

IN THE ENVIRONMENT COURT OF NEW ZEALAND
I MUA I TE KŌTI TAIAO O AOTEAROA

ENV-2024-CHC-26

IN THE MATTER of the Resource Management Act
1991 (“Act”)

AND

IN THE MATTER of an appeal under clause 14 Schedule
1 of the Act concerning the **Proposed
Otago Regional Policy Statement
2021**

BETWEEN

**ROYAL FOREST AND BIRD
PROTECTION SOCIETY OF
NEW ZEALAND
INCORPORATED**

Appellant

AND

OTAGO REGIONAL COUNCIL

Respondent

RMA, S 274 NOTICE BY MERIDIAN ENERGY LIMITED

DATED 7 JUNE 2024

Instructing counsel:

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To The Registrar
Environment Court
Christchurch

Meridian Energy Limited (Meridian) wishes to be a party to the following proceeding:

- (a) The Environment Court appeal reference ENV-2024-CHC-26 concerning an appeal against Otago Regional Council decisions on the Proposed Otago Regional Policy Statement.

Meridian is —

- (a) A person who made a submission about the subject matter of the proceeding; and
- (b) A person with an interest greater than the public generally. Meridian undertakes renewable electricity generation activities across the country, and has a special interest in how the national direction under the NPS-REG is implemented.

Meridian is not a trade competitor for the purposes of [section 308C](#) or [308CA](#) of the Resource Management Act 1991.

Meridian is directly affected by an effect of the subject of the appeal that—

- (a) Adversely affects the environment; and
- (b) Does not relate to trade competition or the effects of trade competition.

Meridian is interested in the entire proceeding, but without limiting the foregoing, signals a specific interest in the following particular issues:

- (a) The extent to which the resolution of the Appellant has identified issues and the relief sought will either promote or frustrate the directions in RMA Part 2, including RMA, ss 7(i) and (j) relevant to renewable energy generation and transmission;
- (b) The extent to which the Appellant has identified issues and relief sought will either promote or frustrate the statutory requirement to give effect to NPS-REG;
- (c) The extent to which the Appellant has identified issues and the relief sought will either promote or frustrate the appropriate recognition of the importance of addressing the impacts of climate change and the need to facilitate renewable energy generation to achieve targets set in the Climate Change Response Act 2002; and
- (d) The extent to which the Appellant has identified issues and the relief sought in the appeal will promote or frustrate the purpose and aims of the Decisions Version of the PORPS that, in combination with the relief

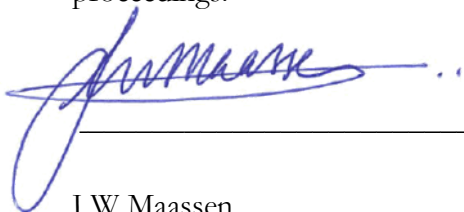
sought by Meridian in its appeal, will satisfactorily meet the requirements of RMA, Part 5.

Meridian opposes the relief sought in the appeal because:

- (a) The relief sought by Meridian in its appeal is, in combination with the Decisions Version of the PORPS, necessary to achieve RMA, Part 5 appropriately and notably:
 - (i) To prepare an Otago Regional Policy Statement in accordance with Part 2;
 - (ii) Give effect to the NPS-REG; and
 - (iii) Appropriately recognise the effects of climate change and the need to facilitate renewable energy to achieve the targets set in the Climate Change Response Act 2002.
- (b) The Appellant's relief will not appropriately secure the issues Meridian is interested in above and undermines the package of provisions in the Otago Regional Policy Statement Meridian seeks in its appeal.

Meridian agrees to participate in mediation or other alternative dispute resolution of the proceedings.

I agree to participate in mediation or other alternative dispute resolution of the proceedings.



J W Maassen
Counsel authorised to sign on behalf of Meridian Energy Limited

Date 7 June 2024

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