission.

**DETAIL OF SUBMISSION**

Specific Plan Provisions	Submission	Decisions Sought [New text shown as <u>underlined</u> and deleted text shown as <del>strike through</del> ]
<p>Policy 4.85A</p>	<p>Meridian opposes in part Policy 4.85A.</p> <p>The policy does not adequately recognise that Meridian’s Waitaki Power Scheme assets are located and influence the braided river environment in the Waitaki Catchment. Activities that could occur within the braided river environment are wider than those relating to existing ‘structures’ and include erosion and gravel management.</p> <p>Further, the policy as proposed is to prevent ‘encroachment’ notwithstanding that encroachment may be necessary to maintain and operate the Waitaki Power Scheme.</p> <p>Finally, the policy contains inappropriately high management responses to indigenous vegetation and habitat matters.</p>	<p>Amend Policy 4.85A as follows:</p> <p><b>Activities in Beds of Lakes and Rivers</b></p> <p>4.85A <u>Canterbury’s braided river systems indigenous biodiversity, and habitats of indigenous fauna and flora is protected, and the natural character is preserved of Canterbury’s braided river systems is preserved through:</u></p> <p>(a) <del>preventing</del> <u>restricting</u> encroachment of activities into the beds and margins of lakes and rivers; and</p> <p>(b) limiting vegetation clearance within the bed, banks and margins of lakes, rivers, wetlands or coastal lagoons</p> <p><u>unless the vegetation clearance activity is for the purpose of pest management, habitat restoration, flood control purposes, the operation, maintenance or repair of structures, renewable hydro-electricity generation activities or network utilities, or maintenance of public access.</u></p>
<p>Rule 5.140A</p>	<p>Meridian supports Rule 5.140A.</p> <p>Meridian installs, operates and maintains such devices as part of the Waitaki Power Scheme. These devices are essential to its operations. Rule 5.140A provides the appropriate activity status.</p>	<p>Retain Rule 5.140A – Structures</p>

Specific Plan Provisions	Submission	Decisions Sought [New text shown as <u>underlined</u> and deleted text shown as <del>strike through</del> ]
Rule 5.141A	<p>Meridian supports Rule 5.141A.</p> <p>Meridian has many structures, ducts, cables, pipes and wires in and over the beds of lakes and rivers. Rule 5.141A provides the appropriate default activity status.</p>	Retain Rule 5.141A
Rule 5.148, Condition 6	<p>Meridian supports Rule 5.148, Condition 6.</p> <p>Condition 6 provides better recognition that Meridian owns, operates and maintains nationally significant structures that could be affected by the extraction of gravel.</p>	Retain Rule 5.141A, Condition 6
Rule 5.163, Condition 9	<p>Meridian opposes in part Rule 5.163, Condition 9.</p> <p>The rule does not adequately recognise and provide for the operation and maintenance of Meridian’s Waitaki Power Scheme assets in the Waitaki Catchment. Removal of vegetation, hence reducing the area and potential diversity of vegetation (both exotic and indigenous), may be necessary to operate and maintain these nationally significant assets and the electricity transmission associated with them.</p>	<p>Amend Rule 5.163, Condition 9 as follows:</p> <p>9. <i>From 5 September 2015, and within the bed of the Clarence, Waiau, Hurunui, Waimakariri, Rakaia, Rangitata, and the Waitaki rivers the vegetation clearance does not result in a reduction in the area or diversity of existing riverbed vegetation <u>unless the activity is for the purpose of the operation, maintenance or repair of renewable hydro-electricity generation activities or network utilities; and</u></i></p>

<p>Rule 5.167, Condition 6</p>	<p>Meridian opposes in part Rule 5.167, Condition 6.</p> <p>The rule does not adequately recognise and provide for the operation and maintenance of Meridian’s Waitaki Power Scheme assets in the Waitaki Catchment. Removal of vegetation, hence reducing the area and potential diversity of vegetation (both exotic and indigenous), may be necessary to operate and maintain these nationally significant assets and the electricity transmission associated with them.</p>	<p>Amend Rule 5.167, Condition 6 as follows:</p> <p>6. <i>From 5 September 2015, and within the bed of the Clarence, Waiau, Hurunui, Waimakariri, Rakaia, Rangitata, and the Waitaki rivers the vegetation clearance does not result in a reduction in the area or diversity of existing riparian vegetation, unless the earthworks have been authorised by a land use consent granted by the relevant territorial authority and conditions 1 to 5 above are also met <u>or the activity is for the purpose of the operation, maintenance or repair of renewable hydro-electricity generation activities or network utilities.</u></i></p>
<p>Rule 5.168, Condition 5</p>	<p>Meridian opposes in part Rule 5.168, Condition 5.</p> <p>The rule does not adequately recognise and provide for the operation and maintenance of Meridian’s Waitaki Power Scheme assets in the Waitaki Catchment. Undertaking earthworks, hence reducing the area and potential diversity of vegetation (both exotic and indigenous), may be necessary to operate and maintain these nationally significant assets and the electricity transmission associated with them.</p>	<p>Amend Rule 5.168, Condition 5 as follows:</p> <p>5. <i>From 5 September 2015, and within the bed of the Clarence, Waiau, Hurunui, Waimakariri, Rakaia, Rangitata, and the Waitaki rivers the earthworks do not result in a reduction in the area or diversity of existing riparian vegetation, unless the earthworks have been authorised by a land use consent granted by the relevant territorial authority and conditions 1 to 4 above are met <u>or the activity is for the purpose of the operation, maintenance or repair of renewable hydro-electricity generation activities or network utilities.</u></i></p>