

**From:** [Andrew Feierabend](#)  
**To:** [Mailroom Mailbox](#)  
**Subject:** Meridian Energy Ltd - Plan Change 7 Land and Water Regional Plan  
**Date:** Friday, 13 September 2019 11:13:07 AM  
**Attachments:** [image001.png](#)  
[Meridian Energy Limited - Submission LWRP Proposed Plan Change 7 Final \(002\).pdf](#)

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Dear Sir/Madam

Please find attached Meridian Energy Limited's submission on Proposed Plan Change 7 to the Land and Water Regional Plan.

Can you please confirm by return email that you have received the attached submission.

Kind regards

Andrew Feierabend

**Andrew Feierabend**  
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**SUBMISSION ON THE PLAN CHANGE 7 TO THE CANTERBURY LAND AND  
WATER REGIONAL PLAN UNDER CLAUSE SIX OF THE FIRST SCHEDULE TO  
THE RESOURCE MANAGEMENT ACT 1991**

**To:** Canterbury Regional Council  
PO Box 345  
**CHRISTCHURCH 8140**

mailroom@ecan.govt.nz

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

Attention: Andrew Feierabend  
Phone: (03) 357-9732  
Mobile: 021 898 143  
Email: andrew.feierabend@meridianenergy.co.nz

Meridian Energy Limited (Meridian) makes the submission on Plan Change 7 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.

  
\_\_\_\_\_  
Andrew Feierabend

For and behalf of Meridian Energy Limited

Dated this 13<sup>th</sup> day of September 2019

## OVERVIEW OF SUBMISSION

1. Meridian Energy Limited ('Meridian') is listed on the New Zealand Stock Exchange (NZX) and Australian Securities Exchange (ASX) and is a mixed ownership model company, 51% owned by the New Zealand Government.
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 Proposed Plan Change 7 (PC7) 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.
4. The Combined 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. In this submission that part of the Combined Waitaki Power Scheme operated by Meridian is referred to as the Waitaki Power Scheme.
5. The Combined 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.
6. The continued development, operation, maintenance and upgrading of the 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). PC7 must give effect to and implement these statutory documents, policies and provisions.
7. Relevant to the preparation of regional plans are both the National Policy Statements for Freshwater (NPSFW) 2017 and the National Policy Statement on Renewable Electricity Generation (NPSREG) 2011. PC7 must give effect to National Policy Statements as required by section 62(3) of the Act.
8. The objective of the NPSREG is "to recognise the national significance of renewable electricity generation activities by providing for the development, operation, maintenance and upgrading of new and existing renewable electricity generation activities, such as the proportion of New Zealand's electricity generated from renewable energy sources increases to a level that meets or exceeds the New Zealand Government's national targets for renewable electricity generation."

9. The NPSREG also:
- recognises the benefits of renewable electricity generation activities
  - acknowledges the practical limitations of achieving New Zealand's target for electricity generation from renewable resources, including maintaining generation output
  - acknowledges the practical constraints associated with the development, operation, maintenance and upgrading of new and existing renewable electricity generation activities in particular the need to locate the renewable electricity generation activity where the renewable energy resource is available
  - guides the management of reverse sensitivity effects on renewable electricity generation activities
  - directs the incorporation of provisions for renewable electricity generation activities into regional policy statements and regional and district plans
  - provides for the development, operation, maintenance and upgrading of existing and new hydro-electricity resources.
10. In addition to the Government initiatives outlined above, sections 7(i) and 7(j) of the RMA expressly require all persons exercising functions and powers under it to have particular regard to the effects of climate change and the benefits to be derived from the use and development of renewable energy. These include having particular regard to these matters in the preparation of regional and district planning documents.
11. Any regional plan policy and rule framework must recognise and provide for the national significance of the on-going operation, maintenance and development of existing renewable generation assets.
12. Given the above, and in addressing the document as notified, Meridian has identified a number of provisions that should be improved to either achieve greater consistency with the purpose of the RMA and with current superior RMA policy.
13. Resource Management Act Section 14 matters within the Waitaki Catchment are managed under the Waitaki Catchment Water Allocation Plan not the Land and Water Regional Plan. The relationship between these two Plans is described in Section 2.8 of the Land and Water Regional Plan which states:
- "The Waitaki Catchment Water Allocation Regional Plan has objectives, policies and rules relating to the allocation of water. By virtue of section 14 of the Resource Management (Waitaki Catchment) Amendment Act 2004 it is the Regional Plan for the allocation of water in that part of the Waitaki Catchment that is within the Canterbury Region. Any objective, policy or rule on the same subject matter in the Waitaki Catchment Water Allocation Regional Plan prevails over the objectives, policies and rules contained in this Plan and any inconsistency between the Plans must be interpreted in favour of the Waitaki Catchment Water Allocation Regional Plan."*
14. Meridian notes that were Section 14 matters relating to the Waitaki Catchment managed through the Land and Water Regional Plan it would have opposed additional provisions in its submission.
15. The changes proposed in PC7 that are of primary interest to Meridian relate to ensuring the policy environment relating to fish passage for existing structures is appropriate,

ensuring water quality outcomes and limits are appropriate for the specific catchment they apply to, ensuring provisions relating to Indigenous Freshwater Species Habitat are effective and efficient and that the Waitaki Power Scheme is appropriately recognised and provided for.

16. Meridian seeks the relief set out below, any relief of similar effect, and any consequential amendment necessary in response to Meridian's submission.
  17. Meridian's requests for specific relief outlined below should not be taken as limiting the general submissions and requests for relief set out in this section.
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## DETAIL OF SUBMISSION

Specific Plan Provision	Submission	Decision Sought [amended text sought shown as <b>bold</b> <u>underlined</u> and deleted text shows as <b>bold-strike through</b> ]
<p>Definition Indigenous Freshwater Species Habitat</p>	<p>The definition of Indigenous Freshwater Species Habitat is linked to changes to the Planning Maps, changes to policies and permitted activity conditions in a number of rules. Submissions are lodged on all of these related provisions included in Plan Change 7.</p> <p>The suite of provisions relating to Indigenous Freshwater Species Habitat (definition, maps, policies and rules) are of concern to Meridian particularly in relation to:</p> <ul style="list-style-type: none"> <li>• the nature and extent of mapping in Lake Benmore and Lake Aviemore</li> <li>• the effect that the definition, mapping, new policies and changes to rules will have on the continued maintenance and operation of the nationally significant Waitaki Power Scheme.</li> </ul> <p>The information supporting and evaluating Plan Change 7 has not evaluated the implications of the suite of provisions (definition, mapping, new policies and rules) on the Waitaki Power Scheme.</p> <p>The Land and Water Regional Plan, the Canterbury Regional Policy Statement and the National Policy Statement for Renewable Electricity Generation all contain provisions (a combination of objectives, policies, methods and rules) of particular relevance to the Waitaki Power Scheme. It is considered that there are inconsistencies with some of the provisions of Plan Change 7 with the existing provisions relevant to the Waitaki Power Scheme. It is also considered</p>	<p><b>Amend</b> the definition to read:</p> <p><u>Indigenous Freshwater Species Habitat</u></p> <p><u>"means an area identified as 'Indigenous Freshwater Species Habitat' on the Planning Maps, and which provides habitat for at least one of the freshwater species listed below <b>and the species within the habitat is identified on the relevant planning maps:</b></u></p> <ol style="list-style-type: none"> <li><u><del>1. Giant kōkopu/Taiwharu (Galaxias argenteus)</del></u></li> <li><u>2. Lowland longjaw galaxias (Waitaki) (Galaxias cobitinis)</u></li> <li><u>3. Canterbury mudfish/Kōwaro (Neochanna burrowsius)</u></li> <li><u>4. Bignose galaxias (Galaxias macronasus)</u></li> <li><u>5. Upland longjaw galaxias (Galaxias prognathus)</u></li> <li><u>6. Upland longjaw galaxias (Waitaki) (Galaxias prognathus)</u></li> <li><u>7. Shortjaw kōkopu (Galaxias postvectis)</u></li> <li><u>8. Northern flathead galaxias (Species N (undescribed))</u></li> </ol>

Specific Plan Provision	Submission	Decision Sought [amended text sought shown as <b><u>bold underlined</u></b> and deleted text shows as <b><del>bold strike through</del></b> ]
	<p>that the consideration of the NPSFW also has not appropriately considered renewable electricity generation which is identified as a national value.</p> <p>The changes proposed do not result in provisions that are effective or efficient in relation to the continued maintenance and operation of the Nationally Significant Waitaki Power Scheme.</p> <p>In considering the definition of Indigenous Freshwater Species Habitat it is recognised that within the list of native freshwater species there is a mix of the conservation status of the species. There are a number that are listed as Group 1 species being those identified as nationally critical, endangered or vulnerable. There are also some Group 2 species being the giant kokopu, kakahi (freshwater mussel) and kekewai (freshwater crayfish) which have a threat status of at risk declining or uncommon. It is submitted that a species listed at listed as nationally critical, endangered or vulnerable should not be treated the same as those that are not in these categories. The submission seeks the focus of species be those Group 1 species having a threat status of nationally critical, endangered or vulnerable.</p> <p>There is insufficient information for those Group 2 species, including information supporting appropriate mapping of habitat areas, to enable the regulatory response in PC7 to be efficient, effective or necessary.</p> <p>The relationship between the definition and the mapping should be improved. Changes are sought to the definition to make it clear that the mapping of habitat areas is to clearly identify which species exist within each mapped area.</p>	<p>9. <u>Lamprey/Kanakana (Geotria australis)</u></p> <p><del>10. Freshwater</del> <del>crayfish/Kekewai</del> <del>(Paranephrops zealandicus)</del></p> <p><del>11. Freshwater mussel/Kākahi (Echyridella menziesi)</del>"</p>

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		<p>Not including this information means there is a lack of clarity as to the species each mapped area is being managed for. This means that the nature and type of assessment in any application and the expectations for management of these habitat areas are not clear for either a consent applicant or the consent authority. This is neither an efficient or effective approach to developing plan provisions. The changes sought provide a clearer link between the species of concern and the mapped area.</p>	
<p>Mapping Indigenous Freshwater Species Habitat</p>	<p>-</p>	<p>The mapping of Indigenous Freshwater Species Habitat is linked to the submission lodged on the definition of Indigenous Freshwater Species Habitat. Both the definition and mapping are important the implementation of new policies and changes to the permitted activity conditions of a number of rules.</p> <p>The suite of provisions relating to Indigenous Freshwater Species Habitat (definition, maps, policies and rules) are of concern to Meridian particularly in relation to:</p> <ul style="list-style-type: none"> <li>• the nature and extent of mapping in Lake Benmore and Lake Aviemore</li> <li>• the effect that the definition, mapping, new policies and changes to rules will have on the continued maintenance and operation of the nationally significant Waitaki Power Scheme.</li> </ul> <p>The information supporting and evaluating Plan Change 7 has not evaluated the implications of the suite of provisions (definition, mapping, new policies and rules) on the Waitaki Power Scheme.</p>	<p><b>Amend</b> the mapping of Indigenous Freshwater Species Habitat to:</p> <ol style="list-style-type: none"> <li>1. Modify the mapping to identify only those areas of Indigenous Freshwater Species Habitat relating those species with a nationally critical, endangered or vulnerable status, consistent with the submission on the definition of Indigenous Freshwater Species Habitat.</li> <li>2. Modify the mapping to include the particular species occurring in each mapped habitat area.</li> <li>3. Delete the mapping from Lake Benmore and Lake Aviemore.</li> </ol>



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	<p>The Land and Water Regional Plan, the Canterbury Regional Policy Statement and the National Policy Statement for Renewable Electricity Generation all contain provisions (a combination of objectives, policies, methods and rules) of particular relevance to the Waitaki Power Scheme. It is considered that there are inconsistencies with some of the provisions of Plan Change 7 with the existing provisions relevant to the Waitaki Power Scheme. It is also considered that the consideration of the NPSFW also has not appropriately considered renewable electricity generation which is identified as a national value.</p> <p>The changes proposed do not result in provisions that are effective or efficient in relation to the continued maintenance and operation of the Nationally Significant Waitaki Power Scheme.</p> <p>With respect to the mapping there is particular concern with the extent of the mapped area in relation to Lake Benmore and Lake Aviemore. Unlike other mapped Indigenous Freshwater Species Habitat areas (which are focused relatively small) the mapping of Lake Benmore and Lake Aviemore are extensive and cover the full extent of both lakes. In the case of Lake Benmore this is approximately 7500 hectares and Lake Aviemore 2900 hectares.</p> <p>The extent of the mapping is excessive and consequently the impact of the subsequent policies and rules (which introduce additional regulatory requirements) is disproportionate to the issue being managed. The extent and nature of the mapping is not justified based on the information that is available.</p>	

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	<p>These lakes are artificial lakes which were formed and are managed as part of the Waitaki Power Scheme. The levels of both lakes are actively managed and a number of activities, necessary to the operation of the Waitaki Power Scheme occur in, on and around these lakes. This includes erosion control, lake monitoring, weed and vegetation control, provision and maintenance of structures, water takes and discharges.</p> <p>The implications of the extent of the mapping in combination with the definition, the restrictions in the policies and the permitted activity conditions in various rules mean many activities occurring in Lakes Benmore and Aviemore that are currently permitted activities will no longer be so.</p> <p>The effectiveness, efficiency, necessity and appropriateness of these provisions have not been adequately considered in the context of the nationally significant Waitaki Power Scheme. The suite of provisions in Plan Change 7, including the mapping needs to be substantially revised.</p>	
Policy 4.101 – Habitat of Indigenous Freshwater species	<p>The suite of provisions relating to Indigenous Freshwater Species Habitat (definition, maps, policies and rules) are of concern to Meridian particularly in relation to:</p> <ul style="list-style-type: none"> <li>• the nature and extent of mapping in Lake Benmore and Lake Aviemore</li> <li>• the effect that the definition, mapping, new policies and changes to rules will have on the continued maintenance and operation of the nationally significant Waitaki Power Scheme.</li> </ul>	<p><b>Amend</b> Policy 4.101 to read:</p> <p>Policy 4.101 – Habitat of Indigenous Freshwater species</p> <p><b><u>Avoid the d</u></b><del>Damage or loss of Indigenous Freshwater Species Habitat caused by sediment discharges, vegetation clearance, excavation and deposition of</del></p>

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	<p>The information supporting and evaluating Plan Change 7 has not evaluated the implications of the suite of provisions (definition, mapping, new policies and rules) on the Waitaki Power Scheme.</p> <p>The Land and Water Regional Plan, the Canterbury Regional Policy Statement and the National Policy Statement for Renewable Electricity Generation all contain provisions (a combination of objectives, policies, methods and rules) of particular relevance to the Waitaki Power Scheme. It is considered that there are inconsistencies with some of the provisions of Plan Change 7 with the existing provisions relevant to the Waitaki Power Scheme. It is also considered that the consideration of the NPSFW also has not appropriately considered renewable electricity generation which is identified as a national value.</p> <p>The changes proposed do not result in provisions that are effective or efficient in relation to the continued maintenance and operation of the Nationally Significant Waitaki Power Scheme.</p> <p>The effect of the regulation proposed by the suite of provisions is disproportionate to the issue being managed.</p>	<p><del>material, or other disturbance in a surface water body, is managed so that unless:</del></p> <p>a. <del>the effects of habitat damage will be remedied or mitigated; or</del></p> <p>b. <del>the habitat loss will be offset by the creation of new habitat in the same surface water catchment and with the same or improved habitat characteristics; or</del></p> <p><b><u>c. for activities associated with the Waitaki Power Scheme the effects of habitat damage will be managed to the extent practicable.</u></b></p>
Policy 4.102 Habitat of Indigenous Freshwater species	Meridian is concerned with the wording in the proposed policy. The current wording is too limiting and does not enable the breadth of options that may be available to facilitate the safe and appropriate passage of indigenous fish to be considered. This is particularly the case when considering sub-clause b. relating to modification and changes to existing structures.	<p><b>Amend</b> Policy 4.102 to read:</p> <p>Policy 4.102 Habitat of Indigenous Freshwater species</p> <p><b><u>Structures Enable the safe passage of indigenous fish where appropriate, while avoiding as far as</u></b></p>

Specific Provision	Plan	Submission	Decision Sought [amended text sought shown as <b>bold</b> <u>underlined</u> and deleted text shows as <del>bold strike through</del> ]
		<p>As currently worded the policy is does not recognise circumstances where modification of a structure may not be possible, practicable or effective. There are a range of considerations that need to be made prior to considering whether to alter an existing structure. In particular health and safety, structural integrity and continued function are key matters when considering any potential modification of an existing structure.</p> <p>In addition the policy does not provide for consideration as to the identification of the species valued for passage and the life cycle, life stages and needs of passage for those species.</p> <p>The current policy wording is unnecessarily and inappropriately restrictive as to how fish passage could be facilitated, what type of passage, at what life stages could be appropriate or necessary, particularly for existing structures.</p> <p>The changes sought are more appropriate and efficient and effective when considering the range of objectives and policies, including those relevant to the Waitaki Power Station within the Land and Water Regional Plan, the Regional Policy Statement and the relevant National Policy Statements.</p>	<p><u>practicable, the passage of any invasive, pest or nuisance fish species by:</u></p> <p>a. <u>the appropriate design, construction, installation and maintenance of new in-stream structures; and</u></p> <p>b. <u>the modification, reconstruction or removal of existing in-stream structures <b>where this is practicable or</b></u></p> <p>c. <u><b>by considering alternative means of providing fish passage for appropriate species in circumstances where the modification, reconstruction or removal of structures is not practicable or would not provide effective passage.</b></u></p>
Rule 5.136		<p>The suite of provisions relating to Indigenous Freshwater Species Habitat (definition, maps, policies and rules) are of concern to Meridian particularly in relation to:</p> <ul style="list-style-type: none"> <li>the nature and extent of mapping in Lake Benmore and Lake Aviemore</li> </ul>	<p><b>Amend</b> Rule 5.136 to read:</p> <p>Rule 5.136</p> <p>The <u>installation, or removal of pipes, ducts, cables or wires, including the associated drilling, tunnelling, or</u></p>

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	<ul style="list-style-type: none"> <li>the effect that the definition, mapping, new policies and changes to rules will have on the continued maintenance and operation of the nationally significant Waitaki Power Scheme.</li> </ul> <p>The information supporting and evaluating Plan Change 7 has not evaluated the implications of the suite of provisions (definition, mapping, new policies and rules) on the Waitaki Power Scheme.</p> <p>The Land and Water Regional Plan, the Canterbury Regional Policy Statement and the National Policy Statement for Renewable Electricity Generation all contain provisions (a combination of objectives, policies, methods and rules) of particular relevance to the Waitaki Power Scheme. It is considered that there are inconsistencies with some of the provisions of Plan Change 7 with the existing provisions relevant to the Waitaki Power Scheme. It is also considered that the consideration of the NPSFW also has not appropriately considered renewable electricity generation which is identified as a national value.</p> <p>The changes proposed do not result in provisions that are effective or efficient in relation to the continued maintenance and operation of the Nationally Significant Waitaki Power Scheme.</p> <p>The provisions fail to recognise that Lakes Benmore and Aviemore are integral parts of the Waitaki Power Scheme and the continued maintenance and operation of the scheme is critical to achieving the government targets for renewable electricity generation. The changes proposed to the rules as part of Plan Change 7 will render a number of key activities associated with the Waitaki</p>	<p>disturbance in or under the bed of a lake or river, <del>and the installation, or removal of pipes, ducts, cables or wires</del> is a permitted activity, provided the following conditions are met:</p> <ol style="list-style-type: none"> <li>The activity is not undertaken in, on, or under the bed of a lake listed as a high naturalness lake in Sections 6 to 15 or in a salmon spawning site listed in Schedule 17, or in any inanga spawning habitat during the inanga spawning season of 1 March to 1 June inclusive, <u>or in any Indigenous Freshwater Species Habitat <b>unless the activity is associated with the Waitaki Power Scheme</b></u>; and</li> <li>.....</li> </ol>

Specific Plan Provision	Submission	Decision Sought [amended text sought shown as <b>bold</b> <u>underlined</u> and deleted text shows as <b>bold-strike through</b> ]
	Power Scheme no longer being permitted activities when undertaken within Lake Benmore and Lake Aviemore. The implications of the provisions of Plan Change implications are disproportionate to the resource management issue being managed.	
Rule 5.137	<p>The suite of provisions relating to Indigenous Freshwater Species Habitat (definition, maps, policies and rules) are of concern to Meridian particularly in relation to:</p> <ul style="list-style-type: none"> <li>• the nature and extent of mapping in Lake Benmore and Lake Aviemore</li> <li>• the effect that the definition, mapping, new policies and changes to rules will have on the continued maintenance and operation of the nationally significant Waitaki Power Scheme.</li> </ul> <p>The information supporting and evaluating Plan Change 7 has not evaluated the implications of the suite of provisions (definition, mapping, new policies and rules) on the Waitaki Power Scheme.</p> <p>The Land and Water Regional Plan, the Canterbury Regional Policy Statement and the National Policy Statement for Renewable Electricity Generation all contain provisions (a combination of objectives, policies, methods and rules) of particular relevance to the Waitaki Power Scheme. It is considered that there are inconsistencies with some of the provisions of Plan Change 7 with the existing provisions relevant to the Waitaki Power Scheme. It is also considered that the consideration of the NPSFW also has not appropriately considered renewable electricity generation which is identified as a national value.</p>	<p><b>Amend</b> Rule 5.137 to read:</p> <p>Rule 5.137</p> <p>The installation, alteration, extension, or removal of bridges and culverts, <del>and including the associated excavation, disturbance and consequential</del> deposition of substances on, in or under the bed of a lake or river, the excavation or other disturbance of the bed of a lake or river, and, in the case of culverts, the associated take, discharge or diversion of water is a permitted activity, provided the following conditions are met:</p> <ol style="list-style-type: none"> <li>1 .....       <ol style="list-style-type: none"> <li>4. The activity is not undertaken in a salmon spawning site listed in Schedule 17, or in any inanga spawning habitat during the inanga spawning season of 1 March to 1 June inclusive, <u>or in any Indigenous Freshwater Species Habitat unless the activity is associated with the Waitaki Power Scheme;</u> and</li> </ol> </li> <li>5. ....</li> </ol>

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	<p>The changes proposed do not result in provisions that are effective or efficient in relation to the continued maintenance and operation of the Nationally Significant Waitaki Power Scheme.</p> <p>The provisions fail to recognise that Lakes Benmore and Avimore are integral parts of the Waitaki Power Scheme and the continued maintenance and operation of the scheme is critical to achieving the government targets for renewable electricity generation. The changes proposed to the rules as part of Plan Change 7 will render a number of key activities associated with the Waitaki Power Scheme no longer being permitted activities when undertaken within Lake Benmore and Lake Avimore. The implications of the provisions of Plan Change implications are disproportionate to the resource management issue being managed.</p>	
Rule 5.139	<p>The suite of provisions relating to Indigenous Freshwater Species Habitat (definition, maps, policies and rules) are of concern to Meridian particularly in relation to:</p> <ul style="list-style-type: none"> <li>• the nature and extent of mapping in Lake Benmore and Lake Avimore</li> <li>• the effect that the definition, mapping, new policies and changes to rules will have on the continued maintenance and operation of the nationally significant Waitaki Power Scheme.</li> </ul> <p>The information supporting and evaluating Plan Change 7 has not evaluated the implications of the suite of provisions (definition, mapping, new policies and rules) on the Waitaki Power Scheme.</p>	<p><b>Amend</b> Rule 5.139 to read:</p> <p>Rule 5.139</p> <p>The use and maintenance of structures, excluding dams, on, in or under the bed of a lake or river are permitted activities, provided the following conditions are met:</p> <ol style="list-style-type: none"> <li>1. ....</li> <li>4. Except for bridges, culverts, pipes, ducts, cables and wires and their associated support structures the maintenance of that part of the structure</li> </ol>

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	<p>The Land and Water Regional Plan, the Canterbury Regional Policy Statement and the National Policy Statement for Renewable Electricity Generation all contain provisions (a combination of objectives, policies, methods and rules) of particular relevance to the Waitaki Power Scheme. It is considered that there are inconsistencies with some of the provisions of Plan Change 7 with the existing provisions relevant to the Waitaki Power Scheme. It is also considered that the consideration of the NPSFW also has not appropriately considered renewable electricity generation which is identified as a national value.</p> <p>The changes proposed do not result in provisions that are effective or efficient in relation to the continued maintenance and operation of the Nationally Significant Waitaki Power Scheme.</p> <p>The provisions fail to recognise that Lakes Benmore and Aviemore are integral parts of the Waitaki Power Scheme and the continued maintenance and operation of the scheme is critical to achieving the government targets for renewable electricity generation. The changes proposed to the rules as part of Plan Change 7 will render a number of key activities associated with the Waitaki Power Scheme no longer being permitted activities when undertaken within Lake Benmore and Lake Aviemore. The implications of the provisions of Plan Change implications are disproportionate to the resource management issue being managed.</p>	<p>within the bed of a lake or river is not undertaken within a salmon spawning site listed in Schedule 17, or in any inanga spawning habitat during the inanga spawning season of 1 March to 1 June inclusive, <u>or in any Indigenous Freshwater Species Habitat <b>unless the activity is associated with the Waitaki Power Scheme;</b></u></p>
Rule 5.140	<p>The suite of provisions relating to Indigenous Freshwater Species Habitat (definition, maps, policies and rules) are of concern to Meridian particularly in relation to:</p> <ul style="list-style-type: none"> <li>the nature and extent of mapping in Lake Benmore and Lake Aviemore</li> </ul>	<p><b>Amend</b> Rule 5.140 to read:</p> <p>Rule 5.140</p>



Specific Plan Provision	Submission	Decision Sought [amended text sought shown as <b>bold</b> <u>underlined</u> and deleted text shows as <del>bold strike through</del> ]
	<ul style="list-style-type: none"> <li>the effect that the definition, mapping, new policies and changes to rules will have on the continued maintenance and operation of the nationally significant Waitaki Power Scheme.</li> </ul> <p>The information supporting and evaluating Plan Change 7 has not evaluated the implications of the suite of provisions (definition, mapping, new policies and rules) on the Waitaki Power Scheme.</p> <p>The Land and Water Regional Plan, the Canterbury Regional Policy Statement and the National Policy Statement for Renewable Electricity Generation all contain provisions (a combination of objectives, policies, methods and rules) of particular relevance to the Waitaki Power Scheme. It is considered that there are inconsistencies with some of the provisions of Plan Change 7 with the existing provisions relevant to the Waitaki Power Scheme. It is also considered that the consideration of the NPSFW also has not appropriately considered renewable electricity generation which is identified as a national value.</p> <p>The changes proposed do not result in provisions that are effective or efficient in relation to the continued maintenance and operation of the Nationally Significant Waitaki Power Scheme.</p> <p>The provisions fail to recognise that Lakes Benmore and Aviemore are integral parts of the Waitaki Power Scheme and the continued maintenance and operation of the scheme is critical to achieving the government targets for renewable electricity generation. The changes proposed to the rules as part of Plan Change 7 will render a number of key activities associated with the Waitaki</p>	<p>Despite any other rule in this Plan, <u>the installation, alteration, extension, or removal</u> of temporary structures and diversions associated with undertaking activities in Rules 5.135 to 5.139, military training activities, or artificial watercourses are permitted activities, provided the following conditions are met:</p> <ol style="list-style-type: none"> <li>1. The activity is not undertaken in a salmon spawning site listed in Schedule 17, or in any inanga spawning habitat during the inanga spawning season of 1 March to 1 June inclusive, <u>or in any Indigenous Freshwater Species Habitat <b>unless the activity is associated with the Waitaki Power Scheme;</b></u> and</li> <li>2. The temporary structure and diversion is in place for not more than 4 weeks in any 12 month period; and</li> <li>3. <b><u>In relation to any new activity</u></b> <del>the activity</del> <u>does not prevent fish passage or result in the stranding of fish; and</u></li> <li>4. ....</li> </ol>

Specific Plan Provision	Submission	Decision Sought [amended text sought shown as <b>bold</b> <u>underlined</u> and deleted text shows as <del>bold strike through</del> ]
	Power Scheme no longer being permitted activities when undertaken within Lake Benmore and Lake Aviemore. The implications of the provisions of Plan Change implications are disproportionate to the resource management issue being managed.	
Rule 140A	<p>The suite of provisions relating to Indigenous Freshwater Species Habitat (definition, maps, policies and rules) are of concern to Meridian particularly in relation to:</p> <ul style="list-style-type: none"> <li>• the nature and extent of mapping in Lake Benmore and Lake Aviemore</li> <li>• the effect that the definition, mapping, new policies and changes to rules will have on the continued maintenance and operation of the nationally significant Waitaki Power Scheme.</li> </ul> <p>The information supporting and evaluating Plan Change 7 has not evaluated the implications of the suite of provisions (definition, mapping, new policies and rules) on the Waitaki Power Scheme.</p> <p>The Land and Water Regional Plan, the Canterbury Regional Policy Statement and the National Policy Statement for Renewable Electricity Generation all contain provisions (a combination of objectives, policies, methods and rules) of particular relevance to the Waitaki Power Scheme. It is considered that there are inconsistencies with some of the provisions of Plan Change 7 with the existing provisions relevant to the Waitaki Power Scheme. It is also considered that the consideration of the NPSFW also has not appropriately considered renewable electricity generation which is identified as a national value.</p>	<p><b>Amend</b> Rule 5.140A to read:</p> <p>Rule 140A</p> <p>The installation, alteration, extension or removal of any equipment or device on or in the bed of a lake or river, that is for the purpose of monitoring, measuring, or taking samples from any surface waterbody, and the associated excavation, disturbance and consequential deposition of substances on, in or under the bed of a lake or river is a permitted activity, provided the following conditions are met:</p> <ol style="list-style-type: none"> <li>1. ....</li> <li>5. The installation, alteration, extension or removal of any equipment or device is not undertaken in any inanga spawning habitat during the inanga spawning season of 1 March to 1 June inclusive, <u>or in any Indigenous Freshwater Species Habitat <b>unless the activity is associated with the Waitaki Power Scheme.</b></u></li> </ol>

Specific Plan Provision	Submission	Decision Sought [amended text sought shown as <b><u>bold underlined</u></b> and deleted text shows as <b><del>bold strike through</del></b> ]
	<p>The changes proposed do not result in provisions that are effective or efficient in relation to the continued maintenance and operation of the Nationally Significant Waitaki Power Scheme.</p> <p>The provisions fail to recognise that Lakes Benmore and Avimore are integral parts of the Waitaki Power Scheme and the continued maintenance and operation of the scheme is critical to achieving the government targets for renewable electricity generation. The changes proposed to the rules as part of Plan Change 7 will render a number of key activities associated with the Waitaki Power Scheme no longer being permitted activities when undertaken within Lake Benmore and Lake Avimore. The implications of the provisions of Plan Change implications are disproportionate to the resource management issue being managed.</p>	
Rule 5.141	<p>The suite of provisions relating to Indigenous Freshwater Species Habitat (definition, maps, policies and rules) are of concern to Meridian particularly in relation to:</p> <ul style="list-style-type: none"> <li>• the nature and extent of mapping in Lake Benmore and Lake Avimore</li> <li>• the effect that the definition, mapping, new policies and changes to rules will have on the continued maintenance and operation of the nationally significant Waitaki Power Scheme.</li> </ul> <p>The information supporting and evaluating Plan Change 7 has not evaluated the implications of the suite of provisions (definition, mapping, new policies and rules) on the Waitaki Power Scheme.</p>	<p><b>Amend</b> Rule 5.141 to read:</p> <p>Rule 5.141</p> <p>Temporary discharges to water or to land in circumstances where a contaminant may enter water associated with undertaking activities in Rules 5.135 to 5.140A <u>or</u> in relation to artificial watercourses are permitted activities, provided the following conditions are met:</p> <p>1. ....</p>

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	<p>The Land and Water Regional Plan, the Canterbury Regional Policy Statement and the National Policy Statement for Renewable Electricity Generation all contain provisions (a combination of objectives, policies, methods and rules) of particular relevance to the Waitaki Power Scheme. It is considered that there are inconsistencies with some of the provisions of Plan Change 7 with the existing provisions relevant to the Waitaki Power Scheme. It is also considered that the consideration of the NPSFW also has not appropriately considered renewable electricity generation which is identified as a national value.</p> <p>The changes proposed do not result in provisions that are effective or efficient in relation to the continued maintenance and operation of the Nationally Significant Waitaki Power Scheme.</p> <p>The provisions fail to recognise that Lakes Benmore and Aviemore are integral parts of the Waitaki Power Scheme and the continued maintenance and operation of the scheme is critical to achieving the government targets for renewable electricity generation. The changes proposed to the rules as part of Plan Change 7 will render a number of key activities associated with the Waitaki Power Scheme no longer being permitted activities when undertaken within Lake Benmore and Lake Aviemore. The implications of the provisions of Plan Change implications are disproportionate to the resource management issue being managed.</p>	<p>2. The discharge is not undertaken in a salmon spawning site listed in Schedule 17, or in any inanga spawning habitat during the inanga spawning season of 1 March to 1 June inclusive, <u>or in any Indigenous Freshwater Species Habitat <b>unless the activity is associated with the Waitaki Power Scheme;</b></u> and</p> <p>3. <del>The discharge is not for more than ten hours in any 24 hour period, and not more than 40 hours in total in any calendar month</del> <u>concentration of total suspended solids in the discharge, except within the first 4 hours of discharge, does not exceed <b>outside the zone of reasonable mixing:</b></u></p> <p>a. <u>50g/m<sup>3</sup> where the discharge is to any spring-fed river, Banks Peninsula river, or to a lake except when the background total suspended solids in the waterbody is greater than 50g/m<sup>3</sup> in which case the Schedule 5 visual clarity standards shall apply;</u> or</p> <p>b. <u>100g/m<sup>3</sup> where the discharge is to any other river or to an artificial watercourse except when the background total suspended solids in the waterbody is greater than 100g/m<sup>3</sup> in which case Schedule 5 visual clarity standards shall apply.</u></p>

Specific Plan Provision	Submission	Decision Sought [amended text sought shown as <b>bold</b> <u>underlined</u> and deleted text shows as <del>bold strike through</del> ]
Rule 5.148	<p>The suite of provisions relating to Indigenous Freshwater Species Habitat (definition, maps, policies and rules) are of concern to Meridian particularly in relation to:</p> <ul style="list-style-type: none"> <li>• the nature and extent of mapping in Lake Benmore and Lake Aviemore</li> <li>• the effect that the definition, mapping, new policies and changes to rules will have on the continued maintenance and operation of the nationally significant Waitaki Power Scheme.</li> </ul> <p>The information supporting and evaluating Plan Change 7 has not evaluated the implications of the suite of provisions (definition, mapping, new policies and rules) on the Waitaki Power Scheme.</p> <p>The Land and Water Regional Plan, the Canterbury Regional Policy Statement and the National Policy Statement for Renewable Electricity Generation all contain provisions (a combination of objectives, policies, methods and rules) of particular relevance to the Waitaki Power Scheme. It is considered that there are inconsistencies with some of the provisions of Plan Change 7 with the existing provisions relevant to the Waitaki Power Scheme. It is also considered that the consideration of the NPSFW also has not appropriately considered renewable electricity generation which is identified as a national value.</p> <p>The changes proposed do not result in provisions that are effective or efficient in relation to the continued maintenance and operation of the Nationally Significant Waitaki Power Scheme.</p>	<p><b>Amend</b> Rule 5.148 to read:</p> <p>Rule 5.148 Gravel Extraction</p> <p>The extraction of gravel from the bed of a lake or river including the deposition of substances on the bed and excavation or other disturbance of the bed of a lake or river, <u>but excluding the diversion of water within the bed of a river</u>, is a permitted activity, provided the following conditions are met:</p> <ol style="list-style-type: none"> <li>1. ....</li> <li>9. The activity is not undertaken in a salmon spawning site listed in Schedule 17, or in any inanga spawning habitat during the period of 1 January to 1 June inclusive, <u>or in any Indigenous Freshwater Species Habitat <b>unless the activity is associated with the Waitaki Power Scheme</b></u> ; and</li> <li>10. ....</li> </ol>

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	<p>The provisions fail to recognise that Lakes Benmore and Aviemore are integral parts of the Waitaki Power Scheme and the continued maintenance and operation of the scheme is critical to achieving the government targets for renewable electricity generation. The changes proposed to the rules as part of Plan Change 7 will render a number of key activities associated with the Waitaki Power Scheme no longer being permitted activities when undertaken within Lake Benmore and Lake Aviemore. The implications of the provisions of Plan Change implications are disproportionate to the resource management issue being managed.</p>	
Rule 5.163	<p>The suite of provisions relating to Indigenous Freshwater Species Habitat (definition, maps, policies and rules) are of concern to Meridian particularly in relation to:</p> <ul style="list-style-type: none"> <li>• the nature and extent of mapping in Lake Benmore and Lake Aviemore</li> <li>• the effect that the definition, mapping, new policies and changes to rules will have on the continued maintenance and operation of the nationally significant Waitaki Power Scheme.</li> </ul> <p>The information supporting and evaluating Plan Change 7 has not evaluated the implications of the suite of provisions (definition, mapping, new policies and rules) on the Waitaki Power Scheme.</p> <p>The Land and Water Regional Plan, the Canterbury Regional Policy Statement and the National Policy Statement for Renewable Electricity Generation all contain provisions (a combination of objectives, policies, methods and rules) of particular relevance to the Waitaki Power Scheme. It is considered that there</p>	<p><b>Amend</b> Rule 5.163 to read:</p> <p>Rule 5.163</p> <p>The introduction or planting of any plant, or the removal and disturbance of existing vegetation in, on or under the bed of a lake or river and any associated discharge of sediment or sediment-laden water in circumstances where sediment may enter surface water is a permitted activity, provided the following conditions are met:</p> <ol style="list-style-type: none"> <li>1. ....</li> <li>7. <u>Vegetation clearance does not occur in a salmon spawning site listed in Schedule 17, or in any inanga spawning habitat during the period of 1 January to 1 June inclusive; or in any Indigenous</u></li> </ol>

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	<p>are inconsistencies with some of the provisions of Plan Change 7 with the existing provisions relevant to the Waitaki Power Scheme. It is also considered that the consideration of the NPSFW also has not appropriately considered renewable electricity generation which is identified as a national value.</p> <p>The changes proposed do not result in provisions that are effective or efficient in relation to the continued maintenance and operation of the Nationally Significant Waitaki Power Scheme.</p> <p>The provisions fail to recognise that Lakes Benmore and Aviemore are integral parts of the Waitaki Power Scheme and the continued maintenance and operation of the scheme is critical to achieving the government targets for renewable electricity generation. The changes proposed to the rules as part of Plan Change 7 will render a number of key activities associated with the Waitaki Power Scheme no longer being permitted activities when undertaken within Lake Benmore and Lake Aviemore. The implications of the provisions of Plan Change implications are disproportionate to the resource management issue being managed.</p>	<p><u>Freshwater Species Habitat</u> <b>unless the activity is associated with the Waitaki Power Scheme</b> and</p> <p>8. ....</p>
Rule 5.167	<p>The suite of provisions relating to Indigenous Freshwater Species Habitat (definition, maps, policies and rules) are of concern to Meridian particularly in relation to:</p> <ul style="list-style-type: none"> <li>• the nature and extent of mapping in Lake Benmore and Lake Aviemore</li> <li>• the effect that the definition, mapping, new policies and changes to rules will have on the continued maintenance and operation of the nationally significant Waitaki Power Scheme.</li> </ul>	<p><b>Amend</b> Rule 5.167 to read:</p> <p>Rule 5.167 Earthworks and Vegetation Clearance in Riparian Areas</p>

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	<p>The information supporting and evaluating Plan Change 7 has not evaluated the implications of the suite of provisions (definition, mapping, new policies and rules) on the Waitaki Power Scheme.</p> <p>The Land and Water Regional Plan, the Canterbury Regional Policy Statement and the National Policy Statement for Renewable Electricity Generation all contain provisions (a combination of objectives, policies, methods and rules) of particular relevance to the Waitaki Power Scheme. It is considered that there are inconsistencies with some of the provisions of Plan Change 7 with the existing provisions relevant to the Waitaki Power Scheme. It is also considered that the consideration of the NPSFW also has not appropriately considered renewable electricity generation which is identified as a national value.</p> <p>The changes proposed do not result in provisions that are effective or efficient in relation to the continued maintenance and operation of the Nationally Significant Waitaki Power Scheme.</p> <p>The provisions fail to recognise that Lakes Benmore and Aviemore are integral parts of the Waitaki Power Scheme and the continued maintenance and operation of the scheme is critical to achieving the government targets for renewable electricity generation. The changes proposed to the rules as part of Plan Change 7 will render a number of key activities associated with the Waitaki Power Scheme no longer being permitted activities when undertaken within Lake Benmore and Lake Aviemore. The implications of the provisions of Plan</p>	<p>The use of land for vegetation clearance outside the bed of a river or lake or adjacent to a wetland boundary but within:</p> <ol style="list-style-type: none"> <li>a. 10 m of the bed of a lake or river or a wetland boundary in Hill and High Country land or land shown as High Soil Erosion Risk on the Planning Maps; or</li> <li>b. 5 m of the bed of a lake or river or a wetland boundary in all other land not shown as High Soil Erosion Risk on the Planning Maps or defined as Hill and High Country on the Planning Maps;</li> </ol> <p>and any associated discharge of sediment or sediment-laden water in circumstances where sediment may enter surface water is a permitted activity, provided the following conditions are met:</p> <ol style="list-style-type: none"> <li>1. ....</li> <li>5. The vegetation clearance does not occur adjacent to a salmon spawning site listed in Schedule 17, or in any inanga spawning habitat during the period of 1 January to 1 June inclusive, <u>or in any Indigenous Freshwater Species Habitat</u> <b>unless the activity is associated with the Waitaki Power Scheme</b>; and</li> <li>6. ....</li> </ol>



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	Change implications are disproportionate to the resource management issue being managed.	
Rule 5.168	<p>The suite of provisions relating to Indigenous Freshwater Species Habitat (definition, maps, policies and rules) are of concern to Meridian particularly in relation to:</p> <ul style="list-style-type: none"> <li>• the nature and extent of mapping in Lake Benmore and Lake Aviemore</li> <li>• the effect that the definition, mapping, new policies and changes to rules will have on the continued maintenance and operation of the nationally significant Waitaki Power Scheme.</li> </ul> <p>The information supporting and evaluating Plan Change 7 has not evaluated the implications of the suite of provisions (definition, mapping, new policies and rules) on the Waitaki Power Scheme.</p> <p>The Land and Water Regional Plan, the Canterbury Regional Policy Statement and the National Policy Statement for Renewable Electricity Generation all contain provisions (a combination of objectives, policies, methods and rules) of particular relevance to the Waitaki Power Scheme. It is considered that there are inconsistencies with some of the provisions of Plan Change 7 with the existing provisions relevant to the Waitaki Power Scheme. It is also considered that the consideration of the NPSFW also has not appropriately considered renewable electricity generation which is identified as a national value.</p>	<p><b>Amend</b> Rule 5.168 to read:</p> <p>5.168 Earthworks and Vegetation Clearance in Riparian Areas</p> <p>The use of land for earthworks outside the bed of a river or lake or adjacent to a wetland boundary but within:</p> <ol style="list-style-type: none"> <li>1. 10 m of the bed of a lake or river or a wetland boundary in Hill and High Country land or land shown as High Soil Erosion Risk on the Planning Maps; or</li> <li>2. 5 m of the bed of a lake or river or a wetland boundary in all other land not shown as High Soil Erosion Risk on the Planning Maps or defined as Hill and High Country;</li> </ol> <p>and any associated discharge of sediment or sediment-laden water in circumstances where sediment may enter surface water is a permitted activity, provided the following conditions are met:</p> <ol style="list-style-type: none"> <li>1. ....</li> </ol>

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	<p>The changes proposed do not result in provisions that are effective or efficient in relation to the continued maintenance and operation of the Nationally Significant Waitaki Power Scheme.</p> <p>The provisions fail to recognise that Lakes Benmore and Avimore are integral parts of the Waitaki Power Scheme and the continued maintenance and operation of the scheme is critical to achieving the government targets for renewable electricity generation. The changes proposed to the rules as part of Plan Change 7 will render a number of key activities associated with the Waitaki Power Scheme no longer being permitted activities when undertaken within Lake Benmore and Lake Avimore. The implications of the provisions of Plan Change implications are disproportionate to the resource management issue being managed.</p>	<p>3. The activity does not occur adjacent to a salmon spawning area listed in Schedule 17, or in any inanga spawning habitat during the period of 1 January to 1 June inclusive, <u>or in any Indigenous Freshwater Species Habitat <b>unless the activity is associated with the Waitaki Power Scheme</b></u>; and</p> <p>4. ....</p>
Schedule 6 – Areas on Rivers or Lakes Commonly used for Freshwater Bathing.	<p>Two of the new sites proposed to be added to Schedule 6 are located on core land owned by Meridian Energy. The purpose of the core land relates to the continued maintenance and operation of the Waitaki Power Scheme. It is considered inappropriate to identify areas within the core land owned by Meridian as “Areas on Rivers or Lakes Commonly used for Freshwater Bathing”.</p> <p>The schedule should be amended to remove those sites on Meridian core land.</p>	<p><b>Amend</b> Schedule 6 to delete the following sites:</p> <ul style="list-style-type: none"> <li>• Loch Cameron 1364728mE, 5099491mN</li> <li>• Pond at Old Iron Bridge Road 367794 mE, 5092249 mN</li> </ul>
Schedule 8 Region-wide Water Quality Limits	<p>Policy 4.2 and Policy 4.7 in the Land and Water Regional Plan identifies that the water quality limits in Schedule 8 apply in absence of water quality standards being set in Sections 6 to 15 of the CLWRP.</p>	<p><b>Insert</b> a statement under the headings of Schedule 8 Region-wide Water Quality Limits, or as a footnote to Schedule 8 to read:</p> <p>Schedule 8 Region-wide Water Quality Limits</p>

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	<p>To provide more effective implementation of Policy 4.2, Policy 4.7, Schedule 8 and the water quality and quantity limits in Sections 6 to 15 of the CLWRP it is important to make it clear that the regional freshwater outcomes and limits apply only in circumstances where sub-regional outcomes and limit have not been established. It is submitted that an explanation of this be included under the heading for Schedule 8, or in a footnote as part of Schedule 8.</p> <p>It is important to ensure the relationship between Schedule 8 and Sections 6-15 is clearly expressed in the Plan. It is essential that deliberate decisions undertaken when sub-regional limits were set, including through Plan Change 5, are not undermined.</p>	<p><b><u>The matters in Schedule 8 are not relevant in circumstances where Water Quality Limits for Rivers, Lakes and or Groundwater have been set in Sections 6-15B.</u></b></p> <p>or in the alternative</p> <p><b>Delete</b> Schedule 8, if Schedule 8 applies to the Waitaki Catchment.</p>
Schedule 17 Salmon Spawning Sites	<p>Two of the new sites proposed to be added to Schedule 17 extend over core land owned by Meridian Energy. The purpose of the core land relates to the continued maintenance and operation of the Waitaki Power Scheme. It is considered inappropriate to identify areas within the core land owned by Meridian as "Salmon Spawning Sites".</p> <p>The location descriptions and map references for both sites should be amended to exclude land owned by Meridian:</p>	<p><b>Amend</b> Schedule 17 Salmon Spawning Sites to read:</p> <p>Upstream Location Description</p> <ul style="list-style-type: none"> <li>Lower Ohau River - Below Ruataniwha Dam <b><u>outside Meridian Core Land approximately 1368095mE, 5092016mN</u></b> <del>1368000mE, 5092100mN</del></li> </ul> <p>Upstream Location Description</p> <ul style="list-style-type: none"> <li>Upper Ohau River – Lake Ohau <del>1355800 mE, 5092000 mN</del> <b><u>below the Lake Ohau Weir outside Meridian Core Land approximately 1356198 mE, 5091984 mN</u></b></li> </ul> <p>Downstream Location Description</p>

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		<ul style="list-style-type: none"> <li>Upper Ohau River – Lake Ruataniwha <del>1363255 mE, 5093635 mN</del> <b><u>Upper Ohau River outside Meridian Core Land approximately 1362678 mE, 5093654 mN</u></b></li> </ul>