

**BEFORE ENVIRONMENT CANTERBURY**

**UNDER** the Resource Management Act 1991

**IN THE MATTER** of Plan Change 5 to the Canterbury Land and Water  
Regional Plan

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**MEMORANDUM OF COUNSEL ON BEHALF OF  
MERIDIAN ENERGY LIMITED REGARDING  
WITHDRAWAL OF PART OF SUBMISSION**

**8 July 2016**

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**ANDERSON LLOYD  
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**MAY IT PLEASE THE COMMISSIONERS:**

- 1 On 11 March 2016 Meridian Energy Limited ("**Meridian**") lodged a submission on Plan Change 5 (Nutrient Management and Waitaki Plan Change) to the Canterbury Land and Water Regional Plan.
- 2 Meridian's submitter ID is 30736.
- 3 Part of Meridian's submission requested the insertion of a new footnote into 15.B6 – Table 15B(a) that seeks to exclude the Upper Ohau River to the extent that the achievement of any outcome in this waterbody is affected by the effects of existing hydroelectricity infrastructure on river flows. Environment Canterbury's reference is PC5LWRP-111. No other submissions and no further submissions address this point.
- 4 Canterbury Regional Council's Section 42A Report (R16/23) recommends to reject that part of Meridian's submission that relates to 15.B6 – Table 15B(a), Footnote 6.<sup>1</sup>
- 5 This memorandum is lodged to notify the hearing commissioners and Canterbury Regional Council that Meridian withdraws that part of its submission that relates to 15.B6 – Table 15B(a), Footnote 6. For the avoidance of doubt, the balance of the relief sought by Meridian with respect to Table 15B(a) which forms part of Environment Canterbury's summary under reference PC5LWRP-111 continues to be pursued by Meridian.
- 6 Again, for the avoidance of doubt, Meridian maintains the rest of its submission on Plan Change 5 to the Canterbury Land and Water Regional Plan.

**S W Christensen**

Counsel for Meridian Energy Limited

8 July 2016

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<sup>1</sup> Paragraph 15.43, page 232